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**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE**

DEAN PARSONS, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

LA SIERRA UNIVERSITY, a California Non-
Profit Corporation,

Defendant.

Case No. CVRI2000104

**DECLARATION OF ERIN LA
RUSSA (ON BEHALF OF CPT
GROUP, INC.) WITH RESPECT
TO NOTIFICATION AND
ADMINISTRATION**

Date: May 19, 2022
Time: 8:30 a.m.
Dept. S302

1 I, Erin La Russa, declare as follows:

2 1. I am employed by CPT Group, Inc., the Court-approved class action Settlement
3 Administrator for *Parsons v. La Sierra University*, as a Case Manager. I have personal knowledge
4 of the facts set forth in this Declaration, and if called as a witness, I could and would testify
5 competently thereto.

6 2. CPT Group, Inc. (“CPT”) has extensive experience in providing notice of class
7 actions and administering class action settlements. In the past 30 years, we have provided
8 notification and/or claims administration services in over one thousand class action cases.

9 3. CPT was selected by the parties to administer the settlement in this action. In this
10 capacity, CPT was charged with (a) printing and mailing to Class Members the *Notice of*
11 *Proposed Class Action Settlement and Hearing Date for Final Approval*, the *Request for*
12 *Exclusion from Class Action* and the *Objection to Class Action Settlement Agreement*, hereinafter
13 referred to as the “Notice”; (b) processing undeliverable mail and locating updated addresses for
14 Class Members; (c) receiving other communications about the settlement; (d) notifying the parties
15 of the number of Class Members who filed timely requests for exclusion; (e) notifying the parties
16 of the number of Class Members who filed untimely or deficient requests for exclusion, and taking
17 steps to cure the deficiencies; (f) establishing and maintaining a toll free case hotline where Class
18 Members can speak to case representatives regarding case specific questions; (g) establishing and
19 maintaining a URL (<https://www.cptgroupcaseinfo.com/LaSierraSettlement/>) where case
20 documents are accessible 24 hours a day, 7 days a week, and where CPT will post the Judgment
21 and Order Granting Final Approval of Class Action Settlement; and (h) will be responsible for
22 calculating and mailing Settlement Payment checks to Class Members as well as completing any
23 associated tax withholding and reporting to the State and Federal tax authorities.

24 4. CPT received the Court-approved text for the Notice from Counsel on October 13,
25 2021. CPT prepared a draft of the Notice for mailing to the Class Members. Attached hereto as
26 Exhibit A is a true and correct copy of the Notice.

27 5. On October 29, 2021, CPT received a data file from Counsel containing the Class
28

1 Data List for the purpose of mailing Notices to Class Members. The finalized mailing list
2 contained five hundred forty-nine (549) unique Class Members including three hundred eighty-
3 eight (388) Adjunct Class Members and one hundred seventy- six (176) Reimbursement Class
4 Members. Fifteen (15) of these Class Members were members of both classes.

5 6. On November 17, 2021, CPT ran a National Change of Address (NCOA) search
6 in attempt to update the addresses on the class list and ensure it was as accurate as possible. A
7 search of this database provided updated addresses for any individual who had moved in the
8 previous four years and notified the U.S. Postal Service of their change of address.

9 7. The Notices were enclosed in an envelope with the Class Member's name and
10 known address printed on the envelope. On November 18, 2021, the Notice was mailed via U.S.
11 first class mail to all Class Members. The deadline to dispute, object or request exclusion from
12 the Settlement was January 17, 2022.

13 8. On January 10, 2022, CPT received a revised data file from Defense Counsel
14 which contained information for five hundred eighty-two (582) Reimbursement Class Members
15 who were inadvertently left off of the Class Data List that was provided to CPT on October 29,
16 2021. One hundred twenty-six (126) of these additional Reimbursement Class Members were
17 also Adjunct Class Members who had previously received a Notice and four hundred fifty-six
18 (456) of the additional Reimbursement Class Members had not previously received a Notice.

19 9. On February 9, 2022, the Corrected Notice attached hereto as Exhibit B was
20 mailed to the one hundred twenty-six (126) additional Reimbursement Class Members who
21 received a prior Notice; and the Corrected Notice attached hereto as Exhibit C was mailed to the
22 four hundred fifty-six (456) additional Reimbursement Class Members who had not received a
23 prior Notice. The Corrected Notices were mailed via U.S. first class mail. The deadline to dispute,
24 object or request exclusion for Class Members who received a Corrected Notice was April 11,
25 2022.

26 10. Altogether, CPT mailed a total of one thousand one hundred thirty-one (1,131)
27 Notices to one thousand five (1,005) unique Class Members including three hundred eighty-eight
28

(388) Adjunct Class Members and seven hundred fifty-eight (758) Reimbursement Class Members. There were one hundred forty-one (141) Class Members who belong to both classes and one hundred twenty-six (126) Class Members who received two Notices.

11. As of the date of this declaration, thirty-one (31) Notices have been returned to our office by the U.S. Postal Service, of which two (2) were provided a new address by the Post Office. For the remaining twenty-nine (29) Notices, CPT performed a skip trace to locate a better address using Accurint, one of the most comprehensive address databases available. It utilizes hundreds of different databases supplied by credit reporting agencies, public records, and a variety of other national databases.

12. As a result of skip trace effort or re-mail requests from Counsel or the Class Members themselves, a total of twenty-nine (29) Notices have been re-mailed to date. In addition, five (5) Notices were also forwarded by CPT. As of the date of this declaration, a total of three (3) out of one thousand one hundred thirty-one (1,131) Notices were ultimately deemed undeliverable as no better address was provided by the U.S. Postal Service nor obtained through a skip trace.

13. As of the date of this declaration, CPT has received a total of twenty-eight (28) exclusion forms. Of these, two (2) unique Class Members submitted duplicate forms and two (2) unique Class Members submitted exclusion forms from each class, so altogether, twenty-four (24) unique Class Members excluded themselves from the Settlement. Attached hereto as Exhibit D are all twenty-eight (28) requests for exclusion including the two duplicate forms. The names of the nineteen (19) Class Members who requested exclusion from the Reimbursement Class are: Kenichiro Aiso, Steven Eric Anderson, Christine Bartholomew, Melissa Brotton, Adam Michael DesJardins, Joy Fehr, Marlene Ferreras, Melissa De La Fuente, Lawrence T. Geraty, Mary Hahn-Young, Raymond Hurst, Christian Johnston, John Jones, Lourdes Morales-Gudmundsson, Cheng Ng, Liza Ngenye, Jill K Rasmussen, Alfredo Takashi Suzuki, and William Wellwood. The names of the seven (7) Class Members who requested exclusion from the Adjunct Class are: John Chen, Dubravka Hajdin, Christian Johnston, Gerard Kiemeney, JoAnne LaFever, Robert Kevan

1 Metcalfe, and Lourdes Morales-Gudmundsson.

2 14. As of the date of this declaration, CPT has received a total of three (3) objection
3 forms, only one (1) of which is valid. The name of the Reimbursement Class Member who
4 submitted a valid objection is Lisa Susanne Goolsby. Two (2) of these objection forms were
5 submitted by Class Members who also submitted an exclusion form. The names of the Class
6 Members who submitted both an objection form and an exclusion form are Gerard Kiemeney and
7 Steven Eric Anderson. CPT requested further clarification from these Class Members to confirm
8 their intent. Both Class Members responded and confirmed that their objection form should be
9 disregarded and that they wish to be excluded from the settlement. Attached hereto as Exhibit E
10 are all three (3) objections forms received.

11 15. As of the date of this declaration, CPT has received three (3) disputes from Class
12 Members regarding their Credits. Of these disputes, one (1) Class Member's credits were
13 approved in their favor, one (1) Class Member's credits were partially approved, and one (1) Class
14 Member's credits remained the same.

15 16. As of the date of this declaration, CPT reports a total of seven hundred thirty-nine
16 (739) out of seven hundred fifty-eight (758) Class Members will participate in the Reimbursement
17 Class, representing 97.49% of the Class.

18 17. As of the date of this declaration, CPT reports a total of three hundred eighty-one
19 (381) out of three hundred eighty-eight (388) Class Members will participate in the Adjunct Class,
20 representing 98.20% of the Class.

21 18. Pursuant to the Settlement Agreement, should the number of Reimbursement Class
22 Members exceed 176 by more than 10% (i.e., more than 194), then the portion of the GSA
23 attributed to Reimbursement Class Members (i.e., \$8,800) shall be increased proportionally for
24 each additional Reimbursement Settlement Class Member above the (10%) threshold. Per CPT's
25 calculations, and in consultation with Counsel, the Reimbursement Class increased by 321%
26 above the 10% threshold, which increased the portion of the GSA attributed to Reimbursement
27 Class Members by \$28,220.00 and increased the Gross Settlement Amount from \$550,000.00 to
28

\$578,220.00. The entire Net Settlement Amount was used to calculate the estimated amount for each Settlement Class Member:

Gross Settlement Amount	\$578,220.00
Less Class Counsel Fees	(\$192,740.00)
Less Class Counsel Costs	(\$19,405.94)
Less Enhancement Award to Plaintiff	(\$7,500.00)
Less PAGA Payment	(\$15,000.00)
<u>Less Settlement Administration Costs</u>	<u>(\$13,500.00)</u>
Net Settlement Amount	\$330,074.06

19. Each of the seven hundred thirty-nine (739) Participating Reimbursement Settlement Class Members will receive \$50.09. The \$293,054.06 remaining from the Net Settlement will be paid to Adjunct Settlement Class Members pro rata. The average payment is \$332.83, the highest is \$5,701.41 and the lowest is \$4.47. Plaintiff Dean Parson's Settlement Payment is estimated to be \$857.66.

20. Seven Hundred Fifty-Eight (758) Reimbursement Class Members worked during the PAGA Period. The average PAGA Payment for each of these Class Members is \$4.47.

21. Two Hundred Twenty-Two (222) Adjunct Class Members worked during the PAGA Period. The average PAGA Payment for each of these Class Members is \$4.47.

22. Pursuant to the Settlement Agreement, Defendant will fund the employer's share payroll tax in addition to the Gross Settlement. This amount is estimated to be \$8,645.09.

23. CPT will charge a flat fee of \$13,500.00 for administration of the settlement. This includes all of the Notice Administration services described above and all costs incurred to date. CPT will perform additional services following final approval which includes issuing and printing checks, tax reporting, mailing Settlement Payment checks, issuing all other payments as awarded by the Court, mailing a reminder postcard to all Class Members who have yet to cash their

1 Settlement Payment checks, and transmitting all sums represented by uncashed checks to the non-
2 profit organization Interdisciplinary Center for Healthy Workplaces. Attached hereto as Exhibit
3 F is a copy of CPT's invoice for administration costs.

4
5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct, and that this declaration is executed this 25th day of April 2022, at
7 Irvine, California.

8
9
10 
11 **Erin La Russa**

EXHIBIT A

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT AND HEARING DATE FOR FINAL APPROVAL

Parsons v. La Sierra University

(California Superior Court, County of Riverside Case No. CVRI2000104)

As a current or former Adjunct Faculty Member of La Sierra University in California, or a current or former employee who worked from home for La Sierra University in California, you are entitled to receive money from a class action settlement.

Please read this Notice carefully. This Notice relates to a proposed settlement of class action litigation. If you are a Class Member, it contains important information about your right to receive a payment from the Settlement fund.

You have received this Notice of Class Action Settlement because La Sierra University's ("Defendant" or "LSU") records show you are an "Adjunct Class Member" or a "Reimbursement Class Member" and therefore entitled to a payment from this class action Settlement. "Adjunct Class Member" refers to all current or former employees who performed the duties of an Adjunct Faculty for LSU in California, at any time between November 12, 2016 and October 14, 2021, while not classified as hourly non-exempt employees. "Reimbursement Class Member" refers to all individuals who worked remotely for LSU in California at any time between March 4, 2020 and October 14, 2021.

- The settlement resolves a class-action lawsuit, *Parsons v. La Sierra University* (the "Lawsuit"), which alleges that Defendant: (1) failed to pay Adjunct Class Members for all hours worked, (2) failed to provide Adjunct Class Members legally-compliant meal and rest breaks under California law, (3) failed to pay Adjunct Class Members all wages owed upon discharge from employment, (4) failed to furnish Adjunct Class Members accurate itemized wage statements, and (5) failed to reimburse Adjunct Class Members who taught courses online both before and during the Covid-19 pandemic for business expenses. The Lawsuit also alleges that Defendant failed to reimburse Reimbursement Class Members for business expenses related to working from home during the Covid-19 pandemic.

- On October 14, 2021, the Riverside County Superior Court granted preliminary approval of this class action Settlement and ordered that all Class Members be notified of the Settlement. The Court has not made any determination of the validity of the claims in the Lawsuit. The Court has determined only that there is sufficient evidence to suggest that the proposed settlement might be fair, adequate, and reasonable. Any final determination of those issues will be made at the final hearing. LSU vigorously denies the claims in the Lawsuit and contends that it fully complied with all applicable laws.

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING AND RECEIVE PAYMENT	Get a payment, and give up your legal rights to pursue claims released by the settlement of the Lawsuit.
OPT OUT OF THE SETTLEMENT	Exclude yourself from the Settlement, get no payment other than your share of PAGA civil penalties as described below, and retain your legal rights to pursue claims that would otherwise be released by the settlement of the Lawsuit.
OBJECT TO THE SETTLEMENT	If you do not opt out, you may write to the Settlement Administrator, CPT, Inc., about why you object to the settlement and they will forward your concerns to counsel which will then be provided to the Court. If the Court approves the Settlement despite your objection, you will still be bound by the Settlement. You or your attorney may also address the Court during the Final Approval hearing scheduled for March 1, 2022, at 8:30 a.m. in the Murrieta Courthouse of Riverside County Superior Court. You do not need to attend the hearing for your objection to be considered.

The Final Fairness and Approval Hearing on the adequacy, reasonableness, and fairness of the Settlement will be held at 8:30 a.m. on March 1, 2022, in Dept. S302, Southwest Justice Center, located at 30755-D Auld Road, Murrieta, CA 92563. You are not required to attend the Hearing, but you are welcome to do so.

Why Am I Receiving This Notice?

Defendant's records show that: (1) you currently work, or previously worked, for LSU in California as an Adjunct faculty member between November 12, 2016 and October 14, 2021 and/or (2) worked remotely for LSU in California between March 4, 2020 and October 14, 2021. You were sent this Class Notice because you have a right to know about a proposed settlement of a class action lawsuit, and about all of your options before the Court decides whether to finally approve the settlement. If the Court approves the settlement and then any objections and appeals are resolved, a "Settlement Administrator" appointed by the Court will make the payments described in this Notice. This Notice explains the Lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

What Is This Case About?

Dean Parsons worked as an adjunct instructor for LSU in California. He is the "Plaintiff" in this case and is suing on behalf of himself and Adjunct Class Members for LSU's alleged failure to pay all wages due for all hours worked, failure to provide Adjunct Class Members with legally-compliant rest and meal breaks, failure to pay all wages owed upon separation from employment, failure to furnish timely and accurate wage statements, and failure to reimburse necessary business expenses in connection with teaching courses online both before and during the pandemic. Plaintiff also alleges that LSU failed to reimburse Adjunct Class Members and Reimbursement Class Members for their necessary business expenses in connection with working remotely from home during the Covid-19 pandemic.

Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at LSUSettlement@cptgroup.com

LSU denies all of the allegations made by Plaintiff and denies that it violated any law. The Court has made no ruling on the merits of Plaintiff's claims. The Court has only preliminarily approved a Class Action Settlement Agreement. The Court will decide whether to give final approval to the Settlement at the Final Fairness and Approval Hearing.

Summary of the Settlement Terms

Plaintiff and LSU have agreed to settle this case on behalf of the Class for the Gross Settlement Amount of \$550,000. The Gross Settlement includes: (1) Administration Costs up to \$20,000; (2) a service payment of up to \$10,000 to Plaintiff for his time and efforts in pursuing this case and in exchange for a general release of claims against LSU he has agreed to enter into; (3) fees of up to 1/3 of the Settlement Amount (\$183,333.33) and up to \$20,000.00 in litigation costs to Class Counsel; and (4) payment allocated to Private Attorney General Act ("PAGA") penalties in the amount of \$15,000 (with \$11,250 to be paid to the Labor and Workforce Development Agency ("LWDA") and 25% paid pro rata to those Adjunct Class Members who worked during the Adjunct PAGA Period (defined as October 20, 2019 to October 14, 2021 and Reimbursement Class Members who worked during the Reimbursement PAGA Period March 4, 2020 and October 14, 2021). After deducting these sums, a total of approximately \$305,416.67 will be available for distribution to Class Members ("Net Settlement Amount"). In addition to the Gross Settlement Amount, Defendant will bear all employer-side payroll tax payments due and payable to federal and state tax authorities as a result of this Settlement.

Distribution to Class Members

The Net Settlement available for distribution to Class Members will be determined by deducting from the Gross Settlement Amount the combined total of any court-awarded attorneys' fees and costs, settlement administration costs, service award to the named Plaintiff, and the amount paid to the LWDA.

\$8,800 of the Net Settlement Amount shall be allocated to the Reimbursement Class and paid to Reimbursement Class Members on a per capita basis.

\$3,750 of the amount allocated to the PAGA claim ("PAGA Payment") shall be paid to Class Members who worked for LSU in California during the Adjunct / Reimbursement PAGA Periods ("PAGA Group"). PAGA Payment shares will be paid to the PAGA Group on a per capita basis. If you Opt Out from the Class, you will still receive your PAGA Payment share and will release the Released PAGA Claims.

The \$292,866.67 remaining from the Net Settlement Amount shall be allocated to the Adjunct Class and shall be paid to Adjunct Class Members pro-rata based on the number of credits that they taught during the Adjunct Class Period in proportion to the credits taught by all Adjunct Class Members. Adjunct Class Members' credits will be weighted as follows: the credits taught as part of a course that was solely online will be reduced by one-quarter (i.e. they will be multiplied by 0.75). Zero-credit courses will be treated as one-credit courses for the purposes of this calculation.

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

Your Estimated Settlement Award

Defendant's records show that you «**Rei_Are_AreNot**» a member of the Reimbursement Class. Your share of the Net Settlement allocated to the Reimbursement Class is «**Reibursement_estAmount**».

Defendant's records also show that you «**Adj_Are_AreNot**» a member of the Adjunct Class and taught a total of: «**TotalCredits**» credits during the Adjunct Class Period. Defendant's records show that «**OnlineCredits**» credits were taught solely online, and a 0.75 multiplier has therefore been applied to these credits. Based on this information, your share of the Net Settlement allocated to Adjuncts is approximately «**Adjunct_estAmount**».

Finally, Defendant's records show that you «**PAGA_Are_AreNot**» a member of the PAGA Group. Your share of the PAGA Payment is «**PAGA_estAmount**».

If you believe this information is incorrect and wish to dispute it, you must mail a dispute to the Settlement Administrator no later than January 17, 2022. Please include any documentation you have that you contend supports your dispute.

Tax Reporting

For tax reporting purposes, the payments monies paid to the Adjunct Class will be allotted 20% to wages and 80% to penalties and interest. Payout to the Reimbursement Class will be allotted 100% to penalties.

Please consult a tax advisor regarding the tax consequences of your Settlement Award. This notice is not intended to provide legal or tax advice on your Settlement Share.

Claims That You Are Releasing Under the Settlement

Adjunct Released Claims: If finally approved by the Court, each Adjunct Class Member who does not request exclusion from the Settlement will be bound by all of the terms of the Settlement, and will release LSU from any and all claims stated in the complaint and those based solely upon the facts alleged in the complaint on their behalves, including claims for any alleged failure to pay all wages due (including minimum wage and overtime wages), failure to pay for all hours worked (including off-the clock and on-call work), failure to provide meal and authorize and permit rest periods, short/late meal and rest periods, failure to relieve of all duties during meal and rest periods, failure to reimburse business expenses, failure to timely pay wages and final wages, failure to furnish accurate wage statements including claims derivative and/or related to these claims, liquidated damages, and conversion of wages, up to and including the date of preliminary approval by the Court. This release shall apply to all claims arising at any point during the Adjunct Class Period.

Reimbursement Released Claims: If finally approved by the Court, each Reimbursement Class Member who does not request exclusion from the Settlement will be bound by all of the terms of the Settlement, and will release LSU from any and all claims stated in the complaint and those based solely upon the facts alleged in the complaint on their behalves including reimbursement-related claims. This release shall apply to all claims arising at any point during the Reimbursement Class Period.

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

Your Options Under the Settlement

Option 1 – *Do Nothing and Receive Your Payment*

If you do not opt out, you are automatically entitled to your Settlement Check because you are a Class Member. If you do not dispute your pay checks calculation and do not opt out of the settlement, you will be bound by the settlement and receive a settlement payment. **In other words, if you are a Class Member, you do not need to take any action to receive the settlement payment set forth above.**

Plaintiff and all Class Members who do not submit a valid and timely opt out (pursuant to Section 2 below), will be deemed to have fully, finally, and forever released, settled, compromised, relinquished, and discharged the Released Parties (including LSU and any employees, officers, and directors) of all Released Claims they may have or had, as described above.

Option 2 – *Opt Out of the Settlement*

If you do not wish to participate in the Settlement, you may exclude yourself by completing the enclosed Exclusion Form and mailing it by U.S. First-Class Mail to the address listed on the Exclusion Form. If you Opt Out from the Class, you will still receive your PAGA Payment Share and will release the Released PAGA Claims.

The Exclusion Form must be postmarked or received by the Administrator not later than January 17, 2022. If you exclude yourself from the Settlement then you will get no payment, and retain your legal rights to pursue claims that would otherwise be released by the settlement of the Lawsuit.

Option 3 – *File an Objection to the Settlement*

If you wish to object to the Settlement, you may complete the enclosed Objection Form and mail it to the Administrator no later than January 17, 2022. Please note that you cannot both object to the Settlement and exclude yourself. If the Court overrules your objection, you will be bound by the settlement and will receive your Settlement Share.

Final Fairness Hearing

You may, if you wish, also appear at the Final Fairness and Approval Hearing set for March 1, 2022 at 8:30 a.m. in Dept S302, Southwest Justice Center, 30755-D Auld Road, Murrieta, CA 92563, and discuss your objections with the Court and the Parties at your own expense. You may also retain an attorney to represent you at the Hearing at your own expense.

Additional Information

This Notice of Class Action Settlement is only a summary of this case and the Settlement. For a more detailed statement of the matters involved in this case and the Settlement, you may visit <https://www.cptgroupcaseinfo.com/LaSierraSettlement>, call the Settlement Administrator at 1(888) 617-1625, or Class Counsel at:

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

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Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625
Email: LSUSettlement@cptgroup.com
Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

You may also refer to the pleadings, the Settlement Agreement, attached as **Exhibit 1** to the Declaration of Julian Hammond in Support of Plaintiff's Motion for Preliminary Approval filed on August 11, 2021, the Amendment to the Settlement Agreement, attached as **Exhibit 1** to the Supplemental Declaration of Julian Hammond in Support of Plaintiff's Motion for Preliminary Approval filed on September 23, 2021 and other papers filed in this case, which may be inspected at the Office of the Clerk of Riverside County Superior Court, located at 30755-D Auld Road, Murrieta, CA 92563, during regular business hours of each court day. You may also access these records online by visiting: <https://epublic-access.riverside.courts.ca.gov/public-portal/>; clicking on "Case Number Search"; and entering the case number (CVRI2000104).

All inquiries by Class Members regarding this Notice of Class Action Settlement and/or the Settlement should be directed to the Settlement Administrator or Class Counsel.

**PLEASE DO NOT CONTACT THE CLERK OF THE COURT, THE JUDGE,
LSU, OR LSU'S ATTORNEYS WITH INQUIRIES.**

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University

(California Superior Court, County of Riverside Case No. CVRI2000104)

USE AND RETURN THIS FORM ONLY IF YOU WISH TO EXCLUDE YOURSELF FROM THE CLASS SETTLEMENT.

If you wish to exclude yourself from the class settlement, you must read and sign the following statement and postmark and mail this form to the Settlement Administrator on or before January 17, 2022, to the following address:

Parsons v. La Sierra University

c/o CPT Group, Inc.

50 Corporate Park

Irvine, CA 92606

Phone: 1(888) 617-1625

Email: LSUSettlement@cptgroup.com

Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

Signature

Date

Print Name

Address

City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Questions? Please call 1(888) 617-1625

OBJECTION TO CLASS ACTION SETTLEMENT AGREEMENT

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

USE AND RETURN THIS FORM ONLY IF YOU WISH TO OBJECT TO THE CLASS SETTLEMENT. DO NOT SUBMIT THIS FORM IF YOU WISH TO BE EXCLUDED FROM THE SETTLEMENT.

If you wish to object to the class settlement, you must state the nature of and basis for your objection and sign below, and postmark and mail this form to the Settlement Administrator on or before January 17, 2022, to the following address:

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625
Email: LSUSettlement@cptgroup.com
Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

I object to the proposed Settlement for the following reason(s): _____

Signature

Date

Print Name

Address

City, State, Zip Code

If you do not wish to object to the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Questions? Please Call 1(888) 617-1625

EXHIBIT B

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT AND HEARING DATE FOR FINAL APPROVAL

Parsons v. La Sierra University

(California Superior Court, County of Riverside Case No. CVRI2000104)

As a current or former Adjunct Faculty Member of La Sierra University in California, or a current or former employee who worked from home for La Sierra University in California, you are entitled to receive money from a class action settlement.

Please read this Notice carefully. This Notice relates to a proposed settlement of class action litigation. If you are a Class Member, it contains important information about your right to receive a payment from the Settlement fund.

You have received this Notice of Class Action Settlement because La Sierra University's ("Defendant" or "LSU") records show you are an "Adjunct Class Member" or a "Reimbursement Class Member" and therefore entitled to a payment from this class action Settlement. "Adjunct Class Member" refers to all current or former employees who performed the duties of an Adjunct Faculty for LSU in California, at any time between November 12, 2016 and October 14, 2021, while not classified as hourly non-exempt employees. "Reimbursement Class Member" refers to all individuals who worked remotely for LSU in California at any time between March 4, 2020 and October 14, 2021.

You already received a prior notice by U.S. Mail notifying you that you are an Adjunct Class Member. This Notice is to inform you that you are a Reimbursement Class Member as well and therefore entitled to a separate payment from this Settlement. As explained in your previous Notice, your deadline to respond with respect to your participation in the Adjunct Class was January 17, 2022. However, should you choose to respond with respect to your participation in the Reimbursement Class, the deadline for you to do so is April 11, 2022.

- The settlement resolves a class-action lawsuit, *Parsons v. La Sierra University* (the "Lawsuit"), which alleges that Defendant: (1) failed to pay Adjunct Class Members for all hours worked, (2) failed to provide Adjunct Class Members legally-compliant meal and rest breaks under California law, (3) failed to pay Adjunct Class Members all wages owed upon discharge from employment, (4) failed to furnish Adjunct Class Members accurate itemized wage statements, and (5) failed to reimburse Adjunct Class Members who taught courses online both before and during the Covid-19 pandemic for business expenses. The Lawsuit also alleges that Defendant failed to reimburse Reimbursement Class Members for business expenses related to working from home during the Covid-19 pandemic.

- On October 14, 2021, the Riverside County Superior Court granted preliminary approval of this class action Settlement and ordered that all Class Members be notified of the Settlement. The Court has not made any determination of the validity of the claims in the Lawsuit. The Court has determined only that there is sufficient evidence to suggest that the proposed settlement might be fair, adequate, and reasonable. Any final determination of those issues will be made at the final hearing. LSU vigorously denies the claims in the Lawsuit and contends that it fully complied with all applicable laws.

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING AND RECEIVE PAYMENT	Get a payment, and give up your legal rights to pursue claims released by the settlement of the Lawsuit.
OPT OUT OF THE SETTLEMENT	Exclude yourself from the Reimbursement Class Settlement, get no payment other than your share of PAGA civil penalties as described below, and retain your legal rights to pursue claims that would otherwise be released by the settlement of the Lawsuit.
OBJECT TO THE SETTLEMENT	If you do not opt out, you may write to the Settlement Administrator, CPT, Inc., about why you object to the Reimbursement Class settlement and they will forward your concerns to counsel which will then be provided to the Court. If the Court approves the Settlement despite your objection, you will still be bound by the Settlement. You or your attorney may also address the Court during the Final Approval hearing scheduled for May 19, 2022, at 8:30 a.m. in the Murrieta Courthouse of Riverside County Superior Court. You do not need to attend the hearing for your objection to be considered.

The Final Fairness and Approval Hearing on the adequacy, reasonableness, and fairness of the Settlement will be held at 8:30 a.m. on May 19, 2022, in Dept. S302, Southwest Justice Center, located at 30755-D Auld Road, Murrieta, CA 92563. You are not required to attend the Hearing, but you are welcome to do so.

Why Am I Receiving This Notice?

Defendant's records show that: (1) you currently work, or previously worked, for LSU in California as an Adjunct faculty member between November 12, 2016 and October 14, 2021 and (2) worked remotely for LSU in California between March 4, 2020 and October 14, 2021. You were sent this Class Notice because you have a right to know about a proposed settlement of a class action lawsuit, and about all of your options before the Court decides whether to finally approve the settlement. If the Court approves the settlement and then any objections and appeals are resolved, a "Settlement Administrator" appointed by the Court will make the payments described in this Notice. This Notice explains the Lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

What Is This Case About?

Dean Parsons worked as an adjunct instructor for LSU in California. He is the "Plaintiff" in this case and is suing on behalf of himself and Adjunct Class Members for LSU's alleged failure to pay all wages due for all hours worked, failure to provide Adjunct Class Members with legally-compliant rest and meal breaks, failure to pay all wages owed upon separation from employment, failure to furnish timely and accurate wage statements, and failure to reimburse necessary business expenses in connection with teaching courses online both before and during the pandemic. Plaintiff also alleges that LSU failed to reimburse Adjunct Class Members and Reimbursement Class

Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at LSUSettlement@cptgroup.com

Members for their necessary business expenses in connection with working remotely from home during the Covid-19 pandemic.

LSU denies all of the allegations made by Plaintiff and denies that it violated any law. The Court has made no ruling on the merits of Plaintiff's claims. The Court has only preliminarily approved a Class Action Settlement Agreement. The Court will decide whether to give final approval to the Settlement at the Final Fairness and Approval Hearing.

Summary of the Settlement Terms

Plaintiff and LSU have agreed to settle this case on behalf of the Class for the Gross Settlement Amount of \$578,220. The Gross Settlement includes: (1) Administration Costs up to \$20,000; (2) a service payment of up to \$10,000 to Plaintiff for his time and efforts in pursuing this case and in exchange for a general release of claims against LSU he has agreed to enter into; (3) fees of up to 1/3 of the Settlement Amount (\$192,740) and up to \$20,000.00 in litigation costs to Class Counsel; and (4) payment allocated to Private Attorney General Act ("PAGA") penalties in the amount of \$15,000 (with \$11,250 to be paid to the Labor and Workforce Development Agency ("LWDA") and 25% paid pro rata to those Adjunct Class Members who worked during the Adjunct PAGA Period (defined as October 20, 2019 to October 14, 2021) and Reimbursement Class Members who worked during the Reimbursement PAGA Period (March 4, 2020 and October 14, 2021). After deducting these sums, a total of approximately \$324,230 will be available for distribution to Class Members ("Net Settlement Amount"). In addition to the Gross Settlement Amount, Defendant will bear all employer-side payroll tax payments due and payable to federal and state tax authorities as a result of this Settlement.

Distribution to Class Members

The Net Settlement available for distribution to Class Members will be determined by deducting from the Gross Settlement Amount the combined total of any court-awarded attorneys' fees and costs, settlement administration costs, service award to the named Plaintiff, and the amount paid to the LWDA.

\$37,020 of the Net Settlement Amount shall be allocated to the Reimbursement Class and paid to Reimbursement Class Members on a per capita basis.

\$3,750 of the amount allocated to the PAGA claim ("PAGA Payment") shall be paid to Class Members who worked for LSU in California during the Adjunct / Reimbursement PAGA Periods ("PAGA Group"). PAGA Payment shares will be paid to the PAGA Group on a per capita basis. If you Opt Out from the Class, you will still receive your PAGA Payment share and will release the Released PAGA Claims.

The \$283,460 remaining from the Net Settlement Amount shall be allocated to the Adjunct Class and shall be paid to Adjunct Class Members pro-rata based on the number of credits that they taught during the Adjunct Class Period in proportion to the credits taught by all Adjunct Class Members. Adjunct Class Members' credits will be weighted as follows: the credits taught as part of a course that was solely online will be reduced by one-quarter (i.e. they will be multiplied by 0.75). Zero-credit courses will be treated as one-credit courses for the purposes of this calculation.

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LSUSettlement@cptgroup.com**

Your Estimated Settlement Award

Defendant's records show that you «**Rei_Are_AreNot**» a member of the Reimbursement Class. Your share of the Net Settlement allocated to the Reimbursement Class is «**Rei_estAmount_Revised**».

As explained in your previous Notice, Defendant's records also show that you «**Adj_Are_AreNot**» a member of the Adjunct Class and taught a total of: «**TotalCredits**» credits during the Adjunct Class Period. Defendant's records show that «**OnlineCredits**» credits were taught solely online, and a 0.75 multiplier has therefore been applied to these credits. Based on this information, your share of the Net Settlement allocated to Adjuncts is approximately «**Adjunct_estAmount_Revised**». Please be advised that your estimated Adjunct Settlement Award may be slightly different due to an increase in class size. If you timely excluded yourself from participation in the Adjunct Class, you will not receive a payment from the portion of the Net Settlement allocated to Adjuncts.

Finally, Defendant's records show that you «**PAGA_Are_AreNot**» a member of the PAGA Group. Your share of the PAGA Payment is «**PAGA_estAmount_Revised**».

Tax Reporting

For tax reporting purposes, the payments monies paid to the Adjunct Class will be allotted 20% to wages and 80% to penalties and interest. Payout to the Reimbursement Class will be allotted 100% to penalties.

Please consult a tax advisor regarding the tax consequences of your Settlement Award. This notice is not intended to provide legal or tax advice on your Settlement Share.

Claims That You Are Releasing Under the Settlement

Adjunct Released Claims: If finally approved by the Court, each Adjunct Class Member who did not request exclusion from the Settlement will be bound by all of the terms of the Settlement, and will release LSU from any and all claims stated in the complaint and those based solely upon the facts alleged in the complaint on their behalves, including claims for any alleged failure to pay all wages due (including minimum wage and overtime wages), failure to pay for all hours worked (including off-the clock and on-call work), failure to provide meal and authorize and permit rest periods, short/late meal and rest periods, failure to relieve of all duties during meal and rest periods, failure to reimburse business expenses, failure to timely pay wages and final wages, failure to furnish accurate wage statements including claims derivative and/or related to these claims, liquidated damages, and conversion of wages, up to and including the date of preliminary approval by the Court. This release shall apply to all claims arising at any point during the Adjunct Class Period.

Reimbursement Released Claims: If finally approved by the Court, each Reimbursement Class Member who does not request exclusion from the Settlement will be bound by all of the terms of the Settlement, and will release LSU from any and all claims stated in the complaint and those based solely upon the facts alleged in the complaint on their behalves including reimbursement-related claims. This release shall apply to all claims arising at any point during the Reimbursement Class Period.

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

Your Options Under the Settlement

Option 1 – *Do Nothing and Receive Your Payment*

If you do not opt out, you are automatically entitled to your Settlement Check because you are a Reimbursement Class Member. If you did not dispute your pay checks calculation and do not opt out of the settlement, you will be bound by the settlement and receive a settlement payment. **In other words, if you are a Class Member, you do not need to take any action to receive the settlement payment set forth above.**

Plaintiff and all Class Members who do not submit a valid and timely opt out (pursuant to Section 2 below), will be deemed to have fully, finally, and forever released, settled, compromised, relinquished, and discharged the Released Parties (including LSU and any employees, officers, and directors) of all Released Claims they may have or had, as described above.

Option 2 – *Opt Out of the Settlement*

If you do not wish to participate in the Reimbursement Class Settlement, you may exclude yourself by completing the enclosed Exclusion Form and mailing it by U.S. First-Class Mail to the address listed on the Exclusion Form. If you Opt Out from the Class, you will still receive your PAGA Payment Share and will release the Released PAGA Claims.

The Exclusion Form must be postmarked or received by the Administrator not later than April 11, 2022. If you exclude yourself from the Reimbursement Class Settlement then you will get no payment, and retain your legal rights to pursue claims that would otherwise be released by the settlement of the Lawsuit.

Option 3 – *File an Objection to the Settlement*

If you wish to object to the Reimbursement Class Settlement, you may complete the enclosed Objection Form and mail it to the Administrator no later than April 11, 2022. Please note that you cannot both object to the Reimbursement Class Settlement and exclude yourself. If the Court overrules your objection, you will be bound by the settlement and will receive your Settlement Share.

Final Fairness Hearing

You may, if you wish, also appear at the Final Fairness and Approval Hearing set for May 19, 2022 at 8:30 a.m. in Dept S302, Southwest Justice Center, 30755-D Auld Road, Murrieta, CA 92563, and discuss your objections with the Court and the Parties at your own expense. You may also retain an attorney to represent you at the Hearing at your own expense.

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

Additional Information

This Notice of Class Action Settlement is only a summary of this case and the Settlement. For a more detailed statement of the matters involved in this case and the Settlement, you may visit <https://www.cptgroupcaseinfo.com/LaSierraSettlement/>, call the Settlement Administrator at 1(888) 617-1625, or Class Counsel at:

HAMMONDLAW, P.C.
Julian Hammond (SBN 268489)
jhammond@hammondlawpc.com
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pbrandler@hammondlawpc.com

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Fax: (310) 295-2385

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625
Email: LSUSettlement@cptgroup.com
<https://www.cptgroupcaseinfo.com/LaSierraSettlement/>

You may also refer to the pleadings, the Settlement Agreement, attached as **Exhibit 1** to the Declaration of Julian Hammond in Support of Plaintiff's Motion for Preliminary Approval filed on August 11, 2021, the Amendment to the Settlement Agreement, attached as **Exhibit 1** to the Supplemental Declaration of Julian Hammond in Support of Plaintiff's Motion for Preliminary Approval filed on September 23, 2021 and other papers filed in this case, which may be inspected at the Office of the Clerk of Riverside County Superior Court, located at 30755-D Auld Road, Murrieta, CA 92563, during regular business hours of each court day. You may also access these records online by visiting: <https://epublic-access.riverside.courts.ca.gov/public-portal/>; clicking on "Case Number Search"; and entering the case number (CVRI2000104).

All inquiries by Class Members regarding this Notice of Class Action Settlement and/or the Settlement should be directed to the Settlement Administrator or Class Counsel.

**PLEASE DO NOT CONTACT THE CLERK OF THE COURT, THE JUDGE,
LSU, OR LSU'S ATTORNEYS WITH INQUIRIES.**

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

USE AND RETURN THIS FORM ONLY IF YOU WISH TO EXCLUDE YOURSELF FROM THE CLASS SETTLEMENT.

If you wish to exclude yourself from the class settlement, you must read and sign the following statement and postmark and mail this form to the Settlement Administrator on or before April 11, 2022 to the following address:

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

Signature

Date

Print Name

Address

City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Questions? Please call 1(888) 617-1625

OBJECTION TO CLASS ACTION SETTLEMENT AGREEMENT

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

USE AND RETURN THIS FORM ONLY IF YOU WISH TO OBJECT TO THE CLASS SETTLEMENT. DO NOT SUBMIT THIS FORM IF YOU WISH TO BE EXCLUDED FROM THE SETTLEMENT.

If you wish to object to the class settlement, you must state the nature of and basis for your objection and sign below, and postmark and mail this form to the Settlement Administrator on or before April 11, 2022 to the following address:

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

I object to the proposed Settlement for the following reason(s): _____

Signature

Date

Print Name

Address

City, State, Zip Code

If you do not wish to object to the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Questions? Please call 1(888) 617-1625

EXHIBIT C

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT AND HEARING DATE FOR FINAL APPROVAL

Parsons v. La Sierra University

(California Superior Court, County of Riverside Case No. CVRI2000104)

As a current or former Adjunct Faculty Member of La Sierra University in California, or a current or former employee who worked from home for La Sierra University in California, you are entitled to receive money from a class action settlement.

Please read this Notice carefully. This Notice relates to a proposed settlement of class action litigation. If you are a Class Member, it contains important information about your right to receive a payment from the Settlement fund.

You have received this Notice of Class Action Settlement because La Sierra University's ("Defendant" or "LSU") records show you are an "Adjunct Class Member" or a "Reimbursement Class Member" and therefore entitled to a payment from this class action Settlement. "Adjunct Class Member" refers to all current or former employees who performed the duties of an Adjunct Faculty for LSU in California, at any time between November 12, 2016 and October 14, 2021, while not classified as hourly non-exempt employees. "Reimbursement Class Member" refers to all individuals who worked remotely for LSU in California at any time between March 4, 2020 and October 14, 2021.

- The settlement resolves a class-action lawsuit, *Parsons v. La Sierra University* (the "Lawsuit"), which alleges that Defendant: (1) failed to pay Adjunct Class Members for all hours worked, (2) failed to provide Adjunct Class Members legally-compliant meal and rest breaks under California law, (3) failed to pay Adjunct Class Members all wages owed upon discharge from employment, (4) failed to furnish Adjunct Class Members accurate itemized wage statements, and (5) failed to reimburse Adjunct Class Members who taught courses online both before and during the Covid-19 pandemic for business expenses. The Lawsuit also alleges that Defendant failed to reimburse Reimbursement Class Members for business expenses related to working from home during the Covid-19 pandemic.

- On October 14, 2021, the Riverside County Superior Court granted preliminary approval of this class action Settlement and ordered that all Class Members be notified of the Settlement. The Court has not made any determination of the validity of the claims in the Lawsuit. The Court has determined only that there is sufficient evidence to suggest that the proposed settlement might be fair, adequate, and reasonable. Any final determination of those issues will be made at the final hearing. LSU vigorously denies the claims in the Lawsuit and contends that it fully complied with all applicable laws.

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING AND RECEIVE PAYMENT	Get a payment, and give up your legal rights to pursue claims released by the settlement of the Lawsuit.
OPT OUT OF THE SETTLEMENT	Exclude yourself from the Settlement, get no payment other than your share of PAGA civil penalties as described below, and retain your legal rights to pursue claims that would otherwise be released by the settlement of the Lawsuit.
OBJECT TO THE SETTLEMENT	If you do not opt out, you may write to the Settlement Administrator, CPT, Inc., about why you object to the settlement and they will forward your concerns to counsel which will then be provided to the Court. If the Court approves the Settlement despite your objection, you will still be bound by the Settlement. You or your attorney may also address the Court during the Final Approval hearing scheduled for May 19, 2022, at 8:30 a.m. in the Murrieta Courthouse of Riverside County Superior Court. You do not need to attend the hearing for your objection to be considered.

The Final Fairness and Approval Hearing on the adequacy, reasonableness, and fairness of the Settlement will be held at 8:30 a.m. on May 19, 2022, in Dept. S302, Southwest Justice Center, located at 30755-D Auld Road, Murrieta, CA 92563. You are not required to attend the Hearing, but you are welcome to do so.

Why Am I Receiving This Notice?

Defendant's records show that: (1) you currently work, or previously worked, for LSU in California as an Adjunct faculty member between November 12, 2016 and October 14, 2021 and/or (2) worked remotely for LSU in California between March 4, 2020 and October 14, 2021. You were sent this Class Notice because you have a right to know about a proposed settlement of a class action lawsuit, and about all of your options before the Court decides whether to finally approve the settlement. If the Court approves the settlement and then any objections and appeals are resolved, a "Settlement Administrator" appointed by the Court will make the payments described in this Notice. This Notice explains the Lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

What Is This Case About?

Dean Parsons worked as an adjunct instructor for LSU in California. He is the "Plaintiff" in this case and is suing on behalf of himself and Adjunct Class Members for LSU's alleged failure to pay all wages due for all hours worked, failure to provide Adjunct Class Members with legally-compliant rest and meal breaks, failure to pay all wages owed upon separation from employment, failure to furnish timely and accurate wage statements, and failure to reimburse necessary business expenses in connection with teaching courses online both before and during the pandemic. Plaintiff also alleges that LSU failed to reimburse Adjunct Class Members and Reimbursement Class Members for their necessary business expenses in connection with working remotely from home during the Covid-19 pandemic.

Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at LSUSettlement@cptgroup.com

LSU denies all of the allegations made by Plaintiff and denies that it violated any law. The Court has made no ruling on the merits of Plaintiff's claims. The Court has only preliminarily approved a Class Action Settlement Agreement. The Court will decide whether to give final approval to the Settlement at the Final Fairness and Approval Hearing.

Summary of the Settlement Terms

Plaintiff and LSU have agreed to settle this case on behalf of the Class for the Gross Settlement Amount of \$578,220. The Gross Settlement includes: (1) Administration Costs up to \$20,000; (2) a service payment of up to \$10,000 to Plaintiff for his time and efforts in pursuing this case and in exchange for a general release of claims against LSU he has agreed to enter into; (3) fees of up to 1/3 of the Settlement Amount (\$192,740) and up to \$20,000.00 in litigation costs to Class Counsel; and (4) payment allocated to Private Attorney General Act ("PAGA") penalties in the amount of \$15,000 (with \$11,250 to be paid to the Labor and Workforce Development Agency ("LWDA") and 25% paid pro rata to those Adjunct Class Members who worked during the Adjunct PAGA Period (defined as October 20, 2019 to October 14, 2021) and Reimbursement Class Members who worked during the Reimbursement PAGA Period (March 4, 2020 and October 14, 2021). After deducting these sums, a total of approximately \$324,230 will be available for distribution to Class Members ("Net Settlement Amount"). In addition to the Gross Settlement Amount, Defendant will bear all employer-side payroll tax payments due and payable to federal and state tax authorities as a result of this Settlement.

Distribution to Class Members

The Net Settlement available for distribution to Class Members will be determined by deducting from the Gross Settlement Amount the combined total of any court-awarded attorneys' fees and costs, settlement administration costs, service award to the named Plaintiff, and the amount paid to the LWDA.

\$37,020 of the Net Settlement Amount shall be allocated to the Reimbursement Class and paid to Reimbursement Class Members on a per capita basis.

\$3,750 of the amount allocated to the PAGA claim ("PAGA Payment") shall be paid to Class Members who worked for LSU in California during the Adjunct / Reimbursement PAGA Periods ("PAGA Group"). PAGA Payment shares will be paid to the PAGA Group on a per capita basis. If you Opt Out from the Class, you will still receive your PAGA Payment share and will release the Released PAGA Claims.

The \$283,460 remaining from the Net Settlement Amount shall be allocated to the Adjunct Class and shall be paid to Adjunct Class Members pro-rata based on the number of credits that they taught during the Adjunct Class Period in proportion to the credits taught by all Adjunct Class Members. Adjunct Class Members' credits will be weighted as follows: the credits taught as part of a course that was solely online will be reduced by one-quarter (i.e. they will be multiplied by 0.75). Zero-credit courses will be treated as one-credit courses for the purposes of this calculation.

Your Estimated Settlement Award

Defendant's records show that you «Rei_Are_AreNot» a member of the Reimbursement Class. Your share of the Net Settlement allocated to the Reimbursement Class is «Rei_estAmount_Revised».

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

Defendant's records also show that you «**Adj_Are_AreNot**» a member of the Adjunct Class and taught a total of: «**TotalCredits**» credits during the Adjunct Class Period. Defendant's records show that «**OnlineCredits**» credits were taught solely online, and a 0.75 multiplier has therefore been applied to these credits. Based on this information, your share of the Net Settlement allocated to Adjuncts is approximately «**Adjunct_estAmount_Revised**».

Finally, Defendant's records show that «**PAGA_Are_AreNot**» a member of the PAGA Group. Your share of the PAGA Payment is «**PAGA_estAmount_Revised**».

If you believe this information is incorrect and wish to dispute it, you must mail a dispute to the Settlement Administrator no later than April 11, 2022. Please include any documentation you have that you contend supports your dispute.

Tax Reporting

For tax reporting purposes, the payments monies paid to the Adjunct Class will be allotted 20% to wages and 80% to penalties and interest. Payout to the Reimbursement Class will be allotted 100% to penalties.

Please consult a tax advisor regarding the tax consequences of your Settlement Award. This notice is not intended to provide legal or tax advice on your Settlement Share.

Claims That You Are Releasing Under the Settlement

Adjunct Released Claims: If finally approved by the Court, each Adjunct Class Member who does not request exclusion from the Settlement will be bound by all of the terms of the Settlement, and will release LSU from any and all claims stated in the complaint and those based solely upon the facts alleged in the complaint on their behalves, including claims for any alleged failure to pay all wages due (including minimum wage and overtime wages), failure to pay for all hours worked (including off-the clock and on-call work), failure to provide meal and authorize and permit rest periods, short/late meal and rest periods, failure to relieve of all duties during meal and rest periods, failure to reimburse business expenses, failure to timely pay wages and final wages, failure to furnish accurate wage statements including claims derivative and/or related to these claims, liquidated damages, and conversion of wages, up to and including the date of preliminary approval by the Court. This release shall apply to all claims arising at any point during the Adjunct Class Period.

Reimbursement Released Claims: If finally approved by the Court, each Reimbursement Class Member who does not request exclusion from the Settlement will be bound by all of the terms of the Settlement, and will release LSU from any and all claims stated in the complaint and those based solely upon the facts alleged in the complaint on their behalves including reimbursement-related claims. This release shall apply to all claims arising at any point during the Reimbursement Class Period.

Your Options Under the Settlement

Option 1 – Do Nothing and Receive Your Payment

If you do not opt out, you are automatically entitled to your Settlement Check because you are a Class Member. If you do not dispute your pay checks calculation and do not opt out of the settlement, you will be bound by the

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

settlement and receive a settlement payment. **In other words, if you are a Class Member, you do not need to take any action to receive the settlement payment set forth above.**

Plaintiff and all Class Members who do not submit a valid and timely opt out (pursuant to Section 2 below), will be deemed to have fully, finally, and forever released, settled, compromised, relinquished, and discharged the Released Parties (including LSU and any employees, officers, and directors) of all Released Claims they may have or had, as described above.

Option 2 – Opt Out of the Settlement

If you do not wish to participate in the Settlement, you may exclude yourself by completing the enclosed Exclusion Form and mailing it by U.S. First-Class Mail to the address listed on the Exclusion Form. If you Opt Out from the Class, you will still receive your PAGA Payment Share and will release the Released PAGA Claims.

The Exclusion Form must be postmarked or received by the Administrator not later than April 11, 2022. If you exclude yourself from the Settlement then you will get no payment, and retain your legal rights to pursue claims that would otherwise be released by the settlement of the Lawsuit.

Option 3 – File an Objection to the Settlement

If you wish to object to the Settlement, you may complete the enclosed Objection Form and mail it to the Administrator no later than April 11, 2022. Please note that you cannot both object to the Settlement and exclude yourself. If the Court overrules your objection, you will be bound by the settlement and will receive your Settlement Share.

Final Fairness Hearing

You may, if you wish, also appear at the Final Fairness and Approval Hearing set for May 19, 2022 at 8:30 a.m. in Dept S302, Southwest Justice Center, 30755-D Auld Road, Murrieta, CA 92563, and discuss your objections with the Court and the Parties at your own expense. You may also retain an attorney to represent you at the Hearing at your own expense.

Additional Information

This Notice of Class Action Settlement is only a summary of this case and the Settlement. For a more detailed statement of the matters involved in this case and the Settlement, you may visit <https://www.cptgroupcaseinfo.com/LaSierraSettlement/>, call the Settlement Administrator at 1(888) 617-1625, or Class Counsel at:

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Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625
Email: LSUSettlement@cptgroup.com
<https://www.cptgroupcaseinfo.com/LaSierraSettlement/>

Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at LSUSettlement@cptgroup.com

Fax: (310) 295-2385

You may also refer to the pleadings, the Settlement Agreement, attached as **Exhibit 1** to the Declaration of Julian Hammond in Support of Plaintiff's Motion for Preliminary Approval filed on August 11, 2021, the Amendment to the Settlement Agreement, attached as **Exhibit 1** to the Supplemental Declaration of Julian Hammond in Support of Plaintiff's Motion for Preliminary Approval filed on September 23, 2021 and other papers filed in this case, which may be inspected at the Office of the Clerk of Riverside County Superior Court, located at 30755-D Auld Road, Murrieta, CA 92563, during regular business hours of each court day. You may also access these records online by visiting: <https://epublic-access.riverside.courts.ca.gov/public-portal/>; clicking on "Case Number Search"; and entering the case number (CVRI2000104).

All inquiries by Class Members regarding this Notice of Class Action Settlement and/or the Settlement should be directed to the Settlement Administrator or Class Counsel.

**PLEASE DO NOT CONTACT THE CLERK OF THE COURT, THE JUDGE,
LSU, OR LSU'S ATTORNEYS WITH INQUIRIES.**

**Questions? Contact the Settlement Claims Administrator toll free at 1(888) 617-1625 or at
LSUSettlement@cptgroup.com**

REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

USE AND RETURN THIS FORM ONLY IF YOU WISH TO EXCLUDE YOURSELF FROM THE CLASS SETTLEMENT.

If you wish to exclude yourself from the class settlement, you must read and sign the following statement and postmark and mail this form to the Settlement Administrator on or before April 11, 2022 to the following address:

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

Signature

Date

Print Name

Address

City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Questions? Please call 1(888) 617-1625

OBJECTION TO CLASS ACTION SETTLEMENT AGREEMENT

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

USE AND RETURN THIS FORM ONLY IF YOU WISH TO OBJECT TO THE CLASS SETTLEMENT. DO NOT SUBMIT THIS FORM IF YOU WISH TO BE EXCLUDED FROM THE SETTLEMENT.

If you wish to object to the class settlement, you must state the nature of and basis for your objection and sign below, and postmark and mail this form to the Settlement Administrator on or before April 11, 2022 to the following address:

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

I object to the proposed Settlement for the following reason(s): _____

Signature

Date

Print Name

Address

City, State, Zip Code

If you do not wish to object to the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Questions? Please call 1(888) 617-1625

EXHIBIT D

REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Phone: 1(888)-617-1625

Email: LSUSettlement@cptgroup.com

Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

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NOV 29 2021

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.


Signature

11/23/21
Date

Lourdes Morales Gudmundsson
Print Name

5004 Butler Dr
Address

Riverside, CA 92505
City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

Questions? Please call 1(888) 617-1625

1

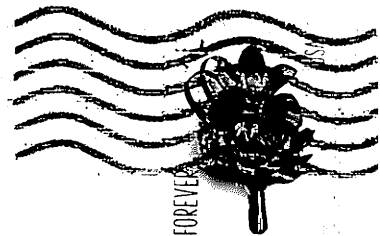




L. Morales Gudmundsson
5004 Butler Dr.
Riverside, CA 92505

SAN DIEGO CA 920

27 NOV 2021 PM 2 L



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NOV 29 2021

17:_____

Parsons v La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Signature

Date

Print Name

Address

City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

Questions? Please call 1(888) 617-1625



Dr. Raymond Hurst
26597 Columbia
Hemet, CA 92544
United States of America



SN BERNARDINO CA 923

24 NOV 2021 PM 6



FOREVER / USA

PARSONS v. LA SIERRA UNIVERSITY
c/o CPT GROUP, INC.
50 CORPORATE PARK
IRVINE, CA 92606

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BY: _____

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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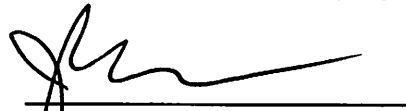
NOV 29 2021

Email: LSUSettlement@cptgroup.com

Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

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Signature

11-24-21
Date

John Chen
Print Name

1330 Cabrilla St.
Address

Costa, CA 92324
City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

3

Questions? Please call 1(888) 617-1625



T. CHEN
1330 Cahuilla St.
Colton, CA 92324

SN BERNARDINO CA 923

24 NOV 2021PM 4 L



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USA



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NOV 29 2021

BY: _____

92606-510550

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Gerard Kiemeny
Signature

11-23-21
Date

Gerard Kiemeny
Print Name

6050 San Martin Ct
Address

Alta Loma CA 91737
City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

4

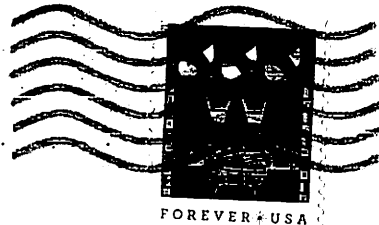
Questions? Please call 1(888) 617-1625



Kremencey
6050 San Martin Ct
Attahona, CA 91737

SN BERNARDINO CA 923

26 NOV 2021 PM 4 L



Parsons V. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

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BY: _____

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REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Adam DesJardins
Signature

11/23/21
Date

Adam DesJardins
Print Name

11852 Mt. Vernon Ave Apt. T645
Address

Grand Terrace, CA 92313
City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

5

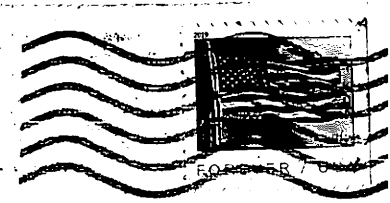
Questions? Please call 1(888) 617-1625



11852 Mt. Vernon Ave
Apt. T645
Grand Terrace, CA 92313

SN. BERNARDINO CA 923

26 NOV 2021 PM 4 L



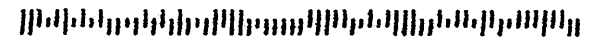
Parsons v La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

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NOV 29 2021

BY: _____

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

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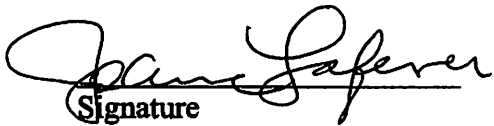
Phone: 1(888) 617-1625

Email: LSUSettlement@cptgroup.com

Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

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I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.


Signature

Nov 29, 2021
Date

JoAnne LaFever
Print Name

140 W. Pioneer Ave #3
Address

Redlands CA 92374
City, State, Zip Code

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Parsons v. La Sierra University

CaseNo: CVRI2000104

Class Action Settlement

Number

6

Questions? Please call 1(888) 617-1625





Jo Ann Lafever
140 W Pioneer Ave Spc 3
Redlands, CA 92374-1624

SN BERNARDINO CA 923

29 NOV 2021 PM 4 L



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BY: _____

Parsons vs La Sierra Univ.
C/O CPT Group, Inc
50 Corporate Park
Irvine CA 92606

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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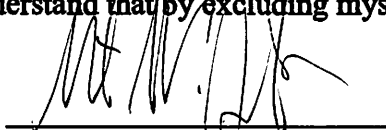
Parsons v. La Sierra University
c/o CPT Group, Inc.
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Irvine, CA 92606
Phone: 1(888) 617-1625

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Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

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I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.


Signature

11-28-21
Date

CHRISTIAN W. JOHNSTON
Print Name

34811 Miller Pl
Address

BEAUMONT, CA 92223
City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

7

Questions? Please call 1(888) 617-1625



JOHNSTON
34811 MILLER PL
BEAUMONT, CA
92223

SN BERNARDINO CA 923

29 NOV 2021 PM 6 L



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PARSONS V. LA SIERRA UNIVERSITY
c/o CPT GROUP, INC.
50 CORPORATE PARK
IRVINE, CA 92606

BY: _____

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
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50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

DEC 16 2021

Email: LSUSettlement@cptgroup.com

Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

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Signature

12-11-2021
Date

Christine Bartholomew
Print Name

3355 Brainerd Lane
Address

Verona CA 92882
City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Questions? Please call 1(888) 617-1000

Number



LA SIERRA UNIVERSITY

Risk & Safety
4500 Riverwalk Parkway
Riverside, CA 92515-8247

SN BERNARDINO CA 923

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FIRST-CLASS MAIL

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BY: _____

PARSONS v. La Sierra University

c/o CAT Group, INC

50 Corporate Park

IRVINE CA 92606

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
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Signature

12.13.2021
Date

Alfredo T. Suzuki
Print Name

11014 Via Del Corso
Address

Riverside, CA 92505
City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Questions? Please call 1(888) 617-16

Number



A. T. Suzuki
11014 Via Del Corso
Riverside, CA 92505

CERTIFIED MAIL



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12/13/2021

US POSTAGE

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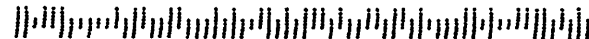
*Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
IRVINE, CA 92606*

RECEIVED

DEC 16 2021

BY: _____

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REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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RECEIVED

DEC 13 2021

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Irvine, CA 92606

Phone: 1(888) 617-1625

Email: LSUSettlement@cptgroup.com

Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

BY: Email

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I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

Christine Bacholomew
Signature

12-11-2021
Date

Christine Bacholomew
Print Name

3355 Brucemar Lane
Address

Irvine CA 92882
City, State, Zip Code

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Questions? Please call 1(888) 617-1625



Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

13

REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Hajoin D
Signature

12/15/2021
Date

Dubravka Hajoin
Print Name

11711 Collett Ave, 1223
Address

Riverside, CA, 92505
City, State, Zip Code

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Parsons v. La Sierra University

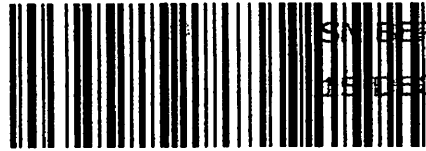
CaseNo:CVRI2000104

Class Action Settlement

Questions? Please call 1(888) 617-1624 Number

DUBRAVKA Hajdin
11711 Collett Ave, 1223,
Riverside, CA, 92505

CERTIFIED MAIL



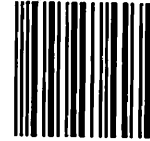
7021 2720 0003 3544 4220

SN BERNARDINO CA 92404

15 DEC 20



1000



92606

U.S. POSTAGE PAID
FCM LETTER
RIVERSIDE, CA
92503
DEC 15, 21
AMOUNT

\$7.38

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RECEIVED

DEC 17 2021

BY: _____

PARSONS v. LA SIERRA University
C/O CPT GROUP, INC.
50 CORPORATE PARK
IRVINE, CA, 92606

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION RECEIVED

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

JAN 03 2022

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Signature

Date

Print Name

Address

City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

15

Questions? Please call 1(888) 617-1625



Robert Kevan Metcalfe
3161 Cutting Horse Rd.
Norco, CA 92860

SANTA ANA CA 926

31 DEC 2021 PM 7 L

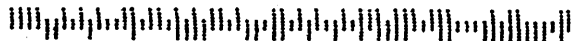


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JAN 03 2022

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

USE AND RETURN THIS FORM ONLY IF YOU WISH TO EXCLUDE YOURSELF FROM THE CLASS SETTLEMENT.

If you wish to exclude yourself from the class settlement, you must read and sign the following statement and postmark and mail this form to the Settlement Administrator on or before January 17, 2022, to the following address:

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

Email: LSUSettlement@cptgroup.com

Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

RECEIVED

JAN 14 2022

BY: Email

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

Jill K. Rasmussen
Signature

1/14/22
Date

Jill K. Rasmussen
Print Name

2623 Victoria Park Drive
Address

Riverside CA 92506
City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

17

Questions? Please call 1(888) 617-1625

REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

Email: LSUSettlement@cptgroup.com

Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

RECEIVED

JAN 14 2022

BY: Email

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Jill K. Rasmussen
Signature

1/14/22
Date

Jill K. Rasmussen
Print Name

2623 Victoria Park Drive
Address

Riverside CA 92506
City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

18

Questions? Please call 1(888) 617-1625

REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

USE AND RETURN THIS FORM ONLY IF YOU WISH TO EXCLUDE YOURSELF FROM THE CLASS SETTLEMENT.

If you wish to exclude yourself from the class settlement, you must read and sign the following statement and postmark and mail this form to the Settlement Administrator on or before April 11, 2022 to the following address:

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

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FEB 17 2022

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

[Signature]
Signature

02/14/22
Date

Lourdes Morales Gudmundsson
Print Name

5004 Butler Dr
Address

Riverside CA 92505
City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Questions? Please call 1(888) 617

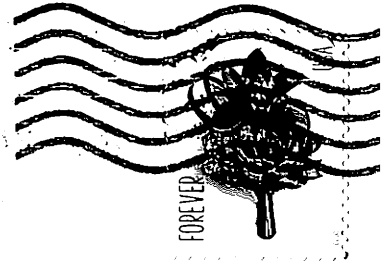
Number



L. Morales Gudmundsson
5004 Butler Dr.
Riverside, CA 92505

SN BERNARDINO CA 923

15 FEB 2022 PM 4 L



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FEB 17 2022

BY: _____

Parsons v. La Sierra University
c/o CPT Group Inc.
50 Corporate Park
Irvine, CA 92606

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
 (California Superior Court, County of Riverside Case No. CVRI2000104)

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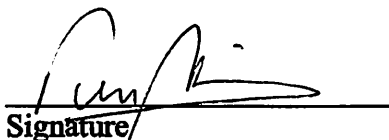
Parsons v. La Sierra University
 c/o CPT Group, Inc.
 50 Corporate Park
 Irvine, CA 92606
 Phone: 1(888) 617-1625

RECEIVED

FEB 18 2022

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.


 Signature

2-15-2022
 Date

KENICHIRO AISO
 Print Name

4149 MILTON AVENUE
 Address

CULVER CITY CA 90232
 City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Questions? Please call 1(888) 617-1625 Number



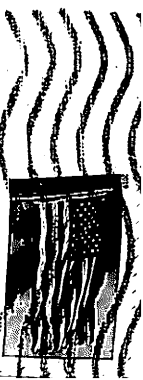
Henichiro Aiso
4149 Milton Ave
Culver City, CA 90232

RECEIVED

FEB 18 2022

LOS ANGELES CA 900

16 FEB 2022 PM 11 L



FOREVER / USA

Parsons v. La Sierra University
% CPT Group, Inc.
50 Corporate Park
Irvine CA 92606

REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

FEB 18 2022

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I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.


Signature

14 Feb, 2022
Date

John R. Jones
Print Name

1338 Elizabeth St
Address

Redlands CA 92373
City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Questions? Please call 1(888) 6.Number

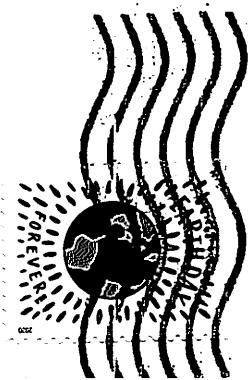
21



Jones
1338 Elizabeth St.
Redlands, CA 92373

SN BERNARDINO CA 923

16 FEB 2022 PM 7 1

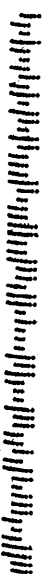


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FEB 18 2022

Parsons v. La Sierra University
% CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
 (California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
 c/o CPT Group, Inc.
 50 Corporate Park
 Irvine, CA 92606
 Phone: 1(888) 617-1625

RECEIVED

FEB 22 2022

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

SA
 Signature

2-16-22
 Date

STEVEN ERIC ANDERSON
 Print Name

11610 ANDERSON STREET
 Address

LOMA LINDA, CA 92354
 City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

CaseNo:CVRI2000104

Questions? Please call 1(888) 617 Class Action Settlement

Number

22



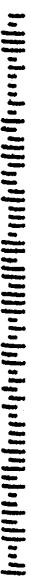
S. ERIC ANDERSON
11610 ANDERSON ST.
LOMA LINDA, CA
92354

SN BERNARDINO CA 923
18 FEB 2022 PM 5 L



RECEIVED
PARSONS V. LA SIERRA UNIVERSITY
C/O CPT GROUP, INC.
SO CORPORAte PARK
IRVINE, CA 92606
FEB 22 2022

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
 (California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
 c/o CPT Group, Inc.
 50 Corporate Park
 Irvine, CA 92606
 Phone: 1(888) 617-1625

FEB 22 2022

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

Lawrence T. Geraty
 Signature

2/14/22
 Date

Lawrence T. Geraty
 Print Name

25 S Buena Vista St.
 Address

Redlands, CA 92373
 City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

CaseNo:CVRI2000104

Questions? Please call 1(888) (Class Action Settlement

Number

23





Mr. Lawrence T. Geraty
25 S Buena Vista St
Redlands, CA 92373

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FEB 22 2022

Parsons v. LSU
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

SN BERNARDINO CA 923

17 FEB 2022 PM 4

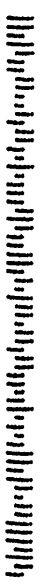


Giant Panda



Flamingo

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

RECEIVED

FEB 22 2022

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

Melissa Broton
Signature

Feb. 14, 2022
Date

Melissa Broton
Print Name

7062 Menlo Park Drive
Address

Riverside, CA 92506
City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

CaseNo:CVRI2000104

Questions? Please call 1(888) 617-1 Class Action Settlement

Number

24



Proud Supporter



Ms. Melissa Brotton
7062 Manhattan Dr.
Riverside, CA 92506

SN BERNARDINO CA 923

17 FEB 2022 PM 7 L



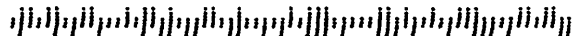
Parsons v. La Sierra University
c/o CPT Group, Inc.

RECEIVED 50 Corporate Park

Irvine, CA 92606

FEB 22 2022

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
 (California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
 c/o CPT Group, Inc.
 50 Corporate Park
 Irvine, CA 92606
 Phone: 1(888) 617-1625

RECEIVED

FEB 23 2022

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I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

W. H. Wellwood
 Signature

2/22/22
 Date

William H. Wellwood
 Print Name

406 Saint Bonaventure St.
 Address

Claremont, CA 91711
 City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Questions? Please call 1(888) 617-16. Number



Wollard
406 Saint Bonaventure St.
Claremont, CA 91711

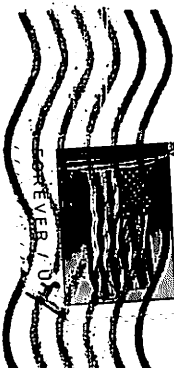
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FEB 23 2022

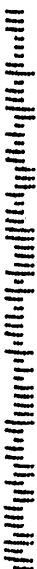
Lawrence V. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Lawrence, CA 92686

SANTA ANA CA 926

22 FEB 2022 PM 2 L



92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

RECEIVED

FEB 24 2022

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

Martene Ferreras 2/20/21
Signature Date

Martene Ferreras
Print Name

1607 Independence Ave
Address

Redlands CA 92374
City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

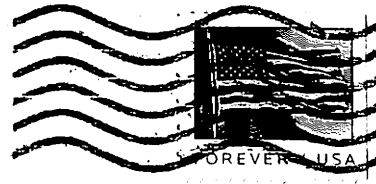
Questions? Please call 1(888) 617-1625 Class Action Settlement

Number

1607 Independence Ave
Redlands CA 92374

SN BERNARDINO CA 923

22 FEB 2022 PM 4 L



Parsons v. La Sierra University
40 CPT Group, Inc.
50 Corporate Park
Irvine CA 92606

RECEIVED

FEB 24 2022

BY: _____

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
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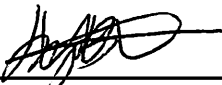
Parsons v. La Sierra University
 c/o CPT Group, Inc.
 50 Corporate Park
 Irvine, CA 92606
 Phone: 1(888) 617-1625

RECEIVED

FEB 24 2022

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I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.


 Signature

February 21st 2022
 Date

Liza Ngenye
 Print Name

4657 Sierra Vista Ave
 Address

Riverside CA 92505
 City, State, Zip Code

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Parsons v. La Sierra University

Questions? Please call 1(888) 617-1625

CaseNo:CVRI2000104
 Class Action Settlement

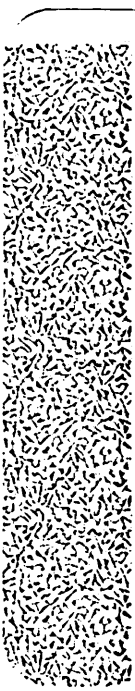
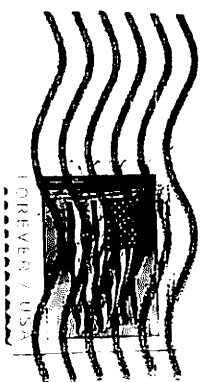
Number

- Liza Ngenye
4657 Sierra Vista Ave
Riverside CA 92505

- Parsons v. La Sierra University
40 CPT Group Inc.
50 Corporate Park
Irvine CA 92606

SM BERNARDINO CA 923

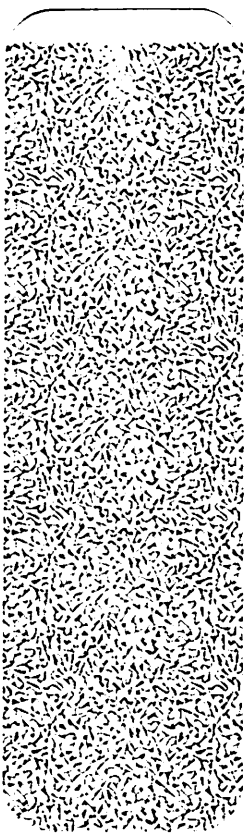
22 FEB 2022 PM 5 L



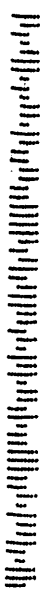
RECEIVED

FEB 24 2022

BY: _____



9260635105 0079



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

RECEIVED

MAR 07 2022

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

Joy A. Fehr
Signature

Mar. 2/22
Date

Joy A. Fehr
Print Name

14265 Rock Place
Address

Riverside, CA 92503
City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

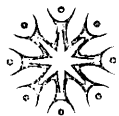
Class Action Settlement

Number

28

Questions? Please call 1(888) 617-1625





La Sierra
UNIVERSITY

Office of the President

4500 Riverwalk Parkway
Riverside, CA 92515-8247
www.lasierra.edu

SN BERNARDINO CA 923

3 MAR 2022 PM 4 L



FOREVER / USA

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA. 92606

RECEIVED

MAR 07 2022

BY: _____

92606-510550



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
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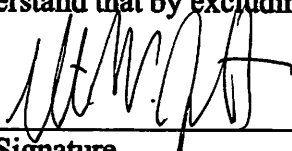
Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

RECEIVED

MAR 09 2022

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.


Signature

3-6-22
Date

CHRISTIAN W. JOHNSTON
Print Name

34811 MILLER PL
Address

BEAUMONT, CA 92223
City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

Questions? Please call 1(888) 617-1625



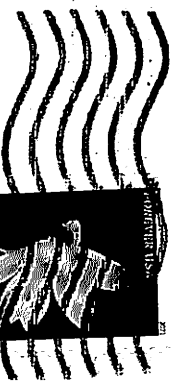


The Johnston Family
34811 Miller Place
Beaumont, CA 92223

RECEIVED
MAR 09 2022

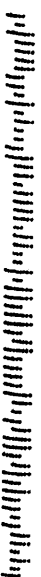
SN BERNARDINO CA 923

7 MAR 2022 PM 7 L



Persons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

92606-510530



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

USE AND RETURN THIS FORM ONLY IF YOU WISH TO EXCLUDE YOURSELF FROM THE CLASS SETTLEMENT.

If you wish to exclude yourself from the class settlement, you must read and sign the following statement and postmark and mail this form to the Settlement Administrator on or before April 11, 2022 to the following address:


Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

RECEIVED

MAR 11 2022

DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.


Signature

2/28/22
Date

Melissa De La Fuente
Print Name

4691 Sierra Vista Ave Apt 207
Address

Riverside, CA, 92505
City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

31

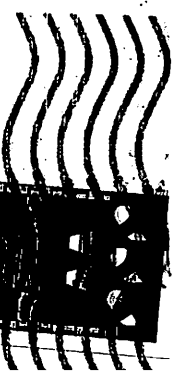
Questions? Please call 1(888) 617-1625



Melissa De la Fuente
4601 Sierra Vista Ave Apt 207
Piverside, CA 92505

SN BERNARDINO CA 923

9 MAR 2022 PM 6 L



FOREVER USA

Parsons v. La Sierra University

RECEIVED

MAR 11 2022

c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

BY: _____

92606-510350



REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
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50 Corporate Park
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Phone: 1(888) 617-1625

MAR 11 2022

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I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.

Dr. Mary Young
Signature

3/8/22
Date

Mary Young
Print Name

2866 via Mazatlan
Address

Corona, CA 92882
City, State, Zip Code

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Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

32

Questions? Please call 1(888) 617-1625



RECEIVED

MAR 11 2022

BY: _____

92606-510350

SANTA ANA

9 MAR 20



Parsons v. La Sierra University

c/o CPT Group, Inc.

50 Corporate Park

IRVINE, CA 92606-5103

RECEIVED

REQUEST FOR EXCLUSION FROM CLASS ACTION

Parsons v La Sierra University

(California Superior Court, County of Riverside Case No. CVRI2000104)

MAR 30 2022

**USE AND RETURN THIS FORM ONLY IF YOU WISH TO EXCLUDE YOURSELF FROM
THE CLASS SETTLEMENT.**

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Parsons v. La Sierra University

c/o CPT Group, Inc.

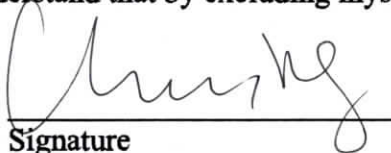
50 Corporate Park

Irvine, CA 92606

Phone: 1(888) 617-1625

**DO NOT SUBMIT THIS EXCLUSION FORM IF YOU WISH TO PARTICIPATE IN THIS
SETTLEMENT. DO NOT FILE THIS EXCLUSION FORM WITH THE COURT.**

I do not wish to participate in this class action and choose to exclude myself from this settlement. I understand that by excluding myself, I will be unable to receive any benefits under the Settlement.



Signature

march 28, 2022

Date

Cheng Ng

Print Name

11865 Creighton St.

Address

Riverside CA 92505

City, State, Zip Code

If you do not wish to exclude yourself from the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

CaseNo:CVRI2000104

Class Action Settlement

Number

33

Questions? Please call 1(888) 617-1625



Cheng Ng
11865 Creighton St.
Riverside CA 92505

SN BERNARDINO CA 923

28 MAR 2022 PM 7 L



RECEIVED

MAR 30 2022

BY: _____

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

32606-510550



EXHIBIT E

OBJECTION TO CLASS ACTION SETTLEMENT AGREEMENT

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

USE AND RETURN THIS FORM ONLY IF YOU WISH TO OBJECT TO THE CLASS SETTLEMENT. DO NOT SUBMIT THIS FORM IF YOU WISH TO BE EXCLUDED FROM THE SETTLEMENT.

If you wish to object to the class settlement, you must state the nature of and basis for your objection and sign below, and postmark and mail this form to the Settlement Administrator on or before January 17, 2022, to the following address:

RECEIVED

Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625
Email: LSUSettlement@cptgroup.com
Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

DEC 03 2021

I object to the proposed Settlement for the following reason(s): _____

I have worked as an adjunct for La Sierra
for many years and as long as I do my part
I have always been treated fairly. I don't agree
with California law in the method of crediting
hours - but that is not the fault of the

University
Lisa S. Goolsby
Signature

11/29/21
Date

Lisa S. Goolsby
Print Name

7508 Healy Run
Address

Ob. Hewan, TN 37363
City, State, Zip Code

If you do not wish to object to the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Parsons v. La Sierra University

Questions? Please Call 1(888) 617-

CaseNo:CVRI2000104
Class Action Settlement

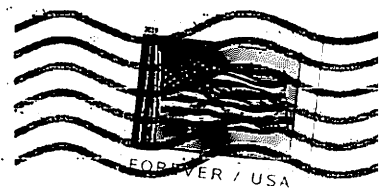
Number



Goolsby
7508 Keely Run
Dolansville, TN 37363

CHATTANOOGA TN 373

30 NOV 2021 PM 1 L



Parsons v. LaSerna University

40 CPT Group, Inc.

50 Corporate Park

Irvine, CA 92606 RECEIVED

DEC 3 2021

92606-510550



OBJECTION TO CLASS ACTION SETTLEMENT AGREEMENT

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625
Email: LSUSettlement@cptgroup.com
Website: <https://www.cptgroupcaseinfo.com/LaSierraSettlement>

I object to the proposed Settlement for the following reason(s): La Sierra has been
very fair in my employment as an Adjunct
Professor in HHS Richard Dwyer School. The
faculty have always been supportive of my teaching
as well as making sure I receive in wages
what I have been contracted to receive!


Signature
11-23-21
Date

Gerard Kieney
Print Name

1050 San Martin Ct
Address

Alta Loma, CA 91737
City, State, Zip Code

If you do not wish to object to the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

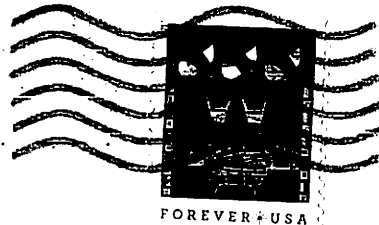
Questions? Please Call 1(888) 617-1625



Kremencey
6050 San Martin Ct
Attahona, CA 91737

SN BERNARDINO CA 923

26 NOV 2021 PM 4 L



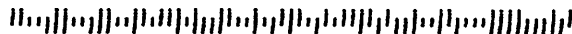
Parsons V. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

RECEIVED

NOV 29 2021

BY: _____

92606-510550



OBJECTION TO CLASS ACTION SETTLEMENT AGREEMENT

Parsons v La Sierra University
(California Superior Court, County of Riverside Case No. CVRI2000104)

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Parsons v. La Sierra University
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Phone: 1(888) 617-1625

I object to the proposed Settlement for the following reason(s): _____

THE LAWSUIT IS WITHOUT MERIT



Signature

2-16-22

Date

STEVEN ERIC ANDERSON

Print Name

11610 ANDERSON STREET

Address

LOMA LINDA, CA 92354

City, State, Zip Code

If you do not wish to object to the class settlement, you do not need to take any action. If the proposed settlement receives final approval from the Court, you will receive a check by U.S. Mail.

Questions? Please call 1(888) 617-1625



S. ERIC ANDERSON
11610 ANDERSON ST.
LOMA LINDA, CA
92354

SN BERNARDINO CA 923
18 FEB 2022 PM 5 L



RECEIVED
PARSONS V. LA SIERRA UNIVERSITY
C/O CPT GROUP, INC.
SO CORPORAte PARK
IRVINE, CA 92606
FEB 22 2022

92606-510550

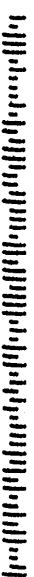


EXHIBIT F



Class Action Administrators

www.cptgroup.com

Contact Name: Dominique Fite

Alan Rock

Corporate Headquarters

50 Corporate Park, Irvine CA 92606

DFite@cptgroup.com

Direct Number: (619) 613-1653

Corporate Office: (800) 542-0900

Fax Number: (949) 428-1023

Parsons v. La Sierra University

All-In Settlement

Class Members: **1,005**

Opt-Out Rate: **2.29%**

Opt-Outs Received: **23**

Postage Total: **\$1,358.90**

Grand Total: **\$17,037.50**

DISCOUNTED FLAT FEE: \$13,500.00

Case Setup

Case Setup / Data Management / Create a Unified Mailing List / TFN Establish & Setup / Website

Administrative Tasks:	Unit Price	Pieces/Hours	Cost Estimate
Project Manager	\$95.00	7	\$665.00
System Programming/Data Base Setup	\$150.00	7	\$1,050.00
Toll-Free Number Establish/Setup	\$150.00	2	\$300.00
Static Website	\$500.00	1	\$500.00
Settlement Email Address	\$150.00	2	\$300.00
Total			\$2,815.00

Notification Procedures

National Change of Address (NCOA) / Notice & Opt-Out Form / Postage (up to 1 oz.)

Administrative Tasks:	Unit Price	Pieces/Hours	Cost Estimate
NCOA	\$150.00	1	\$150.00
Project Manager-Opt-Out/Notice Format	\$95.00	2	\$190.00
Merged Data	\$0.35	1,005	\$351.75
Mailing of Notice Pack	\$1.00	1,005	\$1,005.00
Estimated Postage (up to 1 oz.)	\$0.55	1,005	\$552.75
Total			\$2,249.50

Returned Mail

Notices Returned as Undeliverable / Skip Traces / Remail Notice Packets / Postage

Administrative Tasks:	Unit Price	Pieces/Hours	Cost Estimate
Update Undeliverable	\$0.50	3	\$1.50
Skip Traces	\$1.25	29	\$36.25
Remail Packs	\$1.35	29	\$39.15
Estimated Postage	\$0.55	29	\$15.95
Clerical Staff	\$60.00	1	\$60.00
Total			\$152.85

Opt-Out Processing

Process Opt-Outs, Deficiencies & Other Requests from Class Members / Call Center Support

Administrative Tasks:	Unit Price	Pieces/Hours	Cost Estimate
Programming of Opt-Out Data Base	\$150.00	4	\$600.00
Opt-Out Processing	\$20.00	23	\$460.00
Clerical Staff	\$60.00	1	\$60.00
Deficiency/Dispute Letters	\$20.00	1	\$20.00
Estimated Postage	\$0.55	1	\$0.55
Project Manager	\$95.00	1	\$95.00
Call Center Support	\$3.00	33	\$99.00
Total			\$1,334.55

SSN Verification

Verify SSN for Validity with IRS / Send Deficiency Letters to "No-Match" Class Members

Administrative Tasks:	Unit Price	Pieces/Hours	Cost Estimate
Programming for SSN Selection	\$150.00	1	\$150.00
Project Manager	\$95.00	3	\$285.00
SSN Verification	\$0.20	982	\$196.40
		Total	\$631.40

Disbursement

Calculations / Data Management / Create & Manage QSF / Print & Mail Checks, 1099/W-2

Administrative Tasks:	Unit Price	Pieces/Hours	Cost Estimate
Programming Database-Calculate Totals	\$150.00	3	\$450.00
Project Supervisor Review of Distribution	\$150.00	3	\$450.00
Project Manager-Correspond w/Attorney	\$95.00	2	\$190.00
Obtain EIN, Setup QSF/Bank Account	\$150.00	3	\$450.00
Programming/Setup & Printing of Checks	\$150.00	3	\$450.00
Print Mail Checks, W-2/1099 (8x10 sheet)	\$2.50	982	\$2,455.00
Estimated Postage	\$0.50	982	\$491.00
Check Reminder Postcard	\$0.35	638	\$223.30
Postage for Postcard	\$0.40	638	\$255.20
		Total	\$5,414.50

Post-Disbursement & Tax Reporting

Account Recons / Skip Trace / Reissue Checks / Annual Tax Reporting / Final Reporting & Declaration

Administrative Tasks:	Unit Price	Pieces/Hours	Cost Estimate
Re-Issue Checks as Required	\$5.00	10	\$50.00
Project Supervisor -Account Recons	\$150.00	6	\$900.00
Skip Trace	\$1.25	79	\$98.75
Remail Undeliverable Checks	\$2.50	79	\$197.50
Estimated Postage	\$0.55	79	\$43.45
Project Supervisor-Reconcile Uncashed Chk	\$150.00	1	\$150.00
Programming- Final Reports	\$150.00	2	\$300.00
Project Manager - Acnt Files Sent to Atty	\$150.00	2	\$300.00
Project Supervisor - Final Declaration	\$150.00	2	\$300.00
CA Tax Preparation	\$600.00	1	\$600.00
Annual Tax Reporting to IRS	\$1,000.00	1	\$1,000.00
QSF Annual Tax Reporting	\$500.00	1	\$500.00
Uncashed Checks Revert to Cy Pres	Included	1	Included
		Total	\$4,439.70

Grand Total: \$17,037.50