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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

CHARLOTTE DEARDORFF, individually,
and on behalf of all others similarly situated,

Plaintiff,

v.

TUTOR PARTNERS LLC, a Maryland
limited liability company; DOES 1 through
10, inclusive,

Defendants.

Lead Case No.: 24STCV13693
[Consolidated with Case No. 24STCV21120]

*[Assigned for All Purposes to the Honorable
Laura A. Seigle, Dept. 17]*

**DECLARATION OF CHARLOTTE
DEARDORFF IN SUPPORT OF
PLAINTIFF’S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Final Approval Hearing:

Date: July 15, 2026

Time: 9:00 a.m.

Dept.: 17

Action Filed: May 31, 2024

DECLARATION OF CHARLOTTE DEARDORFF

I, Charlotte Deardorff, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Final Approval of Class Action and PAGA Settlement.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

2. When I decided to become involved in this lawsuit as a class representative on behalf of other employees of Defendant Tutor Partners LLC (“Defendant”) and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for Defendant, and that by doing so, I would be delaying more immediate recovery available to me through the Labor Commissioner’s office.

3. I was also made aware that being a class representative and private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a class representative and private attorney general, I might be responsible for some or all of Defendant’s legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

4. I understood that there were risks involved in class and representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

5. As the named plaintiff, I am the face of the litigation. Additionally, the class notice that was mailed in this case was sent to approximately 279 current and former employees of Defendant. The notice informed all these employees that I filed a class and representative

action against Defendant. Exposing myself to this kind of publicity creates a risk for my future career prospects, since current and former employees of Defendant may move to different companies within the education industry or may know people at other companies within the education industry who may not want to hire someone who sued her employer.

Amount of Time and Effort Spent and Duration of the Litigation

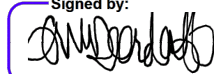
6. I have spent a substantial amount of time and effort on this litigation. My work on this case has included, among other things, searching for documents related to my employment with Defendant, discussing my experiences working for Defendant, keeping in regular contact with my attorneys regarding the status of the case, helping my attorneys prepare for mediation, being on-call for my attorneys on the day of mediation in case questions or concerns arose during mediation, and participating in settlement discussions. After mediation, I remained actively involved by reviewing the settlement papers and contacting my counsel for updates. I estimate that since I retained my counsel in December 2023, I have spent approximately 30 hours on the activities described above. And I estimate that I will spend an additional 1-5 hours assisting my attorneys through the approval process and staying up to date with the case through disbursement of the settlement checks

Personal Benefit Received as a Result of the Litigation

7. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, I have signed a general release for Defendant. The other employees are only releasing the wage and hour claims asserted in the lawsuit.

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

Executed on 6/22/2026, at El Segundo, California.

Signed by:


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 Charlotte Deardorff