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11 LAGUNA COLLEGE OF ART AND DESIGN

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9 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

10 **COUNTY OF ORANGE**

11  
12 **LARISSA MARANTZ and MORGHAN**  
13 **GILL**, individually and on behalf of all others  
14 similarly situated,

15 Plaintiffs,

16 vs.

17 **LAGUNA COLLEGE OF ART AND**  
18 **DESIGN**, a California Non-Profit Corporation,

19 Defendant.  
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CASE NO. 30-2021-01194814-CU-OE-CXC

**DECLARATION OF LEILA NOURANI IN  
SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT**

Date: September 22, 2022

Time: 9:00 a.m.

Dept. CX104

1 I, Leila Nourani, hereby declare and state as follows:

2 1. I am an attorney duly licensed to practice before this Court. I am a partner with the law  
3 firm Jackson Lewis, LLP, counsel of record for Laguna College of Art and Design, ("LCAD"). I make  
4 this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement.

5 2. I if called as a witness I could and would testify competently and truthfully to the facts  
6 asserted in this declaration.

7 3. I am not aware of any class, representative, or individual action in any other court or in  
8 pre-filing LWDA stage, that may be affected by the Settlement of this action. I have inquired with the  
9 other attorneys at my firm and they are not aware of any such action(s). I have also spoken with Agnes  
10 Sanchez, LCAD's Director of Human Resources, , who would know whether any such actions exist, and  
she is also unaware of any such action(s).

11 4. I have also inquired with Ms. Sanchez, who is familiar with the general demographic of  
12 the proposed Classes, regarding the need to translate the Notice into any other language besides English.  
13 Ms. Sanchez has confirmed that all members of both classes are adults, with education levels varying  
14 from high school diplomas to graduate and professional degrees. Ms. Sanchez has also confirmed that all  
15 class members are literate in, and proficient speakers, of English, and able to read and understand various  
16 forms and other business documents in use at LCAD which are in English. There is therefore no need to  
provide Notice to the Classes in any language other than English.

17 Dated: September 13, 2022

18 JACKSON LEWIS P.C.

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20 By:   
21 Leila Nourani  
22 Buck Haddix  
23 JACKSON LEWIS P.C.  
24 Attorneys for Defendant  
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