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County of Santa Clara,
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Case #24CV448267
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12 *Attorneys for Plaintiff and Proposed Class*

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF SANTA CLARA**

15 **RAJ KUMAR SINGH PARIHAR**, on behalf
16 of himself and all others similarly situated,

17 Plaintiff,

18 v.

19 **MIPS HOLIDNG, INC.**,

20 Defendant.

Case No. 24CV448267
Assigned to: Hon. Theodore C. Zayner

**PLAINTIFF’S NOTICE OF MOTION
AND UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Filed with Declaration of Cassandra P. Miller, Declaration of Plaintiff Raj Kumar Singh Parihar, Declaration of Settlement Administrator, Memorandum in Support, and Proposed Orders]

HEARING INFORMATION

Date: February 18, 2026
Time: 1:30 p.m. PST via Zoom
Dept: 19

Complaint Filed: September 26, 2024
Trial Date: Not Set

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE**, that on February 18, 2025 at 1:30 p.m., or as soon thereafter
3 as the case may be heard, in Department 19 of the Santa Clara Superior Court of the State of
4 California, located at 191 N. First Street, Santa Clara, California 95113, Plaintiff Raj Kumar Singh
5 Parihar (“Plaintiff”), through his attorneys, individually and on behalf of all others similarly
6 situated, will move for Preliminary Approval of the proposed Class Action Settlement. This
7 Motion is unopposed.

8 Plaintiff hereby respectfully moves this Court to:

- 9 1. Grant preliminary approval of the class action settlement described in the
10 “Settlement Agreement” between Plaintiff and Defendant MIPS Holding, Inc. (“Defendant”)
11 (together, the “Parties”);
- 12 2. Preliminarily certify the Settlement Class for purposes of Settlement;
- 13 3. Appoint Plaintiff Raj Kumar Singh Parihar as Class Representative;
- 14 4. Appoint Cassandra P. Miller of Strauss Borrelli PLLC as Class Counsel;
- 15 5. Approve the Notice Program set forth in the Settlement Agreement;
- 16 6. Appoint Analytics LLC as Settlement Administrator;
- 17 7. Approve the form and content of the Short Form Notice, Long Form Notice, and
18 Claim Form;
- 19 8. Schedule a Final Fairness Hearing to consider entry of a final order approving the
20 Settlement, final certification of the Settlement Class for settlement purposes only, and the request
21 for attorney fees, costs, and Plaintiff’s Service Award.

22 This Motion is based on:

- 23 (1) this Motion;
- 24 (2) the accompanying Memorandum in Support;
- 25 (3) the Declaration of Cassandra P. Miller, as proposed Settlement Class Counsel;
- 26 (4) the Declaration of Plaintiff Raj Kumar Singh Parihar;

- 1 (5) the Declaration of Richard W. Simmons, on behalf of the proposed Settlement
2 Administrator Analytics LLC, together with its accompanying exhibits;
3 (6) the Settlement Agreement, together with its accompanying exhibits;
4 (7) the [Proposed] Order of Preliminary Approval and Judgment;
5 (8) the [Proposed] Order of Final Approval and Judgment;
6 (9) the records, pleadings, and papers filed in this action; and
7 (10) such other evidence, whether documentary or oral, and argument as may be
8 presented to the Court at or before the hearing on this Motion.
9

10 DATE: August 25, 2025

Respectfully submitted,

11 By: /s/ Andrew G. Gunem
12 Andrew G. Gunem (SBN 354042)
13 Cassandra P. Miller (*Pro Hac Vice*)
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Attorneys for Plaintiff and the Settlement Class

1 **CERTIFICATE OF SERVICE**

2 I, Andrew G. Gunem, hereby certify that on August 25, 2025, I electronically filed the
3 foregoing with the Clerk of the Court using the OneLegal E-Filing system, which will send
4 notification of such filing to counsel of record via the OneLegal system.

5 DATED this 25th day of August, 2025.

6 STRAUSS BORRELLI PLLC

7
8 By: /s/ Andrew G. Gunem

9 Andrew G. Gunem

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