

JULIAN HAMMOND (SBN 268489)  
jhammond@hammondlawpc.com  
POLINA BRANDLER (SBN 269086)  
pbrandler@hammondlawpc.com  
ARI CHERNIAK (SBN 290071)  
acherniak@hammondlaw.com  
HAMMONDLAW, P.C.  
1201 Pacific Avenue, Suite 600  
Tacoma, WA 98402  
Tel.: (310) 601-6766  
Fax: (310) 295-2385

*Attorneys for Plaintiff and the Putative Classes*

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

**COUNTY OF SACRAMENTO**

**CHRISTOPHER PAHL** and **KELLY LESLIE**,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

**CEC EMPLOYEE GROUP, LLC**, a Delaware  
Limited Liability Company, **COLORADO**  
**TECHNICAL UNIVERSITY, INC.**, a  
Colorado Corporation, **AMERICAN**  
**INTERCONTINENTAL UNIVERSITY**  
**SYSTEM, INC.**, a Georgia Corporation,  
**TRIDENT UNIVERSITY**  
**INTERNATIONAL, LLC**, a Delaware  
Corporation, **AMERICAN**  
**INTERCONTINENTAL UNIVERSITY, INC.**,  
a Georgia Corporation, and **CALIFORNIA**  
**SOUTHERN UNIVERSITY**,

Defendants.

CASE NO. 34-2022-00322588

**DECLARATION OF KELLY LESLIE IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

Date: February 9, 2024  
Time: 9:00 a.m.  
Hon. Lauri Damrell

1 I, Kelly Leslie, declare as follows:

2 1. I am a named Plaintiff and putative Class Representative in this matter. I am over 18 years  
3 of age. I have personal knowledge of the following facts and could and would testify competently to  
4 them.

5 2. I was employed as an adjunct instructor by Colorado Technical University ("CTU") from  
6 approximately October 2014 until June 2022, when CTU stopped scheduling me to teach courses. After  
7 that happened, I spoke to Human Resources, and was told that CTU was no longer offering courses to  
8 any California instructors. I had stellar performance reviews and felt that it was unfair for CTU to  
9 abruptly stop employing me and other instructors, and I started looking for an attorney for advice. In  
10 September 2022, I found out about this lawsuit, and reached out to HammondLaw to discuss my potential  
11 claims against CTU. During our first call, I discussed CTU's termination of its California workforce, as  
12 well as details of how CTU paid me when I taught for them, the work I did outside of my courses, and  
13 how much time I spent doing that work.

14 3. During our call, my attorneys asked me to gather my wage statements, contracts, and other  
15 relevant documents and share these documents with them. I promptly searched through my records,  
16 emails, and information on my CTU employee portal, and gathered copies of my course assignments  
17 from 2022, all of the paystubs that I had received in 2022, and other documents detailing CTU's  
18 scheduling policies and pay structure. I also signed a personnel file request so my attorneys could obtain  
19 my personnel file. Altogether, I spent approximately 10 hours discussing my claims with my attorneys  
20 and gathering documents.

21 4. In September 2022, my attorneys sent me a draft Amended PAGA Notice adding me as a  
22 PAGA representative. I spent approximately 30 minutes reviewing the PAGA Notice, providing  
23 feedback and discussing it with my attorneys before approving it for filing.

24 5. I maintained regular and frequent contact with my attorneys throughout the case. I  
25 calendared all of the case deadlines and reached out to the attorneys at the time of each deadline to stay  
26 on top of the case.

27 6. After CTU agreed to attend mediation, my attorneys sent me a list of questions to assist  
28 them in preparing for the mediation. I carefully responded to these questions, which were related to  
CTU's time keeping policies, how CTU calculated my course rate, how much time I spent grading at the  
end of the course, and when grades had to be submitted.

1           7.       Approximately one week before mediation, my attorneys sent to me a copy of the  
2 mediation brief for my review. I carefully reviewed the brief in order to prepare for mediation and to  
3 make sure that the facts as stated reflected my experience at CTU.

4           8.       On March 9, I attended the Zoom mediation for about an hour. After I left the mediation,  
5 I made sure to be available by phone throughout the entire day so my attorneys could contact me. At the  
6 end of the mediation session, I discussed the terms of the proposed settlement with my attorneys,  
7 including the general release I would have to agree to as part of the Settlement. Altogether, I spent about  
8 two hours preparing for mediation, attending mediation, responding to questions before the mediation,  
9 and discussing details of the settlement after mediation ended.

10          9.       In September 2023, my attorneys sent me a draft of the Class Action Settlement  
11 Agreement. I carefully reviewed the Settlement Agreement, and discussed it (via phone and email) with  
12 my attorneys, in order to make sure I understood all the important terms. In January 2024, my attorneys  
13 sent me a revised Settlement Agreement to review and sign. Altogether, I spent approximately 1.5 hours  
14 on these tasks.

15          10.      In all, I estimate that I spent at least 14 hours performing work on this case. That is a  
16 conservative estimate because it consists only of the specific tasks I recall performing as described above.  
17 I will also continue to devote time and effort to the litigation as necessary until the case is concluded.

18          11.      I brought this lawsuit knowing that it might give me a negative reputation with other  
19 colleges and universities at a time when I was looking for teaching offers from other employers.  
20 Notwithstanding those risks, I decided to bring this lawsuit because I felt that it was only fair that my  
21 fellow employees and I be compensated for all hours that we worked and be reimbursed for our out-of-  
22 pocket expenses.

23 I declare under penalty of perjury under the laws of the United States and the State of California that the  
24 foregoing is true and correct. Executed on 1/16/2024.

25  
26  
27  
28  
  
\_\_\_\_\_  
Kelly Leslie