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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN JOAQUIN

WESLEY ARTHER, on behalf of herself and all others similarly situated, and on behalf of the general public; Plaintiffs, vs. YOUNG ADULT INSTITUTE, INC., a New York Delaware Limited Liability Company, and DOES 1 through 10, inclusive, Defendants.	CASE NO. STK-CV-OUE-2025-8482 (Consolidated with Case No. STK-CV-OUE-2025-11697) **[DECLARATION OF PLAINTIFF WESLEY ARTHER IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT AND PROVISIONAL CERTIFICATION OF CLASS** Date: October 27, 2026 Time: 9:00 a.m. Judge: Hon. Robert T. Waters Dept.: 11B

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I, WESLEY ARTHER, declare as follows:

1. I am a named representative in this case. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class and Representative Action Settlement. I make this statement of my own personal knowledge, and if called to testify, I could and would testify competently to the facts below.
2. I was employed by Young Adult Institute, Inc. ("YAI") as an hourly paid non-exempt employee, working as a Direct Service Provider in and around Lodi, San Joaquin County, California, starting in or around July of 2024.
3. During my time working for YAI, I believe that I was not paid all wages, including all minimum and overtime wages owed to me. I also believe that I was denied uninterrupted meal and rest breaks. I was required to continue working through my meal and rest breaks in order to assist Defendant's needs. Defendants also failed to pay me premium wages of one hour's pay for each missed meal and rest break. I further believe that my wage statements were inaccurate, that I was not reimbursed for required use of my personal cell phone for work purposes, that my final wages were not paid in a timely manner, and that I was not timely paid wages during my employment.
4. During the time that I was employed at YAI, I followed the same timekeeping, scheduling and payroll policies and practices as the other hourly employees I observed and interacted with.
5. At the beginning of this case, my attorneys made me aware of the general obligations of serving as a class representative Plaintiff in this case. Because of the wage and hour violations that I experienced during my employment with YAI, I agreed to serve as a class representative Plaintiff and pursue my case as a class and representative action on behalf of the State of California and similarly situated employees of YAI.

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6. By deciding to serve as a Named Plaintiff in this case, I agreed to pursue not only my own wage and hour claims, but the claims of all similarly situated employees of YAI, and, if necessary, to put the interests of all similarly situated employees ahead of my own. I have no interests that are antagonistic to my coworkers with respect to the claims alleged in this case. I pledged to actively participate in the lawsuit and to assume the risks of serving as a Named Plaintiff in a class action. My attorney also explained the risks associated with litigation, that the case could take years to resolve, and therefore required a long-term commitment on my part. I also understood that I was potentially responsible for paying YAI's attorney's fees and costs. However, I accepted these risks, and I wanted my attorneys to sue YAI.

7. During this litigation, I have spent a significant amount of time working with my attorneys and participating in this lawsuit as follows: (a) I regularly conferred with my attorneys, before and after the filing of the lawsuit, to discuss the status of the case, to offer my input on YAI's practices and policies, to provide names of witnesses, to assist in gathering evidence and documents that supported the class claims, to review policy documents and payroll records from YAI, and to discuss settlement options; and (b) I also spent significant time helping my attorneys prepare for mediation and answering questions about how YAI's policies and practices impacted me and my coworkers. I made myself available during the mediation, approved the tentative settlement, and reviewed and approved the final Settlement Agreement. I regularly spoke with my attorneys to make sure I was fully informed of the facts and settlement negotiations.

8. Overall, I estimate that I have devoted 30-40 hours of my time to this case. This was not an easy thing to do as I have my own job and responsibilities.

9. By agreeing to bring this class and representative action, I accepted the responsibilities of

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representing the interests of the State of California as well as all similarly situated employees and willingly chose to assume risks and potential costs associated with the case. I did, and still do, have a concern that future employers may not hire me should they find out that I served as a class representative Plaintiff in a wage and hour lawsuit. However, this is another risk I am willing to take in order to further the interests of the class.

10. I am aware that YAI denies the allegations in this lawsuit and that there has been no determination that YAI is actually liable for any of these alleged violations. I also understand that there are many risks and uncertainties involved in continuing to pursue this case. I have been advised of the terms of the proposed settlement of this case, and in light of the risks and uncertainties in proceeding with the case, I believe the proposed settlement is fair and reasonable and in the best interests of the class members.

11. I have requested a service award for my services as a Named Plaintiff in the amount of Ten Thousand Dollars ($10,000.00). I believe that my request for this service award is fair and reasonable in light of the amount of work I put into this case to ensure a good result as well as the risks I took in serving as a Named Plaintiff.

I declare under penalty of perjury that the foregoing is true and correct under the laws of the State of California. Executed on April 8, 2026 in the City of Stockton, State of California.



WESLEY ARTHER

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