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Attorneys for Plaintiff Mary Brown,
on behalf of herself, all others similarly situated,
and the general public,

FILED
Superior Court of California,
County of Solano
10/22/2025 at 09:22:36 AM
By: S. Brack, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SOLANO

MARY BROWN, on behalf of herself and all
others similarly situated and on behalf of the
general public,

Plaintiff,

v.

SCOOT EDUCATION INC., a Delaware
corporation, and DOES 1 through 10,
inclusive,

Defendants.

CASE NO: CU25-03746

Assigned to the Honorable Christine A.
Carringer, Department 12

**STIPULATION AND ~~PROPOSED~~
ORDER DISMISSING CLASS AND
REPRESENTATIVE PRIVATE
ATTORNEYS GENERAL ACT ACTION**

[CRC 3.769, Labor Code § 2698 et seq.]

[Filed Concurrently with Declaration of Evan
S. Gaines]

Complaint Filed: April 22, 2025

STIPULATION

WHEREAS, on April 22, 2025, Plaintiff Mary Brown, on behalf of herself and all others similarly situated and on behalf of the general public, filed a Class Action complaint against Defendant Scoot Education, Inc. (“Defendant”) (Declaration of Evan S. Gaines [“Gaines Decl.”], ¶ 2);

WHEREAS, on July 2, 2025, Plaintiff amended her complaint to include an additional cause of action, pursuant to the Labor Code Private Attorneys General Act of 2004 (“PAGA”), Labor Code § 2698 *et seq.*, seeking civil penalties for violations of the California Labor Code premised on an April 23, 2025 notice submitted to the California Labor and Workforce Development Agency. The First Amended Complaint is the operative complaint in this action (Gaines Decl., ¶ 3);

WHEREAS, after a review of the claims and defenses to the First Amended Complaint, and considering that a previously filed Class and Representative Action against Defendant (Los Angeles Superior Court Case No. 25STCV12928; consolidated with Los Angeles Superior Court Case No. 25STCV17270) will fully release the claims alleged in the First Amended Complaint, Plaintiff’s Counsel has concluded that it is in all Parties’ best interest to resolve Plaintiff’s individual claims only (Gaines Decl., ¶ 4);

WHEREAS, the Parties have negotiated a settlement of Plaintiff’s individual claims only, and Plaintiff’s class and PAGA claims will be dismissed *without* prejudice (the “Settlement”) (Gaines Decl., ¶ 5);

WHEREAS, the Settlement between Plaintiff and Defendant does not contemplate the waiver of any claims by anyone other than Plaintiff and does not provide for the waiver of class and PAGA claims asserted on behalf of any employee or the state, such that there is no allocation of civil penalties in the Settlement. Indeed, these individuals and the state of California will be eligible to receive compensation from the previously filed Class and Representative Action referenced above. (Gaines Decl. ¶ 6);and

WHEREAS, no notice is required to be given to the putative class or alleged aggrieved employees because no notice of the First Amended Complaint was ever given; there has been no publicity of which the Parties are aware; neither Plaintiff nor my office has communicated with any

absent class or PAGA members about the Action; the putative class is not reasonably ascertainable at the present time; these class members and aggrieved employees will be eligible to receive compensation from the settlement of the previously filed Class and Representative Action referenced above; and, consequently, no absent putative class member or alleged aggrieved employee will suffer prejudice as a result of this dismissal. (Gaines Decl. ¶ 8).

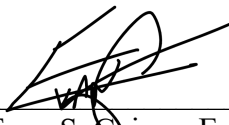
NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties hereto and through their respective attorneys of record that Plaintiff's individual claims shall be dismissed with prejudice, the claims of all putative class members and all allegedly aggrieved employees (except Plaintiff) shall be dismissed without prejudice, and the Court shall retain jurisdiction pursuant to Code of Civil Procedure Section 664.6 with respect to all matters related to the consummation of the settlement, including to enforce the Settlement.

IT IS SO STIPULATED.

Dated: October 21, 2025

For Plaintiff:

GAINES LAW CORPORATION

By: 
Evan S. Gaines, Esq.

For Defendant Scoot Education, Inc.

FISHER & PHILLIPS, LLP

By: /s/ Nicole Kamm*

Nicole Kamm, Esq.

* As authorized by email on October 10, 2025

ORDER

The Court, having reviewed the Parties' stipulation and any and all supporting papers, hereby
ORDERS that:

1. The action is hereby DISMISSED WITH PREJUDICE as to Mary Brown's individual
claims, and DISMISSED WITHOUT PREJUDICE as to claims under PAGA asserted on behalf of
all allegedly aggrieved employees and as to the class action claims asserted on behalf of all similarly
situated individuals; and

2. The Court shall retain jurisdiction pursuant to Code of Civil Procedure Section 664.6
with respect to all matters related to the consummation of the settlement, including to enforce the
Settlement.

IT IS SO ORDERED.

Dated: 10/21/2025



JUDGE OF THE SUPERIOR COURT

1 **PROOF OF SERVICE AND CERTIFICATION**

2 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the
3 action. My business address is 4550 E. Thousand Oaks Blvd., Suite 100 Westlake Village, CA 91362.

4 _____ (For messenger) my business address is:

5 On October 21, 2025, I served the foregoing document described as **STIPULATION AND [PROPOSED]**
6 **ORDER DISMISSING CLASS AND REPRESENTATIVE PRIVATE ATTORNEYS GENERAL ACT ACTION**
7 the interested parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

8 **Fisher & Phillips LLP**
9 **21600 Oxnard Street Suite 650 | Woodland Hills, CA 91367**
10 **Nicole Kamm - nkamm@fisherphillips.com**
11 **Spencer Waldron - swaldron@fisherphillips.com**
12 **Lirit King - lking@fisherphillips.com**
13 **Cina Kim - cakim@fisherphillips.com**
14 **Jennifer Gonzales - jgonzales@fisherphillips.com**
15 **Yessica Juarez – yjuarez@fisherphillips.com**

16 On the above date:

17 _____ (BY ☒ U.S. MAIL/ BY ☐ CERTIFIED MAIL, RETURN RECEIPT REQUESTED) The sealed envelope was
18 mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing
19 correspondence for mailing. It is deposited with United States postal service on that same day in the ordinary course of
20 business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage
21 meter date is more than one day after date of deposit for mailing in affidavit.

22 _____ ☒ (BY ELECTRONIC SERVICE) The above-stated document was submitted for service by electronic transmission
23 via email on the counsel of record listed above.

24 _____ ☒ (UPLOADED TO LWDA WEB PORTAL) I caused the above-described documents to be delivered to the Labor
25 & Workforce Development Agency via online process at the PAGA Filing website (www.dir.ca.gov)
26 in accordance with the procedure imposed by the LWDA.

27 I certify that the above document was printed on recycled paper.

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

Executed on October 21, 2025, at Westlake Village, California.

22 
23 _____
24 EVAN S. GAINES, ESQ.