

United States District Court for the Central District of
California

Simic v. Kasamba, Inc.

Case No. 2:24-cv-08887-SK

Class Action Notice



Why did you get this notice?

This notice is to tell you about the settlement of a class action lawsuit, *Simic v. Kasamba, Inc.*, brought on behalf of people who worked for Kasamba in California as readers. You received this notice because **you may be a member of the group of people affected**, called the “class”, and **you may be entitled to money as part of the settlement**. This notice tells you how to get more information about the settlement.

Did you work for Kasamba in California as a Reader anytime since September 9, 2020?

Your options:	More about each option:
Opt Out	Submit an opt out form. Get no payment except for PAGA, keep the right to sue Kasamba about the wage issues covered here.
Do Nothing	Get a payment from the settlement. Give up the right to sue Kasamba about the same issues.
Object	Tell the Court why you don't like the settlement. You cannot object if you opt out.

If you want to file an objection or opt-out of the settlement, you must do so by: December 22, 2025.

You can learn more at: www.ReaderSettlement.com, or scan the QR code.

Key things to know:

- This is an important legal document.
- If you take no action, you will still be bound by the settlement, and your rights will be affected.
- If you have questions or need assistance, please call Class Counsel listed in Page 7.

Class Action Notice

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About This Notice

Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit, *Simic v. Kasamba* brought for people who work or have worked as a Reader for Kasamba in California. **You received this notice because Kasamba's records show you are a member of the group of people affected, called the "class."** This notice gives you a summary of the terms of the proposed agreement, explains what rights class members have, and helps class members make decisions about what action to take.

What do I do next?

Read this notice to understand the settlement. Then, decide which of these actions you want to take:

Options	What each option means:
Opt Out	Get no payment except for PAGA. Allows you to bring another lawsuit against Kasamba about the same issues.
Object	Tell the Court why you don't like the settlement.
Do Nothing	Get payment through the settlement. Give up rights resolved by settlement.

Read on to understand the specifics of the settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to object or opt out: **December 22, 2025.**
Settlement approval hearing: **January 7, 2026.**

Learning About the Lawsuit

What is this lawsuit about?

Plaintiff, a former Kasamba Reader, filed a lawsuit in 2024 claiming that Kasamba violated California laws regarding worker wages and hours, by classifying its Readers as Independent Contractors, and therefore failed to pay them all required wages. Plaintiff asserted claims based on the California Labor Code, and under the Private Attorneys General Act ("PAGA"). Your options for the Labor Code and the PAGA portions of the settlement are slightly different.

Kasamba denies that it did anything wrong.

Where can I learn more?

You can get a complete copy of the proposed settlement and other key documents in this lawsuit at:

www.ReaderSettlement.com

Why is there a settlement in this lawsuit?

In June 2024, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the cost and risk of continuing the case in court.

The settlement is for the workers who brought the case and all members of the settlement class. The Court has not decided this case in favor of either side.

What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that caused the harm.

What happens next in this lawsuit?

The Court will hold a Fairness Hearing to decide whether to approve the proposed settlement. The hearing will be held at:

Where: Edward R. Roybal Federal Building and U.S. Courthouse

255 East Temple Street, Los Angeles, CA 90012
Courtroom 540

When: January 7, 2025 at 10:00 AM

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You don't have to attend the hearing, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement or the parties decide to end it, it will not take effect and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to www.ReaderSettlement.com.

Learning About the Settlement

What does the settlement provide?

Kasamba has agreed to pay \$1,400,000 into a settlement fund, over two payments. This money will be divided among the class members and will also be used to pay for costs and lawyer fees approved by the Court, and for the cost of administering this settlement. Members of the settlement class will "release" their claims as part of the settlement, which means they cannot sue Kasamba for the same issues and legal violations raised in this lawsuit. The full terms of the release can be found www.ReaderSettlement.com.

The settlement also provides an additional \$10,000 to the worker who brought this lawsuit, to compensate them for their work on the case. This is called a "service payment."

If there is money left over after the claims and expenses are paid, it will be donated to Legal Aid at Work.

How do I know if I am part of this settlement?

If you are working or worked as a Reader for Kasamba in California at any time between September 9, 2020 and July 9, 2025, you are part of this settlement.

Kasamba's records reflect that you are part of the class, but if you are unsure of whether you are part of the class, contact Class Counsel.

How much will my payment be?

Your individual payment is estimated to be \$[amount]. Your payment amount depends on the following factors:

- Your individual length of service, your number of hours and weeks worked, and the number of calls/sessions you conducted.
- Your individual earnings.
- The amount of the lawyer fees, costs, and service payments approved by the Court.

Deciding What to Do

How do I weigh my options?

You have three options. You can stay in the settlement, you can opt out of the settlement, or you can object to the settlement. This chart shows how your rights are affected by each option:

	Opt out	Object	Do Nothing
Can I receive settlement money if I . . .	NO*	YES	YES
Am I bound by the terms of this lawsuit if I . . .	NO*	YES	YES
Can I pursue my own case if I . . .	YES	NO	NO

Will the class lawyers represent me if I . . .	NO	NO	YES
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*Even if you opt out, you will receive some money for the PAGA portion of the settlement, and will be bound by those terms of the settlement.

Receiving Payment

How do I get a payment if I am a class member?

If you wish to receive money, you do not need to take any action.

If the Court grants final approval to the settlement, Kasamba will make an initial payment 30 days after the effective date, and a final payment 120 days later. You will be mailed a check to the address on file after each payment.

Do I have a lawyer in this lawsuit?

In a class action, the court appoints lawyers to work on the case and represent the interests of all the class members. For this settlement, the Court has appointed the following lawyers.

Your lawyers:

REENA I. DESAI (MN BAR #388311)

rdesai@nka.com

612-256-3244

NICHOLS KASTER, PLLP

4700 IDS Center, 80 South 8th Street

Minneapolis, MN 55402

CHRISTOPHER Q. DAVIS (NY BAR #4068680)

cdavis@workingsolutionsnyc.com

WORKING SOLUTIONS LAW FIRM, PLLC

80 Broad Street, Suite 703

New York, NY 10004

These are the lawyers who negotiated this settlement on your behalf.

If you want to be represented by your own lawyer, you may hire one at

| your own expense.

Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid from the Settlement Fund. **You will not have to pay the lawyers directly.**

To date, your lawyers have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this Settlement, that the Court approve a payment of up to \$350,000 total in attorneys' fees (representing 25% of the total settlement amount), plus the reimbursement of out-of-pocket expenses of up to \$25,000.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Your lawyers will also ask the Court to approve a payment of \$10,000 to the Class Representative for the time and effort they contributed to the case. If approved by the Court, the Service Award will be paid from the Settlement Fund.

Opting Out

What if I don't want to be part of this settlement?

You can opt out of the Labor Code portion of the settlement, but not from the PAGA portion of the settlement. If you opt out, you will not receive payment and cannot object to the settlement for the Labor Code claims. However, you will not be bound or affected by what happens in this lawsuit and may be able to file your own case for the same issues. Even if you opt out, you will still receive a PAGA payment.

How do I opt out?

To opt out of the settlement, you must notify Class Counsel by mail,

email, or fax by **December 22, 2025**. Your request to opt out must include your name and address, must clearly state that you wish to be excluded from the settlement, and must include your signature. You may send a request to opt out to:

REENA I. DESAI
rdesai@nka.com
NICHOLS KASTER, PLLP
4700 IDS Center,
80 South 8th Street
Minneapolis, MN 55402

Be sure to include your name, address, telephone number, and signature.

Objecting

What if I disagree with the settlement?

If you disagree with any part of the settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve the settlement and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement — it cannot change the terms of the settlement. You may, but don't have to, hire your own lawyer to help you.

To object, you must send a letter to the Court that:

- (1) is postmarked by December 22, 2025;
- (2) includes the case name and number (*Simic v. Kasamba*, Case No. 2:24-cv-08887-SK)
- (3) includes your full name, address and telephone number, and email address (if you have one);
- (4) states the reasons for your objection;
- (5) states whether either you or your lawyer intend to appear at the final approval hearing and your lawyer's name;
- (6) includes your signature.

Mail letter to: UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA 255 E. Temple Street Courtroom 540, 5th Floor Los Angeles, California 90012 Include on envelope: Re: Case No. 2:24-cv-08887-SK	Please mail or email copy of letter to: REENA I. DESAI (Class Counsel) rdesai@nka.com NICHOLS KASTER, PLLP 4700 IDS Center, 80 South 8th Street Minneapolis, MN 55402
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Doing Nothing

What happens if I do nothing?

If you do nothing, you will receive your full settlement amount, and you will be bound by the settlement and its “release” provisions. That means you won’t be able to start, continue, or be part of any other lawsuit against Kasamba about the issues in this case. Those issues include alleged failure to pay minimum wage, failure to provide reimbursement for business expenses, unlawful withholding of earned wages, failure to provide accurate wage statements, and failure to pay earned wages upon discharge, as well as related penalties under PAGA. A full description of the claims and persons who will be released if this settlement is approved can be found at www.ReaderSettlement.com.

Key Resources

How do I get more information?

This notice is a summary of the proposed settlement. The complete settlement with all its terms can be found at www.ReaderSettlement.com. To get a copy of the settlement agreement or get answers to your questions:

- contact your lawyer (information below)

- visit the case website at www.ReaderSettlement.com.
- access the Court's docket using PACER or by visiting the clerk's office of the Court (address below)

Resource	Contact Information
Case website	www.ReaderSettlement.com
Settlement Administrator	Simpluris, Inc. PO Box 26170 Santa Ana, CA 92799 (888) 369-3780
Your Lawyers	REENA I. DESAI (MN BAR #388311) rdesai@nka.com NICHOLS KASTER, PLLP 4700 IDS Center, 80 South 8 th Street Minneapolis, MN 55402 CHRISTOPHER Q. DAVIS (NY BAR #4068680) cdavis@workingsolutionsnyc.com WORKING SOLUTIONS LAW FIRM, PLLC 80 Broad Street, Suite 703 New York, NY 10004
Court (DO NOT CONTACT)	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA 255 E. Temple Street Los Angeles, California 90012