

1 LARA P. BESSER (SBN 282289)
2 ADRIENNE L. CONRAD (SBN 318776)
3 JACLYN M. REINHERT (SBN 317622)
4 JACKSON LEWIS P.C.
5 225 Broadway, Suite 2000
6 San Diego, CA 92101
7 Telephone: (619) 573-4900
8 Facsimile: (619) 573-4901

6 Attorney for Defendants,
7 SPRINGS CHARTER SCHOOLS, INC., and
8 RIVER SPRINGS CHARTER SCHOOL, INC.

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF RIVERSIDE**
11 **(UNLIMITED JURISDICTION)**

12 JENNIFER WISE, on behalf of herself and all
13 others similarly situated, and as an “aggrieved
14 employee” on behalf of other “aggrieved
15 employees” under the Labor Code Private
16 Attorneys General Act of 2004,

16 *Plaintiff(s),*

17 vs.

18 SPRINGS CHARTER SCHOOLS, INC., a
19 California Corporation; RIVER SPRINGS
20 CHARTER SCHOOL, INC., a California
21 corporation; and DOES 1 through 50,
22 inclusive,

22 *Defendant(s).*

Case No.: RIC2002359

**DECLARATION OF LARA P. BESSER
IN SUPPORT OF DEFENDANTS
SPRINGS CHARTER SCHOOLS, INC.
AND RIVER SPRINGS CHARTER
SCHOOL, INC.’S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Date: December 14, 2022
Hearing Time: 8:30 a.m.
Reservation ID: 590106029795
Hearing Dept.: 1, The Honorable Craig
Riemer
Action filed: July 01, 2020



25 **SPIVAK LAW**
26 Employee Rights Attorneys

27 Mail:
8605 Santa Monica Bl
PMB 42554
West Hollywood, CA 90069
(213) 725-9094 Tel
(213) 634-2485 Fax
SpivakLaw.com

28 Office:
15303 Ventura Bl
Ste 900
Sherman Oaks, CA 91403

1 I, LARA P. BESSER, declare as follows:

2 1. I am a member of the State Bar of California and an attorney with the law firm of
3 Jackson Lewis P.C., attorneys of record for Defendants Springs Charter Schools, Inc. and River
4 Springs Charter School, Inc. (collectively, "Defendants") in this Action. I make this Declaration
5 in response to the Court's August 26, 2020, Class Action Case Management Order #1 (Plaintiff
6 and Defendant are herein collectively referred to as the "Parties").

7 2. Except as otherwise indicated, I have personal knowledge of all matters set forth
8 herein and, if called as a witness, could and would competently testify thereto under oath.

9 3. Following a diligent inquiry in response to the Court's ruling, I am unaware of any
10 class, representative, or other collective action in any other court in this or any other jurisdiction
11 that asserts claims similar to those asserted in this action on behalf of the punitive class, who
12 would also be members of the class defined in this action.

13 The Parties' proposed recipient of any remaining unclaimed funds after distribution of the class
14 member payments is Legal Aid at Work. To the best of my knowledge, there exists no relationship
15 between the proposed recipient and (1) any class representative or other party, (2) any officer,
16 director, or manager of any party, or (3) any attorney or law firm for any party. I conducted my
17 due diligence in determining whether there is any such relationship through verifying with the
18 members of my office working on this matter and with my client's representative and with
19 Plaintiff's Counsel who has also verified with Legal Aid at Work, in determining whether any
20 such relationship exists. See also Joan Graff Declaration ("Graff Decl.")

21 I declare under the penalty of perjury of the laws of the United States and the State of
22 California that the foregoing is true and correct to the best of my knowledge.

23 Executed this 30th day of September, 2022 at San Diego, California

24 

25 LARA P. BESSER
26 Declarant



27 Mail:
8605 Santa Monica Bl
PMB 42554
West Hollywood, CA 90069
(213) 725-9094 Tel
(213) 634-2485 Fax
SpivakLaw.com

28 Office:
15303 Ventura Bl
Ste 900
Sherman Oaks, CA 91403