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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

JOHN MILITO, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

SNAP INC., a foreign profit corporation doing  
business as SNAPCHAT and SNAPCHAT,  
INC.; and DOES 1-20, as yet unknown  
Washington entities,

Defendants.

Case No.

**NOTICE OF REMOVAL**

[Removal from the Superior Court of the  
State of Washington, King County, Case  
No. 25-2-03854-8 SEA]

Action Filed: February 7, 2025

**TO: THE CLERK OF THE ABOVE-TITLED COURT**

**AND TO: PLAINTIFF AND HIS COUNSEL OF RECORD**

PLEASE TAKE NOTICE THAT Defendant Snap Inc. removes this action—with  
reservation of all defenses and rights—from the Superior Court of the State of Washington for  
King County, Case No. 25-2-03854-8 SEA, to the United States District Court for the Western  
District of Washington pursuant to 28 U.S.C. §§ 1332(d), 1441, 1446, and 1453.

As explained further below, the Court has jurisdiction under the U.S. Class Action  
Fairness Act (“CAFA”), 28 U.S.C. § 1332(d), because there is diversity between the parties  
(Plaintiff is not a citizen of the same state as Defendant), the aggregate amount in controversy  
exceeds \$5 million, and the class comprises over 100 putative class members.

NOTICE OF REMOVAL

ORRICK, HERRINGTON & SUTCLIFFE LLP  
401 Union Street, Suite 3300  
Seattle, Washington 98101-2668  
+1 206 839 4300

1 **I. BACKGROUND**

2 1. On February 7, 2025, Plaintiff John Milito, individually and on behalf of all  
3 others similarly situated, filed a Complaint against Defendant Snap Inc. (“Snap”) in the Superior  
4 Court for King County, Washington, Case No. 25-2-03854-8. True copies of all process,  
5 pleadings, or orders in the possession of Snap are attached as **Exhibits 1-5**. No other pleadings  
6 have been filed or served in the action.

7 2. The Complaint asserts a cause of action under RCW 49.58.110 on a class-wide  
8 basis on behalf of all individuals who applied for a job opening in the State of Washington with  
9 Snap from January 1, 2023 to the present, where the job posting did not disclose a wage scale or  
10 salary range. Complaint ¶¶ 49, 50.

11 **II. REMOVAL JURISDICTION UNDER THE CLASS ACTION FAIRNESS ACT**

12 3. Snap removes this action based upon the Class Action Fairness Act of 2005,  
13 codified in 28 U.S.C. § 1332(d). This Court has original jurisdiction of this action under §  
14 1332(d)(2). As set forth below, this action is removable because (1) it is a putative class action  
15 in which at least one class member is a citizen of a state different from that of any one defendant,  
16 (2) the proposed class exceeds 100 members, and (3) the amount in controversy exceeds  
17 \$5,000,000, exclusive of interest and costs. 28 U.S.C. §§ 1332(d)(2)(A); 1441. No defendant  
18 identified in the Complaint is a state, officer of a state, or a governmental agency. 28 U.S.C. §  
19 1332(d)(5).

20 4. There is no antiremoval presumption in cases invoking CAFA. *See Dart*  
21 *Cherokee Basin Operating Co., LLC v. Owens*, 574 U.S. 81, 89 (2014).

22 **A. Minimal Diversity is Satisfied**

23 5. CAFA’s minimal diversity requirement is satisfied here because at least one  
24 member of the putative class is a citizen of a different state from that of one defendant. 28 U.S.C.

1 §§ 1332(d)(2), 1332(d)(5)(B). Specifically, Plaintiff is a citizen of a state (Washington) that is  
2 different from that of Snap (Delaware and California). *See* Complaint ¶ 15.

3 6. ***Plaintiff's Citizenship.*** Plaintiff alleges he resides in King County, Washington.  
4 Complaint ¶ 15. For diversity purposes, a person is a “citizen” of the state in which he or she is  
5 domiciled. *Kantor v. Wellesley Galleries, Ltd.*, 704 F.2d 1088 (9th Cir. 1983). Residence is  
6 *prima facie* the domicile. *See Ayala v. Cox Automotive, Inc.*, 2016 WL 6561284, at \*4 (C.D.  
7 Cal. 2016) (allegation that Plaintiff “is, and at all times mentioned in the Complaint was,” a  
8 California resident “gives rise to a presumption that Plaintiff is a California citizen”). Plaintiff is  
9 a citizen of Washington.

10 7. ***Snap's Citizenship.*** For diversity purposes, a corporation “shall be deemed a  
11 citizen of any State by which it has been incorporated and of the State where it has its principal  
12 place of business.” 28 U.S.C. § 1332(c)(1). Snap’s principal place of business is in California.  
13 Snap is a corporation incorporated under the laws of the State of Delaware. Therefore, Snap is a  
14 citizen of California and Delaware for the purposes of determining diversity of citizenship.

15 B. **The Putative Class Exceeds 100 Members**

16 9. CAFA’s requirement that the proposed class include no less than 100 members is  
17 satisfied here because the alleged putative class has more than 100 members. *See* 28 U.S.C.  
18 § 1332(d)(5)(B).

19 10. Plaintiff alleges that on or about February 1, 2025, he applied for a job opening in  
20 King County, Washington with Snap that did not disclose the wage scale or salary range being  
21 offered. *Id.* ¶¶ 25-26. Plaintiff seeks to represent “[a]ll individuals who, from January 1, 2023,  
22 through the date of notice is provided to the Class, applied for a job opening in the State of  
23 Washington with Snap Inc., where the job posting did not disclose a wage scale or salary range.”  
24 Complaint ¶ 39. Plaintiff does not provide an estimated number of class members, but says only  
25 that there are “potentially dozens.” *Id.* ¶ 41.

1 11. A preliminary analysis of Snap’s records show that more than 1,000 individuals  
2 applied to the same job opening that Plaintiff allegedly applied to, which the Complaint alleges  
3 was “a job opening in King County, Washington.” *Id.* ¶ 25.

4 C. **The Amount in Controversy Exceeds \$5,000,000**

5 12. CAFA’s requirement that the aggregate claims of the individual members of a  
6 putative class, or the amount in controversy, exceed \$5,000,000, exclusive of interest and costs,  
7 is similarly satisfied here. 28 U.S.C. § 1332(d)(6).

8 13. Snap denies Plaintiff’s claims in their entirety and asserts that Plaintiff’s single  
9 cause of action under RCW 49.58.110 is not amenable to class treatment. Snap denies that  
10 Plaintiff’s interpretation of RCW 49.58.110 and the damages scheme thereunder is proper. Snap  
11 provides the following analysis of potential damages for jurisdictional purposes only, without  
12 admitting any liability. Snap bases the below analysis on the allegations in Plaintiff’s Complaint,  
13 solely to demonstrate that Plaintiff’s Complaint puts a sufficient amount “in controversy” to  
14 warrant removal under 28 U.S.C. § 1332(d). Nothing herein waives any of Snap’s defenses or  
15 arguments in this action.

16 14. Plaintiff’s Complaint is silent as to the total amount of damages claimed. When  
17 the amount in controversy is not readily apparent from a complaint, “the court may consider facts  
18 in the removal petition” to determine the potential damages at issue. *Kroske v. US Bank Corp.*,  
19 432 F.3d 976, 980 (9th Cir. 2005) (quoting *Singer v. State Farm Mut. Ins. Co.*, 116 F.3d 373, 377  
20 (9th Cir. 1997)). A defendant must provide “a plausible allegation that the amount in  
21 controversy exceeds the jurisdictional threshold.” *Dart Cherokee Basin Operating Co. v. Owens*,  
22 574 U.S. 81, 89 (2014); see also *Ibarra v. Manheim Invs., Inc.*, 775 F.3d 1193, 1197-98 (9th Cir.  
23 2015) (“[A] defendant can establish the amount in controversy by an unchallenged, plausible  
24 assertion of the amount in controversy in its notice of removal.”).

25 15. The defendant’s amount in controversy allegation should be accepted when not  
26 contested by the plaintiff or questioned by the court, and evidence establishing the amount need  
27 only be submitted when the defendant’s allegation is challenged. *Dart*, 574 U.S. at 87, 89. Thus,  
28

1 Snap is only required to demonstrate that it is plausible that the amount in controversy exceeds  
2 \$5,000,000.

3 16. Statutory penalties may be considered by the Court when determining the amount  
4 in controversy. *See Chabner v. United of Omaha Life Ins. Co.*, 225 F.3d 1042, 1046 n.3 (9th Cir.  
5 2000).

6 17. The Court should also include requests for attorneys’ fees in determining the  
7 amount in controversy. *See Galt G/S v. JSS Scandinavia*, 142 F.3d 1150, 1155-56 (9th Cir.  
8 1998).

9 18. An initial review of Snap’s records shows that during the proposed class period  
10 from January 1, 2023 to the present, more than 1,000 additional applicants applied to the same  
11 job posting that Plaintiff allegedly applied to.

12 19. Plaintiff seeks “[s]tatutory damages of \$5,000 to Plaintiff and each Class member  
13 pursuant to RCW 49.58.070 and RCW 49.58.110.” Complaint ¶ 55.

14 20. Accordingly, under Plaintiffs’ theory, there are more than \$5,000,000 in potential  
15 statutory damages at issue. (At least 1,001 alleged class members x \$5,000 statutory damages  
16 each = \$5,005,000.)

17 21. Additionally, Plaintiff seeks “[c]osts and reasonable attorneys’ fees.” Complaint  
18 ¶ 56.

19 **III. THE PROCEDURAL REQUIREMENTS FOR REMOVAL ARE MET**

20 22. Snap was served with the Complaint on February 12, 2025. This Notice of  
21 Removal is timely because this Notice is filed within 30 days after service of the Complaint. 28  
22 U.S.C. § 1446(b).

23 23. The United States District Court for the Western District of Washington is the  
24 appropriate venue for removal pursuant to 28 U.S.C. § 1441(a) because it embraces the place  
25 where Plaintiff originally filed this case, in the Superior Court of Washington for King County.  
26 *See* 28 U.S.C. § 84(a); 28 U.S.C. § 1441(a). Pursuant to Local Rule 3(e)(1), the action should be  
27 assigned to the Seattle Division of this Court.

1 24. Upon filing this Notice of Removal, Snap will promptly furnish written notice to  
2 Plaintiff's counsel and will file and serve a copy of this Notice with the Clerk of the Superior  
3 Court of Washington for King County, pursuant to 28 U.S.C. § 1446(d).

4 25. In compliance with 28 U.S.C. § 1446(a), attached hereto as **Exhibits 1-5** are  
5 copies of the state-court papers served herein, including copies of all process, pleadings, and  
6 orders served upon Defendant.

7 26. Accordingly, Snap removes to this Court the above action pending in the Superior  
8 Court of Washington for King County.

9 **IV. RESERVATION OF RIGHTS**

10 53. Snap reserves the right to amend or supplement this Notice of Removal, to present  
11 additional argument in support of its entitlement for removal, and to present evidence supporting  
12 this Notice in the event this Removal is challenged.

13 54. Snap intends no admission of fact or liability by this Notice of Removal and does  
14 not waive any defenses, objections, or motions available under state or federal law. Further,  
15 Snap expressly reserves the right to move for dismissal of some or all of Plaintiff's claims.

16  
17 Dated: March 4, 2025

ORRICK, HERRINGTON & SUTCLIFFE LLP

18 By: s/Alice R. Hoesterey

Alice R. Hoesterey (WSBA No. 62122)  
ahoesterey@orrick.com  
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Telephone: +1 206 839 4300  
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19  
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22 s/Erin M. Connell

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405 Howard Street  
San Francisco, CA 94105-2669  
Telephone: +1 415 773 5700

23  
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26 *Attorneys for Defendant Snap Inc.*

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

JOHN MILITO

(b) County of Residence of First Listed Plaintiff King County (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Emery Reddy, PLLC, 600 Stewart Street, Suite 1100, Seattle, WA 98101, (206) 442-9106 - See Attached

DEFENDANTS

SNAP INC., et al.

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Orrick, Herrington & Sutcliffe LLP, 401 Union Street, Suite 3300, Seattle, WA 98101, (206) 839-4300 - See Attached

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, 1 1, 2 2, 3 3, 4 4, 5 5, 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Personal Injury, Contract, Labor, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. Section 1332(d)
Brief description of cause: Violation of Washington pay transparency law (RCW 49.58.110)

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ to be determined CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE: March 4, 2025 SIGNATURE OF ATTORNEY OF RECORD: s/Alice R. Hoesterey

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

**Attachment - Attorneys of Record:**

For Plaintiff:

Timothy W. Emery (WSBA No. 34078)  
Patrick B. Reddy (WSBA No. 34092)  
Paul Cipriani (WSBA No. 59991)  
Hannah M. Hamley (WSBA No. 59020)  
Emery Reddy, PLLC  
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reddyp@emeryreddy.com  
paul@emeryreddy.com  
hannah@emeryreddy.com

For Defendant:

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(206) 839-4300  
ahoesterey@orrick.com

Erin M. Connell (*Pro Hac Vice Forthcoming*)  
Orrick, Herrington & Sutcliffe LLP  
405 Howard Street  
San Francisco, CA 94105-2669  
(415) 773-5700  
econnell@orrick.com

# EXHIBIT 2

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2025 FEB 07 00:06 AM  
KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE #: 25-2-03854-8 SEA

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

JOHN MILITO, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

SNAP INC., a foreign profit corporation doing  
business as SNAPCHAT and SNAPCHAT,  
INC.; and DOES 1-20, as yet unknown  
Washington entities,

Defendants.

No.

SUMMONS (20 DAYS)

TO: SNAP INC.

A lawsuit has been started against you in the above entitled court by the above-captioned plaintiff. Plaintiff's claims are stated in the written complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond by stating your defense in writing, and serve a copy upon the person signing this summons within 20 days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where the plaintiff is entitled to what he asks for because you have not responded. If you serve a notice of appearance on the undersigned person, you are entitled to notice before a default judgment may be entered.

SUMMONS (20 DAYS) - 1

EMERY | REDDY, PLLC  
600 Stewart Street, Suite 1100  
Seattle, WA 98101  
PHONE: (206) 442-9106 • FAX: (206) 441-9711

1 You may demand that the plaintiff file this lawsuit with the court. If you do so, the  
2 demand must be in writing and must be served upon the person signing this summons. Within  
3 14 days after you serve the demand, the plaintiff must file this lawsuit with the court, or the  
4 service on you of this summons and complaint will be void.

5 If you wish to seek the advice of an attorney in this matter, you should do so promptly so  
6 that your written response, if any, may be served on time.

7 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of The State  
8 of Washington.

9 DATED this 7<sup>th</sup> day of February, 2025.

Respectfully Submitted,

EMERY | REDDY, PLLC

10  
11  
12 By: /s/ Timothy W. Emery  
13 Timothy W. Emery, WSBA No. 34078  
14 Patrick B. Reddy, WSBA No. 34092  
15 Paul Cipriani, WSBA No. 59991  
16 Hannah M. Hamley, WSBA No. 59020  
17 Emery Reddy, PLLC  
18 600 Stewart Street, Suite 1100  
19 Seattle, WA 98101  
20 Phone: (206) 442-9106  
21 Fax: (206) 441-9711  
22 Email: emeryt@emeryreddy.com  
23 Email: reddyp@emeryreddy.com  
24 Email: paul@emeryreddy.com  
25 Email: hannah@emeryreddy.com  
26 *Attorneys for Plaintiff and the Class*

# EXHIBIT 4

FILED  
2025 FEB 07 04:05 PM  
KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE #: 25-2-03854-8 SEA

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR THE COUNTY OF KING

MILITO

VS

SNAP INC.

No. 25-2-03854-8 SEA

**ORDER SETTING CIVIL CASE SCHEDULE**

**ASSIGNED JUDGE: Maureen A McKee, Dept. 05**

FILED DATE: 02/07/2025

TRIAL DATE:02/09/2026

A civil case has been filed in the King County Superior Court and will be managed by the Case Schedule on Page 3 as ordered by the King County Superior Court Presiding Judge.

**I. NOTICES**

**NOTICE TO PLAINTIFF:**

The Plaintiff may serve a copy of this **Order Setting Case Schedule (Schedule)** on the Defendant(s) along with the **Summons and Complaint/Petition**. Otherwise, the Plaintiff shall serve the *Schedule* on the Defendant(s) within 10 days after the later of: (1) the filing of the **Summons and Complaint/Petition** or (2) service of the Defendant's first response to the **Complaint/Petition**, whether that response is a **Notice of Appearance**, a response, or a Civil Rule 12 (CR 12) motion. The **Schedule** may be served by regular mail, with proof of mailing to be filed promptly in the form required by Civil Rule 5 (CR 5).

**NOTICE TO ALL PARTIES:**

All attorneys and parties should make themselves familiar with the King County Local Rules [KCLCR] -- especially those referred to in this **Schedule**. In order to comply with the **Schedule**, it will be necessary for attorneys and parties to pursue their cases vigorously from the day the case is filed. For example, discovery must be undertaken promptly in order to comply with the deadlines for joining additional parties, claims, and defenses, for disclosing possible witnesses [See KCLCR 26], and for meeting the discovery cutoff date [See KCLCR 37(g)].

**You are required to give a copy of these documents to all parties in this case.**

## I. NOTICES (continued)

### **CROSSCLAIMS, COUNTERCLAIMS AND THIRD-PARTY COMPLAINTS:**

A filing fee of **\$240** must be paid when any answer that includes additional claims is filed in an existing case.

### **KCLCR 4.2(a)(2)**

A Confirmation of Joinder, Claims and Defenses or a Statement of Arbitrability must be filed by the deadline in the schedule. The court will review the confirmation of joinder document to determine if a hearing is required. If a Show Cause order is issued, all parties cited in the order must appear before their Chief Civil Judge.

### **PENDING DUE DATES CANCELED BY FILING PAPERS THAT RESOLVE THE CASE:**

When a final decree, judgment, or order of dismissal of all parties and claims is filed with the Superior Court Clerk's Office, and a courtesy copy delivered to the assigned judge, all pending due dates in this *Schedule* are automatically canceled, including the scheduled Trial Date. It is the responsibility of the parties to 1) file such dispositive documents within 45 days of the resolution of the case, and 2) strike any pending motions by notifying the bailiff to the assigned judge.

Parties may also authorize the Superior Court to strike all pending due dates and the Trial Date by filing a *Notice of Settlement* pursuant to KCLCR 41, and forwarding a courtesy copy to the assigned judge. If a final decree, judgment or order of dismissal of all parties and claims is not filed by 45 days after a *Notice of Settlement*, the case may be dismissed with notice.

**If you miss your scheduled Trial Date**, the Superior Court Clerk is authorized by KCLCR 41(b)(2)(A) to present an *Order of Dismissal*, without notice, for failure to appear at the scheduled Trial Date.

### **NOTICES OF APPEARANCE OR WITHDRAWAL AND ADDRESS CHANGES:**

*All parties to this action must keep the court informed of their addresses.* When a Notice of Appearance/Withdrawal or Notice of Change of Address is filed with the Superior Court Clerk's Office, parties must provide the assigned judge with a courtesy copy.

### **ARBITRATION FILING AND TRIAL DE NOVO POST ARBITRATION FEE:**

A Statement of Arbitrability must be filed by the deadline on the schedule **if the case is subject to mandatory arbitration** and service of the original complaint and all answers to claims, counterclaims and crossclaims have been filed. If mandatory arbitration is required after the deadline, parties must obtain an order from the assigned judge transferring the case to arbitration. **Any party filing a Statement must pay a \$250 arbitration fee.** If a party seeks a trial de novo when an arbitration award is appealed, a fee of \$400 and the request for trial de novo must be filed with the Clerk's Office Cashiers.

### **NOTICE OF NON-COMPLIANCE FEES:**

All parties will be assessed a fee authorized by King County Code 4A.630.020 whenever the Superior Court Clerk must send notice of non-compliance of schedule requirements and/or Local Civil Rule 41.

**King County Local Rules are available for viewing at [www.kingcounty.gov/courts/clerk](http://www.kingcounty.gov/courts/clerk).**

## II. CASE SCHEDULE

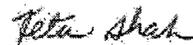
* CASE EVENT	EVENT DATE
Case Filed and Schedule Issued.	02/07/2025
* Last Day for Filing Statement of Arbitrability without a Showing of Good Cause for Late Filing [See <i>KCLMAR 2.1(a) and Notices on Page 2</i> ]. <b>\$250 arbitration fee must be paid</b>	07/18/2025
* <b>DEADLINE</b> to file Confirmation of Joinder if not subject to Arbitration [See <i>KCLCR 4.2(a) and Notices on Page 2</i> ].	07/18/2025
<b>DEADLINE</b> for Hearing Motions to Change Case Assignment Area [KCLCR 82(e)].	08/01/2025
<b>DEADLINE</b> for Disclosure of Possible Primary Witnesses [See <i>KCLCR 26(k)</i> ].	09/08/2025
<b>DEADLINE</b> for Disclosure of Possible Additional Witnesses [See <i>KCLCR 26(k)</i> ].	10/20/2025
<b>DEADLINE</b> for Jury Demand [See <i>KCLCR 38(b)(2)</i> ].	11/03/2025
<b>DEADLINE</b> for a Change in Trial Date [See <i>KCLCR 40(e)(2)</i> ].	11/03/2025
<b>DEADLINE</b> for Discovery Cutoff [See <i>KCLCR 37(g)</i> ].	12/22/2025
<b>DEADLINE</b> for Engaging in Alternative Dispute Resolution [See <i>KCLCR 16(b)</i> ].	01/12/2026
<b>DEADLINE:</b> Exchange Witness & Exhibit Lists & Documentary Exhibits [KCLCR 4(j)].	01/20/2026
* <b>DEADLINE</b> to file Joint Confirmation of Trial Readiness [See <i>KCLCR 16(a)(1)</i> ]	01/20/2026
<b>DEADLINE</b> for Hearing Dispositive Pretrial Motions [See <i>KCLCR 56; CR 56</i> ].	01/26/2026
* Joint Statement of Evidence [See <i>KCLCR 4 (k)</i> ]	02/02/2026
<b>DEADLINE</b> for filing Trial Briefs, Proposed Findings of Fact and Conclusions of Law and Jury Instructions (Do not file proposed Findings of Fact and Conclusions of Law with the Clerk)	02/02/2026
Trial Date [See <i>KCLCR 40</i> ].	02/09/2026

The \* indicates a document that must be filed with the Superior Court Clerk's Office by the date shown.

## III. ORDER

Pursuant to King County Local Rule 4 [KCLCR 4], IT IS ORDERED that the parties shall comply with the schedule listed above. Penalties, including but not limited to sanctions set forth in Local Rule 4(g) and Rule 37 of the Superior Court Civil Rules, may be imposed for non-compliance. It is FURTHER ORDERED that the party filing this action **must** serve this *Order Setting Civil Case Schedule* and attachment on all other parties.

DATED: 02/07/2025



\_\_\_\_\_  
PRESIDING JUDGE

#### IV. ORDER ON CIVIL PROCEEDINGS FOR ASSIGNMENT TO JUDGE

**READ THIS ORDER BEFORE CONTACTING YOUR ASSIGNED JUDGE.**

This case is assigned to the Superior Court Judge whose name appears in the caption of this case schedule. The assigned Superior Court Judge will preside over and manage this case for all pretrial matters.

**COMPLEX LITIGATION:** If you anticipate an unusually complex or lengthy trial, please notify the assigned court as soon as possible.

**APPLICABLE RULES:** Except as specifically modified below, all the provisions of King County Local Civil Rules 4 through 26 shall apply to the processing of civil cases before Superior Court Judges. The local civil rules can be found at [www.kingcounty.gov/courts/clerk/rules/Civil](http://www.kingcounty.gov/courts/clerk/rules/Civil).

**CASE SCHEDULE AND REQUIREMENTS:** Deadlines are set by the case schedule, issued pursuant to Local Civil Rule 4.

**THE PARTIES ARE RESPONSIBLE FOR KNOWING AND COMPLYING WITH ALL DEADLINES IMPOSED BY THE COURT'S LOCAL CIVIL RULES.**

**A. Joint Confirmation regarding Trial Readiness Report**

No later than twenty one (21) days before the trial date, parties shall complete and file (with a copy to the assigned judge) a joint confirmation report setting forth whether a jury demand has been filed, the expected duration of the trial, whether a settlement conference has been held, and special problems and needs (e.g., interpreters, equipment).

The Joint Confirmation Regarding Trial Readiness form is available at [www.kingcounty.gov/courts/scforms](http://www.kingcounty.gov/courts/scforms). If parties wish to request a CR 16 conference, they must contact the assigned court. Plaintiff's/petitioner's counsel is responsible for contacting the other parties regarding the report.

**B. Settlement/Mediation/ADR**

a. Forty five (45) days before the trial date, counsel for plaintiff/petitioner shall submit a written settlement demand. Ten (10) days after receiving plaintiff's/petitioner's written demand, counsel for defendant/respondent shall respond (with a counter offer, if appropriate).

b. Twenty eight (28) days before the trial date, a Settlement/Mediation/ADR conference shall have been held. FAILURE TO COMPLY WITH THIS SETTLEMENT CONFERENCE REQUIREMENT MAY RESULT IN SANCTIONS.

**C. Trial**

Trial is scheduled for 9:00 a.m. on the date on the case schedule or as soon thereafter as convened by the court. The Friday before trial, the parties should access the court's civil standby calendar on the King County Superior Court website [www.kingcounty.gov/courts/superiorcourt](http://www.kingcounty.gov/courts/superiorcourt) to confirm the trial judge assignment.

#### MOTIONS PROCEDURES

**A. Noting of Motions**

**Dispositive Motions:** All summary judgment or other dispositive motions will be heard with oral argument before the assigned judge. The moving party must arrange with the hearing judge a date and time for the hearing, consistent with the court rules. Local Civil Rule 7 and Local Civil Rule 56 govern procedures for summary judgment or other motions that dispose of the case in whole or in part. The local civil rules can be found at [www.kingcounty.gov/courts/clerk/rules/Civil](http://www.kingcounty.gov/courts/clerk/rules/Civil).

**Non-dispositive Motions:** These motions, which include discovery motions, will be ruled on by the assigned judge without oral argument, unless otherwise ordered. All such motions must be noted for a date by which the ruling is requested; this date must likewise conform to the applicable notice requirements.

Rather than noting a time of day, the Note for Motion should state "Without Oral Argument." Local Civil Rule 7 governs these motions, which include discovery motions. The local civil rules can be found at [www.kingcounty.gov/courts/clerk/rules/Civil](http://www.kingcounty.gov/courts/clerk/rules/Civil).

**Motions in Family Law Cases not involving children:** Discovery motions to compel, motions in limine, motions relating to trial dates and motions to vacate judgments/dismissals shall be brought before the assigned judge. All other motions should be noted and heard on the Family Law Motions calendar. Local Civil Rule 7 and King County Family Law Local Rules govern these procedures. The local rules can be found at [www.kingcounty.gov/courts/clerk/rules](http://www.kingcounty.gov/courts/clerk/rules).

**Emergency Motions:** Under the court's local civil rules, emergency motions will usually be allowed only upon entry of an Order Shortening Time. However, some emergency motions may be brought in the Ex Parte and Probate Department as expressly authorized by local rule. In addition, discovery disputes may be addressed by telephone call and without written motion, if the judge approves in advance.

**B. Original Documents/Working Copies/ Filing of Documents:** All original documents must be filed with the Clerk's Office. Please see information on the Clerk's Office website at [www.kingcounty.gov/courts/clerk](http://www.kingcounty.gov/courts/clerk) regarding the requirement outlined in LGR 30 that attorneys must e-file documents in King County Superior Court. The exceptions to the e-filing requirement are also available on the Clerk's Office website. The local rules can be found at [www.kingcounty.gov/courts/clerk/rules](http://www.kingcounty.gov/courts/clerk/rules).

The working copies of all documents in support or opposition must be marked on the upper right corner of the first page with the date of consideration or hearing and the name of the assigned judge. The assigned judge's working copies must be delivered to his/her courtroom or the Judges' mailroom. Working copies of motions to be heard on the Family Law Motions Calendar should be filed with the Family Law Motions Coordinator. Working copies can be submitted through the Clerk's office E-Filing application at [www.kingcounty.gov/courts/clerk/documents/eWC](http://www.kingcounty.gov/courts/clerk/documents/eWC).

**Service of documents:** Pursuant to Local General Rule 30(b)(4)(B), e-filed documents shall be electronically served through the e-Service feature within the Clerk's eFiling application. Pre-registration to accept e-service is required. E-Service generates a record of service document that can be e-filed. Please see the Clerk's office website at [www.kingcounty.gov/courts/clerk/documents/efiling](http://www.kingcounty.gov/courts/clerk/documents/efiling) regarding E-Service.

**Original Proposed Order:** Each of the parties must include an original proposed order granting requested relief with the working copy materials submitted on any motion. **Do not file the original of the proposed order with the Clerk of the Court.** Should any party desire a copy of the order as signed and filed by the judge, a pre-addressed, stamped envelope shall accompany the proposed order. The court may distribute orders electronically. Review the judge's website for information: [www.kingcounty.gov/courts/SuperiorCourt/judges](http://www.kingcounty.gov/courts/SuperiorCourt/judges).

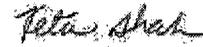
**Presentation of Orders for Signature:** All orders must be presented to the assigned judge or to the Ex Parte and Probate Department, in accordance with Local Civil Rules 40 and 40.1. Such orders, if presented to the Ex Parte and Probate Department, shall be submitted through the E-Filing/Ex Parte via the Clerk application by the attorney(s) of record. E-filing is not required for self-represented parties (non-attorneys). If the assigned judge is absent, contact the assigned court for further instructions. If another judge enters an order on the case, counsel is responsible for providing the assigned judge with a copy.

**Proposed orders finalizing settlement and/or dismissal by agreement of all parties shall be presented to the Ex Parte and Probate Department.** Such orders shall be submitted through the E-Filing/Ex Parte via the Clerk application by the attorney(s) of record. E-filing is not required for self-represented parties (non-attorneys). Formal proof in Family Law cases must be scheduled before the assigned judge by contacting the bailiff, or formal proof may be entered in the Ex Parte Department. **If final order and/or formal proof are entered in the Ex Parte and Probate Department, counsel is responsible for providing the assigned judge with a copy.**

### C. Form

Pursuant to Local Civil Rule 7(b)(5)(B), the initial motion and opposing memorandum shall not exceed 4,200 words and reply memoranda shall not exceed 1,750 words without authorization of the court. The word count includes all portions of the document, including headings and footnotes, except 1) the caption; 2) table of contents and/or authorities, if any; and 3) the signature block. Over-length memoranda/briefs and motions supported by such memoranda/briefs may be stricken.

***IT IS SO ORDERED. FAILURE TO COMPLY WITH THE PROVISIONS OF THIS ORDER MAY RESULT IN DISMISSAL OR OTHER SANCTIONS. PLAINTIFF/PETITIONER SHALL FORWARD A COPY OF THIS ORDER AS SOON AS PRACTICABLE TO ANY PARTY WHO HAS NOT RECEIVED THIS ORDER.***



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PRESIDING JUDGE

# EXHIBIT 5

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SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF KING

JOHN MILITO, individually and on behalf of all others  
similarly situated,

Plaintiff(s),

Vs.

SNAP INC., a foreign profit corporation doing business  
as SNAPCHAT and SNAPCHAT, INC.; et al.,

Defendant(s).

NO. 25-2-03854-8 SEA

DECLARATION OF SERVICE OF: SUMMONS (20  
DAYS); CLASS ACTION COMPLAINT FOR  
DISCRIMINATION; CASE INFORMATION COVER  
SHEET AND AREA DESIGNATION; ORDER  
SETTING CIVIL CASE SCHEDULE.

STATE OF WASHINGTON  
COUNTY OF KING

That I am now, and at all times herein mentioned, was a citizen of the United States and a resident of the State of Washington, over the age of 18 years, not a party to or interested in the above entitled action, and am competent to be a witness therein.

That at 10:25 A.M. on February 12<sup>th</sup>, 2025, at 300 Deschutes Way Southwest, Suite 208, Tumwater, Washington, I duly served the above-described documents in the above-described matter upon Snap Inc., by then and there personally delivering a true and correct copy thereof by leaving the same with Ellen Jones, Customer Service Associate for Corporation Service Company, its Registered Agent, who is authorized to receive service.

I declare under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Process Fee: 12.00  
 Prep: 10.00  
 Travel: 52.50  
 Bad Address:  
 SSA:  
 Wait:  
 Special Fee:  
 Declaration Fee: 12.00

TOTAL \$86.50

Signed at Seattle, Washington, on 2/13/25

  
 TIMOTHY DZIERZANOWSKI PIERCE CO. #31471

FILED  
2025 FEB 07 00:06 PM  
KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE #: 25-2-03854-8 SEA

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

JOHN MILITO, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

SNAP INC., a foreign profit corporation doing  
business as SNAPCHAT and SNAPCHAT,  
INC.; and DOES 1-20, as yet unknown  
Washington entities,

Defendants.

No.

SUMMONS (20 DAYS)

TO: SNAP INC.

A lawsuit has been started against you in the above entitled court by the above-captioned plaintiff. Plaintiff's claims are stated in the written complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond by stating your defense in writing, and serve a copy upon the person signing this summons within 20 days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where the plaintiff is entitled to what he asks for because you have not responded. If you serve a notice of appearance on the undersigned person, you are entitled to notice before a default judgment may be entered.

SUMMONS (20 DAYS) - 1

**EMERY | REDDY, PLLC**  
600 Stewart Street, Suite 1100  
Seattle, WA 98101  
PHONE: (206) 442-9106 • FAX: (206) 441-9711

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

JOHN MILITO

(b) County of Residence of First Listed Plaintiff King County (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Emery Reddy, PLLC, 600 Stewart Street, Suite 1100, Seattle, WA 98101, (206) 442-9106 - See Attached

DEFENDANTS

SNAP INC., et al.

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Orrick, Herrington & Sutcliffe LLP, 401 Union Street, Suite 3300, Seattle, WA 98101, (206) 839-4300 - See Attached

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, 1 1, 2 2, 3 3, 4 4, 5 5, 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, HABES CORPUS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, INTELLECTUAL PROPERTY RIGHTS, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. Section 1332(d)
Brief description of cause: Violation of Washington pay transparency law (RCW 49.58.110)

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ to be determined CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE: March 4, 2025 SIGNATURE OF ATTORNEY OF RECORD: s/Alice R. Hoesterey

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

**Attachment - Attorneys of Record:**

For Plaintiff:

Timothy W. Emery (WSBA No. 34078)  
Patrick B. Reddy (WSBA No. 34092)  
Paul Cipriani (WSBA No. 59991)  
Hannah M. Hamley (WSBA No. 59020)  
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paul@emeryreddy.com  
hannah@emeryreddy.com

For Defendant:

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401 Union Street, Suite 3300  
Seattle, WA 98101  
(206) 839-4300  
ahoesterey@orrick.com

Erin M. Connell (*Pro Hac Vice Forthcoming*)  
Orrick, Herrington & Sutcliffe LLP  
405 Howard Street  
San Francisco, CA 94105-2669  
(415) 773-5700  
econnell@orrick.com

# EXHIBIT 1

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2025 FEB 07 04:05 PM  
KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE #: 25-2-03854-8 SEA

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

JOHN MILITO, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

SNAP INC., a foreign profit corporation doing  
business as SNAPCHAT and SNAPCHAT,  
INC.; and DOES 1-20, as yet unknown  
Washington entities,

Defendants.

No.

**CLASS ACTION COMPLAINT FOR  
DISCRIMINATION**

Plaintiff John Milito (“Plaintiff”), on behalf of himself and all others similarly situated (the “Class”), by and through counsel, brings this Class Action Complaint against Defendant Snap Inc. (“Defendant”) and alleges, upon personal knowledge as to Plaintiff’s own actions and Plaintiff’s counsel’s investigation, and upon information and belief as to all other matters, as follows:

**I. NATURE OF THE EPOA**

1. This is a class action lawsuit to remedy Defendant’s ongoing violation of Plaintiff and the Class members’ civil rights.

2. Effective January 1, 2023, employers with 15 or more employees must disclose, in each posting for each job opening, the wage scale or salary range and a general description of all of the benefits and other compensation being offered to the hired applicant. *See* RCW

1 49.58.110(1).

2 3. The Washington Legislature finds that “despite existing equal pay laws, there  
3 continues to be a gap in wages and advancement opportunities among workers in Washington.”  
4 RCW 49.58.005(1). The Legislature further finds that “lower starting salaries translate into lower  
5 pay, less family income, and more children and families in poverty.” RCW 49.58.005(3)(b).

6 4. This lawsuit follows important, recent research which revealed pervasive pay  
7 disparity in Washington with respect to both women and other protected classes. In particular, the  
8 study found that women are paid 78 cents for every dollar paid to men—a decline from 80 cents  
9 to the dollar a decade ago. *See* Alison Saldanha, *Seattle’s pay gap between women and men just*  
10 *won’t stop growing* (Mar. 8, 2024), [https://www.seattletimes.com/business/seattle-hits-rock-](https://www.seattletimes.com/business/seattle-hits-rock-bottom-in-terms-of-the-pay-gap-between-women-and-men/)  
11 [bottom-in-terms-of-the-pay-gap-between-women-and-men/](https://www.seattletimes.com/business/seattle-hits-rock-bottom-in-terms-of-the-pay-gap-between-women-and-men/).

12 5. “Some folks do not have the networks or ability to negotiate salaries. Salaries vary  
13 wildly in companies within the same industry and applicants do not have the ability to know what  
14 the value of the position is.” Engrossed Substitute S.B. 5761 House Bill Report, 67th Leg., Reg.  
15 Sess. (Wash. 2022). The pay transparency provision of the Washington Equal Pay and  
16 Opportunities Act (“EPOA”), RCW 49.58.110, “allows a discussion at the start of the process  
17 instead of after an offer has been made, which will increase the ability to negotiate pay.” *Id.*  
18 Additionally, “[m]any candidates spend hours going through rounds of interviews only to find  
19 out they can’t live on the offered pay.” Engrossed Substitute S.B. 5761 Senate Bill Report, 67th  
20 Leg., Reg. Sess. (Wash. 2022). The EPOA makes Washington “more competitive” for job  
21 seekers. *Id.*

22 6. “[P]ay range disclosures function primarily to correct information asymmetry:  
23 they give applicants access to key information that only the employer may know. This information  
24 is essential to help job candidates, particularly females and candidates in other protected classes,  
25 to achieve equal pay when faced with negotiating a starting salary. Pay range disclosures also  
26 stand to help current employees discover if they are being underpaid, either to ask for more or  
27 equitable compensation or, if the employee suspects discrimination, to initiate an enforcement

1 action.” Stephanie Bornstein, *The Enforcement Value of Disclosure*, 72 Duke L.J. 1771, 1789  
2 (2023).

3 7. “[T]he duty to disclose a pay range and to do so publicly goes further, serving  
4 other important purposes of a disclosure scheme. It may induce behavior-forcing effects by  
5 requiring an employer to identify the pay received by other employees currently in the position  
6 and set new employee pay comparably. The goal is that the employer will create pay uniformity  
7 based on the position itself rather than the person holding the position.” *Id.* at 1790.

8 8. “That pay range postings are public creates additional pressure on employers to  
9 provide accurate and fair salary ranges that will attract the best job applicants. And setting pay in  
10 a range to which an employer has publicly pre-committed may likely limit the role that even  
11 unconscious gender and racial biases play in pay setting.” *Id.*

12 9. On January 1, 2021, the State of Colorado enacted a similar pay transparency law  
13 that requires online job postings to include information about the expected salary of the position.  
14 “One early study of the Colorado pay range posting law showed that, among firms that complied,  
15 posted job salaries increased by 3.6 percent.” *Id.* (citing David Arnold, Simon Quach & Bledi  
16 Taska, *The Impact of Pay Transparency in Job Postings on the Labor Market 2* (Aug. 17, 2022)  
17 (unpublished manuscript), <https://perma.cc/KBQ5-L9U2>.

18 10. This is a class action on behalf of individuals who applied to job openings with the  
19 Defendant where the job postings did not include the wage scale or salary range being offered in  
20 direct violation of RCW 49.58.110.

21 11. Plaintiff and the Class seek injunctive relief to address Defendant’s refusal to  
22 include a wage scale or salary range in its job postings, and statutory damages pursuant to RCW  
23 49.58.070 and RCW 49.58.110.

24 **II. JURISDICTION AND VENUE**

25 12. This Court has jurisdiction over this cause of action pursuant to RCW 2.08.010.

26 13. Venue is proper in this Court pursuant to RCW 4.12.025 because the acts and  
27 omissions alleged took place, in whole or in part, in King County, Washington, and Defendant

1 resides and transacts business in King County, Washington.

2 14. Federal jurisdiction is inappropriate under the Class Action Fairness Act, 28  
3 U.S.C. § 1332(d)(4)(A), because: (a) all members of the Class are applicants of a Washington  
4 employer, or were applicants of a Washington employer, at all times relevant to their interactions  
5 with Defendant; (b) Defendant is registered to conduct business, and regularly transacts business,  
6 within Washington; and (c) the alleged conduct of Defendant occurred within Washington.  
7 Alternatively, federal jurisdiction is inappropriate under the Class Action Fairness Act because:  
8 (a) pursuant to 28 U.S.C. § 1332(d)(4)(B), more than two-thirds of the Class reside in  
9 Washington; and (b) pursuant to 28 U.S.C. § 1332(d)(2), the amount in controversy does not  
10 exceed the sum or value of \$5,000,000, exclusive of interest and costs.

11 **III. PARTIES**

12 15. Plaintiff John Milito resides in King County, Washington and applied for a  
13 position with Defendant in the State of Washington.

14 16. Defendant Snap Inc. is a foreign limited liability company doing business as  
15 Snapchat and Snapchat, Inc. Defendant Snap, Inc. regularly transacts business in King County,  
16 Washington and has multiple offices for the transaction of business in King County, Washington,  
17 including at 110 110th Avenue Northeast, Suite 700, Bellevue, Washington 98004 and 2025 1st  
18 Avenue North, Floor 5, Seattle, Washington 98109.

19 17. Plaintiff is currently unaware of the true names and capacities of the defendants  
20 sued herein under fictitious names Does 1-20, inclusive, and therefore sues such defendants by  
21 such fictitious names. Plaintiff will seek leave to amend this Complaint to allege the true names  
22 and capacities of the fictitiously named defendants when their true names and capacities have  
23 been ascertained. Plaintiff is informed and believes, and thereon alleges, each of the fictitiously  
24 named defendants is legally responsible in some manner for the events and occurrences alleged  
25 herein, and for the damages suffered by Plaintiff and the Class.

26 **IV. STATEMENT OF FACTS**

27 18. Effective January 1, 2023, all Washington employers with 15 or more employees

1 are required to disclose, in each posting for each job opening, the wage scale or salary range, and  
2 a general description of all of the benefits and other compensation being offered to the hired  
3 applicant. *See* RCW 49.58.110.

4 19. For the purposes of RCW 49.58.110, “posting” means any solicitation intended to  
5 recruit job applicants for a specific available position, including recruitment done directly by an  
6 employer or indirectly through a third party, and includes any postings done electronically, or  
7 with a printed hard copy, that includes qualifications for desired applicants. RCW 49.58.110(1).

8 20. Defendant employs more than 15 individuals.

9 21. From January 1, 2023, to the present, Plaintiff and more than 40 Class members  
10 applied to job openings with Defendant for positions located in Washington where the postings  
11 did not disclose the wage scale or salary range being offered.

12 22. Despite RCW 49.58.110 becoming effective January 1, 2023, Defendant continues  
13 to withhold pay information in some, if not all, of its job postings for Washington-based positions.

14 23. As of the date of this filing, Defendant continues to employ discriminatory hiring  
15 practices as a result of its ongoing refusal to comply with RCW 49.58.110.

16 24. Defendant’s refusal to post a wage scale or salary range in job postings is a  
17 violation of Plaintiff and the Class members’ civil rights, as specifically defined by RCW  
18 49.58.110.

19 25. On or about February 1, 2025, Plaintiff applied for a job opening in King County,  
20 Washington with Defendant.

21 26. The posting for the job opening Plaintiff applied to did not disclose the wage scale  
22 or salary range being offered.

23 27. In working through the application, Plaintiff expected that at some point he would  
24 learn the rate of pay for the open position.

25 28. However, Defendant withheld the rate of pay for the open position in the job  
26 posting and throughout the application process, forcing Plaintiff to complete the entire application  
27 without learning the rate of pay.

1 29. A true and correct copy of Defendant’s job posting that Plaintiff responded to is  
2 attached hereto as Exhibit 1.

3 30. As a result of Defendant’s refusal to publish the wage scale or salary range within  
4 the job posting, Plaintiff was unable to determine the rate of pay for the position.

5 31. As a result of Defendant’s refusal to disclose the wage scale or salary range in the  
6 job posting, Plaintiff remains unable to evaluate the pay for the position and compare that pay to  
7 other available positions in the marketplace, which negatively impacts Plaintiff’s current and  
8 lifetime wages.

9 32. As a result of Defendant’s refusal to disclose the wage scale or salary range in the  
10 job posting, Plaintiff’s ability to negotiate pay remains adversely affected.

11 33. Plaintiff lost valuable time applying for a position for which the wage scale or  
12 salary range being offered was not disclosed. As noted by the Legislature, “[m]any candidates  
13 spend hours going through rounds of interviews only to find out they can’t live on the offered  
14 pay.” Engrossed Substitute S.B. 5761 Senate Bill Report, 67th Leg., Reg. Sess. (Wash. 2022).

15 34. Plaintiff has experienced economic and non-economic harm as a direct result of  
16 Defendant’s discriminatory hiring practices, its violation of RCW 49.58.110, and its contribution  
17 to wage inequality as a result of its refusal to post a wage scale or salary range in the job postings  
18 it publishes.

19 35. Plaintiff and the Class are victims of Defendant’s discriminatory hiring practices,  
20 which are specifically prohibited by RCW 49.58.110.

21 36. Defendant engaged in a common course of conduct of failing to disclose the wage  
22 scale or salary range in the job postings to which Plaintiff and the Class applied.

23 37. As a result of Defendant’s systemic violations of RCW 49.58.110, and the EPOA  
24 generally, the Class has experienced harm identical to that experienced by Plaintiff.

25 38. Plaintiff and each Class member seek statutory damages of \$5,000, plus their  
26 reasonable attorneys’ fees and costs.

V. CLASS ACTION ALLEGATIONS

39. Class Definition. Under Civil Rule 23(a) and (b)(3), Plaintiff brings this case as a class action against Defendant on behalf of the Class defined as follows (the “Class”):

All individuals who, from January 1, 2023, through the date notice is provided to the Class, applied for a job opening in the State of Washington with Snap Inc., where the job posting did not disclose a wage scale or salary range.

40. Excluded from the Class are the Defendant and Defendant’s officers, directors, and independent contractors, and any judge to whom this case is assigned, as well as his or her staff and immediate family.

41. Numerosity. There are potentially dozens of Class members who applied for jobs with Defendant within the time period relevant to this matter. Joinder of all such individuals is impracticable. Further, the disposition of all claims of the Class in a single action will provide substantial benefits and efficiency to all parties and to the Court.

42. Commonality. Because the Class members applied for job openings that did not disclose the wage scale or salary range being offered, this is a straightforward matter of determining whether Defendant’s actions violate Washington law, and, if so, assessing statutory damages.

43. Typicality. Plaintiff’s claims are typical of the claims of the Class. Plaintiff and the Class members applied for job openings with Defendant that did not disclose the wage scale or salary range being offered.

44. Adequacy. Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff has retained competent and capable attorneys with substantial experience in complex class action litigation. Plaintiff and Plaintiff’s counsel are committed to prosecuting this action vigorously on behalf of the Class and have the financial resources to do so. Neither Plaintiff nor Plaintiff’s counsel have interests that are contrary to or that conflict with those of the Class.

45. Predominance. Defendant has engaged in a common course of conduct of failing to disclose the wage scale or salary range being offered in job postings in violation of RCW

1 49.58.110. The common issues arising from Defendant’s unlawful conduct affect Plaintiff and  
2 Class members and predominate over any individual issues. Adjudication of these common issues  
3 in a single action has the important and desirable advantage of judicial economy.

4 46. Superiority. Plaintiff and the Class have suffered, and will continue to suffer, harm  
5 and damages as a result of Defendant’s unlawful and wrongful conduct. Absent a class action,  
6 however, most Class members would find the cost of litigating their claims prohibitive, especially  
7 when that cost is balanced against each individual’s respective potential award. Class treatment  
8 is superior to multiple individual lawsuits or piecemeal litigation because it conserves judicial  
9 resources, promotes consistency and efficiency of adjudication, provides a forum for claimants  
10 with smaller cases and those with few resources, and deters illegal activities. There will be no  
11 significant difficulty in the management of this case as a class action. The Class members and the  
12 job postings to which they applied are readily identifiable through Defendant’s own records.

13 **VI. CAUSE OF ACTION**

14 **FIRST CAUSE OF ACTION**  
15 **VIOLATION OF RCW 49.58.110**  
16 ***Claim of Relief for Plaintiff and the Class***

17 47. Plaintiff incorporates by reference all foregoing factual allegations and realleges  
18 them as though fully set forth herein.

19 48. As described more fully above, Defendant did not disclose the wage scale or salary  
20 range being offered in its job postings seeking workers for its Washington locations.

21 49. On or after January 1, 2023, Plaintiff and the Class members applied for job  
22 openings with the Defendant where the job postings did not disclose the wage scale or salary  
23 range being offered.

24 50. Defendant’s actions and omissions violate RCW 49.58.110.

25 51. As a result of Defendant’s actions and omissions, Plaintiff and the Class have  
26 experienced economic and non-economic harm.

27 52. Plaintiff and the Class seek statutory damages pursuant to RCW 49.58.070 and  
RCW 49.58.110, as opposed to their actual damages.

1 53. Plaintiff and the Class also seek to recover their costs and reasonable attorneys'  
2 fees.

3 **VII. REQUEST FOR RELIEF**

4 Plaintiff, individually and on behalf of the members of the Class, requests that the Court  
5 enter judgment against Defendant as follows:

6 54. An order certifying that this action be maintained as a class action and appointing  
7 Plaintiff as Class Representative and Plaintiff's counsel as Class Counsel;

8 55. Statutory damages of \$5,000 to Plaintiff and each Class member pursuant to RCW  
9 49.58.070 and RCW 49.58.110;

10 56. Costs and reasonable attorneys' fees pursuant to RCW 49.58.070 and RCW  
11 49.58.110;

12 57. Preliminary and permanent injunctive relief prohibiting, restraining, and enjoining  
13 Defendant from engaging in the conduct complained of herein, including, but not limited to, an  
14 order requiring Defendant to disclose a wage scale or salary range in job postings for jobs located  
15 in Washington;

16 58. Declaratory relief to the effect that Defendant's failure to disclose in each posting  
17 for each Washington job opening the wage scale or salary range violates Washington law;

18 59. Pre- and post-judgment interest;

19 60. Leave to amend the Class Action Complaint to conform to the evidence; and

20 61. Any additional or further relief which the Court deems equitable, appropriate, or  
21 just.

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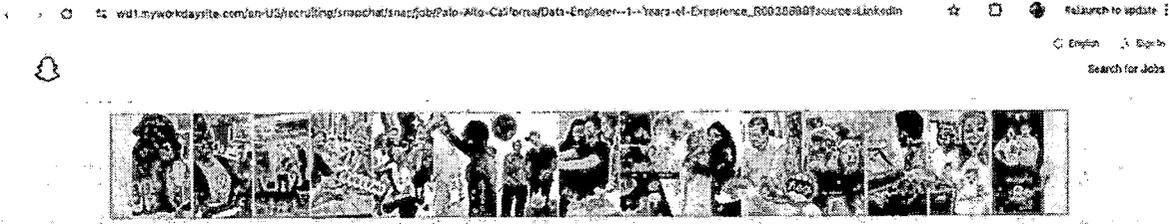
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DATED February 7, 2025

EMERY | REDDY, PLLC

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# EXHIBIT 1



### Data Engineer, 1+ Years of Experience



Palo Alto, California  
Seattle, Washington  
Los Angeles, California

Full time  
Posted 3 Days Ago  
R0028888

Snapchat is a technology company. We believe the camera presents the greatest opportunity to improve the way people live and communicate. Snap contributes to human progress by empowering people to express themselves, live in the moment, learn about the world, and have fun together. The Company's three core products are **Snapchat**, a virtual messaging app that enhances your relationships with friends, family, and the world; **Lens Studio**, an augmented reality platform that powers AR across Snapchat and other services; and its AR glasses, **Spectacles**.

Snapchat's engineering teams build fun and technically sophisticated products that reach hundreds of millions of Snapchatters around the world, every day. We're deeply committed to the well-being of everyone in our global community, which is why **our values** are at the root of everything we do. We move fast, with precision, and always execute with privacy at the forefront.

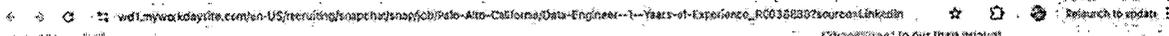
#### About Us



**A Decade of Snap:** Learn about our origin story, values, mission, culture of innovation, and more.

**CitizenSnap:** In our third annual

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### Data Engineer, 1+ Years of Experience



Snapchat's engineering teams build fun and technically sophisticated products that reach hundreds of millions of Snapchatters around the world, every day. We're deeply committed to the well-being of everyone in our global community, which is why **our values** are at the root of everything we do. We move fast, with precision, and always execute with privacy at the forefront.

We're looking for a Data Engineer to join our Decision & Insights Team!

#### What you'll do:

- Work closely with stakeholders in engineering, product, data science, and governance to make high quality datasets available to consumers in a timely manner
- Develop scalable data ETL pipelines that automate manual data processes, optimize data delivery, and adhere with privacy and governance principles
- Implement and manage data warehousing solutions and ensure data integrity and quality through rigorous testing and validation
- Build testing and implement systems to overcome limitations of the data consumption portals when appropriate
- Implement and maintain data security practices to ensure data privacy and protection, and compliance with data governance policies and regulations.

#### Knowledge, Skills & Abilities:

- Experience in building data pipelines to serve reporting needs
- Experience owning all or part of a team roadmap
- Ability to prioritize requests from multiple stakeholders in disparate domains
- Ability to effectively communicate complex projects to non-technical stakeholders

#### Minimum Qualifications:

- BS/BA degree in Computer Science, Math, Physics, or a related field, or equivalent years of

wdl.myworkdayite.com/en-US/recruiting/snapchat/snapchat/job/Palo-Alto-California/Data-Engineer--1--Years-of-Experience\_R003888?source=LinkedIn

### Data Engineer, 1+ Years of Experience

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- BS/BA degree in Computer Science, Math, Physics, or a related field, or equivalent years of experience in a relevant field
- 1+ year experience in SQL or similar languages
- 1+ years development experience in at least one object-oriented or scripting language (Python, Java, Scala, etc)

**Preferred Qualifications:**

- Hands-on experience with Google BigQuery, Spark, and Hadoop
- Experience in version control systems such as Git, and workflow management tools such as Airflow
- Experience in ETL tools and data architecture and warehousing experience
- Experience leading a small team of data or software engineers
- Strong analytical and problem-solving skills
- Excellent communication and teamwork abilities
- Attention to detail and commitment to data quality

If you have a disability or special need that requires accommodation, please don't be shy and provide us some information.

**"Default Together" Policy at Snap:** At Snap Inc, we believe that being together in person helps us build our culture faster, reinforce our values, and serve our community, customers and partners better through dynamic collaboration. To reflect this, we practice a "default together" approach and expect our team members to work in an office 4+ days per week.

At Snap, we believe that having a team of diverse backgrounds and voices working together will enable us to create innovative products that improve the way people live and communicate. Snap is proud to be an equal opportunity employer, and committed to providing employment opportunities regardless of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, pregnancy, childbirth and breastfeeding, age.

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### Data Engineer, 1+ Years of Experience

[Apply](#)

marital status, sex, gender, gender identity, gender expression, pregnancy, childbirth and breastfeeding, age, sexual orientation, military or veteran status, or any other protected classification, in accordance with applicable federal, state, and local laws. EOE, including disability/vets.

**Our Benefits:** Snap Inc. is its own community, so we've got your back! We do our best to make sure you and your loved ones have everything you need to be happy and healthy, on your own terms. Our benefits are built around your needs and include paid parental leave, comprehensive medical coverage, emotional and mental health support programs, and compensation packages that let you share in Snap's long-term success!

**Compensation**  
In the United States, work locations are assigned a pay zone which determines the salary range for the position. The successful candidate's starting pay will be determined based on job-related skills, experience, qualifications, work location, and market conditions. The starting pay may be negotiable within the salary range for the position. These pay zones may be modified in the future.

**Zone A (CA, WA, NYC):**  
The base salary range for this position is \$0-\$0 annually

**Zone B:**  
The base salary range for this position is \$0-\$0 annually

**Zone C:**  
The base salary range for this position is \$0-\$0 annually

This position is eligible for equity in the form of RSUs.

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### Data Engineer, 1+ Years of Experience

Apply

This position is eligible for equity in the form of RSUs.

#### Similar Jobs (1)

- Software Engineer, Android, 1+ Years of Experience**
  - 5 Locations
  - Full time
  - Posted 24 Days Ago

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# EXHIBIT 3

**FILED**  
2025 FEB 07 04:05 PM  
KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE #: 25-2-03854-8 SEA

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR THE COUNTY OF KING**

MILITO	No. 25-2-03854-8 SEA
VS	<b>CASE INFORMATION COVER SHEET AND AREA DESIGNATION</b>
SNAP INC.	(CICS)

**CAUSE OF ACTION**

TTO - Tort /Other

**AREA OF DESIGNATION**

SEA Defined as all King County north of Interstate 90 and including all of Interstate 90 right of way, all of the cities of Seattle, Mercer Island, Issaquah, and North Bend, and all of Vashon and Maury Islands.