

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

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

3 12702 VIA CORTINA, SUITE 500

4 DEL MAR, CALIFORNIA 92014

5 Telephone: (858) 509-3652

6 E-mail: DJGSAN@AOL.COM

7 Attorneys for Plaintiff Class

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 **[proposed] ORDER GRANTING**
20 **PRELIMINARY APPROVAL OF**
21 **PROPOSED CLASS-ACTION AND**
22 **PAGA SETTLEMENT**

23 HEARING:

24 Date: 17 AUGUST 2026

25 Time: 11:00 a.m.

26 Place: Dept. 613

27 ACTION FILED:

28 03 NOVEMBER 2025

TRIAL DATE:

Not set.

1 ON 17 AUGUST 2026, at 11:00 a.m., came on to be heard the Motion of
2 Plaintiff, Paul Reeb (**hereinafter “Reeb”**), for Preliminary Approval of Proposed
3 Class-Action and PAGA Settlement, and for Ancillary Relief. David J. Gallo,
4 Esq., of the Law Offices of David J. Gallo, appeared on behalf of Plaintiff.
5 _____, Esq., of Littler Mendelson, P.C., appeared on behalf of
6 Defendant, Air Education, Inc. (**hereinafter “AEI”**). The Court, having
7 considered the evidence presented and the argument of counsel, finds as follows:

- 8 a. the evidence before the Court would support a finding that the
9 proposed settlement agreement (**hereinafter the “PSA”**) filed __
10 July 2026 would be fair, adequate and reasonable;
- 11 b. all criteria have been established for preliminary approval of the
12 PSA pursuant to Cal. Rules of Court, rule 3.769;
- 13 c. Plaintiff has served all documents and notices upon the Labor and
14 Workforce Development Agency, as prescribed by PAGA;
- 15 d. the parties’ jointly-proposed form of class notice (**hereinafter the**
16 **“Joint Proposed Class Notice”**) filed on __ July 2026 would
17 adequately advise Class Members of the terms of the PSA, and of
18 their right to participate in the Final Fairness Hearing scheduled by
19 this Order, and would in all respects satisfy the due process rights
20 of Class Members.

21 IT IS HEREBY ORDERED that preliminary approval of the PSA is hereby
22 GRANTED;

23 IT IS FURTHER ORDERED that the following settlement class and
24 subclass shall be, and hereby are, CONDITIONALLY CERTIFIED FOR
25 SETTLEMENT PURPOSES ONLY:

26 **California Tutor Class:** the not more than one
27 hundred thirty-six (136) persons: (a) who have provided
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1 California addresses to AEI at any time; and (b) who at any
2 time after 3 November 2021, were parties to contracts to
3 provide tutoring services in California (whether or not they
4 actually conducted any Tutoring Sessions).

5 **Former Tutor Sub-Class:** the members of the
6 California Tutor Class who have conducted one or more
7 Tutoring Sessions, but have resigned, or whose contracts have
8 expired without the entry of a new contract, at any time on or
9 after 03 November 2022.

10 IT IS FURTHER ORDERED that Plaintiff, Paul Reeb, shall be, and hereby
11 is, PROVISIONALLY APPOINTED AS CLASS REPRESENTATIVE;

12 IT IS FURTHER ORDERED that David J. Gallo, Esq., of the Law Offices
13 of David J. Gallo, shall be, and hereby is, PROVISIONALLY APPOINTED AS
14 CLASS COUNSEL;

15 IT IS FURTHER ORDERED that the parties' Joint Proposed Class Notice
16 shall be, and hereby APPROVED;

17 IT IS FURTHER ORDERED that the Court hereby adopts the following
18 schedule set out in the PSA:

- 19 a. Not more than fourteen (14) days from the entry of this Order, AEI
20 shall deliver the Class Data to Simpluris (the parties' jointly-selected
21 Administrator) as prescribed by PSA Section 7.4.1;
- 22 b. Not more than fourteen (14) days from its receipt of the Class Data,
23 Simpluris shall mail the Class Notice to the Class Members, as
24 prescribed by PSA Section 7.4.2;
- 25 c. By not later than thirty (30) days after the Simpluris mails the Class
26 Notice, Class Members may: (a) fax, e-mail or mail Requests for
27 Exclusion, (b) fax, e-mail or mail objections to the Settlement, or (c)
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1 fax, e-mail or mail a challenge to the number of Tutoring Sessions
2 allocated to the Class Member in the Class Notice. (This deadline is
3 extended by fourteen [14] days for any Class Member to whom Class
4 Notices are re-sent after having been returned undeliverable to the
5 Administrator.) (See, PSA, at § 1.41.)

6 d. The parties' responses to any objections, and additional filings in
7 support of preliminary approval (if any) shall be filed by not later
8 than _____, 2026;

9 e. Motion for Compensation and Reimbursement of Class Counsel, and
10 for Approval of Class Representative Service Payment, shall be filed
11 by not later than _____, 2026;

12 IT IS FURTHER ORDERED that the Final Approval / Final Fairness
13 Hearing is scheduled to occur in Department 613 of the above-captioned Court
14 on _____, 2026, at _____ .m.

15 IT IS FURTHER ORDERED that the hearing on Motion for Compensation
16 and Reimbursement of Class Counsel, and for Approval of Class Representative
17 Service Payment, is scheduled to occur in Department 613 of the above-captioned
18 Court on _____, 2026, at _____ .m.

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21 Dated: __ August 2026

HON. JEFFREYS S. ROSS, JUDGE OF THE
SUPERIOR COURT OF CALIFORNIA FOR
THE CITY AND COUNTY OF SAN
FRANCISCO, DEPARTMENT 613

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27 [ORDER for PRELIMINARY APPROVAL.wpd]
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