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SCHOOLS, INC.

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County of Fresno
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF FRESNO**

RAMELLA GUIDRY, individually, and on
behalf of Aggrieved Employees pursuant to
the California Private Attorneys General Act,

Plaintiff,

v.

KIDS KARE SCHOOLS, INC.; and DOES 1
through 25, inclusive,

Defendant.

Case No. 24CECG03465

*Assigned for All Purposes to Jon M. Skiles,
Dept. 403*

**DECLARATION OF JAMES FISHER IN
SUPPORT OF PLAINTIFF'S RENEWED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

I, James Fisher, declare:

1. I am the owner of Defendant Kids Kare Schools, Inc. ("Kids Kare"). I have

1 personal knowledge of the matters stated herein and, if called as a witness, could and would testify
2 competently thereto.

3 2. In my position, I am familiar with Kids Kare's personnel, payroll, timekeeping, and
4 human resources records and the manner in which those records are created and maintained in the
5 ordinary course of business.

6 3. I submit this declaration in support of Plaintiff's renewed Motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 4. I have reviewed Kids Kare's business records relating to the individuals employed
9 as non-exempt employees in California during the period June 6, 2020 through June 10, 2025.

10 5. Based on my review of those records, there are approximately 1,100 individuals
11 who were employed by Kids Kare as non-exempt employees in California during the period June
12 6, 2020 through June 10, 2025.

13 6. Kids Kare maintains payroll, personnel, and employment records for its employees
14 in the ordinary course of business, including records reflecting employee names, contact
15 information, dates of employment, job positions, work locations, payroll information, and
16 timekeeping information.

17 7. The individuals who fall within the proposed settlement class can be identified
18 through Kids Kare's payroll and personnel records using objective criteria, including employee
19 status, dates of employment, and work location.

20 8. The individuals who fall within the proposed PAGA group can likewise be
21 identified through Kids Kare's payroll and personnel records.

22 9. Kids Kare's records permit the determination of the number of workweeks worked
23 by each class member during the class period and the number of pay periods worked by each
24 aggrieved employee during the PAGA period.

25 10. During the relevant periods, Kids Kare utilized centralized payroll and
26 recordkeeping systems for its California non-exempt employees.

27 11. During the relevant periods, Kids Kare maintained company-wide policies and
28 practices concerning payroll processing, timekeeping, meal periods, rest periods, wage statements,

1 final pay, and employee expense reimbursement applicable to its California non-exempt
2 employees.

3 12. These policies and practices were not unique to any single California location.

4 13. These policies and practices were applied to California non-exempt employees
5 across Kids Kare's California locations and across job titles.

6 14. To the extent employees worked in different positions or at different locations,
7 Kids Kare maintained their payroll and employment information through the same centralized
8 systems and under the same generally applicable policies and practices identified above.

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

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12 Dated: June 15, 2026

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James Fisher