

COHELAN KHOURY & SINGER

Michael D. Singer (SBN 115301)

msinger@ckslaw.com

Jeff Geraci (SBN 151519)

jgeraci@ckslaw.com

605 C Street, Suite 200

San Diego, CA 92101

Telephone: (619) 595-3001

Facsimile: (619) 595-3000

LEBE LAW, APLC

Jonathan M. Lebe (SBN 284605)

jon@lebelaw.com

Zachary Gershman (SBN 328004)

zachary@lebelaw.com

777 S. Alameda Street, Second Floor

Los Angeles, CA 90021

Telephone: (213) 444-1973

Attorneys for Plaintiff Julio Ochoa, individually and
on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

JULIO OCHOA, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

SPEECH AND LANGUAGE
DEVELOPMENT CENTER, INC.; and DOES
1 through 25, inclusive

Defendants.

Case No. 30-2020-01143577-CU-OE-CXC

Hon. Lon F. Hurwitz

CLASS ACTION

**DECLARATION OF LISA PAVLIK
REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION**

Hearing Set by Court Order - ROA #194

Date: May 17, 2024

Time: 1:30 p.m.

Dept: CX 103

Judge: Hon. Lon F. Hurwitz

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DECLARATION OF LISA PAVLIK

I, Lisa Pavlik, hereby declare:

1. I am employed as a Project Manager by Simpluris, Inc. (“Simpluris”), the claims administrator in the above-entitled action. Our Corporate Office address is 3194-C Airport Loop Dr., Costa Mesa, CA 92626. My telephone number is (714) 415-2872. I am over twenty-one years of age and authorized to make this declaration on behalf of Simpluris and myself.

2. Simpluris is a Class Action Settlement Administration company located in Costa Mesa, California. It was founded by individuals who have each managed hundreds of settlements, along with professionals in the areas of Software Development, Third-Party Claims Administration, Mail-House Operations, and Call Center Support Management.

3. Simpluris was approved by Counsel for Julio Ochoa (“Plaintiff”), and Speech and Language Development Center, Inc. (“Defendant”), (collectively the “Parties”), to provide settlement administration services in the *Ochoa v Speech and Language Development*. case (“Settlement”). In this capacity, Simpluris was charged with (a) establishing and maintaining a related settlement fund account; (b) establishing and maintaining a calendar of administrative deadlines and responsibilities; (c) processing and mailing payments to the Plaintiff, Class Counsel and Class Members; (d) printing and mailing the Notice of Proposed Class Action Settlement to Class Members; (e) receiving and validating Requests for Exclusion, Objections or Disputes of Work Weeks submitted by Class Members; (f) calculating Employer Payroll Taxes and providing appropriate forms and calculations to Defendant; (g) mailing settlement checks, and (h) other tasks as the Parties mutually agree or the Court orders Simpluris to perform.

TOLL FREE TELEPHONE HELPLINE

4. A toll-free telephone number was included in the Class Notice for the purpose of allowing the Class Members to call Simpluris and to make inquiries regarding the Settlement. The system is accessible 24 hours a day, 7 days a week, and will remain in operation throughout the

1 settlement process. Callers have the option to speak with a live call center representative during normal
2 business hours or to leave a message and receive a return call during non-business hours. Spanish-
3 speaking representatives are available during normal business hours. The toll-free telephone number
4 included in the Notice of Class Action Settlement was (888) 369-3780 and was live on January 10,
5 2024.

6 NOTIFICATION TO THE CLASS

7 5. On December 22, 2023, Simpluris received the Court-approved Notice Class Action
8 Settlement (hereafter “Notice”). The Class Notice advised Class Members of their right to request
9 exclusion from the Settlement, object to the Settlement, dispute workweeks, do nothing, and the
10 implications of each such action. The Class Notice advised Class Members of applicable deadlines and
11 other events, including the Final Approval Hearing, and how Class Members could obtain additional
12 information.

13 6. On February 23, 2023, Defense Counsel provided Simpluris with a mailing list (“Class
14 List”) containing Class Members’ names, most recent mailing address, Social Security numbers and
15 dates of employment for each Class Member during the Class Period. The Class List contained data for
16 two hundred sixty-eight (268) Class Members.

17 7. The mailing addresses contained in the Class List were processed and updated utilizing
18 the National Change of Address Database (“NCOA”) maintained by the U.S. Postal Service. The
19 NCOA contains requested changes of address filed with the U.S. Postal Service. In the event that any
20 individual had filed a U.S. Postal Service change of address request, the address listed with the NCOA
21 would be utilized in connection with the mailing of the Notice Packets.

22 8. On January 10, 2024, Class Notice was mailed to two hundred sixty-eight (268) Class
23 Members with addresses contained in the Class List via First Class mail or updated via the NCOA
24 search. A copy of the Class Notice is attached hereto as **Exhibit A**. The Response Deadline was
25 February 26, 2024.

26 9. If a Class Member’s Notice Packet was returned by the USPS as undeliverable and
27 without a forwarding address, Simpluris performed an advanced address search (i.e. skip trace) on all of
28

1 these addresses by using Accurant, a reputable research tool owned by Lexis-Nexis. Simpluris used the
2 Class Member's name and previous address to locate a current address. Ultimately, six (6) Notice
3 Packets were undeliverable.

4 REQUESTS FOR EXCLUSION, OBJECTIONS AND DISPUTES

5 10. As of this date, Simpluris received one (1) Change of Address Form.

6 11. As of this date, Simpluris has not received any Request for Exclusion from a Class
7 Member.

8 12. As of this date, Simpluris has not received any Objections to the Settlement from Class
9 Members.

10 13. As of this date, Simpluris has not received any Disputes regarding work weeks from
11 Class Members.

12 14. As of this date, Simpluris has received communication from four (4) Self-Identifiers
13 requesting inclusion to the Settlement Class. Simpluris has sent this information for these four (4) Self-
14 Identifiers to the Defense Counsel for the Defendants review. Of these four (4) Self-Identifiers, three
15 (3) are Class Members and one (1) is not a Class Member.

16 CLASS MEMBER AWARDS

17 15. As of this date, there are two hundred seventy-one (271) Class Members who will be
18 paid their portion of the Net Settlement Fund.

19 16. The Net Settlement Fund of \$454,023.54 available to pay Class Members was
20 determined by subtracting the Class Counsel's Fees (\$250,000.00), Class Counsel's Costs Payment
21 (\$9,976.46), Named Plaintiff Service Award (\$5,000.00), the PAGA LWDA Payment (\$18,750.00), the
22 PAGA Class payment (\$6,250.00), and the Administration Costs (\$6,000.00) from the Maximum
23 Settlement Amount (\$750,000.00).

24 17. As of this date, \$454,023.54 of the Net Settlement Fund will be disbursed to the Class
25 Members. The ***average estimated payment*** is \$1,698.43, the ***highest estimated payment*** is \$ 3,380.28,
26 and the ***minimum payment*** is \$24.13.
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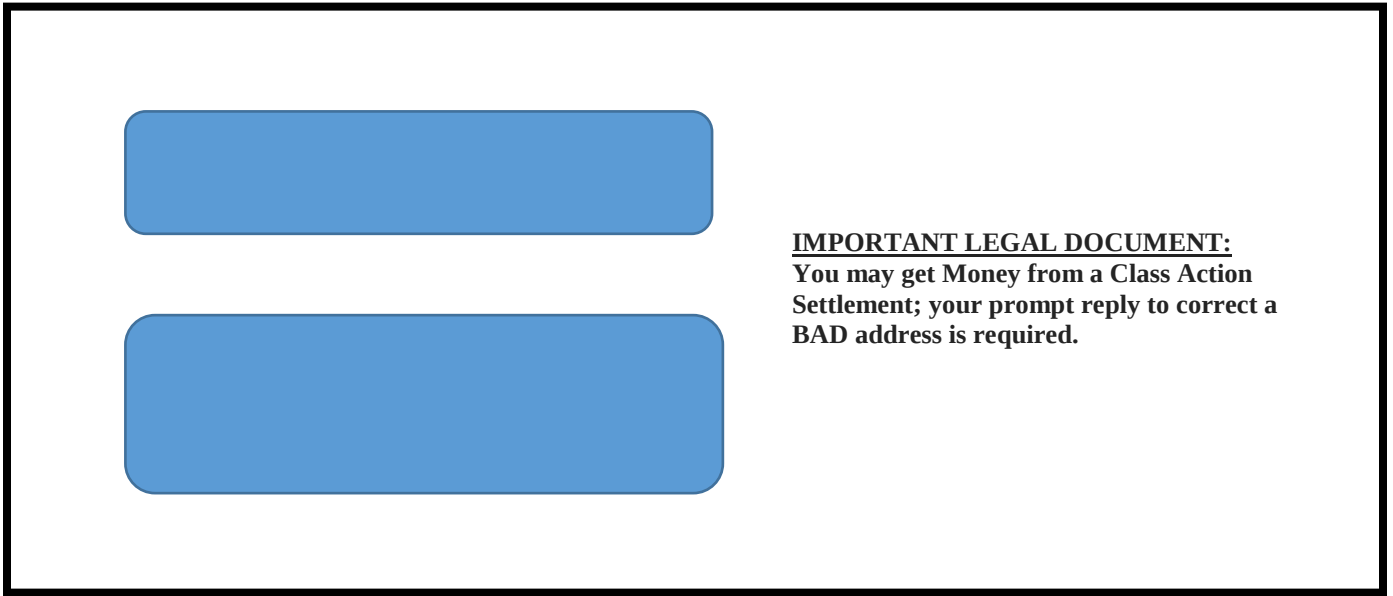
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on this 25th day of April 2024, in Otsego, Minnesota.

LISA PAVLIK

Exhibit A

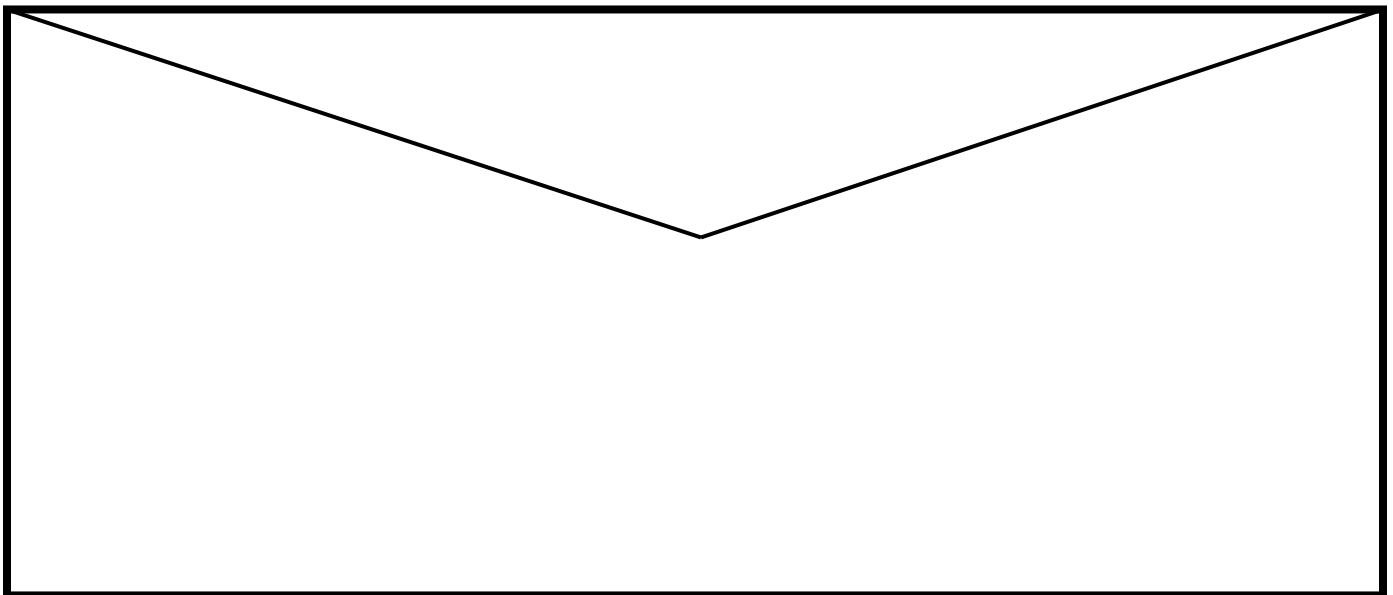
No. 10 Envelope Front



The front of a No. 10 envelope is shown. It features two blue rectangular areas on the left side, one above the other. To the right of these areas, there is a legal notice in bold, italicized text.

IMPORTANT LEGAL DOCUMENT:
You may get Money from a Class Action Settlement; your prompt reply to correct a BAD address is required.

No. 10 Envelope Back



Superior Court of California, County of Orange
Ochoa vs. Speech and Language Development Center, Inc.
Case No. 30-2020-01143577-CU-OE-CXC

NOTICE OF CLASS ACTION SETTLEMENT

To: All non-exempt employees of Speech and Language Development Center, Inc., (“SLDC”) in California at any time from April 6, 2016 through March 13, 2020

«IMailBarcodeEncoded»

«FirstName» «LastName» «BusinessName»

«Address1» «Address2»

«City», «State» «Zip»-«ZipDPC3»

*A court authorized this Notice. This is not a solicitation.
This is not a lawsuit against you and you are not being sued.
However, your legal rights are affected whether you act or don’t act.*

If you are a Class Member, as described above, you are eligible for a payment from the Class Action Settlement. You do not need to return a claim form.

PLEASE READ THIS NOTICE CAREFULLY

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING	To receive your Settlement Payment, you do not have to do anything. Your check will be automatically mailed to you after the Court grants final approval of the Settlement. The amount of your Settlement Payment is shown on page 9 of this Notice. <u>NOTE:</u> You must keep a current address on file with the Settlement Administrator to ensure receipt of your check.
UPDATE YOUR ADDRESS	Update your personal information with the Settlement Administrator to make sure your Settlement Payment is sent to the correct address. (A Change of Address Form and return envelope are enclosed with this Notice.)
EXCLUDE YOURSELF (“Opt Out”)	If you do not wish to participate in the Settlement, you can exclude yourself from the Settlement (that is, to opt out) and retain all rights you may have against SLDC for the Class Claims. However, PAGA does not allow individuals to opt out, so if you opt out, you will still receive your share of the PAGA Payment, and release your PAGA claims.
OBJECT	Write to the Court if you think the Settlement is not fair. You may speak in Court about why you think the Settlement is not fair. <u>NOTE:</u> If you ask to exclude yourself from the Settlement, you cannot also object.

- **THIS NOTICE EXPLAINS YOUR RIGHTS AND THE DEADLINES TO EXERCISE THEM**
- **DEFENDANT SUPPORTS THE SETTLEMENT AND WILL NOT RETALIATE AGAINST ANY CLASS MEMBER FOR EXERCISING THE RIGHTS DESCRIBED IN THIS NOTICE**

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NOTICE OF CLASS ACTION SETTLEMENT
QUESTIONS? CALL TOLL FREE – (888)369-3780

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BASIC INFORMATION

1. **Why did I get this Notice?**

A proposed settlement of a class action lawsuit was reached between Plaintiff Julio Ochoa and Speech and Language Development Center, Inc. (“SLDC”). The Court in charge of this case granted preliminary approval of the Settlement. You received this Notice because you may be a member of the Class, defined as all persons employed by SLDC in California as non-exempt employees any time from April 6, 2016 to March 13, 2020.

This Notice explains the settlement of the class action lawsuit, your legal rights, what benefits are available, who is eligible for them, and how to get them.

2. **What is this Action about?**

The lawsuit is *Ochoa v. Speech and Language Development, Inc.* Case No. 30-2020-01143577-CU-OE-CXC, Superior Court of the State of California, County of Orange. (the “Action”). The Action alleges SLDC did not provide Class Members all wages, rest and meal breaks, all of which caused inaccurate wage statements, and violations of the Private Attorneys General Act (“PAGA”).

SLDC denies all allegations in the Action and contends it complied with California law at all times. Due to the COVID-19 Pandemic, SLDC was shut down by State order on March 13, 2020. Before it re-opened, it received Plaintiff’s notice of alleged violations and took steps to correct the alleged causes of the violations. The Settlement is not an admission of any wrongdoing by SLDC or an indication any law was violated.

3. **Who are the Parties in this Action and the Proposed Class Members?**

Speech and Language Development Center, Inc. (SLDC), a California Corporation, is the Defendant.

Plaintiff Julio Ochoa was employed in California by SLDC as a non-exempt Bus Aid in the Transportation Department from August 2012 to March 2020.

Class Members are defined as all non-exempt employees of SLDC in California at any time from April 6, 2016 through March 13, 2020. There are an estimated 268 members of the Class.

PAGA Members, a subgroup of the Class, are defined as all non-exempt employees of SLDC in California at any time from April 6, 2019 through March 13, 2020. There are an estimated 155 PAGA Members.

4. **Why is this a Class Action?**

In a class action, one or more people called Class Representatives (in this case, Julio Ochoa) sue on behalf of themselves and other people who they allege have similar claims. This group of people is called a “class.” Each person receiving this notice is a “Class Member” for purposes of this Settlement.

5. **Who are the attorneys for the Plaintiff and the Class?**

COHELAN KHOURY & SINGER

Michael D. Singer / Jeff Geraci
605 "C" Street, Suite 200
San Diego, California 92101-5305
Telephone: (619) 595-3001

LEBE LAW, APLC

Jonathan M. Lebe/Zachary Gershman
777 S. Alameda Street, Second Floor
Los Angeles, California 90021
Telephone: (213) 444-1973

6. **Why is there a Settlement?**

The Court did not decide in favor of Plaintiff or SLDC. There was no trial. Both sides agreed to settle the Action to avoid the cost and risks of a trial, and ensure Class Members get compensation from the Settlement.

THE TERMS OF THE SETTLEMENT

7. **What is the Settlement Amount?**

Defendant agreed to pay \$750,000 (the "Gross Settlement Amount"). The Gross Settlement Amount includes all Settlement payments to Class Members and, subject to Court approval: (a) Settlement Administration Expenses not to exceed \$6,000, (b) Class Representative Service Payment up to \$5,000 to compensate Plaintiff for services undertaken on behalf of the Class, (c) Class Counsel Fees up to \$250,000, (d) Class Counsel Litigation Expenses up to \$12,500, (e) up to \$25,000 for civil penalties - \$18,750 (75%) paid to California's Labor Workforce and Development Agency ("LWDA Payment"); and, \$6,250 (25%) paid to Class Members who worked from April 6, 2019 to March 13, 2020.

The exact amount of the attorneys' fees, litigation costs, Class Representative Service Payment, and Settlement administration expenses will be determined by the Court at the Final Approval hearing. The remaining portion of the Settlement, the "Net Settlement," estimated at \$451,500, will be apportioned and paid to Class Members who do not request to be excluded from the Settlement, ("Participating Class Members"). **Claim forms are not required.** Participating Class Members will receive a proportionate share of the Net Settlement Amount based on the number of Workweeks worked from April 6, 2016 to March 13, 2020. PAGA Members will receive a proportionate share of the \$6,250 (25% of \$25,000) PAGA Payment based on the number of pay periods worked from April 6, 2019 to March 13, 2020.

8. **How much will my Individual Settlement Payment be?**

The estimated amount of your Settlement Payment is shown on the Employment Information Sheet (Page 9). This is an estimate. The actual amount may be more or less depending on whether other Class Members opt out of the Settlement and how much the Court approves in attorneys' fees, litigation expenses, and other costs.

HOW TO GET A PAYMENT

9. **How can I get my Individual Settlement Payment?**

If you do nothing, you will automatically receive your Individual Settlement Payment if the Court approves the Settlement. You must, however, notify the Settlement Administrator of any change in your name or mailing address if the name, or address to which this Notice was mailed, is not correct. **It is your responsibility to keep the Settlement Administrator informed of any change in your mailing address. Your Settlement Payment will be mailed to the last known address it has on file for you.** You may call the Settlement Administrator at (888)369-3780. You may also contact attorneys for the Class. (See Paragraph 5).

10. **What do I do if I think my information or Number of Work Weeks is wrong?**

The amount of your Settlement Payment is based on the number of Workweeks you worked from April 6, 2016 to March 13, 2020. If you are a PAGA Member, your share of penalties will be based on the number of Pay Periods you worked from April 6, 2019 to March 13, 2020. The number of Workweeks and Pay Periods shown on the Employment Information Sheet (on page

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**NOTICE OF CLASS ACTION SETTLEMENT
QUESTIONS? CALL TOLL FREE – (888)369-3780**

9), was obtained from SLDC's records. If you dispute the information your Settlement Payment is based on, you must return a written statement of the reasons you believe it is not correct, with any supporting documents you have, to the Settlement Administrator no later than **February 26, 2024**. You should include any documents or other information supporting your belief the information in the Employment Information Sheet is not correct. Your written dispute should be signed by you, and include the case name, and case number, *Ochoa v. Speech and Language Development Center*, Case No. 30-2020-011443577-CU-OE-CXC. The Settlement Administrator will resolve disputes about the number of Workweeks based on SLDC's records, and any information you provide, subject to review by the Court. \

11. When can I expect to receive my Individual Settlement Payment?

If you do not exclude yourself from the Settlement, and there are no objections submitted, your share of the Settlement will be mailed to you about 30 days after the Court grants final approval of the Settlement and enters judgment. ***Your share of the Settlement will be mailed to the address the Administrator has on file for you, which is the address where this Notice was mailed.*** If this address is not right, or if you move after you receive this Notice, you must inform the Settlement Administrator.

The Individual Settlement Payment will be characterized as 10% wages for which an IRS W-2 Form will be issued, and 45% penalties and 45% interest for which IRS 1099 Forms will be issued. Nothing in this Notice is advice about taxes or taxability. Each Participating Class Member may want to consult a tax advisor about the consequence of the Settlement payments.

12. What am I giving up to get an Individual Settlement Payment?

After the Court approves the Settlement, unless you exclude yourself, you are staying in the Class and can't sue, continue to sue, or be part of any other lawsuit against Defendants concerning the legal issues in this Action. You will be bound by the judgment in this Action and you will "give up" or release these claims:

Released Claims: As of the date the Judgment becomes Final, all Participating Class Members will fully and finally release Defendant and the Released Parties from all claims or causes of action of any kind alleged in the Complaint, for (1) failure to pay minimum, regular, and overtime wages, (2) rest period violations, (3) meal period violations, (4) inaccurate wage statement violations, (5) failure to pay final wages, and (6) unfair business practices. The release of these claims shall be effective from April 6, 2016 through March 13, 2020 ("Released Class Claims"). PAGA Members will release claims for PAGA civil penalties for failure to provide all wages, meal periods, rest periods, accurate wage statements, and final wages from April 6, 2019 to March 13, 2020, ("Released PAGA Claims") whether or not they submit a Request for Exclusion.

EXCLUDING YOURSELF FROM THE SETTLEMENT

13. How do I get out of the Settlement?

If you do not want to participate in the Settlement for any reason, you may request to be excluded from the Settlement ("to opt out"). **If you opt out, you will not receive a Settlement Share payment,** and you will not be bound by the terms of the Settlement.

To opt out, you must complete and return the Request for Exclusion Form included with this Notice, or submit your own written, signed and dated Request for Exclusion, postmarked no later than **February 26, 2024** to the Settlement Administrator:

Speech and Language Development Center Class Action Settlement Administrator
P.O. Box 26170
Santa Ana, CA 92799

The Request for Exclusion Form must include your full name, signature, last four digits of your social security number for verification purposes, and be dated. If you choose to submit your own Request for Exclusion, it must state in substance: "I want to be excluded from the Class in the *Ochoa v. Speech and Language Development Center* lawsuit, Case No. 30-2020-011443577-CU-OE-CXC. I understand by asking to be excluded, I will not receive a Settlement Share payment from the Settlement." The request must state your full name, address, last four digits of your social security number for verification purposes, and it must be signed by you.

Opt out requests postmarked after **February 26, 2024** or that are incomplete or unsigned will be rejected, and you will remain bound by the Settlement, the Released Class Claims, and you will receive your Settlement Share payments.

If you Opt out of the Settlement, and worked anytime from April 6, 2019 through March 13, 2020, you will still receive a share of PAGA Penalties based on the number of Pay Period worked during that time, and will release PAGA claims.

14. If I don't opt out of the Settlement, can I sue SLDC for the same thing later?

No. Unless you exclude yourself from this Action, you give up any right to sue SLDC for the claims settled in this Lawsuit. ***If you have a claim or lawsuit already against SLDC, speak to your lawyer in that case immediately.*** You must ask to exclude yourself from the Settlement, Opt Out, to continue your own lawsuit.

15. If I opt out, can I get money from this Settlement?

No. If you Opt Out of the settlement, you will not receive an Individual Settlement Payment. Your payment will go to Participating Class Members. But you may receive a share of the PAGA Penalties if you worked between April 6, 2019 and March 13, 2020.

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I don't like the Settlement?

If you have not returned an opt out request and believe the Settlement should not be finally approved by the Court, you may object to any Settlement term either in person or in writing by completing and returning the enclosed Objection Form. The Objection Form must include your name, current mailing address, telephone number, last four digits of your social security number for verification purposes, reason(s) for objecting, and be dated. Include any documents to which support your objection.

You may also submit your own written objection. All written objections must state your name, current address, telephone number, last four digits of your social security number for verification purposes, the reason(s) for the objection, and the name and number of the case, *Ochoa vs. Speech and Language Development Center, Inc.*, Case No. 30-2020-01143577-CU-OE-CXC. Include any documents which support your objection.

The written objection must be mailed to the Administrator on or before **February 26, 2024**. The Administrator's mailing address and toll-free number are shown on the last page of this Notice.

You, or a lawyer at your expense, may also appear in person to discuss any objection with the Court, even if you have not submitted a written objection. The Final Approval Hearing is set for May 17, 2024 at 1:30 p.m. in Dept. CX103 of the Superior Court of California, County of Orange to discuss your objections with the Court. The Court is located at 751 West Santa Ana Blvd., Santa Ana, California 92701.

If you wish to preserve your right to appeal if your valid objection is denied, you, or a lawyer on your behalf, must file formal papers with the Court intervening in the Action, before a final judgment is entered.

17. What's the difference between objecting and opting out of the Settlement?

Objecting is telling the Court you don't like something about the Settlement. You may object only if you stay in the Class. Requesting to be excluded, opting out, is telling the Court you don't want to be part of the Class or the Settlement. If you opt out, you have no basis to object because the case no longer affects you.

If you remain in the Class and object to the Settlement, the Court will consider your objections when deciding whether to grant final approval to the Settlement. If you have submitted a timely written objection, you do not need to appear to discuss the objection with the Court.

THE COURT'S FINAL FAIRNESS HEARING

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NOTICE OF CLASS ACTION SETTLEMENT
QUESTIONS? CALL TOLL FREE – (888)369-3780

18. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing in Department CX103 of the Superior Court of California, County of Orange, located at 751 West Santa Ana Blvd., Santa Ana, California 92701 on May 17, 2024 at 1:30 p.m. The Court will determine whether the Settlement is fair, reasonable, and adequate. The Court will also be asked to approve Class Counsel's request for attorneys' fees and reimbursement of litigation costs, the Class Representative Service payment, and the Settlement Administrator's fees and expenses.

The Court may reschedule the Final Approval Hearing without further notice to Class Members. However, any Class Member who has submitted a written objection will be notified by Class Counsel of any rescheduling of the date and time of the Final Approval hearing. Should the Court grant Final Approval of the Settlement and Enter Judgment, the Court's Order approving the Settlement and the Judgment may be viewed on the Administrator's website, www.simpluris.com/case-search/.

19. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Judge may have. If you send an objection, you do not need to come to Court. If you mailed a written objection (Paragraph 16), the Court will consider it. You or your own lawyer, at your own expense, may also come to the hearing and discuss your objections with the Court.

20. May I appear and speak at the hearing?

Yes, but you cannot speak at the hearing if you have opted out of the Settlement.

GETTING MORE INFORMATION

21. Who can I contact if I have questions about the Settlement?

This Notice is only a summary of the case and the Settlement. For more detailed information, you may view a complete copy of the settlement agreement, and any of the papers filed in the Action, at the Filing Department of the Superior Court of California, County of Orange located at 700 W. Civic Center Drive, Santa Ana, California, 92702 during regular Court hours, from 8:00 a.m. to 4:00 p.m., Monday through Friday, excluding Court Holidays.

You may also examine case records on the Court's website, <https://civilwebshopping.occourts.org/Search.do#searchAnchor>, by clicking on "Online Services," "Case Access," "Civil Case & Documents Access." Once you've read the Court's "Information Disclaimer" and clicked "Accept Terms," type case number "01143577" and year field "2020," confirm you are not a robot and click "search." The documents filed in this case are listed in the Register of Actions, many may be available to view at a minimal charge.

You may also contact the attorneys for the Plaintiff and the Class at the contact information listed above in Paragraph 5 if you have any questions about the Settlement. You may also contact the Settlement Administrator by calling toll free at [\(888\)369-3780](tel:(888)369-3780) or by writing to the Administrator at the address in Paragraph 13.

PLEASE DO NOT CONTACT THE CLERK OF THE COURT, THE JUDGE, OR THE DEFENDANT, ITS SUPERVISORS, OR ATTORNEYS ABOUT THIS SETTLEMENT

ADDITIONAL IMPORTANT INFORMATION

A. **SLDC supports the Settlement** and will not retaliate in any manner against any Class Member who stays in the Class and receives an Individual Settlement Payment or requests to opt out of the Settlement.

B. **It is your responsibility to ensure the Settlement Administrator** has your current mailing address and telephone number on file. This will be the address Individual Settlement Payment checks will be mailed.

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NOTICE OF CLASS ACTION SETTLEMENT
QUESTIONS? CALL TOLL FREE – (888)369-3780

C. **Settlement Payment checks must be cashed soon after receipt.** Checks not cashed after 180 days of the date of issuance will be forwarded to California's State Controller, Unclaimed Property Division for further handling on behalf of the Class Member whose check was voided. If your check is lost or misplaced, immediately contact the Settlement Administrator and request a replacement.

D. **Administrator's Address and Toll-Free Number**

Speech and Language Development Center Class Action Administrator
P.O. Box 26170
Santa Ana, CA 92799
Toll free: (888)369-3780

Superior Court of California, County of Orange
Ochoa vs. Speech and Language Development Center, Inc.
Case No. 30-2020-01143577-CU-OE-CXC

EMPLOYMENT INFORMATION SHEET

Class Member's Address on File with the Settlement Administrator:

Name: «FirstName» «LastName»
Address: «Address1» «Address2»
City, State, Zip Code: «City», «State» «Zip»-«ZipDPC3»

-
- The number of Workweeks you worked from April 6, 2016 through March 13, 2020, according to SLDC's records is «MERGED_WW».
 - The number of Pay Periods you worked from April 6, 2019 through March 13, 2020, according to SLDC's records is «MERGED_PayPeriods».

Based on the information above, it is estimated that if you do not opt out of the Settlement, you will receive an estimated \$«MERGED_EstSettAmnt_CALC», less applicable payroll taxes. The amount shown is an estimate. The actual amount you receive may be more or less than the estimate shown.

You do not have to take any action to receive your share of the Settlement. Your share of the Settlement will be mailed to you at the address shown above.

Page 8 of 9
NOTICE OF CLASS ACTION SETTLEMENT
QUESTIONS? CALL TOLL FREE – (888)369-3780

If your address has changed, or is different than the address shown above, you must notify the Settlement Administrator by returning the enclosed Change of Address Form to receive your Settlement Payment. You may also contact attorneys for Plaintiff and the Class, Cohelan Khoury & Singer at (619) 595-3001.

Please Note: On receipt of your Settlement Payment, it is highly recommended that it be deposited or cashed without delay. The check will be voided after 180 days and funds represented by uncashed checks will be forwarded to California's Secretary of State, Controller, Unclaimed Property Division for further handling.

OBJECTION FORM

MAIL TO:

Speech and Language Development Center Class Action Administrator

P.O. Box 26170

Santa Ana, CA 92799

Telephone: (888)369-3780

**ONLY SUBMIT THIS FORM IF YOU
OBJECT TO THE CLASS SETTLEMENT**

Please provide the following information:

Name: _____

Mailing Address: _____

Telephone: _____

Reasons for Objection: _____

Last 4 Digits of Social Security Number: _____

Signature: _____

ONLY SUBMIT THIS FORM IF YOU WANT TO FILE AN OBJECTION TO THE SETTLEMENT. INCLUDE ANY PAPERS UPON WHICH YOUR OBJECTION IS BASED.

YOU CAN ONLY OBJECT TO THE CLASS SETTLEMENT IF YOU DO NOT REQUEST EXCLUSION FROM THE CLASS SETTLEMENT.

IF YOU WANT TO OBJECT TO THE SETTLEMENT IN WRITING, YOUR OBJECTION SHOULD BE POSTMARKED ON OR BEFORE **FEBRUARY 26, 2024**, AND MAILED TO THE FOLLOWING MAILING ADDRESS:

Speech and Language Development Center Class Action Administrator

P.O. Box 26170

Santa Ana, CA 92799

Telephone: (888)369-3780

Superior Court of California, County of Orange
Ochoa vs. Speech and Language Development Center, Inc.
Case No. 30-2020-01143577-CU-OE-CXC

CHANGE OF ADDRESS FORM

I want to change my name or mailing address or other contact information to the following:

Name: _____

Former Name (if applicable): _____

Street and Apt. No., if any: _____

City, State, and Zip Code: _____

Telephone(s): (Home): _____; (Cell): _____

Email: _____

I understand all future correspondence in this Action, including important notices or Settlement Payments, will be sent to the address listed above and not to the address I previously used. I request the use of the address listed above for these purposes.

Submitted by:

DATED: _____, 2024

Print Name: _____

Signature: _____

**PLEASE RETURN THIS FORM IN THE ENVELOPE PROVIDED
OR VIA UNITED STATES FIRST-CLASS MAIL TO:**

Speech and Language Development Center Class Action Administrator
P.O. Box 26170
Santa Ana, CA 92799
Telephone: (888)369-3780

REQUEST FOR EXCLUSION FORM

MAIL TO:

Speech and Language Development Center Class Action Administrator
P.O. Box 26170
Santa Ana, CA 92799
(888)369-3780

COMPLETE THIS FORM **ONLY IF** YOU WISH TO EXCLUDE YOURSELF FROM THE NON-PAGA SETTLEMENT CLASS. IF YOU EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS, YOU **WILL NOT** RECEIVE YOUR INDIVIDUAL CLASS SETTLEMENT PAYMENT FROM THE NON-PAGA CLASS SETTLEMENT.

I, _____, request to be excluded from the Settlement Class in the matter of *Ochoa vs. Speech and Language Development Center, Inc.*, Orange County Superior Court, Case No. 30-2020-01143577-CU-OE-CXC. I understand that, by submitting this Request for Exclusion Form, I will no longer be eligible for a payment from the settlement (except for the PAGA Payment if I am also a PAGA Member).

Sign your name here

Date

Print your name here

Last 4 Digits of Social Security Number

IF YOU WISH TO BE EXCLUDED FROM THE CLASS SETTLEMENT (AND NOT RECEIVE AN INDIVIDUAL CLASS SETTLEMENT PAYMENT), YOU MUST MAIL THIS REQUEST FOR EXCLUSION FORM BY **FEBRUARY 26, 2024** TO THE FOLLOWING ADDRESS:

Speech and Language Development Center Class Action Administrator
P.O. Box 26170
Santa Ana, CA 92799
(888)369-3780

No. 9 Envelope Front



No. 9 Envelope Back

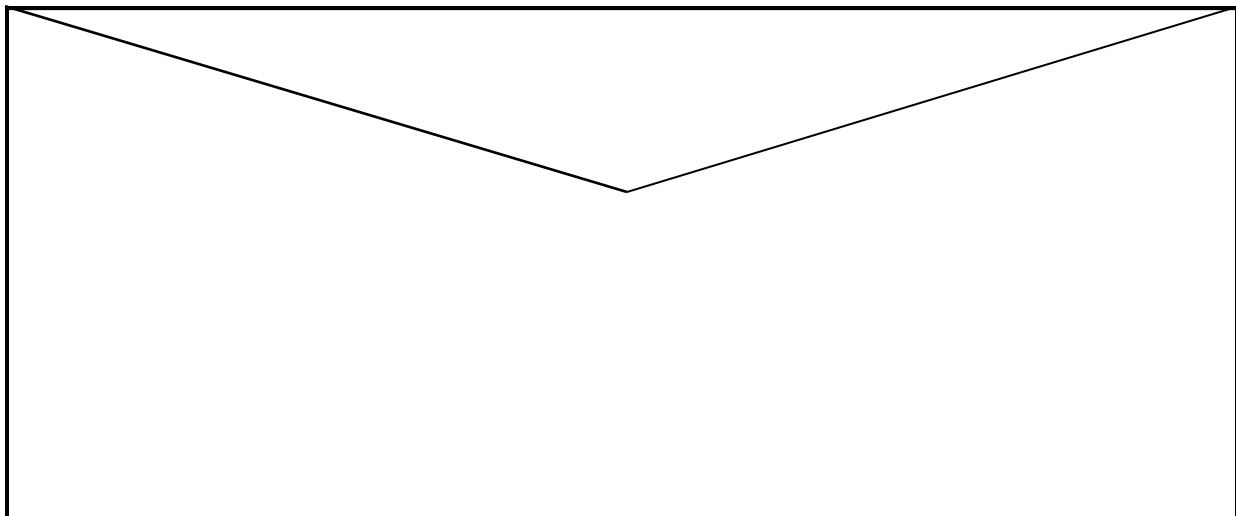


Exhibit B



Simpluris, Inc.
3194-C Airport Loop Drive
Costa Mesa, CA 92626
(714) 640-5614
www.simpluris.com

BILL TO

SpeechLanguageDevelopmentCenter_Ochoa_OptOut
CA

CASE INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
24014	01/11/2024	\$6,000.00	12/31/2024	Special	

BID NUMBER

13350

ACTIVITY	DESCRIPTION	RATE	QTY	AMOUNT
Fixed Bid (D)	Case Name: Ochoa v Speech and Language Development	5,763.17	1	5,763.17
Postage (D)	Postage Cost	236.83	1	236.83

Thank you for your business!

BALANCE DUE

\$6,000.00

Please make checks payable to Simpluris, Inc.

Attention: Accounts Receivable

Accounting@simpluris.com

Accounting: (714) 640-5614

We also accept payment by Credit Card, Wire Transfer, or
ACH - please contact us for further details.