

1 DAVID J. GALLO (*California Bar No. 127722*)

2 **LAW OFFICES OF DAVID J. GALLO**

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7 Attorneys for Plaintiff

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF SAN FRANCISCO**

10 PAUL REEB, individually and on
11 behalf of others similarly
12 situated,

13 Plaintiff,

14 v.

15 AIR EDUCATION, INC., a
16 Delaware corporation, and
17 DOES 1 through 50,

18 Defendants.

Case Number:

CGC-25-630919

CLASS ACTION

(Plaintiff Class,

Cal.Code Civ.Proc., § 382)

19 **PROOF OF SERVICE OF**
20 **PROPOSED SETTLEMENT**
21 **DOCUMENTS UPON LABOR AND**
22 **WORKFORCE DEVELOPMENT**
23 **AGENCY**

24 HEARING:

Date: 17 AUGUST 2026

Time: 11:00 a.m.

Place: Dept. 613

25 ACTION FILED:

03 NOVEMBER 2025

26 TRIAL DATE:

Not set.

1 I, DAVID J. GALLO, hereby declare:

2 1. All of the facts set forth in this Declaration are within my personal
3 knowledge true and correct (except as to any matters which may be contained
4 herein which are expressly stated to be based upon information and belief;
5 however, I believe that any and all matters stated herein to be based upon
6 information and belief are true).

7 2. I am an attorney licensed to practice before, *inter alia*, the above-
8 captioned court.

9 3. I am engaged in the representation of the Plaintiff / proposed class
10 representative in the above-captioned civil action.

11 4. This Proof of Service pertains to the following documents
12 **(hereinafter the “Subject Documents”):**

13 a. the accompanying NOTICE OF MOTION AND MOTION FOR
14 PRELIMINARY APPROVAL OF PROPOSED CLASS-ACTION AND
PAGA SETTLEMENT, AND FOR ANCILLARY RELIEF;

15 b. the accompanying MEMORANDUM OF POINTS AND
16 AUTHORITIES IN SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED CLASS-ACTION AND PAGA
17 SETTLEMENT;

18 c. the accompanying DECLARATION OF DAVID J. GALLO, ESQ., IN
19 SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED CLASS-ACTION AND PAGA SETTLEMENT;

20 d. the accompanying DECLARATION OF MR. PAUL REEB IN
21 SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED CLASS-ACTION AND PAGA SETTLEMENT;

22 e. the accompanying DECLARATION OF SIMPLURIS
23 REPRESENTATIVE IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF PROPOSED CLASS-ACTION AND
PAGA SETTLEMENT;

24 f. the accompanying DECLARATION OF MR. XING ZHANG IN
25 SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED CLASS-ACTION AND PAGA SETTLEMENT;

26 g. the accompanying NOTICE OF FILING OF PROPOSED
27 SETTLEMENT AGREEMENT [Cal. Rules of Court, rule 3.769(c)];

28 h. the accompanying STATEMENT REGARDING CLASS NOTICE

1 [Cal. Rules of Court, rule 3.766(b)];

- 2 i. the accompanying [proposed] ORDER GRANTING PRELIMINARY
3 APPROVAL OF PROPOSED CLASS-ACTION AND PAGA
4 SETTLEMENT, AND ANCILLARY RELIEF;
5 j. the FIRST AMENDED COMPLAINT FOR MONETARY
6 RECOVERY AS A REMEDY FOR LABOR CODE VIOLATIONS,
7 AND FOR PAGA REMEDIES; JURY DEMAND filed 30 June 2026;
8 and
9 k. the instant PROOF OF SERVICE OF PROPOSED SETTLEMENT
10 DOCUMENTS UPON LABOR AND WORKFORCE
11 DEVELOPMENT AGENCY

12 5. On 27 July 2026, I served each of the Subject Documents upon the
13 Labor and Workforce Development Agency (“LWDA”) by online filing through
14 the LWDA’s web portal.

15 I declare under penalty of perjury that the foregoing is true and correct.
16 Executed this 27th day of July, 2026, within San Diego County, California.

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/s/ David J. Gallo

DAVID J. GALLO

[POS UPON LWDA.wpd]

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Sophia B. Collins, Esq.: scollins@littler.com
Anthony Ly, Esq.: aly@littler.com
Blair Senesi, Esq.: bsenesi@littler.com

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 27th day of July, 2026, at Del Mar, California.

/s/ David J. Gallo
DAVID J. GALLO

**PROOF OF SERVICE OF PROPOSED SETTLEMENT DOCUMENTS
UPON LABOR AND WORKFORCE DEVELOPMENT AGENCY – PAGE 4**