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7 Attorneys for Plaintiffs and the Provisionally
8 Certified Class

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF SAN DIEGO-CENTRAL DIVISION

11 MICHELLE JACKSON and ERICA)
12 AUGUSTIN, individually and as)
13 aggrieved employees pursuant to the)
14 Private Attorneys General Act (“PAGA”))
15 on behalf of the State of California and)
16 similarly situated employees,)

17 Plaintiffs,

18 vs.

19 ALLIANT INTERNATIONAL)
20 UNIVERSITY, INC., a California)
21 corporation; and DOES 1 through 50,)

22 Defendant.)

Case No.: 37-2023-00043742-CU-OE-
CTL (Consolidated with Case No.: 37-
2024-00002100-CU-OE-CTL)

**DECLARATION OF MICHELLE
JACKSON ISO PLAINTIFFS’
MOTION FOR FINAL APPROVAL
OF CLASS AND PAGA
SETTLEMENT, FOR FEES, COSTS,
REPRESENTATIVE
ENHANCEMENT PAYMENTS,
CLASS ADMINISTRATION
EXPENSES, AND ENTRY OF
JUDGMENT**

Judge: Hon. Joel R. Wohlfeil
Dept.: 73
Hearing Date: July 25, 2025
Hearing Time: 9:00 a.m.

Complaint Filed: October 9, 2023

[Not. of Mot., [Proposed] Order, and
Mem. of P&As, Decs. of Thomas
Rutledge, Settlement Administrator
Taylor Mitzner, and Erica Augustin filed
concurrently herewith]

DECLARATION OF MICHELLE JACKSON

I, MICHELLE JACKSON, declare and state as follows:

1. I am the named Plaintiff and Class Representative in this matter. As such, I am fully familiar with the facts, pleadings, and history of this matter. The following facts are within my own personal knowledge, and if called as a witness, I could testify competently to the matters stated herein.

2. This declaration is submitted in support of Plaintiffs' Motion for Final Approval of the Class Settlement and for Fees, Costs, Representative Enhancements Payments, Class Administration Expenses, and Entry of Judgment.

3. I am the first Plaintiff in this case.

4. From about July 29, 2013 to August 18, 2023, Defendant Alliant International University, Inc. employed me in various job assignments, the last of which was serving as Defendant's Assistant Vice President of Student Affairs.

5. During my employment, I witnessed Defendant commit what I believed to be a wide range of Labor Code violations.

6. Based on what I observed in the workplace as Defendant's employee, I decided to contact Mr. Thomas D. Rutledge.

7. Mr. Rutledge interviewed me regarding the merits of my case.

8. Based upon his interview, he agreed to represent me on a contingency fee basis.

9. Mr. Rutledge requested my personnel file and payroll records from the Defendant and forwarded them to me for my review.

10. Through Mr. Rutledge's office, I pursued this litigation against Defendant.

11. Over the last two years, I remained actively involved in this case by regularly communicating with counsel, reviewing legal filings for accuracy, providing factual context for the claims, and assisting in preparing for hearings and settlement discussions.

1 12. I reviewed and provided input to many of the draft pleadings that Mr.
2 Rutledge's office filed because the outcome of this case is important to me.

3 13. I spoke with Mr. Rutledge and his staff over the phone and through
4 emails dozens of times to obtain information about my case and to provide any
5 assistance needed.

6 14. I invested a significant amount of time in this matter and have risked my
7 reputation for being a named Plaintiff in this matter due to my desire to obtain justice
8 for the Aggrieved Employees.

9 15. I also referred Mr. Rutledge to other victims of what I believe to be
10 Defendant's misconduct, one of whom is Plaintiff Augustin.

11 16. I knew that by getting involved in this lawsuit, I had to consider the
12 interests of the other employees, above my own interests, and I agreed to actively
13 participate in this case as their representative.

14 17. In preparation for mediation, I also assisted Mr. Rutledge and their staff
15 by answering the numerous phone calls and emails they sent me.

16 18. Days before the mediation, I met via telephone with Mr. Rutledge
17 regarding my employment records and we discussed the case more thoroughly.

18 19. Mr. Rutledge reminded me again that my case had significant merit and
19 that I would help many people, other than myself.

20 20. In total, estimated time doing all the foregoing has been about 50 hours
21 on the low side.

22 21. For the personal suffering of various Labor Code and employment
23 claims beyond the scope of this litigation, I have agreed to provide Defendant a full
24 release pursuant to Civil Code § 1542 in exchange for the settlement proceeds of
25 \$5,000 if this Court approves the class and PAGA settlement.

26 22. This is a more than fair amount of money in exchange for my Civil Code
27 § 1542 because I believe the Defendant also wrongfully terminated me.

28 23. But for this lawsuit, I firmly believe Defendant would not have corrected

24. In consideration of the amount of work, hours, and effort I have dedicated to this case, as well as the financial and professional risks I took in pursuing a lawsuit against an employer, and in consideration of the § 1542 release I have given to the Defendant for my claims, I believe the requested \$5,000 incentive award for my service is fair, reasonable, and well-deserved.

26. I accepted this risk because I felt strongly about advocating for coworkers who were unaware of their rights or afraid to come forward.

28. I understand that service awards are not automatic and must be earned.

30. I took this responsibility seriously and have no regrets about standing up on behalf of other workers who may not have had the ability to do so.

31. Accordingly, I very respectfully request the Court to award me \$5,000 as an enhancement payment and grant final approval of the settlement.

Except as to those matters made upon information and belief, I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this day of July 1, 2025, in San Diego, California

Declarant, Michelle Jackson

PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

I, THOMAS D. RUTLEDGE, the undersigned, am employed in the County of San Diego, State of California; I am over the age of 18 and not a party to the within action; my business address is 16956 Via de Santa Fe, Suite 1847, Rancho Santa Fe, California 92091-4606.

On July 1, 2025, I served the foregoing document(s) described as:

DECLARATION OF MICHELLE JACKSON ISO PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS AND PAGA SETTLEMENT, FOR FEES, COSTS, REPRESENTATIVE ENHANCEMENT PAYMENTS, CLASS ADMINISTRATION EXPENSES, AND ENTRY OF JUDGMENT

on the interested parties to this action by placing a copy thereof enclosed in a sealed envelope addressed as follows: **See Attached List.**

☐ **(BY MAIL)** I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service. This correspondence was deposited with the United States Postal Service this same day in the ordinary course of business at our Firm's office address in San Diego, California. Service made pursuant to this paragraph, upon motion of a party served, shall be presumed invalid if the postal cancellation date of postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.

☒ **(BY E-MAIL via E-file)** I am readily familiar with the business practice for collection and processing of correspondence for emailing with the Court authorized third-party vendor. This correspondence was sent via email via this third-party vendor pursuant to the vendor's policies and practices.

☐ **(BY OVERNIGHT DELIVERY SERVICE)** I served the foregoing document by Federal Express, an express service carrier which provides overnight delivery, as follows. I placed true copies of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed to each interested party as set forth above, with fees for overnight delivery paid or provided for.

☐ **(BY PERSONAL SERVICE)** I caused such envelope to be delivered by hand to the offices of the above named addressee(s).

☐ **(BY FACSIMILE)** I caused such documents to be delivered via facsimile to the offices of the addressee(s) at the following facsimile number:

Executed July 1, 2025, at San Diego, California.

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

/s/THOMAS D. RUTLEDGE
THOMAS D. RUTLEDGE

SERVICE LIST

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