Docusign Envelope ID: 9A898848-04F1-8CD8-8180-13965D0E2947

Tyler J. Woods (SBN 232464)
tyler.woods@wilshirelawfirm.com
James Yoo (SBN 310680)
james.yoo@wilshirelawfirm.com
Trenten N. Bilodeaux (SBN 332692)
trenten.bilodeaux@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

CHRISTIN ENRIGHT and AARON LE, individually, and on behalf of other members of the general public similarly situated,

Plaintiffs,

v.

KA PRESCHOOL OF HUNTINGTON BEACH, a California corporation; KA PRESCHOOL OF COSTA MESA, a California corporation; KA PRESCHOOL OF IRVINE CORPORATION, a California corporation; KA PRESCHOOL OF ORANGE, a California corporation; KA PRESCHOOL OF SANTA ANA, INC., a California corporation; KA PRESCHOOL OF TUSTIN, a California corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No. 30-2024-01442772-CU-OE-CXC

Assigned for all purposes to Hon. David A. Hoffer, Dept. CX103

SUPPLEMENTAL DECLARATION OF PLAINTIFF AARON LE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Preliminary Approval Hearing:
Date: October 26, 2026
Time: 1:30 p.m.
Dept.: CX103

Complaint Filed: November 27, 2024
Trial Date: None Set

I, Aaron Le, declare as follows:

1. I am a named Plaintiff and proposed Class Representative in this action. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently to them.

2. I previously signed a declaration in support of the Motion for Preliminary Approval of Class Action and PAGA Settlement, filed on March 17, 2026. In that declaration I

Docusign Envelope ID: 9A898848-04F1-8CD8-8180-13965D0E2947

stated that I was requesting an enhancement award of $5,000.00. However, according to the terms of the settlement agreement, each enhancement award is for the $10,000.00 amount listed in the corresponding section.

3. I understand that the Parties have signed a First Amendment to the Settlement Agreement confirming that each named Plaintiff may request an enhancement award of up to $10,000.00. I now request an enhancement award of up to $10,000.00, in addition to any Individual Class Payment and Individual PAGA Payment I am entitled to receive.

4. I make this request for the time and effort I have spent on this case on behalf of the Class and the Aggrieved Employees, and for the risks I took by bringing it. That work is described in my prior declaration and includes sending my PAGA notice to the LWDA and Defendants on August 21, 2025; joining this action as a named Plaintiff in the Second Amended Complaint filed December 9, 2025; communicating with my attorneys to prepare for mediation and during the December 15, 2025 mediation; and reviewing the settlement documents.

5. I understand that the Court will decide at final approval whether to award an enhancement award and in what amount, and that the Court may award less than I request. My support for the Settlement does not depend on receiving an enhancement award in any amount. I believe the Settlement is fair and reasonable and in the best interests of the Class.

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

Executed on 10/6/2026, at Westminster, California.

DocuSigned by:
Aaron Le
44969DC40AEB4C4...
Aaron Le