

LITTLER MENDELSON, P.C.
101 Second Street
Suite 1000
San Francisco, California 94105
415.433.1940

Sophia B. Collins, BAR No. 289318
scollins@littler.com
LITTLER MENDELSON, P.C.
Treat Towers
1255 Treat Boulevard, Suite 600
Walnut Creek, California 94597
Telephone: 925.932.2468
Facsimile: 925.946.9809

ANTHONY G. LY, Bar No. 228883
aly@littler.com
LITTLER MENDELSON, P.C.
2049 Century Park East, 5th Floor
Los Angeles, California 90067.3107
Telephone: 310.553.0308
Facsimile: 800.715.1330

BLAIR C. SENESI, Bar No. 313580
bsenesi@littler.com
VALENTINA WILSON, Bar No. 347301
vwilson@littler.com
LITTLER MENDELSON, P.C.
101 Second Street, Suite 1000
San Francisco, California 94105
Telephone: 415.433.1940
Facsimile: 415.399.8490

Attorneys for Defendant
AIR EDUCATION, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

PAUL REEB, individually and on behalf of others
similarly situated,

Plaintiff,

v.

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

Defendants.

Case No. CGC-25-630919

**DECLARATION OF XING ZHANG IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED CLASS-ACTION
AND PAGA SETTLEMENT**

*[Assigned for all purposes to Hon. Jeffrey S.
Ross, Dept. 613]*

Date: **17 AUGUST 2026**
Time: **11:00 a.m.**
Dept.: **613**

Trial Date: Not Set
Complaint Filed: November 3, 2025

1 I, Xing Zhang, hereby declare:

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

6 2. I am, and for the past five years have been, the Chief Executive Officer of Defendant,
7 Air Education, Inc. (hereinafter "AEI").

8 3. My duties and responsibilities include business operations, strategy development, and
9 growth initiatives to support organizational objectives and operational effectiveness.

10 4. In my role as CEO, I am able to access and review AEI's computerized business records
11 (hereinafter the "Business Records") as described herein.

12 5. AEI creates and maintains the Business Records in the ordinary course of its business.

13 6. The Business Records described below are created by data entry effected at or near the
14 time of the acts, conditions, or events described therein.

15 7. Each person who enters data into the Business Records does so in the course and scope of
16 their employment by AEI, and does so based upon their own personal knowledge.

17 8. Each person who enters data into the Business Records is under a duty to input only
18 accurate information, and I have no reason to question that the Business Records described below are
19 accurate.

20 9. The Business records show:

21 a. There are one hundred thirty-four (134) persons (hereinafter the "California Tutors"): (a)
22 who have provided California addresses to AEI at any time; and (b) who at any time after 3 November
23 2021, were parties to contracts to provide tutoring services in California (whether or not they actually
24 conducted any Tutoring Sessions);

25 b. Of said one hundred thirty-four (134) persons, only one hundred-two (102) have conducted
26 one or more Tutoring Sessions at any time after 03 November 2021;

27 c. The California Tutors (cumulatively) conducted 33,896 tutoring Sessions after 3
28 November 2021;

1 d. The California Tutors (cumulatively) worked on 7,344 workdays (on or after 3 November
2 2021) during which more than one tutoring session was conducted;

3 e. The California Tutors (cumulatively) worked during 1,161 pay periods ending on or after
4 3 November 2024; and

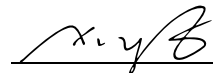
5 f. There are 79 California Tutors who have resigned, or whose contracts have expired
6 without the entry of a new contract, at any time on or after 3 November 2022.

7 g. I am not aware of any facts which might create an actual or potential conflicts of interest
8 between AEI and Simpluris, or between AEI and Access Books Bay Area (the proposed Cy Pres
9 Recipient).

10 h. I am not aware of any other pending matter or action asserting claims that will be
11 extinguished or adversely affected by the proposed Settlement now before the Court.

12
13 I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing
14 is true and correct.

15 Executed this 9th day of July, 2026, in California.

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18 
19 XING ZHANG

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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 24th day of July, 2026, at
Del Mar, California.

[POS ZHANG DECLARATION.wpd]