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Attorneys for Plaintiff and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

MATTHEW MILLER as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

STANBRIDGE UNIVERSITY, a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 30-2021-01206298-CU-OE-CXC

(Assigned for all purposes to the Hon. William
Claster, Dept. CX 104)

**DECLARATION OF MATTHEW MILLER
IN SUPPORT OF PLAINTIFF'S MOTION
TO APPROVE SETTLEMENT
AGREEMENT PURSUANT TO THE
PRIVATE ATTORNEYS GENERAL ACT**

Date: July 22, 2022

Time: 9:00 a.m.

Dept.: CX104

Reservation No.: 73787090

Complaint Filed: June 17, 2021

Trial Date: None

DECLARATION OF MATTHEW MILLER

I, Matthew Miller, declare as follows:

1. I am an individual over the age of 18. I am the named Plaintiff in the above-referenced action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I worked for Defendant Stanbridge University ("Defendant") from about September 2020, until about April 2, 2021. I worked as an hourly, non-exempt employee.

3. During my employment, I was paid wages via direct deposit. Each time I was paid wages, a \$1.00 fee was deducted from my wages. This charge was identified as "Direct Deposit" on my wage statements. Defendant did not reimburse me for the costs of electing to receive my wages through direct deposit. As a result of this charge, I did not receive all wages owed to me.

4. In addition, it is my understanding that the wage statements I received did not accurately reflect the correct deductions taken and net wages earned.

5. I do not believe I have any interests that are adverse to the other employees that are part of the PAGA settlement.

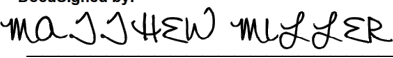
6. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of the Defendant's company practices. I met with my attorneys to discuss this case and the facts involved, responded to questions, and provided documents.

7. I also executed a general waiver of any and all claims, known and unknown, including a waiver of California Civil Code § 1542, which I understand was not required of other employees.

8. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people will benefit because of the actions that I have taken.

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

Executed on this 06/06/2022 day of June 2022, at Mission Viejo, California.

DocuSigned by:

Matthew Miller