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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
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; EMPIRE SPRINGS CHARTER
22 SCHOOL, INC., a California corporation;
23 HARBOR SPRINGS CHARTER SCHOOL,
24 INC., a California corporation; CITRUS
25 SPRINGS CHARTER SCHOOL, INC., a
26 California corporation; VISTA SPRINGS
CHARTER SCHOOL, INC., a California
corporation; PACIFIC SPRINGS CHARTER
SCHOOL, INC., a California corporation and
DOES 1-50, inclusive,

27 *Defendants.*
28

Case No.: RIC2002359

**SUPPLEMENTAL DECLARATION OF
LARA P. BESSER IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Action filed: 07/01/2020
Hearing: 07/3/2023, 8:30 a.m.
FSC: Not set
Trial: Not set
Department: 1, Hon. Craig G. Riemer

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., River
4 Springs Charter School, Inc., Empire Springs Charter School, Inc., Harbor Springs Charter
5 School, Inc., Citrus Springs Charter School, Inc., Vista Springs Charter School, Inc., and Pacific
6 Springs Charter School, Inc. (“Defendants”) in this Action. I make this Declaration in response
7 to the Court’s operative Class Action Case Management Order (Plaintiff and Defendants are
8 herein collectively referred to as the “Parties”).

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

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

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

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

25 Executed this 23d day of May, 2023 at San Diego, California

26 

27 _____
28 LARA P. BESSER
Declarant