

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

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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)**

**STATEMENT REGARDING CLASS  
NOTICE**

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

**HEARING:**

Date: 17 AUGUST 2026

Time: 11:00 a.m.

Place: Dept. 613

**ACTION FILED:**

03 NOVEMBER 2025

**TRIAL DATE:**

Not set.

1 This Statement Regarding Class Notice is filed on behalf of Plaintiff, Paul  
2 Reeb (**hereinafter “Plaintiff”**), in compliance with Cal. Rules of Court, rule  
3 3.766(b):

4 **(1) Whether notice is necessary.**

5 Plaintiff contends that notice is necessary. The parties have agreed upon  
6 the proposed form of notice, which is an attachment to the parties’ proposed  
7 settlement agreement. The parties’ agreed form of notice is adapted from the Los  
8 Angeles County Superior Court’s form for notice of a proposed class-action and  
9 PAGA settlement. The redlined version showing changes from that form is before  
10 the Court at Exhibit Pages 048 through 069 of the accompanying Notice of Filing  
11 of Proposed Settlement Agreement. The version as adapted and agreed upon by  
12 the parties is before the Court at Exhibit Pages 113 through 131 of the  
13 accompanying Notice of Filing of Proposed Settlement Agreement.

14  
15 **(2) Whether class members may exclude themselves from the**  
16 **action.**

17 The parties’ parties’ proposed settlement agreement provides that, upon  
18 timely request, Class Members may be excluded from the class settlement (but  
19 not the PAGA settlement).

20  
21 **(3) The time and manner in which notice should be given.**

22 The parties have agreed that Simpluris will be the settlement  
23 administrator, and that Simpluris will transmit the class notice by First Class  
24 Mail. Class notice must be mailed within twenty-eight (28) days of entry of an  
25 order granting preliminary approval of the proposed settlement. (See, PSA, at §  
26 7.4, at Exhibit Pages 22-23 to the accompanying Notice of Filing of Proposed  
27 Settlement Agreement.)

1           **(4) A proposal for which parties should bear the costs of notice.**

2           Costs of notice are included in the \$6,568.00 estimated cost of  
3 administration. The proposed settlement agreement provides that the  
4 Settlement Class will pay the estimated \$6,568.00 cost of administration (with  
5 any excess over the \$6,568.00 to be paid by AEI). (See, PSA, at § 1.21, at Exhibit  
6 Page 74 to the accompanying Notice of Filing of Proposed Settlement Agreement.)  
7

8           **(5) If cost shifting or sharing is proposed under subdivision (4),**  
9 **an estimate of the cost involved in giving notice.**

10          Please see Item 4, *supra*.  
11

12 Dated: 24 July 2026

Respectfully submitted,

13           DAVID J. GALLO  
14           **LAW OFFICES OF DAVID J. GALLO**  
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16                               /s/ David J. Gallo  
17           By:   David J. Gallo,  
                    California Bar No. 127722  
                    Attorneys for all Plaintiffs  
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/s/ David J. Gallo  
DAVID J. GALLO

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