

Larry W. Lee (State Bar No. 228175)
 Kristen M. Agnew (State Bar No. 247656)
 Nicholas Rosenthal (State Bar No. 268297)
DIVERSITY LAW GROUP, P.C.
 515 S. Figueroa St., Suite 1250
 Los Angeles, California 90071
 (213) 488-6555
 (213) 488-6554 facsimile
 lwlee@diversitylaw.com
 kagnew@diversitylaw.com
 nrosenthal@diversitylaw.com

William L. Marder (SBN 170131)
 bill@polarislawgroup.com
POLARIS LAW GROUP
 501 San Benito Street, Suite 200
 Hollister, CA 95023
 Telephone: (831) 531-4214
 Facsimile: (831) 634-0333

Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SAN JOAQUIN**

ANISHA WISE, individually and on behalf of all
 others similarly situated,

Plaintiff,

vs.

LA PETITE ACADEMY, INC., a Delaware
 corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. STK-CV-UOE-2021-10461

(Assigned for all purposes to the Hon. Erin Guy
 Castillo, Dept. 10B)

**DECLARATION OF ANISHA WISE IN
 SUPPORT OF PLAINTIFF'S MOTION FOR
 FINAL APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: November 14, 2022
 Time: 9:00 a.m.
 Dept.: 10B

Complaint Filed: November 9, 2021
 FAC Filed: May 2, 2022
 Trial Date: None Set

DECLARATION OF ANISHA WISE

I, Anisha Wise, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference 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 was employed by Defendant La Petite Academy, Inc. ("Defendant") as a teacher from about 2018 until on or about September 29, 2021. I worked as a non-exempt, hourly employee.

3. During my employment, the wage statements I received from Defendant did not accurately identify all hourly rates of pay and the total number of hours worked. When the hours shown on the wage statement are added up, they do not appear to equal the actual total hours worked.

4. Prior to and subsequent to the filing of this lawsuit, I met with and regularly conferred with my attorneys to discuss the status of the case, provide information and documents to my attorneys, and assist my attorneys in gathering evidence to support the class claims.

5. Throughout this case, I have been kept apprised of the status of this case.

6. I understand that this action was brought on behalf of other similarly situated employees of Defendant in the State of California, and thus I am acting as a representative for the Class. As the class representative, I understand that it is my responsibility to act in the Class's best interest and not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

7. I have and continue to be willing to assist in the investigation of this matter as well as make myself available for trial or any further proceeding in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed class and will carry out those duties as necessary. I have actively participated in this litigation in numerous ways: I have communicated with my attorneys regularly both to keep apprised of the status as well as provide them with information. I have searched for and provided documents needed by my attorneys. I have reviewed case documents. I have provided declarations as needed. In total, I have spent approximately 45 hours in the prosecution of this case.

1 8. I have discussed the terms of the settlement with my attorneys, and based on the
2 information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for
3 the entire Class.

4 9. I am aware and have been aware from the inception of the case, that there is the risk
5 that if I do not win my case, then I could be liable for Defendant's litigation fees and costs. I also
6 understand that filing a case on my own behalf could have involved fewer costs and resolved faster
7 than filing a class action. I accepted that risk in this case.

8 10. I also understood that filing this lawsuit is a public record and I accepted that burden.
9 As such, I risked my future employment in order to bring this action. Moreover, this lawsuit, which is
10 a public record, is something that potential employers can look into, and which may cause a negative
11 impact of my employment prospects.

12 11. I understand that because of my actions, many others have benefited by this case. I feel
13 that I took upon myself the risk of this lawsuit and achieved a result for my other former co-workers
14 who did not have to file suit.

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

17 Executed on this 12th day of October 2022, at Antioch, California.

18 DocuSigned by:

19 Anisha Wise

20 Anisha Wise
21 71855929107406