

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
PAUL BERKOWITZ, Cal. Bar No. 251077
2 pberkowitz@sheppardmullin.com
RAYMOND J. NHAN, Cal. Bar No. 306696
3 rnhan@sheppardmullin.com
DANIEL J. GANZ, Cal. Bar No. 346222
4 dganz@sheppardmullin.com
1901 Avenue of the Stars, Suite 1600
5 Los Angeles, California 90067
Telephone: 310.228.3700
6 Facsimile: 310.228.3701

7 Attorneys for Defendant
AUTISM LEARNING PARTNERS, LLC

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

RHINA BLANCO, individually, and on behalf
of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act; CARLOS
GONZALEZ, individually, and on behalf of
other members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiffs,

vs.

AUTISM LEARNING PARTNERS, an
unknown business entity; AUTISM
LEARNING PARTNERS, LLC, a Delaware
limited liability company; PACIFIC CHILD &
FAMILY ASSOCIATES, LLC, an unknown
business entity; PROOF POSITIVE ABA
THERAPIES, LLC, a California limited
liability company; CHILDREN'S LEARNING
CONNECTION, INC., a California
corporation; A IS FOR APPLE, INC., a
California corporation; and DOES 2 through
100, inclusive,

Defendants.

CLASS ACTION

Case No.: 24STCV01979

Assigned to: Honorable Kenneth Freeman,
Department 14

**DECLARATION OF BRITTANY
WOLFSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL**

Date: September 16, 2025
Time: 10:00 a.m.
Dept: 14

Complaint Filed: January 24, 2024
FAC Filed: February 24, 2025
Trial Date: None set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4
5
6
7
8
9
10
11
12

13
14
15
16
17

18
19
20
21
22
23
24
25

26

27

Executed on March 10, 2025, at Los Angeles, California.

DocuSigned by:
Brittany Wolfson
877C04633995413...

BRITTANY WOLFSON