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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEBORAH RODRIGUEZ,
individually and as a representative of a class of
participants and beneficiaries on behalf of the
Intuit Inc. 401(k) Plan,

Plaintiff,

v.

INTUIT INC.,

Defendant.

Case No. 5:23-cv-05053-PCP

NOTICE OF PROPOSED SETTLEMENT

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1 **TO THE HONORABLE COURT:**

2 Plaintiff Deborah Rodriguez (“Plaintiff”) and Defendant Intuit Inc. (“Defendant”) (together,
3 the “Parties”) jointly give notice that they have reached a settlement with the assistance of mediator
4 Hon. Morton Denlow (Ret.) and have negotiated a final written settlement agreement for approval by
5 the Court.

6 The Parties plan to execute the settlement agreement and Plaintiff will file an unopposed
7 motion and memorandum for preliminary approval of the settlement by May 16, 2025. The parties
8 therefore respectfully request that all deadlines in this action continue to be stayed until such time.

9
10 Dated: April 29, 2025

11
12 GROOM LAW GROUP, CHARTERED
13 /s/ Sarah M. Adams (pro hac vice)
14 Attorney for Defendant

HAYES PAWLENKO LLP
/s/ Matthew B. Hayes
Matthew B. Hayes