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2 **DE BLOUW LLP**

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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **IN AND FOR THE COUNTY OF RIVERSIDE**
15

16 ERIC HARROLD, an individual, on behalf
17 of himself, and on behalf of all persons
18 similarly situated,

19 Plaintiffs,

20 vs.

21 SPARTAN EDUCATION GROUP, LLC, a
22 Limited Liability Corporation, and DOES 1
23 through 50, inclusive,

24 Defendants.

CASE No. **CVRI2300320**

PROOF OF SERVICE

Hearing Date: February 27, 2024

Hearing Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp

Dept: 1

Action Filed: January 19, 2023

Trial Date: Not Set

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

3 I, Kyle Nordrehaug, am employed in the County of San Diego, State of California. I am
4 over the age of 18 and not a party to the within action. My business address is 2255 Calle Clara, La
5 Jolla, California 92037.

6 On January 25, 2024, I served the document(s) described as:

- 7 **1. Notice of Motion and Motion for Preliminary Approval of Class Settlement**
8 **2. Memorandum of Points and Authorities in Support of Motion for Preliminary**
9 **Approval of Class Settlement**
10 **3. Declaration of Kyle Nordrehaug in Support of Motion for Preliminary**
11 **Approval of Class Settlement**
12 **4. [Proposed] Preliminary Approval Order**

13 X **(BY ELECTRONIC SERVICE):** Pursuant to the provisions of CCP §1010.6, I provided
14 the documents referenced above electronically via electronic mail (e-mail) to counsel for
15 Defendant at the following confirmed e-mail addresses:

16 Tracie Childs, Esq.
17 Cameron J. Davila, Esq.
18 Katie M. Greenbaum, Esq.
19 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
20 4660 La Jolla Village Drive, Suite 900
21 San Diego, California 92122
22 Phone: (858) 652-3100;
23 Facsimile: (858) 652-3101

24 Email:
25 tracie.childs@ogletreedeakins.com
26 Cameron.Davila@ogletreedeakins.com
27 katie.greenbaum@ogletreedeakins.com

28 Kristin Menchaca, Practice Assistant to Tracie Childs
kristin.menchaca@ogletreedeakins.com

Lisa Bernard, Practice Assistant to Cameron Davila and Katie Greenbaum
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Anant Pandadiya, Practice Assistant to Cameron Davila
anant.pandadiya@ogletreedeakins.com

X **(ONLINE TO THE LWDA):** I caused the above-described document to be delivered to the

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Labor Workforce Development Agency via online process at the PAGA Filing website in
accordance with the procedure imposed by the LWDA.

X (State): I declare under penalty of perjury under the laws of the State of California that the
above is true and correct.

Executed on January 25, 2024, at La Jolla, California.

/s/ Kyle Nordrehaug
Kyle Nordrehaug

1 **TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on February 27, 2024, or as soon
3 thereafter as the matter can be heard, in Department 1 at the above entitled Court before the
4 Honorable Harold W. Hopp, Plaintiff Eric Harrold ("Plaintiff") will apply for an order:

5 (1) preliminarily approving the proposed settlement of this class action with Defendant Spartan
6 Education Group, LLC ("Defendant"); (2) for settlement purposes only, conditionally certifying the
7 following Class: "all individuals who were employed by Defendant in California and classified as a
8 non-exempt employee at any time during the Class Period, excluding those employees who signed
9 severance agreements", which is January 19, 2019 through January 5, 2024; (3) provisionally
10 appointing Plaintiff as the representatives of the Class; (4) provisionally appointing Norman B.
11 Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik, Nicholas J. De Blouw, Jeffrey S. Herman,
12 Sergio J. Puche, and Trevor G. Moran of Blumenthal Nordrehaug Bhowmik De Blouw LLP as
13 Class Counsel for the Class; (5) approving the form and method for providing class-wide notice;
14 (6) directing that notice of the proposed settlement be given to the class; (7) appointing Apex Class
15 Action Administration as Administrator, and (8) scheduling a final approval hearing for the
16 proposed date of July 30, 2024 to consider Plaintiff's motion for final approval of the settlement
17 and for approval of attorneys' fees and litigation expenses.

18 This motion for preliminary approval of the class settlement is brought pursuant to
19 California Rules of Court, rule 3.769. Plaintiff's motion will be based on this notice of motion and
20 motion, the accompanying points and authorities, the Declaration of Kyle Nordrehaug, the
21 Declaration of Plaintiff Eric Harrold, the Class Action and PAGA Settlement Agreement
22 ("Agreement") between the Parties, and the complete files and records in this action. Because all
23 Parties have agreed to the proposed class settlement, this motion is not opposed by Defendant.

24 Respectfully submitted,

25 Dated: January 25, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

26 By: /s/ Kyle Nordrehaug

27 Norman B. Blumenthal, Esq.
28 Kyle R. Nordrehaug, Esq.
Attorney for Plaintiff