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Private Attorney General Representative*

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

JOHN WALDREP, in his capacity as Private
Attorney General Representative,

Plaintiff,

v.

CAMBLY INC.,

Defendant.

Case No. 34-2022-00314360-CU-OE-GDS

*Assigned for all purposes to:
Hon. Lauri A. Damrell, Dept. 22*

**DECLARATION OF JON WALDREP IN
SUPPORT OF PLAINTIFF'S REVISED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Operative Complaint: March 3, 2025
Trial Date: None Set

1 I, Jon Waldrep, hereby declare as follows:

2 1. I have personal knowledge of the facts set forth in this declaration.

3 2. I worked as an online English as a Second Language (“ESL”) teacher for Cambly
4 Inc. (“Cambly”) in Sacramento, California from approximately March 2020 to May 2022.

5 3. I served as the sole lead plaintiff in this class action, *Waldrep v. Cambly Inc.*,
6 Sacramento Super. Ct., Case No. 34-2022-00314360-CU-OE-GDS. The claims in this class case
7 are now being settled as part of a combined class-wide and PAGA settlement.

8 4. I decided to bring the class case because I believe that Cambly misclassified
9 teachers like me as independent contractors in order to avoid paying for things like minimum
10 wages, overtime, and expense reimbursement for equipment necessary to perform my work such
11 as a computer and internet connection, as well as other things that employees were typically
12 entitled to in California.

13 5. For example, prior to bringing this class case I specifically realized that the rate
14 that teachers like me were being paid was far less than California’s minimum wage. I wanted to
15 make sure that California-based teachers like me are justly compensated through this class action
16 suit.

17 6. As part of my role as a class representative, I have felt that it is my duty to
18 support this case in any way that I can. I have researched many of the issues that face
19 misclassified “gig economy” workers on my own so that I can better understand the technical
20 aspects of my case and how it relates to all of the recent changes in the independent contractor
21 misclassification laws in California.

22 7. Through my participation in this case, I provided my attorneys with information
23 relating to my work for Cambly, including how Cambly’s proprietary teaching platform works,
24 its pay practices, and its control over teachers’ day-to-day work.

25 8. For example, I provided valuable information about Cambly’s policies and
26 procedures that all teachers must adhere to, such as the requirement that teachers use the Cambly
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platform to either schedule tutoring sessions with repeat students or else wait for an on-demand student to log on, as well as information about Cambly's rate of pay (17 cents per minute).

9. In addition to providing my attorneys with information regarding my work for Cambly, I also spoke and corresponded regularly with my attorneys and their staff about the case and the settlement negotiations. While litigation and settlement discussions were ongoing, I estimate that I spoke or corresponded with my attorneys two to four times per week.

10. Early in the case, I participated in discovery by producing documents, including screenshots of Cambly's proprietary platform and my account information, attestations from my students stating that I was a good tutor, documentation regarding my internet usage and costs, verification of the hours that I worked, and receipts showing the pay that I received.

11. During the mediation, I was in constant contact with my attorneys and provided further documentation and information in response to requests from the mediator and opposing counsel, such as screenshots showing my current rating on the Cambly platform and the total number of tutoring sessions I completed, my performance/discipline history and additional information regarding my pay.

12. After mediation, I played an active role in understanding the terms of the settlement and what it meant for other California Cambly teachers who will benefit from it.

13. I estimate that I cumulatively spent at least 100 hours in total conducting research for the case, corresponding with my attorneys and their staff regarding the case, the mediation, and settlement negotiations with Cambly, and producing and gathering documents in support of the litigation and mediation.

14. From the beginning, I have known that this class action would have my name on it, and I have been concerned about how this might affect prospects with future employers. This is a risk that I have been willing to take because I think that it is important that Cambly answer for its misclassification of teachers on a class-wide basis.

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

3 Executed on July 24, 2025, in Sacramento, California.

4 *Jon Waldrep*

5 Jon Waldrep (Jul 24, 2025 12:52:07 PDT)

6 Jon Waldrep