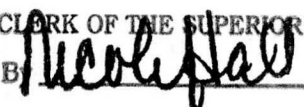


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FILED
ALAMEDA COUNTY

AUG 01 2022

CLERK OF THE SUPERIOR COURT
B 

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13 *Attorneys for Plaintiffs and the Putative Class*

14
15 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
16 **COUNTY OF ALAMEDA**

17 CHERYL BURLEIGH and CHAD HARRIS,
18 individually and on behalf of all others similarly
19 situated,

20 Plaintiffs,

21 v.

22 WALDEN UNIVERSITY, LLC, a Florida
23 Limited Liability Company and LAUREATE
24 EDUCATION, INC., a Delaware Corporation,

25 Defendants.

Case No. RG21106062

**~~PROPOSED~~ ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

ASSIGNED FOR ALL PURPOSES TO
JUDGE EVELIO GRILLO
DEPARTMENT 21

Date: June 7, 2022
Time: 10:00 a.m.
Reservation No.: 429533363155

Action Filed: July 22, 2021
Trial Date: None Set

1 This matter is before the Court on Plaintiffs' unopposed Motion for Preliminary Approval of
2 Class Action Settlement based on a ^{Amended} Settlement Agreement in the above-titled case, ^{C: Settlement Agreement")} ~~which is attached~~
3 ~~hereto as Exhibit 1~~. The Motion, having been fully considered by the Court, and it appearing to the
4 Court upon preliminary examination that the Settlement set forth herein is within the range of
5 reasonableness, and that a hearing should and will be held after notice to the Class to confirm that the
6 Settlement Agreement is fair, adequate, and reasonable, and to determine whether a judgment should be
7 entered in this action thereon,

8 IT IS HEREBY ORDERED THAT:

9 1. This Order hereby incorporates by reference the definitions in the Settlement
10 Agreement, and all terms used herein shall have the same meaning as set forth in the Settlement
11 Agreement.

12 2. The Court preliminarily approves the Settlement Agreement and finds that it is
13 within the range of reasonableness as to the Class and Defendants, and is the product of good
14 faith, arm's length negotiations between the Parties.

15 3. The Court certifies, for the purposes of this Settlement, a provisional class defined
16 as: all part-time faculty members who were classified as Contributing Faculty or paid according
17 to the Faculty Compensation Schedule and who are or have been employed by Defendants in
18 California during the Class Period, which is from January 25, 2017 to May 31, 2022.

19 4. The Court finds that for the purposes of settlement, Plaintiffs have established in
20 the moving papers and supporting declarations the requirements for certification of a provisional
21 settlement class pursuant to California Rules of Court, Rule 3.769(d).

22 5. The Court appoints and designates Phoenix Settlement Administrators as
23 Settlement Administrator. The Court further preliminarily approves the payment of the settlement
24 administration costs as provided in the Settlement Agreement.

25 6. The Court appoints and designates Plaintiffs Cheryl Burleigh and Chad Harris as
26 the Class Representatives, and the law firms HammondLaw, P.C. and The Jhaveri-Weeks Firm,
27 P.C. as Class Counsel.

1 7. The Court preliminarily approves payment from the Gross Settlement Amount of
2 the Service Awards to Plaintiffs and payment of attorneys’ fees and costs to Class Counsel as set
3 forth in the Settlement Agreement, with final approval of those awards to be determined following
4 the class notice process and the submission of a Motion for Attorneys’ Fees, Costs, and Class
5 Representatives’ Service Awards.

6 8. The Court approves the Class Notice, and finds that the method of disseminating
7 the Class Notice meets the requirements of due process and is the best notice practicable under the
8 circumstances.

9 9. Notice shall be provided to the Class Members in the following manner: Within 10
10 business days of entry of this Order, Defendants shall provide the Class Data List to the Settlement
11 Administrator. Within 25 calendar days of entry of this Order, the Settlement Administrator will
12 send the Class Notice in the form of **Exhibit A** to the Settlement Agreement (“Class Notice”) to
13 the Class by first class mail.

14 10. Class Members will have sixty (60) calendar days from the date of the first mailing
15 to submit requests for exclusion or objections. Unless a Class Member submits a valid and timely
16 Request for Exclusion as provided in the Settlement Agreement, he or she will automatically
17 become a Settlement Class Member. Class Members who wish to be excluded from the
18 Settlement must do so in writing and must include the Class Member’s full name, signature,
19 address, and last four digits of his or her social security number, as well as the case name and
20 number and a clear statement that he or she seeks to be excluded from the Settlement. Class
21 Members who wish to object to the Settlement must do so in writing and must include the Class
22 Member’s full name, address, and last four digits of his or her social security number, as well as
23 the case name and number and a clear statement of the basis for his or her objection. All
24 exclusions and objections must be mailed to the Settlement Administrator and postmarked no later
25 than the Response Deadline. Counsel for the Parties shall file any responses to any objections at
26 the time the Motion for Final Approval is filed.

1 11. If any Class Member timely disputes the calculation of the settlement allocation
2 listed on his or her Class Notice, the dispute will be submitted to the Settlement Administrator,
3 who will examine the records and either verify the calculation or provide a corrected calculation.
4 Disputes must be in writing and submitted to the Settlement Administrator, postmarked on or
5 before the Response Deadline. A dispute must contain the Class Member's full name, address,
6 signature, and last four digits of his or her Social Security number, the case name and number, and
7 any facts supporting the Class Member's dispute, including any supporting materials confirming
8 that the calculation on the notice is incorrect. The Settlement Administrator's determination of
9 disputes will be final and non-appealable.

10 12. The Final Approval Hearing shall be held on _____ to
11 determine whether the Settlement Agreement is fair, adequate, reasonable, and should be
12 approved. Plaintiffs' Motion for Approval of Attorneys' Fees, Costs, and Class Representatives'
13 Service Awards shall be heard on the same date and at the same time. Plaintiffs' Motion for Final
14 Approval and supporting papers, as well as Plaintiffs' Motion for Approval of Attorneys' Fees,
15 Costs, and Class Representatives' Service Awards and supporting papers, shall be filed and served
16 at least 16 court days before the hearing.

17
18 **IT IS SO ORDERED.**
19 **AUG 01 2022**

20 Date: _____, 2022



21 _____
22 Hon. Eyelio Grillo
23 Judge of the Superior Court

SUPERIOR COURT OF CALIFORNIA COUNTY OF ALAMEDA	Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Rene C. Davidson Courthouse 1225 Fallon Street, Oakland, CA 94612	FILED Superior Court of California County of Alameda 08/01/2022
PLAINTIFF/PETITIONER: Cheryl Burleigh et al	Chad Finke, Executive Officer / Clerk of the Court By: <u><i>Nicole Hall</i></u> Deputy N. Hall
DEFENDANT/RESPONDENT: Walden University, LLC et al	
CERTIFICATE OF MAILING	CASE NUMBER: RG21106062

I, the below-named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States mail at the courthouse in Oakland, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

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11780 W Sample Rd #103
Coral Springs, FL 33065-

Chad Finke, Executive Officer / Clerk of the Court

Dated: 08/01/2022

By:

Nicole Hall

N. Hall, Deputy Clerk

CERTIFICATE OF MAILING