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Attorneys for ERIC WARD, on behalf of himself,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

ERIC WARD on behalf of himself, all
others similarly situated, and on behalf of
the general public,

Plaintiffs,

v.

LEARNING ARTS CORPORATION;
and DOES 1-100,

Defendants.

Case No. 34-2023-00334389-CU-OE-GDS

**DECLARATION OF PLAINTIFF ERIC
WARD IN SUPPORT OF SETTLEMENT
APPROVAL**

Complaint Filed: February 7, 2023
Trial Date: None Set

I, Eric Ward, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.
2. I am the named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit this declaration in support of settlement approval.
3. I worked for Learning Arts Corporation (“Learning Arts”) as a non-exempt, hourly employee in California from approximately November 4, 2020, to November 2, 2022.
4. I originally decided to contact an attorney because I felt that some of Learning Art’s policies and practices violated the law.
5. Since becoming a class representative, I have diligently worked on this case.
6. I always answered phone calls from my attorneys or called them back promptly when they called. I also promptly responded to emails sent by my attorneys.
7. This case has been pending for almost two and a half years. During the entirety of this time, I have worked diligently to help progress it forward. I have spent many hours in prosecuting this case.
8. On many occasions, I spoke with my attorneys for case related purposes. I assisted my attorneys in investigating the case and reached out to them to provide them with information about my time working for Learning Arts that I thought might help the case.
9. I also looked for any paperwork and documents from my employment with Learning Arts, like my paystubs and emails I received from Learning Arts, to provide to my attorneys.
10. Learning Arts took my deposition on October 16, 2024. I met with my attorneys prior to my deposition to prepare for it.
11. Although I did not attend the mediations in person, I was available by phone. I also was kept apprised of settlement negotiations that occurred after mediation. I gave my consent to settle with Learning Arts for the gross settlement amount of \$850,000. I completely and carefully reviewed the settlement agreement. I then signed the settlement agreement.

12. I estimate that I spent approximately 40 hours or more on tasks like speaking with my attorneys, searching for documents, prepare for my deposition, sitting for my deposition, and reviewing the settlement documents.

13. In light of the work I performed in this case and the duties associated with being a class representative in a case of this magnitude, I believe the \$10,000 class representative enhancement payment is reasonable. I understand that this additional payment is not guaranteed and is subject to Court approval.

14. I have and will continue to adequately represent the interests of the class. With my status as class representative, I will treat the interests of the class above my interests.

15. I initiated this lawsuit on behalf of myself and the other employees because I wanted to fix what I perceived as problems affecting all of us. From the very beginning, I understood that I was participating in this case, not only for my own benefit, but for the many past and present hourly employees.

16. While I believe that I was doing the right thing in pursuing this case, I do believe that I have paid a price for the greater good of other employees, who will now obtain some relief through the terms of the proposed settlement.

17. My claims are typical of the Class Members because I am similarly situated to persons who worked for Defendant as non-exempt, hourly paid employees in the State of California at any time from February 7, 2019 through December 31, 2024. Thus, my interests are the same as all members of the proposed Class.

18. I recognize that any resolution of this matter must be approved by the Court in terms of whether the settlement is fair and reasonable, and that I am obligated to protect the interests of all of class members for the Class Period.

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

Dated: 5/28/2025

DocuSigned by:
By: Eric Ward
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