

Exhibit A

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Nyo McGirt

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Nyo McGirt. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Argosy University San Francisco Bay Area Campus and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

It is very stressful and have caused mental instability due to the anxiety I have felt with the loans that I owe. It has affected my mental health and financial health as I have tried buying a house and have higher interest offers, for example. I've literally been losing sleep over the delays around the sweet vs cardona settlement. Each time a decision has been made toward possibly cancelling my debt, basically giving my life back, there is a delay from the interveners. It's been one nightmare after another. I know I'm not alone in saying my life was turned upside down.

Signed under the penalty of perjury.



January 23, 2023

Nyo McGirt

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Alyssia Gonzalez

1. My name is Alyssia Gonzalez. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended ANTHEM BRYMAN COLLEGE, Florida Technical Institute, UEI and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

My entire life is on hold because these for profit colleges wanted to make a quick buck off the backs of young and unsuspecting students. I was lied to and was given promises of a well paying job in my field of study. I was taken advantage of and this has followed me every single day I wake up and keeps me up at night. How can I pay groceries? How can I pay rent? How can I buy a home? How can I start a family with this good for nothing loan hanging over my head like a noose waiting for me to just give up. I've waited years for my application to be reviewed with no decision. I want to go back to school and build a future but I'm filled with doubt, distrust, and disgust as I recall my very first college experience. Its been years and I cannot move on in life because this has affected everything from my mental health to my credit score. We deserve to move on. I deserve to live my life.

Signed under the penalty of perjury.

January 23, 2023



Alyssia Gonzalez

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Varney Outland

1. My name is Varney Outland. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

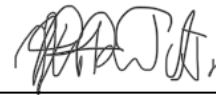
2. I attended Devry University and Keller and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

This case has been a burden to my family and me as I am always worried about what is going to happen to my finances as a I do not have the job base on the education that I have received from Devry to pay back the debt that I have incurred. The stress from this has made my life a living hell. I am always worrying which takes a tow on everything I do. I have anticipated all this to be over until I heard of the Appeal that was submitted. Delaying this appeal will continue to affect my livelihood the loans has ruined my credit and it has kept a huge debt to income on my credit

Signed under the penalty of perjury.

January 23, 2023



Varney Outland

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Lacey Hendershot

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Lacey Hendershot. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended University of Phoenix and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

My physical and mental health would continue to be negatively impacted due to stress. My hopes of possibly purchasing a car or home in the next couple of years will be put on hold as this keeps getting extended and my financial well-being remains unsure. I'm emotionally spent as are the majority of full and post-class members. It's disheartening, overwhelming, and frustrating each time we get closer to an end date only to have these "schools" remind us that their profits are more important than their distressed students.

Signed under the penalty of perjury.

January 23, 2023



Lacey Hendershot

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

5 v.

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Karlene Liranzo

10 1. My name is Karlene Liranzo. I submit this declaration in opposition to the Motion for Stay
11 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
12 information in this declaration.


13 2. I attended Art Institute of NYC and submitted a borrower defense application on or before
14 June 22, 2022.

15 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

16 The delay would bring more dread into my existence. I have been settled with this debt,
17 doing the best I can to come to terms with the harm that was done by this fraudulent school. It
18 has affected my life in trying to get a car, a home, trying to live. Trying to keep my head above
19 water and juggle payments. The overwhelming debt has made me anxious and overwhelmed to
20 take out loans and I try in my best to pay off anything with fear. My peace of mind is at stake,
21 my financial freedom is at stake. My heart dropped when the appeals were first discussed. The
22 anxiety returns. I want to have a family and have children without the fear of this debt hanging
23 over them. I won't even marry my boyfriend because of my student debt in fear that they will
24 burden him if something happened to me. Please, do not let this continue. Not for just my sake,
25 for the countless of other that are also in worse situations. The ones that want to die, the ones
26 who can barely make it.

27 Signed under the penalty of perjury.

28 January 24, 2023



Karlene Liranzo

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Carolyn Rose-Smith**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Carolyn Rose-Smith. I submit this declaration in opposition to the Motion for
13 Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended Walden University and submitted a borrower defense application on or before
16 June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 If a stay is issued and settlement is delayed by the Courts, the negative effects for me will
19 continue financially, emotionally, and mentally. Not obtaining relief does have a negative impact
20 on my ability to purchase a home due to the high student loan debt. In addition, I feel as if my
21 borrower defense has been stuck in time and this part of my life is stuck in time due to the delay.
22 I have been trying to obtain relief since 2018. Any continued delay results in continued stress,
23 which has resulted in high blood pressure. I now take two types of blood pressure medicine each
24 day. Immediate relief now would help in improving my physical, emotional, and mental health
25 as well as the quality of life for my family and me. Therefore, I am respectfully requesting that
26 the Courts do not issue a stay or delay the delivery of settlement relief due to the continued
27 negative effect on all class members. Thank you for your time and consideration!

28 Signed under the penalty of perjury.

January 24, 2023

Carolyn T. Rose-Smith

Carolyn Rose-Smith

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1
2
3 THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

4 v.

DECLARATION OF Nichole Peterson

5
6 MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
7 Education, and THE UNITED STATES
8 DEPARTMENT OF EDUCATION,
Defendants.

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11 1. My name is Nichole Peterson. I submit this declaration in opposition to the Motion for
12 Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended DeVry University and submitted a borrower defense application on or before
15 June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 I am a single mom, drowning in student loan debt and barely surviving while my
18 payments are on pause. I have \$85,000 in student loans that started out as \$25,000 and I have
19 been paying them for almost 19 years. I'm also battling Stage 3 cancer. The stress from not
having this resolved is awful and not helping my recovery, to put it lightly

20 Signed under the penalty of perjury.

21
22 January 24, 2023

Nichole Peterson

Nichole Peterson

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Dannielle Pope

1. My name is Dannielle Pope. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

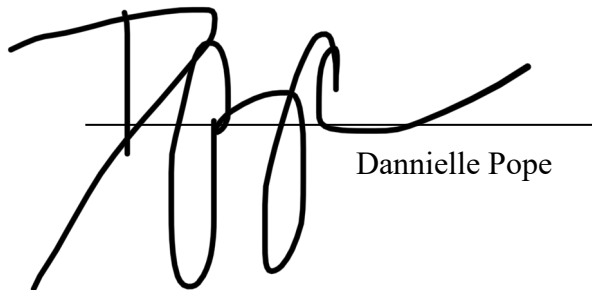
2. I attended DeVry University and TESST College (Kaplan) and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am in the process of trying to purchase a house and this is delaying the process via my approval for a mortgage. For now this is drastically affecting my debt to income ratio tremendously. We have been waiting patiently for the outcome and the release of the debt. It has been a long process and the procrastination is ridiculous. There is no need to hold up the process any longer

Signed under the penalty of perjury.

January 23, 2023



Dannielle Pope

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Meghan Hall

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Meghan Hall. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended University of Phoenix, Everest University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

My whole life has been on hold for 10 years due to these fraudulent, upside down loans! I am wanting to buy a home at age 34 for my 3 children in 2023 or 2024. Extending a stay and delaying relief will cause me and other class members more harm than already endured over the last 10 years of fighting these fraudulent loans. I ask that you do NOT allow a stay and that you rule fairly for the victims of these schools to prevent us all further delay and harm. I am missing milestones in my life every second these loans are on my credit. They prevent me from living the american dream!

Signed under the penalty of perjury.

January 23, 2023



Meghan Hall

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Casey Dempsey

1. My name is Casey Dempsey. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

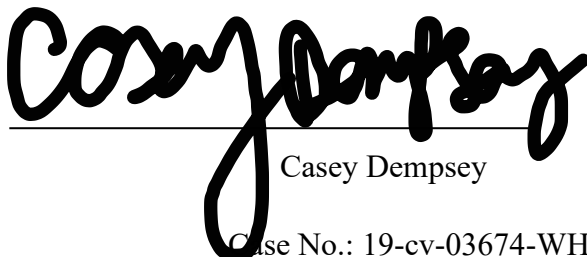
2. I attended Charlotte School of Law and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I would be affected because these student loans from Charlotte Law have been a proverbial "albatross." I have been denied for obtaining a mortgage on my own because my debt to income ratio is too high due to the nature of the debt accrued from my school that misrepresented employment rates, bar passage rates, and ultimately closed. I can never get rid of the stigma in my profession for having attended a law school that was shut down by the ABA. That burden will forever be tied to the name of the school on my JD degree. What I can do is finally be relieved of the debt incurred at a school that misled its students. I have had a borrower's defense to repayment application pending since 2017 (for nearly 6 years) and continually have to explain why it has not yet been resolved and why it should not be counted against me when being considered for loans. I recently had trouble purchasing a vehicle due to the pending borrower defense to repayment application because lenders do not understand the nuances of the claim and will deny you as a result. 6 years is long enough to wait for a resolution. Further stay and delays in approval of the settlement will cause me delays in moving forward with my normal aspects of life.

Signed under the penalty of perjury.

January 23, 2023


Casey Dempsey

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1
2
3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

DECLARATION OF Brian J Pajak

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
10 *Defendants*.

11 1. My name is Brian J Pajak. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended The Art Institue of Pittsburgh and submitted a borrower defense application on
15 or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 My name is Brian Pajak and I am a full class member of Sweet v Cardona. From 2007-
18 2010, I attended the Art Institute of Pittsburgh Online division, for a BA in Graphic/Web Design.

19 I would like to reiterate for the 3rd time now that I HAVE NEVER MISSED A SINGLE
20 MONTHLY PAYMENT ON MY STUDENT LOANS.

21 My attendance there has led to a federal student debt that now totals \$66,470.63.

22 Making these monthly payments of up to \$500+ has had a massive impact on my
23 financial plans. It is the equivalent of paying a second mortgage (I am fortunate to have an
24 incredibly low mortgage payment of \$550.)

25 When I heard about Borrower Defense, I knew it was my last chance at getting relief,
26 due to the fraudulent actions taken by my school, which resulted in a penalty of \$95 Million for
27 EDMC. Obviously, due to the actions of the former head of the Department of Education, failure
28 to process those claims has led to this lawsuit and now agreed by both parties to a settlement.

Due to the financial impact of these payments, my family's future is in limbo until this
settlement is resolved. I am hesitant to consider any career changes, and have been holding off
on home repair and improvement projects until I can be certain that we will be able to continue
to pay our bills, without the looming threat of repayment on these loans.

I have received official confirmation that I am a full class member, and therefore, the
settlement going into effect means an IMMEDIATE addition of \$500+ a month into our family
budget. Further delay due to these baseless claims by the interveners will keep this degree of
uncertainty going for months, possibly years. Borrower Defense is a protected right all borrowers
have when granted Federal student loans. It is ironic that they are claiming Due process, when

Declaration of Brian J Pajak

Case No.: 19-cv-03674-WHA

1 the judge has repeatedly informed them that their rights are completely federally protected. Yet
2 they will trample on our rights to due process that many of us have been fighting since 2019
3 when this lawsuit was first filed.

4 Signed under the penalty of perjury.

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6 January 24, 2023



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Brian J Pajak

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Elizabeth Gilbert

1. My name is Elizabeth Gilbert. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended IADT Tampa (now Sanford Brown) and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

The longer this gets delayed, the longer it's going to take for me to buy a house. I can get approved for a mortgage as soon as the settlement is finalized and the bank can consider an appropriate DTI. Until then, I'll continue to live in a sketchy part of town in a small 2-bedroom apartment with my toddler and no yard....

Signed under the penalty of perjury.

January 24, 2023



Elizabeth Gilbert

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Laura Russell

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Laura Russell. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Kaplan University and University of Phoenix and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am 58 years old and I hold almost \$180,000 in false school loan debt due to my fraudulent schools. I have lost MANY years of being able to save for my retirement. Please DO NOT allow a stay! I must use the last few years to save for retirement and I need the monthly payments to do that. I have been dealing with this school loan defraud for YEARS and I am mentally at the end of my rope. I am ASHAMED of the United States in allowing these schools to cheat so many innocent individuals who were trying to better themselves and ended up being completely cheated out of their best years!

Signed under the penalty of perjury.

January 24, 2023

Laura Russell

Laura Russell

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1
2
3 THERESA SWEET, et. al,
Plaintiffs,

Case No.: 19-cv-03674-WHA

4 v.

DECLARATION OF Rebecca Smith

5
6 MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
7 Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
8 Defendants.

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11 1. My name is Rebecca Smith. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

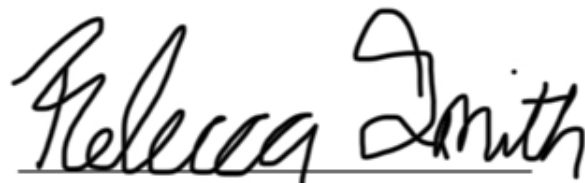
14 2. I attended IADT and submitted a borrower defense application on or before June 22, 2022.

15 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

16 The school I went to closed while I was on maturity leave with no notice. I was never
17 informed what non-accredited meant until I tried to transfer my 112 credits to another school and
18 couldn't. 72k and 112 credits that mean absolutely nothing to me or my family but a waste of
19 time energy and money. My student loans have impacted my everyday life, prevented me from
20 getting a mortgage at times in my life and have impacted my credit substantially. If the stay is
21 considered and the loan goes back into payment status, I'll have to decide weather or not I can
22 pay for the student loans that have had no benefit to my life financially (because I can't get a job
in the field) or my car payment/ my mortgage or even food for my family. Knowing if I miss a
payment it will then start a vicious circle and continue to impact my financial wellbeing due to
credit dings and the lives of my children. I beg that you hold true to the judgment, this has been a
huge burden on myself and my family for far to long.

23 Signed under the penalty of perjury.

24
25 January 24, 2023



26 Rebecca Smith

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Christopher Malizia

1. My name is Christopher Malizia. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended DeVry University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

A stay would greatly affect myself and many others who have had our lives put on hold for years now regarding these borrowers defense claims. These loans have halted my progress in life as I can't afford a house with them and they make getting a mortgage close to impossible. I've been making payments for 10 years and I owe 30% more than what I originally took the loan out for, which is ridiculous. These schools are intervening in a decision that has nothing to do with them. We have waited years for the DoE to even look at our claims and now we finally have an agreement both sides feel is fair and at the last minute these schools are trying to cause even more pain to all of these students. The students really only made one mistake in this and that was trusting these schools were legitimate institutions. Please don't let these schools greed continue to handicap so many people.

Signed under the penalty of perjury.

January 24, 2023

Christopher Malizia

Christopher Malizia

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

5 v.

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
10 *Defendants*.

Case No.: 19-cv-03674-WHA

**DECLARATION OF Cathryne Maciolek
Waugh**

11 1. My name is Cathryne Maciolek Waugh. I submit this declaration in opposition to the
12 Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to
13 testify to the information in this declaration.

14 2. I attended Argosy University DC Campus and submitted a borrower defense application
15 on or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 If a stay is issued I will be harmed in the following ways: First, my credit score has been
18 and continues to be negatively impacted with my inability to make the full monthly payments on
19 the student loans. The payments barely cover the interest rate due to the large loan that I was told
20 to take out. Additionally, due to the student loans and inability to pay the loans down, I have
21 been denied a multitude of loans- car loans, and most importantly a mortgage. I am currently
22 living in an apartment with my son and triplet girls since I do not qualify for a home loan. I am
23 depended on my family to cosign everything I have due to the outstanding student loans. As
24 previously stated, I have 4 children that I may not be able to take out student loans for their
25 college due to my outstanding debt. In summary, a stay and delayed relief would impact every
26 aspect of my life: my family's financial stability, my living arrangement/delayed
27 homeownership, interpersonal stress with my family that I still depend on for cosigning
28 purchases and to borrow money from, and possibly my children's future and their ability to
access higher education. A stay delays my ability to move forward in my life.

Signed under the penalty of perjury.

January 24, 2023



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Robyn Frumento

1. My name is Robyn Frumento. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended DeVry University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

This would immensely affect my financial health. If this is not approved I have no idea how I can pay necessities such as food and shelter. This school defrauded me and should be held accountable. I have over \$90,000 in student loans that were based on lies and deception.

Signed under the penalty of perjury.

January 23, 2023

Robyn Frumento

Robyn Frumento

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Scarlett Sears Brown

1. My name is Scarlett Sears Brown. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Daymar College and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

It will be hurting my chances to go back to college, since the loans from Daymar have gone to default. These loans have been hurting me for over 10 years. I would love to see them discharged, so I can start again. Daymar tricked me into enrolling and then scammed me out of thousands of dollars. It will be so discouraging to not get them taken care of, since the school isn't one of the ones that are appealing the case. Just let the ones of us who went to the schools listed that aren't appealing get what you have agreed in the settlement.

Signed under the penalty of perjury.

January 24, 2023

Scarlett Sears Brown

Scarlett Sears Brown

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Janell Durr**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Janell Durr. I submit this declaration in opposition to the Motion for Stay filed
13 by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information
14 in this declaration.

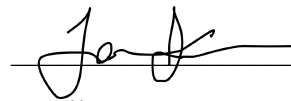
15 2. I attended Vatterrott and submitted a borrower defense application on or before June 22,
16 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 This stay would be extremely detrimental to my continuing education. I am currently
19 working toward my BA in Human Resource Management, and I will reach the end of my loan and
20 grant eligibility because of the loans that I had originally taken out for Vatterrott. I have \$30,000
21 in loans from a school that I was not able to use credits from, which caused me to have to start
22 from scratch, and which I have a very expensive piece of paper that means nothing. This stay will
23 keep me from being able to take out enough loans to finish my degree, which I need in order to
24 have a career that I can make a meaningful, livable wage with. If this stay goes through I will have
25 to come up with \$9,000 before I can graduate next year which is not feasible considering I have a
26 job that only pays \$14/hour while I go to school.

27 Signed under the penalty of perjury.

28 January 24, 2023



Janell Durr

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Sarah Mercer

1. My name is Sarah Mercer. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.


2. I attended Marinello School of Beauty and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I have waited years for a settlement one that has already taken a toll on continuing my education, impacting my credit, garnishing my wages, taking my tax returns for a school that I can't get my transcripts from. I'm 33 years old and pregnant with my first child. Delay of this settlement postpones continuing my education to establish a career so that I can financially provide for my child as a single mothers.

Signed under the penalty of perjury.

January 24, 2023



Sarah Mercer

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Tracey Quattlebaum

1. My name is Tracey Quattlebaum. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Ashford Universitu and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I will, once again, be at a standstill in my life with 55k in debt. Ashford’s practices of maxing our federal aid have caused me to not be able to attend another college to get my degrees because I cannot qualify for more funding. I also can’t use my Chapter 35 benefits through the Department of Veterans Affairs because no school wants to accept me due to no aid or loans available. My credit is damaged due to the amount of loans. So I am basically stuck in this situation until resolved with no degrees and no career. Our family has taken a financial hit because I have no degree, no money making career as was promised.

Signed under the penalty of perjury.

January 23, 2023



Tracey Quattlebaum

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF William Stevenson

1. My name is William Stevenson. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

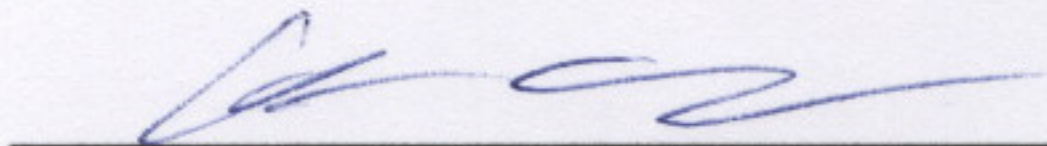
2. I attended DeVry and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I will be struggling to pay my bills more and these mess holding up my life. So, I can go back to school and actually get a real education. I have been working jobs that is not in the field of my education. Every job I apply to with this education, they laugh at me. I really am ready to get this loan gone and move on from this horrible mistake.

Signed under the penalty of perjury.

January 23, 2023



William Stevenson

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1
2
3 THERESA SWEET, *et. al.*
Plaintiffs,

Case No.: 19-cv-03674-WHA

4
5 v.

DECLARATION OF Aleshea Robinson

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
Defendants.

10
11 1. My name is Aleshea Robinson. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended Grand Canyon University and Ashford University and submitted a borrower
15 defense application on or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 I am trying to get my kids and myself out of harsh living conditions and get a home. If this
18 stay is approved and delivery of relief is delayed, it will put a strain on me and my children.

19 Signed under the penalty of perjury.

20 

21 January 23, 2023

22 _____
Aleshea Robinson

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Brittainy Young**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Brittainy Young. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended Colorado Technical University and submitted a borrower defense application on
16 or before June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 If relief is issued a stay and delayed I may not be able to afford to live. If my loans go into
19 affect it could mean large loan payments for me. I'm a single mother of 2 and I have been working
20 so hard to give my children a future. The pressure of student loan debt is crushing my ability to
21 move forward. I ask that Judge Alsup's approval moves forward and I can finally be at peace and
22 focus on building a future for myself and my children.

23 Signed under the penalty of perjury.

24 January 23, 2023

25 DocuSigned by:
26 *Brittainy Young*
27 E3A502F7101248D...

28 Brittainy Young

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF April Hawthorne

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is April Hawthorne. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended IADT/Sanford Brown and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

The harmful effects of my losses from acquiring a bachelor's degree has haunted nearly all of my adulthood and journey as a single mother. The catastrophic amounts of student loans and inability to secure gainful employment in my career has left me, as the head of my household, and my children in shackles out of the reach of financial independence, peace, and a healthy quality of life.

The greatest impact that settlement relief offers is to open the door to opportunities in the form of housing for my family. My children and I are in a cohabiting situation with family members due to the massive impact that a gross amount of debt and failed promises of career success potential has burdened me with. My family of four, pioneered by my ability to survive and provide as best I have been able to manage, reside within 400 square feet of shared space. We have been busting at the seams in our living space for far too long. The emotional, psychological, and health impacts have been extensive for all of us.

Delaying settlement relief for my family and other households in need of this places a severe burden upon our lives. It means more days, months, years ... that it takes to finally receive what is rightfully ours and causes stress and discourse that furthers the negative and painful effects of the situation we are already subject to and have been subject to for far too many years.

Signed under the penalty of perjury.

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January 23, 2023



April Hawthorne

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

5 v.

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
10 *Defendants*.

Case No.: 19-cv-03674-WHA

DECLARATION OF Katelin Mundy

11 1. My name is Katelin Mundy. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended DeVey University and Keller Graduate School of Management and submitted a
15 borrower defense application on or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 I would lose the financing on my house and would be subject to a debt repayment that
18 would prevent me from giving my husband and children the life that they deserve. As a veteran, a
19 mother, and a wife all I wanted was to go to school to obtain an education to secure a higher paying
20 job to support my family without a worry of where we will get our next meal. I chose DeVry
21 University as the Student Advisor promised that obtaining my education through DeVry
22 University would mean I'd be guaranteed to obtain a high paying job after graduation. Once I got
23 my Bachelors, i was offered a discount on a Masters degree with the promise that DeVry
24 University/Keller Graduate School of Management would hire me as a virtual professor. Needless
25 to say, I graduated and never became a professor despite having the education they required. I
26 don't want If this settlement doesn't go through and my loans discharge soon, I will lose everything
27 im fighting for. I'm begging and pleading to please please please push this settlement through and
28 provide relief very soon. All I want is to provide for my family while still being able to be a present
mother for my children. Please help.

Signed under the penalty of perjury.

January 23, 2023



Katelin Mundy

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Erica Kollmann

1. My name is Erica Kollmann. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.


2. I attended DeVry and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am a single mom of 2 children, one of whom is severely disabled. I have been struggling to save for a down-payment on a first home for my family. I need the loans discharged before a mortgage loan application would be approved, and I would be able to move my family into an appropriate and affordable home that would accommodate the special needs of my child. This appeal is lengthening our wait-time and is forcing me to continue to pay unaffordable and ever-increasing rental home rates.

Signed under the penalty of perjury.

January 24, 2023



Erica Kollmann

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF LaCresha Grigsby

1. My name is LaCresha Grigsby. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

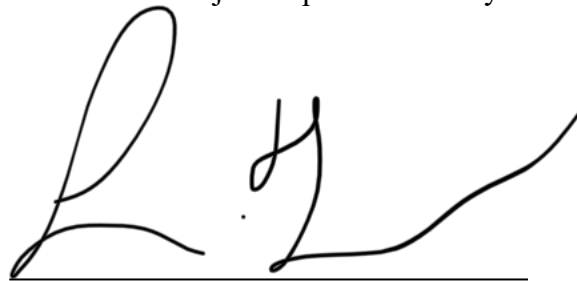
2. I attended Virginia College and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I will literally be homeless and still be unable to find a job to provide for my children, which one is special needs.

Signed under the penalty of perjury.

January 24, 2023



LaCresha Grigsby

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Jeffrey Adkins

1. My name is Jeffrey Adkins. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended DeVry University & Keller Graduate School and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

First and most importantly is the mental anguish this causes with not being able to figure out my longer term financial affairs. I feel like since graduation I have been held prisoner by this debt and with the pause due to covid I've been given hope and with the sweet settlement I've been given new life and that is being held hostage by parties that won't feel or be harmed in any way like myself and those like me are. Next, if this continues to get dragged out I will experience financial harms from payments coming due that I will need to figure out how to work back into my finances as well as potential for tax liabilities depending on if / when this is approved. So if the intervenors are successful at dragging this out I may very well continue to be financially harmed via taxes on this settlement that otherwise wouldn't exist. These 3 schools should not be allowed to hold up relief for everyone and a stay only has the potential to harm the students. Any stigma the school fears due to exhibit "C" is not going to be the reason why people view them in an unfavorable light. It will be because of the deceptive practices to put us in crippling debt that cannot be made whole with the worthless degrees issued and their obsessive attempts to deny relief which allows them to walk away without fear of retribution from the DOE.

Signed under the penalty of perjury.

January 23, 2023



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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Stormy Adkins

1. My name is Stormy Adkins. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Art Institute and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

When Judge Alsup ruled in favor of the settlement I felt the glimmer of hope I'd been seeking out for the first time in years. My life is barely afloat. Over the past 14 months I've lost so much and I'm barely floating in the current economy. I no longer have a safety harness. The loans are crushing me and I'm balancing on the verge of homelessness. I need a vehicle. I can't get approved for a loan for a legitimately reliable vehicle. I'm working three jobs just to pay rent whereas if I had a vehicle I'd be able to commute into Houston for better pay and thereby achieve a better quality of life. The four cars I've cycled through the last couple of years have failed me within months and drained every cent I had in savings - what little that was to begin with. I've had many opportunities come and go that I was unable to grasp them due to distance. I'm terrified to fall any further because once you do, there's little to no help getting back up, especially in Texas. If the motion to Stay is granted, the extension of time will make it that much harder to keep fighting for my basic life necessities.

Signed under the penalty of perjury.

January 24, 2023



Stormy Adkins

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Corwin Albers

1. My name is Corwin Albers. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended DeVry University (Kansas City) and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

Having this debt hanging over my head is an albatross that I have to weigh every financial decision against. I was finally starting to see light at the end of the tunnel with this ruling and now with the stay it seems like 2023 will be another year of waiting to make major life decisions due to personal finances and thinking "what if". I feel like I have lost years off my life from stress caused by this appeal and this whole ordeal. I wasn't even old enough to order a drink at a bar when I signed up for this debt and I was lied to every step of the way by every person in the system. If there is any justice this appeal will be struck down quickly.

Signed under the penalty of perjury.

January 24, 2023

Corwin Albers

Corwin Albers

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1
2
3 THERESA SWEET, *et. al.*,
4 *Plaintiffs,*

Case No.: 19-cv-03674-WHA

5 v.

DECLARATION OF Sahn Assan

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
10 *Defendants.*

11 1. My name is Sahn Assan. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

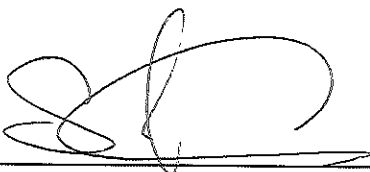
14 2. I attended Ashford University and submitted a borrower defense application on or before
15 June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 I have paid thousand of dollars, and spent years of my life on an education that was
18 worthless on the promise of a counselor who was no more than a salesman. I applied for relief
19 and was declined relief after years of waiting for an answer. My school was on the list of schools
20 included in the lawsuit as a school that used fraudulent means to soak funds from hard working
21 people who wanted to better their lives. My family which includes my mother who is elderly and
22 relies on us could benefit a lot by the relief that was approved. The schools who are delaying this
23 are not even responsible for repayment. This is harmful that they are doing this. The department
24 of education is doing the right thing to wrong their lack of oversight by approving these loans for
25 schools that were defrauding their student. And they are stopping this for their reputation. They
26 don't have to pay back to money they stole and they are stoping it. Its hurting everyone and its
27 not right.

28 Signed under the penalty of perjury.

January 24, 2023



Sahn Assan

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al.*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Aaron Atkinson

1. My name is Aaron Atkinson. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

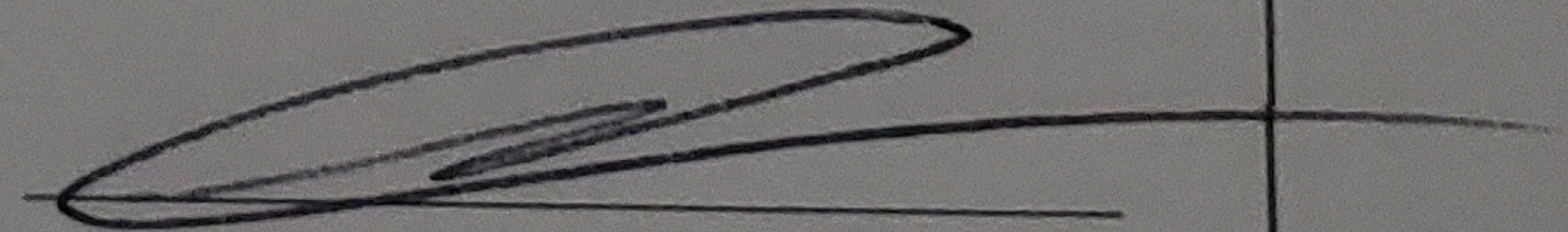
2. I attended Keller Graduate School of Management and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

It will postpone buying a house in which each of my 3 children will have space to play. Currently in a 2 bedroom duplex with my 3 children sharing one room. The money I would get back in the form of payments i have made will be a down payment on a new home. I am still paying on a loan that I took 5 years before the birth of my first child. I don't think they should be paying for the predatory lending practices of the for profit schools nor should any other child. It was the schools decisions and deceitful tactics that persuaded me to sign up for the school. I think they should be held 100% accountable for their gross misrepresentation of their schools and the original judgement should be allowed to move forward, swiftly.

Signed under the penalty of perjury.

January 24, 2023



Aaron Atkinson

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Kimberly Baillargeon**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Kimberly Baillargeon. I submit this declaration in opposition to the Motion for
13 Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

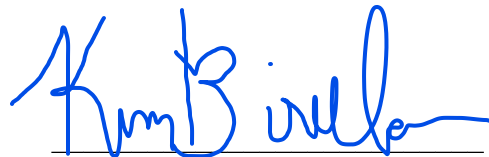
15 2. I attended University of Phoenix and submitted a borrower defense application on or before
16 June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 This has caused so much mental strain and stress on me. University of Phoenix and it's
19 enrollment staff knew what they were doing when they preyed on a single mom. I could barely
20 afford to feed my kids let alone pay back these astronomical loans. They coerced me to truly
21 believe this would change my financial circumstances and provide a beautiful future for me and
22 my children. I believed them, and yet here I am decades later and I have had companies I
interviewed with shame me for going to a for profit university it was humiliating. My family has
been delayed in getting a home loan because our lender states the student loan debt is putting our
DTI in too high. This is insane, I will never be able to move on with my life as a hard working
middle class citizen with these loans haunting me. I will be paying on these till I pass away and it
will still not be paid off, what kind of system is this.

23 Signed under the penalty of perjury.

24
25 January 24, 2023



26
27 Kimberly Baillargeon

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Nicholas Belcher

1. My name is Nicholas Belcher. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended University of Phoenix and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

We wouldn't be able to buy a house. My wife, daughter, a dog, and a cat are living in an apartment while we search for a house to buy. While we have done a good job at saving, our debt to income ratio will keep us from being approved for a mortgage due to my student loans. This debt from a school that I believe committed fraud with their promises, is keeping us from continuing the American dream.

Signed under the penalty of perjury.

January 23, 2023



Nicholas Belcher

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Ryan Bergamini

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Ryan Bergamini. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Brooks Institute and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

For 20 years I along with my fellow classmates have been forced into financial destitution due to the actions of Brooks Inst. We have suffered mentally, emotionally, and financially due to their lies and deceit. One would think an institution with such a prominent past would have had a grand gala, a final hurrah bringing students from the past and present along with future graduates in the celebration of such a storied school. Instead Brooks Inst. decided one day to literally close their doors forever, failing to inform students that their school was closing, in typical fashion they left landlords, contractors, and students on the hook for their expenses. That is the actions of CEC and the Brooks Inst.

Most importantly the court needs to remember why we are here in the first place, the lack of the DOE's recognition that we had been defrauded by Brooks Inst. They failed us as taxpayers to protect us against predatory educational institutions like Brooks Inst. This case has been the first time in my life that justice was served on my behalf. It took us 20+ years to have our "day in court", and now a handful of lawyers representing THREE schools intend to delay our long awaited relief just to protect their clients reputation. These schools and the lawyers representing them should have been happy to have had the privilege to have their voices heard in a trial that had nothing to do with them. This case was between us the class members and the DOE, they should have never had the ability to delay the relief of 100,000's of harmed students who were denied relief over the past two decades.

While I understand our judicial system works in the way it was intended, at some point the court needs to stand up to the interveners and remind them that they were payed while the students that were harmed by the DOE's neglect, we still bear the financial burden we legally

1 can't get out of. This is just another slap in the face to those of us who've been waiting 20+ years
2 for some kind of relief, any kind of relief. The intervening schools and their legal counsel should
3 be not only reprimanded for their actions, but they should be punished for only caring about their
4 reputation's and career goals, and not the lives ruined by their clients behavior.

5 How will I be affected by the delay if the appeal stay is granted you ask? I will continue
6 to be financially unable to buy anything of substance to make my life worth living. The debt I'm
7 carrying with nothing to show for it has crushed my dreams of having a family, buying a home
8 or even a new car. I never made any money with the "education" I received, only the non-stop
9 mental wear and tear of having debt collectors hounding me for money I don't have. If the court
10 is truly about Justice, they should deny the appeal and allow the thousands of us who were
11 damaged the opportunity to prosper. I think it's important to remember, we all only get ONE life.
12 For thousands of us, 20 of the 40 or so prosperous years to grow and prepare for the sunset years
13 of our existence were taken from us by the same people who are intervening in our settlement
14 today. They must be stopped, they must accept the terms agreed upon by the Court and our class
15 and they must be taught a lesson for their actions. The court should claw back their ill-gotten
16 gains and they should be punished for interjecting in a matter they were only given a courtesy
17 voice for in the first place.

18 Do the right thing, deny their stay, deny their appeal, and give us the opportunity to turn
19 our lives around before it's too late for many of us.

20 Best,
21 Ryan Bergamini

22 Signed under the penalty of perjury.

23 January 24, 2023



24 _____
25 Ryan Bergamini

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Jana Bergevin

1. My name is Jana Bergevin. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.


2. I attended The Art Institute of California - San Francisco and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I've been waiting for 7 years for justice and this appeal of intervenors that have nothing to do with me since I didn't attend their school, directly impacts and prolongs my suffering. I demand that they be punted to a special legal hell for daring to come between 250,000 borrowers and our relief. This is cruel and unusual punishment for our class and post class members. We've been waiting for almost a decade!!! Want to know what happened in that decade? Lots of mental health stress and difficult financial choices. I have a three year old son, I have a family that I provide for, and the department of education has acknowledged that my school has overwhelmingly done us damage. Stop letting assholes intervene in cases that DO NOT CONCERN them. They're not involved, they're parasites trying to screw us all over again, let them pound sand and tell them to take the scenic tour of hell.

Signed under the penalty of perjury.

January 24, 2023



Jana Bergevin

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1
2
3 THERESA SWEET, *et. al.*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

4 v.

DECLARATION OF Andrew Beyer

5
6 MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
7 Education, and THE UNITED STATES
8 DEPARTMENT OF EDUCATION,
Defendants.

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11 1. My name is Andrew Beyer. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended Capella University and submitted a borrower defense application on or before
15 June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 The student debt that I have has prevented me from buying a home, getting refinancing
18 loans.. My BDC has been pending for almost 2 years. I need this relief now not later. I was lied to
19 by my University and was lead along with the promise of a PhD. Never happened. Once they
20 milked me for all they could I was given a lesser degree and kicked out. Why do we have to wait
21 for relief? The college that ripped me off did not appeal.

22 Signed under the penalty of perjury.

23 January 24, 2023

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Andrew Beyer

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Megan Boger

1. My name is Megan Boger. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Charlotte school of law and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I would be adversely affected financially. The delay is causing me undue hardship because I cannot move on with my life and afford to buy a house for my family. I cannot qualify to get a mortgage and am stuck in the repetitious cycle of renting and not being able to afford to buy my own home.

Signed under the penalty of perjury.

January 24, 2023



Megan Boger

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Logan Brade

1. My name is Logan Brade. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended University of Phoenix and Grand Canyon University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

This would further delay my ability to make any large financial decisions for me and my family as this continues to stay on my credit. It forces me to pay more money for any type of loan and, in some cases, leading to outright rejection when trying to get a home. The worst part is that the FTC already settled with my universities and Navient years ago but, because of the delay with Borrower’s Defense process, I can’t get the relief I should’ve gotten from those judgments nearly 5 years ago.

Signed under the penalty of perjury.

January 23, 2023



Logan Brade

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Kristen Bretzius

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Kristen Bretzius. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Kaplan and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

This debt has been a weight on my shoulders since 2008, between servicer deferments and forbearances the debt has almost tripled. I can buy a house, I cannot help my kids pay for school, I will never retire, I will work until the day I die. The "education" I received has not helped me in any way. The school talked me out of a masters degree and into another Bachelors, which they didn't even let me finish by not providing the class I needed to graduate. That two schools out of the 150 on the list are staying the decision due to "damage to their reputation" is heartbreaking.

Signed under the penalty of perjury.

January 24, 2023



Kristen Bretzius

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Shannon Brocco

1. My name is Shannon Brocco. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Sanford Brown and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I have spent a good part of my life in debt from my time in college. I thought it was hopeless at one point. I couldn't afford the payments and couldn't find a job. I finally have part of my life together and things are good, except the issues my student debt causes. I've worked hard on my credit score that never rises because of all my school debt. We are ready to build our forever home and my loans affect our rates and our approval for our construction loan. It has to all go into my husbands name when we are ready, because my loans would hurt our chances of getting a loan or would cause us to have higher rates. I'm ready to move on from this. All I wanted was a college education to better my life and it's done nothing but hurt me. These schools chose to lie! Over and over. When the pandemic hit and inflation rocketed we put building our home on hold. With that being out of our hands and no ending near I was hoping in that waiting period I would finally see my loans forgiven and maybe so much wouldn't be on my husbands shoulders. Timing is of the essence for a lot of us and has already put our lives on hold for so long. It's going on 12 yrs now that this has affected my life and now my husbands. When do we get our justice?!

Signed under the penalty of perjury.

January 23, 2023



Shannon Brocco

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Hanah K Brock

1. My name is Hanah K Brock. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Illinois Institute of Art- Tinley Park & Schaumburg and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

Devastated. I need relief to get even a used car, keep my 1 bedroom apartment over my head, pay off my cat's surgery, and countless other bills. I can't have student debt from a scam school continue to weigh me down.

Signed under the penalty of perjury.

January 24, 2023



Hanah K Brock

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Melissa Brooks**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Melissa Brooks. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended Chamberlain University and submitted a borrower defense application on or
16 before November 16, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 I would feel like the courts care about me as much as the fraudulent predatory
19 schools do. I cannot move on and take care of my two disabled children with this
20 predatory debt lingering over our heads with no job right now. I feel hopeless and
21 felt forced to take these loans hoping i would have an amazing career after obtaining
22 my degrees from Chamberlain. I was damned either way. When will enough be
23 enough, please help us move on from being taken advantage of and lied to.

24 Signed under the penalty of perjury.

25 January 24, 2023

26 
27 _____
28 Melissa Brooks

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al.*,
4 *Plaintiffs,*

5 v.

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
10 *Defendants.*

Case No.: 19-cv-03674-WHA

DECLARATION OF Brittany Broyles-McMaster

11 1. My name is Brittany Broyles-McMaster. I submit this declaration in opposition to the
12 Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to
13 testify to the information in this declaration.

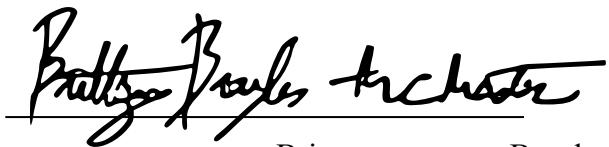
14 2. I attended Art Institute of Philadelphia and submitted a borrower defense application on or
15 before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 Delaying the settlement will continue to punish myself, my parents, and all others who
18 have been victimized by predatory for profit schools. We have waited long enough, stressed and
19 worried long enough. Put our lives on hold and struggled long enough. It is time to put this
20 matter to bed for all involved.

21 Signed under the penalty of perjury.

22 January 24, 2023



23 Brittany Broyles-McMaster

24 McMaster

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

**DECLARATION OF Katelyn Bryan (née
Coram)**

1. My name is Katelyn Bryan (née Coram). I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

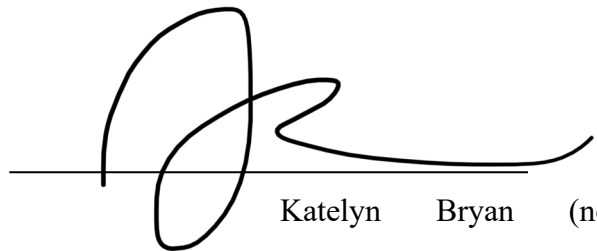
2. I attended Art Institute and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I have been waiting several years for this relief. This debt is affecting my ability to advance in my life financially, it weighs down my credit and throws off my debt to income ratio. I am a 40 year old single mother and my parents had to co-sign on my home.

Signed under the penalty of perjury.

January 23, 2023



Katelyn Bryan (née

Coram)

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Daniel Burke

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Daniel Burke. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.


2. I attended University of Phoenix & Colorado Technical University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

Continued delays means I'll have student loans when my daughter starts college, which will effect my contribution to her since I'll be in limbo.

Signed under the penalty of perjury.

January 24, 2023


Daniel Burke

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

5 v.

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Leisyl Buxton

10
11 1. My name is Leisyl Buxton. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended The Art Institute of Pittsburgh Online and submitted a borrower defense
15 application on or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 I am 40 years old and I need a co-signer to get a car. I couldn't be on my mortgage with
18 my husband because of my student loan debt. I discovered that the Art Institute lied about their
19 interior design program being accredited when I started researching masters programs and
20 getting NCIDS certified or licensed in interior design and found I am not eligible. This debt is
21 heavy. It is a heavy weight on my chest that weighs on me daily, and all for nothing.

22 Signed under the penalty of perjury.

23 January 24, 2023



24 _____
25 Leisyl Buxton
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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

5 v.

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
10 *Defendants*.

Case No.: 19-cv-03674-WHA

DECLARATION OF Tara Cadman

11 1. My name is Tara Cadman. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended International Academy of Design and Technology / Sanford Brown and
15 submitted a borrower defense application on or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 The day I graduated from the international Academy of design and technology with my
18 bachelors in fashion design merchandising I was so exceptionally proud. I thought I had truly
19 accomplished some thing, and had a bright future and career ahead of me. This blissful feeling
20 was short-lived and replaced by the sobering reality that my degree hurt my chances of getting
21 hired more than it helped. My school who promised to assist with job placement felt forwarding
22 hourly paid retail positions from indeed.com was a sufficient form of assisted job placement.
23 Graduating IADT I was left with \$56,000 in debt though I had been paying hundreds of dollars
24 every single month directly to the school for tuition. My student loan payments are \$500 a
25 month. This is a crippling payment, taking precedence over paying for health insurance, buying a
26 new car etc. It is a consistent life setback. Not only does the student loan debt I have incurred
27 hang over my head and I am consistently stressed about the ability to make this payment every
28 month. It also inhibits my ability to grow due to the amount of debt, and its affects on my credit.
I would have loved to achieve my masters degree, however, every higher institution informed
me, they would not recognize my credits earned through IADT, even though I was promised by
IADT during registration that they were recognized. I have not been able to achieve any other
additional education due to this debt. I cannot afford to. The relief the settlement will bring to my
self and the life opportunities that it will open are endless. Hindrance to the settlement
proceeding would be continued detriment to not only myself emotionally but financially as
described.

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Signed under the penalty of perjury.

January 24, 2023

The image shows the Authentisign logo, which consists of a blue square with a white 'A' and the word 'Authentisign' in green. To the right of the logo is a handwritten signature in black ink, which appears to be 'Tara Cadman'.

Tara Cadman

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Michael J Calvert

1. My name is Michael J Calvert. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Kaplan and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I'm currently \$500 overdrawn every month. Now that the COVID relief items are over all of my funds are back into my children's lunch, going to school items and gas. Adding another \$600 a month for 30 years would probably make me want to give up and stop working all together. It seems like with the income driven repayment plan it is better to be bankrupt than to try to succeed. After I got my degree, I never got a new job. I've been at the same job since I was 20 years old, and I have been paying \$600 a month close to 15 years with my principal balance in my loans actually going up. This case has felt like a light at the end of the tunnel and it just got dark...

Signed under the penalty of perjury.

January 24, 2023



Michael J Calvert

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Peter Contreras

1. My name is Peter Contreras. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Florida Coastal School of Law and submitted a borrower defense application on or before November 16, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

A stay would harm me in that it will create more delay and uncertainty when we already will have to potentially wait 3 years to find out if relief will be granted. Adding the time for an appeal to this already long period of time is not in the interest of justice.

Signed under the penalty of perjury.

January 24, 2023



Peter Contreras

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Dallas Coulter

1. My name is Dallas Coulter. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

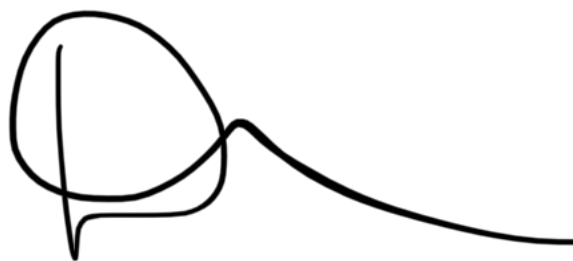
2. I attended Art institute of California San Francisco and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

My life has been on hold for years. I can't rent, I can't buy a house, I can't buy a car, I can never get married. My credit is horrible because of the debt to income ratio caused by these loans. I just wanna be able to live a regular life like most people are able to do. This is so unfair to be stuck in this position with nothing to show for it.

Signed under the penalty of perjury.

January 24, 2023



Dallas Coulter

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Linda K Coyle

1. My name is Linda K Coyle. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. My child attended AI Cincinnati and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I was unable to save for my retirement due to paying a Parent Plus Loan for my daughter. I'll be 64 this year and have no savings. I can't retire. Because my daughter and I were lied to and she was left with no education, I know the US Education Department owes us a refund along with interest and inflation.

Signed under the penalty of perjury.

Linda K Coyle

January 24, 2023

Linda K Coyle

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Victor Cruz**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Victor Cruz. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended Fast Train and submitted a borrower defense application on or before June 22,
16 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 I'm having my first baby on Feb 26th 2023 and I was so delighted to hear the settlement
19 was approved after over 10 years of having this fraudulent loan on my credit. It would be perfect
20 timing for the settlement to have cleared off my name in time for me to be able to have proper
21 credit to purchase a home for my family. Unfortunately another delay can cause unforeseen
22 consequences for the livelihood of my newborn. It's paramount that the courts keep the all the
23 judges ruling in place for the stability many families including mine vs the profits of these
24 colleges that defrauded their students.

25 Signed under the penalty of perjury.

26 January 24, 2023



27 Victor Cruz

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Laura Dadich

1. My name is Laura Dadich. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Katharine Gibbs and SBI - An Affiliate of Sanford Brown and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

This would affect me in a nearly catastrophic way. I am planning on buying a home within the next few months, and by having this astronomical debt hanging over my head by 2 schools (Katharine Gibbs and SBI An Affiliate of Sanford Brown), could greatly effect my living situation. I was hoping to finally own a home, rather than throwing away my hard earned money renting for the last 10+ years. I was hoping to have this debt cleared from my credit report and use the refund towards a down payment on a permanent, steady home.

Signed under the penalty of perjury.

January 23, 2023



Laura Dadich

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Jody DeMuth

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Jody DeMuth. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

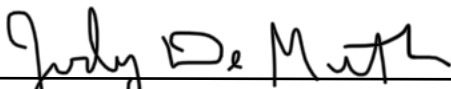
2. My child attended ITT Tech and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

Currently I am living paycheck to paycheck because of the prices going up higher and higher, for groceries, for gasoline, my house taxes and utilities. I feel I deserve to have this settled since the school my child attended which I paid for, scammed my son into thinking this school was the top notch place to get an education. They lied, and I shouldn't have to pay for an education that he never received. His 69 credits are not valid anywhere, and I paid over 20,000 on his education and he paid 10,000 himself which we have absolutely nothing to show for it. They just shut their doors and left without giving anyone a heads up, or telling us the government was shutting them down. I could use this money that I spent to pay off my car to lessen my monthly payments so I can not have to worry about not eating or borrowing money to eat. Every time I enter the store prices go up. The damn is about to break. Please give me back what I was ripped off. I have never needed to use government assistance and I don't want to start. This money could help me through the rough time of this recession. Thank you

Signed under the penalty of perjury.

January 24, 2023



Jody DeMuth

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Tamie Donham

1. My name is Tamie Donham. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Perdue University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I have endured enough financial harm due to the student loans I acquired while attending a fraudulent school. I can't get a loan to purchase a home, my insurance rates are high, banks see me as a risk when they pull my credit report due to my student loans. I'm currently living with my family waiting for my loans to be discharged so I can purchase a home. I'm almost 53 years old and do not have a place to call my own and it is due to my student loan balance. Why should I have to be further harmed financially by a stay order, and asked to wait an unknown amount of time again. I have been paying for my decision to attempt to better myself to have a better life because I attended a school that committed fraud, misled it's students and destroyed the dreams that I had for bettering myself or so I thought. Instead I have been stuck for years with an overwhelming burden of debt that has held me back. I think I have waited long enough to have this weight lifted off of my shoulders. Please don't ask me to wait any longer.

Signed under the penalty of perjury.

January 23, 2023

Tamie Donham

Tamie Donham

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Deanna L Draper

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Deanna L Draper. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Stevens Henager and Independence University. and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I was recruited into Stevens henager after issues had already risen and the school was under investigation, they knew it would likely be shut down.without notice it did, and pushed me into it's sister college independence university (knowing it too would be shut down) in order to keep getting my student aid and loans. I was robbed of money that I didn't even have, and lied to and now in an economy that I cannot make enough money to survive in and am barely able to support my children, I will have to pay back the money I borrowed. I was taken full advantage of and betrayed while trying to make a better life for myself and children. I applied for borrowers defense in a last ditch effort to get out of the hole I was put in, we were told we had a chance when this law suit was made known to us , suddenly there was hope . Hear my cries, hear my pleas. A stay in this case would mean granting criminals who have already been caught red handed more opportunity to further take advantage of us. It would be pushing our faces into the mud while we are already down and about to be even further out ,then we have been in the last couple years. I need justice for my families well being. I cannot afford to pay for this criminal activity. I am already a low income individual. I have a family to support. I just wanted more for them and I trusted the people who told me they would help me. I will never have the money to spare to pay for this.

Signed under the penalty of perjury.

1 January 24, 2023


Deanna L Draper

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Marlo Duffy**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Marlo Duffy. I submit this declaration in opposition to the Motion for Stay filed
13 by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information
14 in this declaration.

15 2. I attended Keiser College and submitted a borrower defense application on or before June
16 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 The loans that I have been paying on for over 20 years are a huge financial burden. They
19 have more than doubled what I originally borrowed. As a single parent and a grandparent, there is
20 never peace of mind with this much debt. I am recently divorced and trying to keep my house. I
21 will need to refinance soon, and this debt is an issue in that as well.

22 Signed under the penalty of perjury.



23 January 24, 2023

24 _____
25 Marlo Duffy

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Shannon Dunn

1. My name is Shannon Dunn. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Kaplan University Online (Graham & Rollins) and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am currently in school now for a degree that will help me further my career, and due to me being at my aggraget limit and I am not able to apply for any student loans. I am \$92,000+ in debt in student loans with no degree. I was charged for two bachelors degrees and I was only going to school for a Bachelor of Science in Criminal Justice. I have to hope that I qualify for tuition reimbursement each term from my employer to pay for classes. If I don't qualify at any given moment I will have to find a way to pay thousands out of my pocket. Not only that I will never be able to own my own home because of the amount I owe it raises my debt to income ratio. I only make \$39,000.00 per year and with the economy I will never be able to pay these loans off. If this doesn't work I will be forced to file bankruptcy to have these loans removed.

Signed under the penalty of perjury.

January 24, 2023



Shannon Dunn

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Joshua Edwards

1. My name is Joshua Edwards. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended DeVry University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

This settlement isn't about me or how it affects me. This was a group effort, beginning to end. We moved in numbers this entire time, did the leg work, and the judge felt this settlement between all parties is acceptable, yet a select few have deemed it "harm to their reputation." Why should a select few get to speak for myself and others in this settlement when we agreed this is an acceptable outcome? These schools already took advantage of us by making us take on this debt with their predatory practices, yet you are concerned about your reputation?

What about my finances? What about my job growth? DeVry promised me a job within my field of study within 6 months of graduating and I would make more than other people. Guess what? That was a lie and they got caught. Why should I have to shoulder the burden of student loan debt when this school deceived myself and others?

So I say to you, filthy intervenors, you are only harming yourselves in trying to stop this from becoming reality.

Signed under the penalty of perjury.

January 24, 2023

Joshua Edwards

Joshua Edwards

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Kimberly Evans

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Kimberly Evans. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended The art institute of inland empire and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

My husband and I have 4 kids. He is military and we are struggling with just the one pay check. Having this loan in default for 9-10 years has made it impossible for me to go back to school to help provide for our family. It also would be amazing to receive the tax refund that was taken by the dept. of education however on their website it does not show 1 payment ever made. I am so discouraged by the way my education was handled and I felt tossed aside when I couldn't afford to attend school anymore.

Signed under the penalty of perjury.

January 23, 2023



Kimberly Evans

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Chazsity Favela**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Chazsity Favela. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended Argosy University, University of Phoenix and submitted a borrower defense
16 application on or before June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 These school's predatory acts have caused several student loans (that were useless) to sit
19 on my credit report for YEARS. I first attended one of these school at 18 and I am now 30. This
20 has affected my ability to buy a home for my family. I was a young mother when I enrolled and I
21 feel completely taken advantage of. I'd like to put this behind me and move on with my life and
22 be able to do the things I've worked so hard for, for the last 12 years. My student loans also
23 affect my husband who was never even a student because we live in Texas. Living in Texas and
24 being legally married you have to include your spouse's debts when buying a home. We have had
25 several hardships over the years with moving because we can only rent.

26 Signed under the penalty of perjury.

27 January 24, 2023

28 

Chazsity Favela

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Amber Garcia

1. My name is Amber Garcia. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Devry and UOP and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

My credit is low, I am barely making my bills as it is. I need my credit score to improve In order to lower my apr on other debt I have been forced to acquire to make ends meet. It's just a bottomless pit. I grew up poor. I was the first of my family to graduate high school. I took my self to sign up for community college on the bus. I had no guidance. Being a single mom shortly after I was forced to sign up for school online. I thought "education " was the answer to keeping my kids from growing up the way I did. But sadly seeking an education in the American system I was taught you should be "educated " to know when you're being swindled and signing on the dotted line seeking a future could actually cost you your future.

Signed under the penalty of perjury.

January 24, 2023



Amber Garcia

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Yvette Getty**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Yvette Getty. I submit this declaration in opposition to the Motion for Stay filed
13 by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information
14 in this declaration.

15 2. I attended University of Phoenix and submitted a borrower defense application on or before
16 November 16, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 The delaying of the settlement relief would deny me the assistance I need to pay
19 my living expenses. The cost of living has increased significantly over the last
20 couple of years, and so many of us are counting on this settlement relief to offset
21 the financial burden that has caused us. My husband and I also have medical
22 procedures that we have been putting off despite needing to get them done, because
23 we don't want to incur medical bills that would bury us. This loan has been a
24 weight dragging my family down for years! To know relief is possible, but is being
25 delayed is truly dangerous for peoples mental health in what is already a very tough
26 time.

27 Signed under the penalty of perjury.

28 January 24, 2023


Yvette Getty

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Tarah Gramza

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Tarah Gramza. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

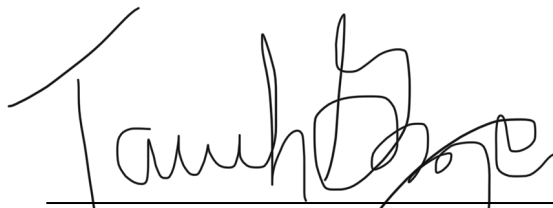
2. I attended American Intercontinental University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I continue to live with the crippling debt. Although payments may be deferred the debt remains on my credit report which continues to limit my ability to use my credit, buy a home, buy a car, and conduct general financial life decisions. I've been waiting for this debt to be addressed with my BD application since 2016 when I filed. Waiting again, after years and years of abuse by the department in failing to even review my application, and illegally denying my application in 2019, and now these schools want to continue more delays by inserting themselves into a lawsuit that doesn't involve them, it's proposterous and is victimizing me even further. We trust the courts to protect us.. please protect us from further abuse by these schools. I didn't even attend one of these schools yet they are harming me further.

Signed under the penalty of perjury.

January 23, 2023



Tarah Gramza

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

**DECLARATION OF Ashten Griswold
(Ashley Bolger)**

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
Defendants.

10
11 1. My name is Ashten Griswold (Ashley Bolger). I submit this declaration in opposition to the
12 Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify
13 to the information in this declaration.

14 2. I attended Independence University and submitted a borrower defense application on or
15 before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 I would be financially destroyed and forced to file for bankruptcy

18 Signed under the penalty of perjury.

19
20 January 23, 2023



Ashten Griswold (Ashley

21
22 Bolger)

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28 Declaration of Ashten Griswold (Ashley Bolger)

Case No.: 19-cv-03674-WHA

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Peter Contreras

1. My name is Peter Contreras. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Florida Coastal School of Law and submitted a borrower defense application on or before November 16, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

A stay would harm me in that it will create more delay and uncertainty when we already will have to potentially wait 3 years to find out if relief will be granted. Adding the time for an appeal to this already long period of time is not in the interest of justice.

Signed under the penalty of perjury.

January 24, 2023



Peter Contreras

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Tiffina L. Haigler

1. My name is Tiffina L. Haigler. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

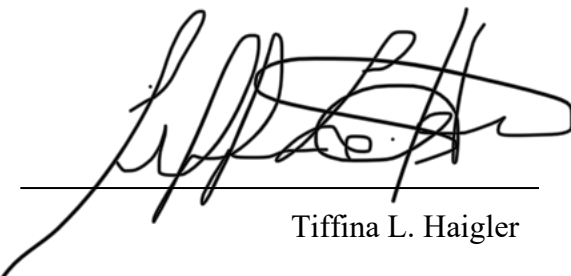
2. I attended South University and Capella University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I was patiently waiting for January 17, 2023 to finally exhale after years of battling crippling debt. I thought I would finally realize my dream of home ownership as my lender needed proof of the pending relief. I have gone through a financially devastating divorce and bankruptcy and this set back is devastating.

Signed under the penalty of perjury.

January 23, 2023



Tiffina L. Haigler

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Kenna Hamilton

1. My name is Kenna Hamilton. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

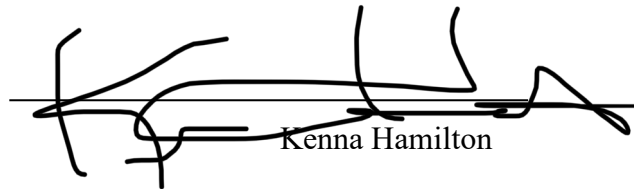
2. I attended Walden University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

The delay results in financial and emotional harm to myself and others. It feels like waiting for another weight to be added to the overloaded burden. I have responsibly paid my student loans despite predatory lending and playing me as a sucker of which I am horribly embarrassed. Always thought I was smarter but I fell for every manipulative, smoozing, sake pitch. I feel like an idiot. Please don't drag this agony any longer. Colleges and universities be responsible and admit your wrongdoings and let us get on with our lives. This is emotionally exhausting waiting for a life without this burden due to my stupidity and weakness to a predator. I am just plain tired

Signed under the penalty of perjury.

January 24, 2023


Kenna Hamilton

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1
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3 THERESA SWEET, *et. al.*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

4 v.

DECLARATION OF Sheena Harings

5
6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
Defendants.

10
11 1. My name is Sheena Harings. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

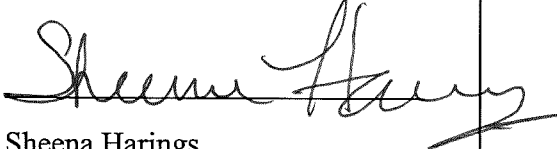
14 2. I attended Minnesota School of Business and submitted a borrower defense application on
15 or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 I am waiting to buy a house and cannot because this is showing up as debt. My degree I
18 received is not valid in the state of Wisconsin because Minnesota School of Business-Globe
19 University was not accredited like they told me. I have over \$60,000 in debt with a degree that I
20 can't use. They even changed my answer on the postcard I returned about me finding a job using
21 my degree to use to try and get accredited. I went online and my degree took a lot of time to obtain
while I still worked full time, part time and cared for my grandmother with dementia. This was all
time and money wasted and now I am still suffering the effects with a huge debt going against me.
I just want to put this behind me and move on.

22 Signed under the penalty of perjury.

23
24 January 24, 2023

25 
26 Sheena Harings

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Seanta Harrison

1. My name is Seanta Harrison. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Daymar College and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

My life would continue to be devastated. I can't even get a job that will take me serious and pay me what I am worth. When going to an interview and the employer looks at my resume and they see my education, "worthless diploma" they keep looking for others who went to an accredited college. For years I have been working at dead end jobs, paycheck to paycheck, trying to pay back student loan and taking care of my children. It is so much harder than it should be and the debt is neverending!!!

Signed under the penalty of perjury.

January 24, 2023

Seanta Harrison

Seanta Harrison

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Casey Hoffman

1. My name is Casey Hoffman. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended The Art Institute of Pittsburgh and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am currently expecting our first baby. A stay would mean more time waiting to possibly be a little more secure in our finances. It would also bring more stress worrying about a dept hanging over my head from a degree that is unusable.

Signed under the penalty of perjury.

January 23, 2023

Type text here
CASEY HOFFMAN
Casey Hoffman

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Chervonne Hollins

1. My name is Chervonne Hollins. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Wright Career College and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I would be affected greatly, this journey for relief has been long and stressful. I attended a school who did not provide the education that would of helped me financially in the future here I'm still paying for an education I never received. This has delayed me from going back to college this debt has held me back beyond words that I can express. The sigh of relief when the Sweets vs Devos came to my email overjoyed me. Now that the school's who have appealed this settlement simply just shows how careless and nonchalant they are with how our BD applications were handled and how all the class members are being greatly affected. I hope the District Courts will see this matter through and dismiss the appeal as it has already reached a settlement. We of the class deserve to finally get a resolution. Thank you.

Signed under the penalty of perjury.

January 24, 2023



Chervonne Hollins

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, et. al,
4 Plaintiffs,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Caitlin Hoyle**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 Defendants.

12 1. My name is Caitlin Hoyle. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

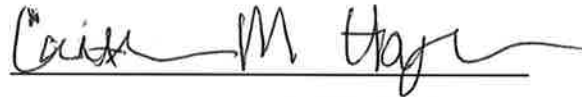
15 2. I attended The Illinois Institute of Art and submitted a borrower defense application on or
16 before June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 My mom is working 2 jobs and my dad can't work due to arthritis in his hips. I would use
19 this money to help them be able to retire sooner (my mom especially) and it would allow me to
20 not stress from all the debt I am in both student loans and credit cards. My boyfriend is currently
21 out of work and I am supporting us both right now and it would help to know I don't have to worry
22 about paying my loans back.

23 Signed under the penalty of perjury.

24 January 23, 2023



25 Caitlin Hoyle

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Brianna K Jackson

1. My name is Brianna K Jackson. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Colorado Technical University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

The amount of school loans on my credit report, just sitting there alone, with no other debt in my name and perfect credit payment for the last 7 years, leaves me unable to rent a home, purchase a home, lease or purchase a vehicle, or further the stability of my life in any way. I have been and continue to be stuck in a holding pattern, unable to even participate in society as an equal member and due to no fault of my own. I hold a useless degree from a closed down college with debt that rivals those that went to state colleges and more. A two year degree that cost me more than my first home did. I want to move on with my life, I'm sure those other schools will move on with their businesses just fine. I appreciate everyone help in making this settlement happen and getting so many people the Justice and opportunity they always deserved. Thank you

Signed under the penalty of perjury.

January 24, 2023

Brianna K Jackson

Brianna K Jackson

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Mary James

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Mary James. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Westwood and Art Institute Online and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

The decision to deny student loan relief would continue to cripple us financially. I have not been able to buy a home and I'm almost 50. We continue to rent because we can't save money to put down on a house. My credit is still in tatters from this. The decision to get married was also tough because of the student loan debts and not wanting this to be put on my husband/our family. We have to file taxes separately to keep my payments from going up even though these debts are mine from before marriage.

I have been waiting over 7 years for this resolution now and my financial life and credit have been ruined by all of this. We deserve resolution now and this to go through without even more delays. These schools harmed us with predatory practices and we have been paying the price ever since.

Signed under the penalty of perjury.

January 24, 2023



Mary James

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Amy Jensen

1. My name is Amy Jensen. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Art Institute of Pittsburgh Online and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am currently going into my last month of eligible forbearance and will have to make the decision to continue paying my loan or go into default. I have a commercially held FFELP loans that will not be paid back to me because I didn't pay into the federal government, but they will be forgiven if the settlement is allowed to continue uninterrupted.

Any money I pay into the loans will be gone forever, but I don't think I would be able to not pay my loans and have that on my credit rating, even temporarily, because we are in the middle of making some life-changing purchasing that will rely on those ratings.

I've already paid tens of thousands of dollars for a degree that got me nowhere in my career and cost me time and money that I couldn't afford under the circumstances, and I don't know if I can afford to keep throwing my resources away in this manner.

Signed under the penalty of perjury.

January 24, 2023



Amy Jensen

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Sonia Johnson

1. My name is Sonia Johnson. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Florida coastal school of law & University of Phoenix and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

It causes me to remain in debt to a group of thieves who lied to woo me into a school that did not provide the promises given. No job assurance. Debt higher than my salary. It's been long enough. They have profited, been closed, and the board of directors that profited hundreds of millions of dollars off of students are now in other schools hiding as if they did nothing wrong or did not benefit! While we the students are struggling to make ends meet. And by meet I mean our food on the table & pay rent.

Signed under the penalty of perjury.

January 24, 2023



Sonia Johnson

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

DECLARATION OF Stella Johnson

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
Defendants.

10
11 1. My name is Stella Johnson. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended Anthem College (formerly Hightech Institute) and submitted a borrower defense
15 application on or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 I am without a car right now and in order to finance a new car I need to have a large
18 down payment which I do not have and my finance chargers will be 28 percent. This is because
19 the 65 thousands dollars in student loans I have are still on my credit. I want to own a home
20 instead of paying \$900 a month for rent, but I can't get a mortgage also because of these loans.
21 Delaying this any further will result in me not buying a car and still continuing to pay high rent
22 which I struggle to pay. My bachelor degree in criminal justice from a for profit school has led
23 me to a minimum wage job. This has been my life since 2007 and this delay will only keep my
24 life in the same position. Please don't allow any further delays.

25 Signed under the penalty of perjury.

26 January 24, 2023

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28 _____
Stella Johnson

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

**DECLARATION OF Crystal Dawn
Kaulbars**

1. My name is Crystal Dawn Kaulbars. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Kaplan University-Online, University of Phoenix-Online, Art Institute of Pittsburgh-Online and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I've been waiting 12 years to resolve this and if a stay and delayed delivery of settlement relief was issued, I would continue to live under a dark shadow of financial despair without hope of having a home, a fair interest rate, and pursue true happiness. I know that as soon as this weight is lifted from my shoulders, I will be the happiest person in the world.

Signed under the penalty of perjury.

January 24, 2023

Crystal Dawn Kaulbars

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al.*
4 *Plaintiffs,*

Case No.: 19-cv-03674-WHA

5 v.

DECLARATION OF Mary Kovach

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
10 *Defendants.*

11 1. My name is Mary Kovach. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended Ross University School of Vet Med and submitted a borrower defense application
15 on or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 Due to my school debt (over \$400,000 now with accrued interest) my husband and I have
18 to make many damaging financial decisions. We have to taxes file separately, to keep my IBR
19 payments manageable. This means for a decade we've missed out on married tax benefits. When
20 we moved across country, our home decisions had to be based on his income only, since my debt
21 to income ratio was so high. This meant we were more limited on home choices. As we face
22 another potential move, we were anticipating the school debt to not play a role in our decisions, as
23 with a final settlement we could show paperwork that my debt to income ratio was drastically
24 lower. This stay will seriously inhibit our future over the next year.

25 Signed under the penalty of perjury.

26 January 24, 2023

27 
28 Mary Kovach

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Wendie LaGamba

1. My name is Wendie LaGamba. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Art Institute of Pittsburgh, Art Institute of Pittsburgh - Online and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I will be affected in many ways, but the most is by my own daughter starting college. I will not be able to get loans out for her. I have private loans also I struggle to pay even month also. I want to move but can't get a mortgage because I had to take out so many student loans. I had to take unnecessary classes because the program I was in was not even finished yet. So in order for me to stay in school, I had to take a bunch of electives until the program was finished. I maxed out all my student loans and ran out of options. I was in debt with student loans and had to drop out of school because I could not take out any more loans. I was not able to finish my program. They had a program that was "available" (bachelors in photography) but was not even completed! So not only did I not get my degree, I want up with over \$100,000 in student loan debt because they offered a program that was not even available/finished. And now I have to pay the price. That is how I was affected!

Signed under the penalty of perjury.

January 24, 2023



Wendie LaGamba

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Keith Lapsker

1. My name is Keith Lapsker. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Lincoln Tech and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I have been battling this issue for more then 25 years. I'm almost 60 now and the stress and uncertainty is affecting my health.

Signed under the penalty of perjury.

January 24, 2023

Keith LAPSKER

~~Keith Lapsker~~

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Chanté Laws

1. My name is Chanté Laws. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

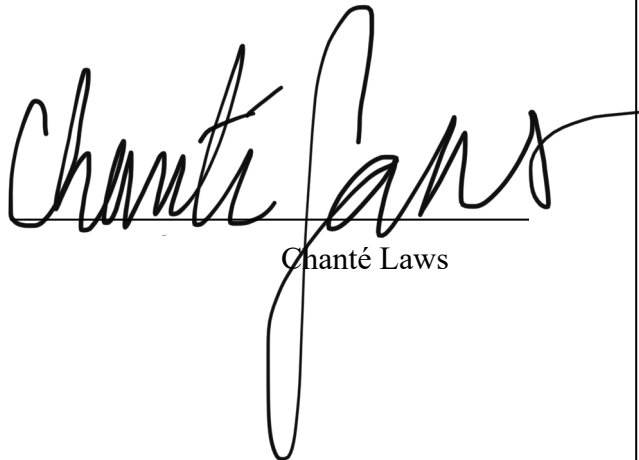
2. I attended Art institute of va beach and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

The great news of the debt settlement will relieve my total debt ratio from \$90k to \$25k, leaving my car note and a future for me to finally start up on purchasing a home. I am a single mother and with todays inflation and trying to save for a better future for my family it's quite difficult to think I'll be soon starting payments for a debt that has not helped me although it was suppose to be the means of a brighter future. Holding up will hold up not only my future but cause more debt along with the inflation as I'm barely making it now.

Signed under the penalty of perjury.

January 23, 2023


Chanté Laws

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF James Leisure

1. My name is James Leisure. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.


2. I attended Vatterott College and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

Living my life would be postponed yet again, my worthless degree prevents me from being taken serious with employers, and the debt prevents me from ever getting ahead. I can only afford to pay Income-Driven Repayment Plans (IBR), so the debt never goes down because of the interest, the debt just keeps growing every year.

Signed under the penalty of perjury.

January 24, 2023


James Leisure

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF David Leon

1. My name is David Leon. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

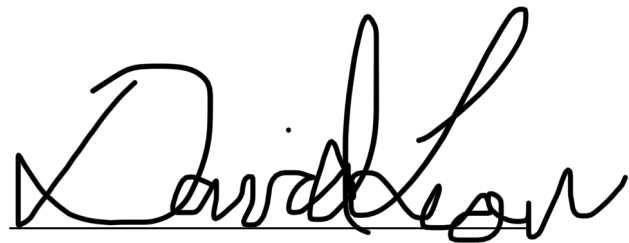
2. I attended DeVry University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

My family don't have savings because of this student loan. This loan hurt us so much financially because of interests that got carried over from previous years. I can't afford to send my child to day care so my wife can study at home for her licensure.

Signed under the penalty of perjury.

January 24, 2023



David Leon

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Denise Lucero**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

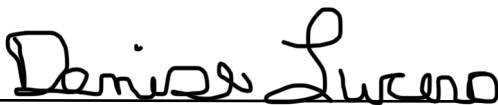
12 1. My name is Denise Lucero. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. My child attended Sacramento Art institute and submitted a borrower defense application
16 on or before June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 I applied for Borrowers Defense in 2019 after years of paying without reducing my
19 owed balance. I am 64 years old and after a full lifetime of work now behind me
20 (and an unexpected change of circumstances) i can't buy a home and cannot get
21 approved for rental applications due to the lenders and bureaus using a percentage
22 of the direct parent plus student loan of \$224,000 against my debt to income ratio.
23 I recently retired and have reduced income. I was relying on the approved
24 forgiveness and never thought I would end up homeless or be used against my will
25 and without my permission as a pawn by unknown appellants when my school
26 already admitted guilt and closed its doors. I don't want to pay for something we
27 never received, and I don't want to wait until I am dead before there is actual relief.
28 I just want my life back without the stress of potential payments being forcibly
taken from my SSI retirement.

Signed under the penalty of perjury.


Denise Lucero

January 24, 2023

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Dawn Lueck**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Dawn Lueck. I submit this declaration in opposition to the Motion for Stay filed
13 by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information
14 in this declaration.

15 2. I attended ITT Tech and University of Phoenix and submitted a borrower defense
16 application on or before June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 My loan debt continues to cause me housing issues. My credit is so bad because the weight
19 the debt carries against me. I've faced issues obtaining safe housing in a secure lease for 8 years
20 now, because of the illegitimate debt from for profit colleges.

21 I face extra deposit, or cosigner requirements that are unlikely.

22 This debt continues to carry as a burden on my overall wellness. It's stressful to know this
23 process drags on. When time and time again the obvious is confirmed, the for-profits schools
24 intended to mislead and entrap folks in bad debt and harmful amounts and terms on loans.

25 If this Delivery of Settlement is delayed. My plans, goals and long time process for safe
26 and secure housing will not be possible. I am out of modification, or plan 'A-B-C'...,to my
27 financially vulnerable life. You cannot explain away what is showing on a credit report, and when
28 affordable housing is competitive. This debt burden leads to denials or really difficult terms. If this
settlement is delayed, I can only imagine further stress related health issues. People not directly
impacted by the harmful effects of this type of debt don't understand these delays or reasons why
the loans continue to show as a debt owed. how does any debtor plan their life or attempt to move
forward, and after a pandemic.m? If these predators can just keep throwing delays in, for what?
Theses folks filing for a delay need to focus on accountability, restitution and restorative justice
that rights the wrong. So everyone can move forward.

Signed under the penalty of perjury.

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January 23, 2023



Dawn Lueck

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

1
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3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

DECLARATION OF Perla J Lujan

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
Defendants.

10
11 1. My name is Perla J Lujan. I submit this declaration in opposition to the Motion for Stay filed
12 by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information
13 in this declaration.

14 2. I attended Kaplan College (now Brightwood College) and submitted a borrower defense
15 application on or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 It will continue to affect my ability to move forward with my life, keep me in debt and
18 continue to hurt my credit. I was 18 when the school preyed upon me taking out over 15k in loans
19 and giving me false information. The staff was fraudulent, unreliable and completely
20 underqualified. I was lied to about the amount of money they took out of grants and the interest
accumulating as soon as the loans were released. The school went after undereducated kids and
adults, promising to help their future but did the complete opposite.

21 Signed under the penalty of perjury.

22
23 January 24, 2023

24 
Perla J Lujan

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, et. al,
4 *Plaintiffs,*

5 v.

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Peter Majerus

10
11 1. My name is Peter Majerus. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended Sanford-Brown College and submitted a borrower defense application on or
15 before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 The delay of settlement is further frustrating as well as an insult to injury. This already
18 has been financially a struggle given that inflation and covid have all been effecting us some way
19 shape or form. In addition, to know that 3 objectors want to appeal this hearing is appalling! I
20 speak for every student when I say this, but we have all been deceived by the financial
21 aid/counselor/dean departments that we all trusted at these "colleges." It is my reason of belief
22 that delaying this would enhance economic struggle for myself and all students entitled to their
23 refund. I depended on this monetary relief to pay for my families necessities and for the quality
24 of life for they deserve, EVERYDAY! For those that paid off these loans already, we have
25 already waited years on end for this time to come. This delay doesn't need to happen, nor should
26 it be the question of for that matter. I'm requesting to you as a hard-worker, an honor student, and
27 more importantly, a father to two young daughters, please don't prolong this any longer.

28 Signed under the penalty of perjury.

January 24, 2023



Peter Majerus

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Jillian Marsala

1. My name is Jillian Marsala. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.


2. I attended Illinois Institute of Art, Schaumburg and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

15 years old. I've been working since I was old enough to do so. With next to no money and my single father barely able to make ends meet, I never had much of a choice. A starving artist through and through. 18 years old. I walked into the college recruitment office with empty pockets and a dream. Little did I know I was their favorite type. They wasted no time before advising me to take out student loans they knew I'd spent the better part of my life working to pay off. That once 15-year-old, turned eighteen-year-old, now 30-year-old. Fifteen years spent working against the clock to provide for myself, and now my two young children. Fifteen years later and still barely scraping by with looming debts and dismay but still holding onto hope. Working hard for a better life for my kids. 2023. Maybe this will be the year, I thought. It held so much promise. On January 6th, 2023 my husband was laid off from his job of seven years. A harsh reality set in that quickly reminded us just how vulnerable we are and how one curveball has the ability to knock us off our feet and put us in further financial ruin if we don't act quickly. Please act quickly. We've been working, and waiting patiently for a future that we were promised. That future is now the present. Please don't let it be the past. Thank you.

Signed under the penalty of perjury.

January 24, 2023



1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Cory Martin**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Cory Martin. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended The Art Institute of Charlotte and submitted a borrower defense application on
16 or before June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 I have been waiting over 7 years for my BDTR case to be reviewed. I've been struggling
19 to budget as it is, with inflation and rising interest rates. And now fears of hitting the debt ceiling
20 and it's ripple effects. Having to wonder if this relief will ever come, or a decision will be made
21 is putting my life on hold, and making me fearful for if these loans come back. It ruins my DTI
22 ratio, all while it just sits there.

23 My legal right to file and be reviewed under due process has been violated enough as it
24 is. Not to mention my school has closed since because their fraud was exposed. And Whether it
25 was Obama eras lack of processing, and Betsy DeVos's blanket denials, we have been waiting
26 too long for an answer. And for schools to jump in at the very last minute is shady.

27 Signed under the penalty of perjury.

28 January 24, 2023


Cory Martin

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF William C Martin

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is William C Martin. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended MTA School and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I have a VA Loan being held hostage, I'm in default without an avenue out, \$3000 in 1989, is now over \$16000. So my multi unit storefront dream is caught up in this mess.

Signed under the penalty of perjury.

January 23, 2023



William C Martin

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Dallas Martinez

1. My name is Dallas Martinez. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Arizona Summit Law School and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I would continue to owe over 250k in loans for law school. This puts me way above the debt to income ratio limits needed to qualify for a home. I have to keep renting and dealing with the rising costs of rent and housing in Seattle - with a family, including my 90 year old father aging in place with us. Also, this debt keeps me from being able to get a second family car. Our financing options are dismal. We get disqualified for financial aid services and resources because my income looks average on paper, but my haunting debt makes it to where my family cannot truly afford things despite the income made. Also, this has had a large impact on my mental health. Having this much debt without the valued credentials is crippling. I cannot just go out and get a great salaried position with my botched closed school's history. And, this affects my entire family and delays our opportunity for generational wealth, which adds to the barriers we face already as a queer family of color.

Signed under the penalty of perjury.

January 24, 2023



Dallas Martinez

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

**DECLARATION OF Jonathan Charles
Martinez**

1. My name is Jonathan Charles Martinez. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Florida Coastal School of Law and submitted a borrower defense application on or before November 16, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am a Veteran of the US Army and cannot use my VA loan due to my outstanding debt. I want to buy a house to raise my family and if a stay is issued it would prolong my ability to use this benefit that I fought for.

Signed under the penalty of perjury.

January 24, 2023



Jonathan Charles

Martinez

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Paul McClay

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Paul McClay. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended The Art Institute of Philadelphia and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

As a class member who attended a school on the automatic approval list, I'm entitled to a full discharge of my federal student loans as well as a refund of payments made. I was hoping to use that money to help pay down some credit cards which I used to help cover the rising costs of everyday living. I was also hoping that the Sweet Settlement would become a legal argument for the discharge of private student loans. I can no longer afford my private loan payments and my servicer has been harassing me with calls and threatening letters.

My school defrauded me and the Department of Education agrees. Why should a few schools that I didn't even attend have a say in denying me relief?

Signed under the penalty of perjury.

January 24, 2023



Paul McClay

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Michael C McDonald

1. My name is Michael C McDonald. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended University of Phoenix and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am a single father working full time who drives 100 miles round trip per work day because I cannot get a mortgage to move closer only because of my student loans. I do not work in the field I study for and am looking for a recourse in action but at 37 years old and in high debt is that really obtainable. The jobs the school promised were in the realm of imagination but they can sell a degree for sure. Please don't delay the relief as this is my last real chance to finally have my first home....at 37...PLEASE HELP

Signed under the penalty of perjury.

January 24, 2023



Michael C McDonald

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, et. al,
4 *Plaintiffs,*

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Hugh McGinley**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants.*

12 1. My name is Hugh McGinley. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended Illinois Institute of Art, Schaumburg - Art Institute of California, Sunnyvale -
16 Art Institute of California, Los Angeles and submitted a borrower defense application on or
17 before June 22, 2022.

18 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

19 I wish that I could say that I didn't expect any schools to appeal this case, but I can't
20 because I know how scummy they truly are. Just like every other student who attended these
21 scam schools, I would continue to be affected both mentally and financially if a stay was issued.
22 I submitted my Defense to Repayment almost 7 years ago now, and it STILL has not been
23 addressed. I've paid and stressed over my student loans for over a decade, and now these schools
24 want me to wait even longer for some relief, just to try and save face? They should be fined
25 additional penalties for even considering such an act. It is so disrespectful and inconsiderate... I
26 really don't know how these people sleep at night.

27 Thank you Judge Alsop for all your time and consideration you've given us. We greatly
28 appreciate it. And thank you, too, Project on Predatory Student Lending. The time and effort
you've provided us is truly unbelievable. We cannot thank you enough.

Signed under the penalty of perjury.

January 24, 2023



Hugh McGinley

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Kelli McLaughlin

1. My name is Kelli McLaughlin. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

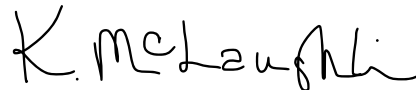
2. I attended University of Phoenix and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I'm trying to buy a home and this balance effects my debt to income ratio greatly making it impossible for me to buy a house a lender can approve. My rent keeps going up and so do interest rates. If this delays and stays on my credit I will not be able to get approved for a mortgage.

Signed under the penalty of perjury.

January 23, 2023



Kelli McLaughlin

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Heather Miller

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Heather Miller. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Arizona Summit Law School and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I currently am barely making enough money to pay rent. My debt to income ratio includes my student loan so I cannot be approved to buy a home, which would cost less monthly. I am a mom who had a kidney autotransplant two years ago and never passed the bar to obtain the job I have 325,000 in student loans for. The school defrauded me and I cannot continue to provide for my two children.

Signed under the penalty of perjury.

January 24, 2023



Heather Miller

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, et. al,
4 *Plaintiffs,*

Case No.: 19-cv-03674-WHA

5 v.

DECLARATION OF Margaret Montes

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
Defendants.

10
11 1. My name is Margaret Montes. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended Art Institute of Fort Lauderdale and submitted a borrower defense application on
15 or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 The delay of the delivery of the settlement would affect me not only because of my age (70
18 years old), but financially as I'm on a fixed retirement income. Allowing the stay requested by
19 these three schools who don't really have standing in the case because their school reputations
20 maybe effected is an issue between them and the DOE, which is not a part of this class action. The
21 stay would certainly add multiple years to a resolution to this case. I may not have those years.
Having been defrauded by my school has haunted me for many years. Having to pay for being
defrauded has been a financial burden, which I hope does not follow me to my grave. The many
years it has taken for the members of the class action to get justice has already been too great.

22 Signed under the penalty of perjury.

23
24 January 24, 2023

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26 Margaret Montes
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Lorinda Morgan

1. My name is Lorinda Morgan. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Vatterott College and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

As long as I have this embarrassing debt, I cannot heal from the damage that Vatterott has caused me. I take medication for anxiety and depression. I was not on this medicine until I got this debt. I will never be able to pay it off. Vatterott lied to me, the administrators guaranteed that I would be making at least 2 times the amount I make now. I am working in my "field of study" and I have been with the same company for 9+ years and I still am not making what I was promised. No company in the area pays as much as Vatterott promised.

The schools who want to stop this settlement from moving forward have no reason to fight this. They are putting their own school names in the spotlight, then accusing the Sweet lawsuit of causing them a bad reputation. Their lawyers do not even care about their reputation, that is proven every time they open their mouths. Their lawyers only see dollar signs. Meanwhile, thousands of student loan borrowers are paying for their clients deceitful practices.

If the stay is approved, it only delays the inevitable. Whether or not this settlement goes through, the DOE still has more applications for relief than they can possibly review. This was addressed on November 9th. Some of the people who applied for relief will be dead and buried before the DOE gets to their application. There are applications that have been pending for over 10 years. Give that some thought, please. Let this settlement move forward.

Signed under the penalty of perjury.

1 January 24, 2023



2 Lorinda Morgan

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Michael Morris**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Michael Morris. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended Anthem College and submitted a borrower defense application on or before
16 June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 My first lesson in life as an adult that entities such as schools didn't always have your
19 best interest in mind was a very hard one. After everything I'd been through with this school, the
20 lying, misrepresentation, bankruptcy of the school itself, I thought after many years of
21 hopelessness that a fair solution was at hand. By letting only these few schools hold back relief
22 from the many thousands of borrowers who were taken advantage of by these for profit schools,
23 justice isn't prevailing. Tying the courts limited resources up by appealing on extremely flimsy
24 grounds is delaying justice to ultimately try to defeat it. I personally believe all of these tactics
25 undermine the spirit and legitimacy of the courts, and rights that citizens have. Please do not
26 allow big corporations to legitimately railroad our rights further. Thank you for your time.

27 Signed under the penalty of perjury.



28 January 24, 2023

Michael Morris

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Kyle Noland

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Kyle Noland. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

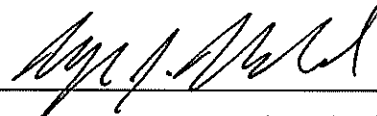
2. I attended The Art Institute of Ohio—Cincinnati and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I, like many others, am struggling both financially as well as psychologically from the sheer uncertainty behind all this. Do we trust to hope? I certainly have. I need this wrong righted to prove that morality still has a place in our society. I desperately need this relief from this debt, which feels like a hand around my throat, putting so many of my big decisions in my life on hold. Do I never get married because the debt would be too much to expect to unload onto anyone else? Will I ever get to own a place I can call truly home? Will I ever be free from being taken advantage of by a for-profit college targeting a poor, gay 18-year-old kid and giving him a false sense of hope that this would be the thing that would change his traumatic life for the better. A delay would affect me, simply put, by forcing me to put my best future on hold, yet again, after so many years already with little more than hope to hold to.

Signed under the penalty of perjury.

January 24, 2023



Kyle Noland

Declaration of Kyle Noland

Case No.: 19-cv-03674-WHA

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Laura Oliver

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Laura Oliver. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Art Institute - Santa Monica and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

This puts me back at risk of having to start paying back student loans that I can't afford. For the last almost a year I have been the only one working to support my family. I work two jobs 7 days a week to make ends meet. I applied for borrower defense in 2019 because I felt like after 15 years at the time (graduated in 2004) after paying and paying and paying for a degree that did nothing I was reaching my breaking point. My original loan was around \$35k and I've paid over \$30k and today have a balance of around \$65k. I went to the Art Institute because the only thing I ever wanted to be for as long as I can remeber was an artist. This was my dream. I never had the option to go to a school like a UC or anything like that. And the Art Institite enrolled me no questions asked and ignorant me didn't know any better. I was a kid living on my own since I left my parents house two weeks after I turned 18 (that's a whole nother mess) and I wanted so badly to get an education I jumped on it. I worked two jobs 7 days a week and went to school from 6-10pm 4 nights a week because I thought this was my future. Once I finished and got my degree I communicated with the people that are supposed to help you get a job and it was crickets. I even tried to find work myself and nothing. I eventually just gave up. And now 19 years later all I have is debt. I don't know how I can put money aside for my kids college when I can't even afford to pay for my own.

Signed under the penalty of perjury.

January 23, 2023

Handwritten signature of Laura Oliver in black ink, featuring a stylized 'L' and 'O'.

Laura Oliver

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Victoria Patterson

1. My name is Victoria Patterson. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended The Art Institute of Houston and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I have been waiting over 3 years for a final decision. I am a single mother of 3 I am unable to purchase a home. I am in default and even though they are not supposed to be reporting this to my credit it is being reported that I am not paying my loans I call the default people and I'm told to call the borrower defense department. Where they inform me to call my servicer and it's a never ending cycle. My loans are from 2013. They shouldn't be showing on my credit at all however they updated the date to 2019 and only some of them show. I'm forced to rent because of my credit I am unable to make payments and my children are the ones that stuffer the most. I am not even a student for one of the schools appealing. The dream center held my loans and should have been discharged several years ago during a different settlement however I was unaware. I have never been able to use my degree and it won't transfer I can not get ahead in life because of this. It does not harm theses schools in anyway to let this settlement continue. However they are trying to stop it for millions of people and we have waited long enough.

Signed under the penalty of perjury.

January 24, 2023

Victoria Patterson

Victoria Patterson

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Katie Payne

1. My name is Katie Payne. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Art Institute and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

My fiance and I have been waiting for this for what seems like forever. We are trying to get married and start a family but these loans are greatly in our way. My so called degree does nothing for our family and hasn't been able to help me aquire a good job in the specific field of study. Living paycheck to paycheck is no way to live and there's no way to save money until this all get resolved.

Signed under the penalty of perjury.

January 23, 2023


Katie Payne

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Victoria Peace

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Victoria Peace. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.


2. I attended ITT Technical Institute, University of Phoenix and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

This will delay buying a home. I am 40 and so close to owning a home but these loans are hurting my credit score tremendously. I feel terrible because all I wanted was an education but I got the short end of the stick instead. I just want to have a home, something to possibly leave my children when it's my time to go. As of right now, I'll just leave them debt.

Signed under the penalty of perjury.

January 23, 2023


Victoria Peace

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1
2
3 THERESA SWEET, *et. al.*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

4 v.

DECLARATION OF Jaime Perez

5
6 MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
7 Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
8 *Defendants.*

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11 1. My name is Jaime Perez. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

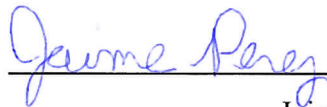
14 2. I attended Chubb Institute/Anthem Institute and submitted a borrower defense application
15 on or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 I've been waiting over a year and half to get a response to the application I submitted. I
18 could really use the refund/discharge of my loans to help pay for my current bills that keep piling
19 up. Inflation is really hurting my paycheck and I'm tired of living from paycheck to paycheck.
This loan, which failed to give me the proper degree and job opportunities it promised me, has
20 haunted me for almost 20 years. I would like to one stop logging in daily to the student aid
website and move on with my life.

21 Signed under the penalty of perjury.

22
23 January 24, 2023



Jaime Perez

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Danielle Picard

1. My name is Danielle Picard. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

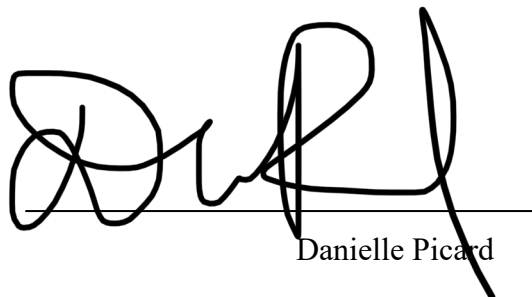
2. I attended Keller graduate school and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I have 280k loans impacting my credit every day after being frauded years ago. I pay high interest rates I cannot get a car loan. People have been waiting 6,7,8 years with no relief in limbo. The parties involved agreed to a settlement The delay is impacting 200k people lives..the ability to buy a house or plan for retirement.

Signed under the penalty of perjury.

January 24, 2023



Danielle Picard

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Ashley Pizzuti

1. My name is Ashley Pizzuti. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Brooks Institute and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I would be devastated. I filed for BDTR back in early 2016. I have an absolute solid case with hundreds of pages of evidence. My husband and I desperately need to move out of our neighborhood, but we are stuck with these loans on our credit. I attended Brooks 20 years ago this past September. These predatory loans have ruined my life. The government has failed me and my right to fair due process. We have waited long enough.

Signed under the penalty of perjury.

January 24, 2023



Ashley Pizzuti

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Nicole Porter

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Nicole Porter. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Brooks Institute and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

My husband and I are currently working with a non-profit agency that helps people "on the cusp" find a path to homeownership. Our target is to buy our first home, and then start a family in 12-15 months. Our ability to do this HINGES on being otherwise debt free (my student loans from Brooks is the only debt we have). I am also hoping that reimbursement funds can be added to our down payment, or assist with home repairs. Im about to turn 36. If I'm able to get pregnant in 18 months, I will be 38 by the time the child is born. I litterally do not have another year, or 18 months to delay these plans if I ever want this to happen. Any delay in moving forward with with the settlement will mean never having a child of my own.

Signed under the penalty of perjury.

January 24, 2023

Nicole Porter

Nicole Porter

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Melissa Raney**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Melissa Raney. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.


15 2. I attended The Art Institute of CA and submitted a borrower defense application on or before
16 June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 I have commercially held felp loans. They are accumulating interest even though they are
19 in forbearance. What this means is my balance continues to increase causing me a ton of anxiety,
20 with mental health challenges. It is detrimental to my well being to not continue to wait. My health
21 is important as I take care of my son who is disabled and has autism. My pending loan status
22 financially affects not only myself, but him as well knowing he is incapable of ever taking care of
23 himself. I would like to be able to provide for him through his life and with these loans already
24 doubling in size, financially we are broken. I have already paid for the last 22 years on these loans
25 with no relief and double the amount owed. Please do not approve a stay. Our health and wellness
26 depends on it. Thank you.

27 Signed under the penalty of perjury.

28 January 24, 2023


Melissa Raney

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Meghan Ratte

1. My name is Meghan Ratte. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended DeVry University/Keller Graduate School and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I lost my home and everything I owned to a house fire in April 2022. This debt even affected me trying to replace and rebuild mine and my daughter's lives - my car was destroyed, and my credit was barely good enough to get a replacement; I had to rely heavily on my credit cards, which are nearly maxed out, instead of being able to get a personal loan to fund the purchase of clothing, shoes, food, and work equipment for my job and small business. A loan would have had lower interest rates, and saved me money over time. I had intentions of building a home this year, after experiencing such a devastating loss, and finally owning something - something I have wanted to do for 15 years. But without the settlement being put into action, I cannot move forward. I am trapped in limbo. I can't move on with life, I can't get out from under the weight of the depression and hopelessness it puts me in, and I cannot feel financially stable.

Signed under the penalty of perjury.

January 23, 2023


Meghan Ratte

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Jennifer Roberts

1. My name is Jennifer Roberts. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Ross University School of Veterinary Medicine and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

This would be absolutely devastating to me. By May 2023, my forbearance will end and I will be forced to make massive payments toward my loan used toward my school that continues to refuse to issue me credentials that I earned. This means I never received a degree, and I am being forced to pay \$353,000.00. NO DEGREE. At this school, I earned the equivalent of a Masters Degree, but it was never awarded, despite my requests via telephone and email. I had been placed in my clinical year placement, but the school refused to provide me with my placement, despite passing ALL CLASSES for my 7th semester (and all preclinical coursework). This was because the school made false promises that clinic seats would be available to all students, but in fact this was not the case. In fact, they purposely and illegally changed my transcript from a C to an F in a course to force me to repeat the semester and pay over \$20,000 in course expenses and other fees that I did not have the money for. At this point, I am struggling to find steady work with the credentials I earned outside of DeVry owned Ross University School of Veterinary Medicine. My interest on my loan is over \$50,000 for a degree that I never received. I have no idea what I am going to do.

Signed under the penalty of perjury.

January 23, 2023

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Whitney Robertson

1. My name is Whitney Robertson. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended The Art Institute and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

This is a true mental roller coaster. All of us were defrauded. We are stressed. These debts are not valid and we are tired of living with this burden. If payments were to start again, there's no way I would be able to afford them. I'm already paying money for private loans for a fraudulent school that I can barely afford.

Signed under the penalty of perjury.

January 23, 2023



Whitney Robertson

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Teliamarie Robinson

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Teliamarie Robinson. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Stanford brown (le Cordon Bleu) and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

Currently I am unable to get financial aid to further my education because of the balance I still have due to financial aid from attending the school above the balance is also affecting my credit score and my debt to income ratio was has caused my a higher interest rate on my home

Signed under the penalty of perjury.

January 23, 2023



Teliamarie Robinson

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Echo Rodriguez

1. My name is Echo Rodriguez. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

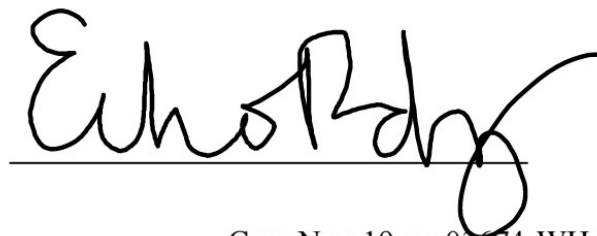
2. I attended DeVry University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

If the District Court or the Ninth Circuit issued a stay and delayed the delivery of settlement relief until the intervenors' appeal is resolved, this will affect my life in many ways. I filed Borrower's Defense in 2017, roughly 5 years ago. It has affected my life before I filed & will continue to drag this whole situation out for me even longer. My credit is one of the main things affected & will still be affected for even longer as well. Another way I'd be affected is if I want to go back to school, I have to take into consideration that I have this debt & I would need it to be separate from the new debt (which I don't have the confidence or trust that the DOE could successfully do this). This also affects me by taking my time & attention away from my family & other priorities. We've already had to deal with the issues of fraudulent activity by the schools, then had to deal (still having to deal) with the unacceptable time frame that it's taking for the Borrower's Defense to even be looked at, now to having to painfully wait through this all to see where a decision lies & many little things in between. This will affect me in not just in many ways, but will affect everyone else in many ways as well. We deserve to be able to move on & continue on with our lives without having to deal with the pain & trauma all of this has caused.

Signed under the penalty of perjury.

January 23, 2023



1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Roger Ruggles**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Roger Ruggles. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended The International Academy of Design and Technology (Sanford Brown) and
16 submitted a borrower defense application on or before June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 This would be devastating, the school I attended lied and has even settled lawsuits for that
19 same lie. To be forced to continue payments would be a blow to my family financially. We can't
20 let these schools continue to delay what is right for hundreds of thousands of defrauded people.
21 We are expecting a child this month on the 29th, my wife and I would not have been able to achieve
22 this if I was paying my loans. The monthly payment for which is equal to the mortgage on our
23 small house. The Department of Education failed to process our applications in an appropriate time
24 frame, people waited 5 years for a response. The whole time these colleges said and did nothing,
25 they had over 5 years to go through due process but did not think they had a reason too; now they
26 decide to claim they have a right to due process? How is that fair, how is that justice?

27 Signed under the penalty of perjury.

28 January 23, 2023


Roger Ruggles

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Joe Russell**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Joe Russell. I submit this declaration in opposition to the Motion for Stay filed
13 by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information
14 in this declaration.

15 2. I attended University of Phoenix and submitted a borrower defense application on or before
16 June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 It continues to hinder my debt/income ratio along with credit making it harder to obtain
19 loans and lines of credit to better mine and my family's living situation. My wife has had to put
20 our home and vehicles in her name bc of continued credit issues. I have an extremely rare heart
21 condition with medical debt from Mayo Clinic and the relief is of great need to pay towards that.
I've already had to file bankruptcy once in 2012 to clear other debt and allow me to pay towards
the loans that obviously couldn't be lumped in. I've never held a job for any length of time, def
never a "career" and def not in my field of study. I just need all of this behind me. Part of my heart
condition includes an aortic aneurysm and stress is a huge contributor to a possible eruption.

22 Signed under the penalty of perjury.

23
24 January 24, 2023



25
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28
Joe Russell

1 **UNITED STATES DISTRICT COURT**
2 **NORTHERN DISTRICT OF CALIFORNIA**

3 THERESA SWEET, *et. al.*,
4 *Plaintiffs,*

5 v.

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Jessica Ryan

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11 1. My name is Jessica Ryan. I submit this declaration in opposition to the Motion for Stay filed
12 by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information
13 in this declaration.

14 2. I attended The Art Institute of Colorado and submitted a borrower defense application on or
15 before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 I am unable to qualify for approval of a home loan as I cannot accurately determine my
18 debt. I have been in this holding pattern since 2017 when I submitted my application for defense
19 to repayment due to fraudulent recruitment by the school. It's been over five years. I am suffering
20 due this decision being continually held up.

21 Signed under the penalty of perjury.

22 January 23, 2023

Jessica L.
Ryan

Digitally signed by Jessica
L. Ryan
Date: 2023.01.24 06:44:55
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23 **Jessica Ryan**

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

DECLARATION OF Taylor Sampson

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
Defendants.

10
11 1. My name is Taylor Sampson. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended The Art Institute of Michigan and submitted a borrower defense application on
15 or before June 22, 2022.

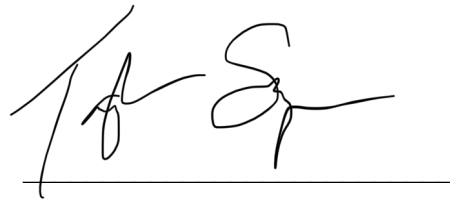
16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 It would continue to be a setback for me financially. I don't think anyone would have
18 attended these schools if we knew they were going to haunt us all these years. My loans, on top of
19 everything else you need to pay for as an adult, have made me take a longer track to doing
20 adulthood things such as buying a vehicle, renting/buying a house, having children, etc. I have
21 been fighting to get my loans forgiven (for a school that has now been closed) for many years.
22 These schools prey upon young people who legally can't do many things, but somehow are told
23 it's completely ok to take out \$40k+ in loans for only a year and a half of schooling for an
24 accelerated associates program. The school also got my parents involved when I couldn't pay, and
25 they still have thousands in debt to pay back. These schools know a parent isn't going to allow
26 their child to fail and will talk them into taking out loans for their child's supposed "education". I
27 say "education" because I ended up wasting so much time and money on classes, books, supplies,
28 required technology, etc that ultimately was hardly ever touched or referenced again when it came
to my actual schooling. The Art Institutes big claim was industry connections to help you get into
the field after school. They did nothing to support that claim. When I asked if they had any
references or leads for me when I was graduating, they told me the local mall was hiring part-time
staff. These were jobs I was already working prior to ever signing a contract with the school. I did
not need them to walk into a store and become a cashier. They did not contribute to any of my
future positions at the places I have ended up working at throughout my life. Most places never
have even asked about my degree, let alone seen it as a point of having extra skills for the industry.
At the end of the day, I feel as if I wasted those 18 months of my life, but never would I imagine I
would still be trying to pay back loans on a worthless degree that I "earned" over a decade ago.

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Signed under the penalty of perjury.

January 24, 2023

A handwritten signature in black ink, appearing to be 'T Sampson', written over a horizontal line.

Taylor Sampson

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Kelly Sax

1. My name is Kelly Sax. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Minnesota School of Business and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am currently affected having to pay for college out of pocket to obtain a worthwhile degree to help people. I was taken for a lot of money for credits that don't transfer and for a subpar education in a field that underpaid. I was also not informed about what was being borrowed and that my credits wouldn't transfer. Paying out of pocket with a family of 4 is putting us in debt.

Signed under the penalty of perjury.

January 23, 2023



Kelly Sax

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Ami Schneider

1. My name is Ami Schneider. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. My child attended The Illinois Institute of Art Schaumburg and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I graduated almost 13 years ago from a predatory for-profit college and have spent years fighting for justice. I filed my Borrower Defense to Repayment in AUGUST of 2015!! So much of my life and so much of my mothers life has been put on hold because of the delay in adjudication of my/our claim(s) against the school. I have never found employment in my field of study, yet I hold tens of thousands in debt for a fraudulent education. My mother has been putting off her retirement as we wait in limbo for these loans to be cancelled. Another delay would be a smack in the face from a predatory industry that has already caused so much irreparable damage. The cancellation has always been the bare minimum. We cannot get back our time. We cannot undo the years of anguish and desperation. I can't go back to school to pursue a meaningful career track because it is nearly 13 years now since I graduated. I am no longer young or in a position where I can devote myself to an education. Delaying this process again will add to my anxiety and depression. I am tired of fighting for justice when justice could have been served time and time again. This settlement is something we have collectively fought so hard for.

Signed under the penalty of perjury.



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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Lindsay Schuh

1. My name is Lindsay Schuh. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Minnesota School of Business and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I have been waiting since 2016 for my borrower defense application to be approved. They were found to have defrauded their criminal justice students by the MN Attorney General. I was one of those students. A lot can and did happen in the 8 years that I've been waiting. I had a baby, one of my kids was diagnosed with autism, COVID, and I was diagnosed with an autoimmune disorder along with a bunch of other diagnoses that made it impossible for me to work 2 years after the diagnosis. I have since filed for disability and as we know the government doesn't make speedy decisions and I have been waiting since August 2022 with no decision yet. All of this happened while I dutifully paid my student loan payments. I have the opportunity to get back the \$12k that I already paid in during a time where it would be the most helpful. It's not right to make everybody wait for a few schools who dislike the outcome. My case has nothing to do with the schools appealing. I think me and the other class members have waited long enough for an outcome and any longer of a wait would be an injustice.

Signed under the penalty of perjury.

January 24, 2023



Lindsay Schuh

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Colleen Sherlock

1. My name is Colleen Sherlock. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended University of Phoenix and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I would be impacted by a delay in the delivery of settlement relief because I am a mentally disabled, singled mother who is responsible for the care of my elderly mother and my disabled now adult daughter. The University of Phoenix took advantage of my vulnerability in 2008 and preyed upon the fact that I did not understand what I was getting into. This settlement relief is crucial to my family in finally rectifying my credit and helping to give us a safer future.

Signed under the penalty of perjury.

January 24, 2023

Colleen Sherlock

Colleen Sherlock

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Lisa Simpson

1. My name is Lisa Simpson. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

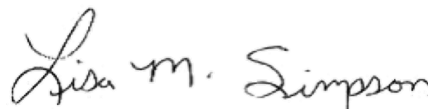
2. I attended Arizona Summit and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am currently 58 years old and there is no chances of ever retiring until there is resolution. Since just about every penny I made went toward trying to pay off my student loans at an interest rate that was nothing short of highway robbery, it did not leave much to put aside for any hopes of a future retirement.

Signed under the penalty of perjury.

January 24, 2023



Lisa Simpson

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Tammy Sjarrpm**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Tammy Sjarrpm. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended Westwood, Brown Mackey and submitted a borrower defense application on or
16 before June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 I have been waiting since 2019 for some type of resolution. Not only was I defrauded by
19 Westwood but I am being charged over \$75,000 for a Associates degree that isn't worth the paper
20 it was printed on. This constant worry over whether or not I am going to die with this debt not only
21 affects me but also my family. I am unable to make \$900.00 a month payments on this which
22 makes no sense because I only make \$2800.00 dollars a month. They have included my husbands
23 income in this repayment plan which isn't fair because he didn't incur the debt yet he must pay for
24 it. For how long must we wait on relief? They have scammed us in so many ways; they should
25 now be held accountable.

26 Signed under the penalty of perjury.

27 January 24, 2023

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Tammy Sjarrpm

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Duane Smith

1. My name is Duane Smith. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. My child attended DeVry University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I filed a Borrower Defense claim against this institution 5 years ago, long before this settlement relief action. Despite the school acknowledging their wrongdoings several times over the years in other actions taken against them, my claim is "Being reviewed" all of this time. I am a parent with Parent Plus loans and am 65 years old now. Additionally, I had been making payments during the no interest period to save some money but stopped doing so a few months ago because I thought this settlement relief was finally a done deal. I am truly weary of all of this. 12 years of payments to an institution that scammed my son and I. 5 years of waiting for an answer to the Borrower Defense claim. 5 years of phone calls only to be told it's "Being reviewed". Now this...

Signed under the penalty of perjury.

Duane Smith

Duane Smith

January 24, 2023

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, et. al,
Plaintiffs,

v.

**MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,**
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Richard Stapleton

1. My name is Richard Stapleton. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended University of Phoenix and Argosy and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

With \$116,000 in student loans, a stay and delayed delivery of the settlement relief will impact many areas of my life and the life of my family. At this point in time, one month's payment on a 20-year plan is \$1000 per month. Yes, I could do an income-contingent repayment plan; however, I am trying to save for college for my daughter, so she doesn't have to experience something like this when she goes to college. My wife and I were also hoping for another child, but at this point in time, we can't afford it because of my student debt. I've been waiting for debt relief through the borrower's defense since 2016. One of my schools, the University of Phoenix admitted to their predatory practices in a letter to me, which I submitted to the DOE as evidence. Neither the University of Phenix nor Argosy are a part of the group of intervenors, and for those of us who didn't attend the schools the intervenors represent, it is unfair that we have to wait any longer. I've waited since 2016. I've waited long enough. This isn't about the schools at this point. This is about the DOE not doing their job by processing our claims. Where was my due process? Seven years is long enough. I struggle to get a home loan. I struggle with getting car loans. I have an 810 credit score, but when creditors see my student loan debt, they say "no". I understand the intervenors' are concerned about their reputations. However, what about my reputation? This isn't about them. This is about the DOE not processing claims and following the rules that were set. I am angry, I am disheartened and I should have to wait several more months to a few years for an appeal. There should be separate lawsuits to remove them from the list if they feel this impacts them negatively. It shouldn't be a part of this which impacts thousands of people like myself that didn't even attend the schools the intervenors' represents.

Declaration of Richard Stapleton

Case No.: 19-cv-03674-WHA

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Signed under the penalty of perjury.

January 24, 2023



Richard Stapleton

Declaration of Richard Stapleton

Case No.: 19-cv-03674-WHA

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

DECLARATION OF Jenifer N Starr

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
10 *Defendants*.

11 1. My name is Jenifer N Starr. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended Art Institute of Pittsburg Online Division and submitted a borrower defense
15 application on or before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 This debt hanging over my head has prevented my from purchasing a house and has kept
18 my debt to income ratio well over what it should be. I have been paying on this debt; however, due
19 to my income based repayment being lower than even the interest on the loans monthly, they keep
20 going up. Sure after 20 years they will be forgiven BUT, I will owe the IRS \$25k in taxes that year
21 when they forgive \$99k in loans, when my original amount borrowed was closer to \$50k after
22 paying on them for 20 years. Not only did the school lie to me and call me every night until I
23 enrolled convincing me, this is what I needed to do, to make a better life for my daughter, but they
24 pressured me to max out my loans every semester to pay for equipment, books and current bills to
25 help me live easier while in school. Then after graduation, they counted me keeping my current
26 job as 100% job placement and provided no help in trying to find a job in the my field I studied
27 with them since I already had a job. They said since I used some basic info from my degree in my
28 current job that was 100% job placement and I didn't need help finding a new career. This has gone
on too long. The shame we carry surrounding being defrauded, and the length of time we have
waited for the DOE to do something about it and stand up and follow through on the Borrower
Defense program has been long enough. Please do not let this drag out any longer. My daughter is
in 11th grade and I'm finding it really hard to push her towards "higher education" at this point due
to everything I went through. Make things right for these borrowers and move on.

Signed under the penalty of perjury.

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January 24, 2023

Jenifer Starr

Jenifer N Starr

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Jason Stepanek

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Jason Stepanek. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended ITT and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am a refund candidate. Even though loans were paid off I sacrificed much during the repayment. I sold my home and had to use the equity to pay off the remainder of my student loans.

Signed under the penalty of perjury.

January 23, 2023



Jason Stepanek

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Steven C Sullwold

1. My name is Steven C Sullwold. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. My child attended Al Collins College for Graphic Design and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

The deception dates to 2003/04 when the ED cited the then Career Education Corporation for 18 "serious" Title IV violations - neither entity disclosed to loan holders preventing me an 'informed decision'. All loans were satisfied by 2016 - \$92,000.00 worth and Borrower Defense filed in 2016. I have lost significant dollar value while neither party has - nor the State of Arizona who intervened for private loan holders in a judgment against Career Education Center. My retirement years remain tenuous absent this legitimate reimbursement. Our son attended this so called college and his parents paid for the time he attended. I have been dismissed and disregarded by those in authority and it is beyond time this wrong be righted. Thank you.

Signed under the penalty of perjury.



Steven C Sullwold

January 24, 2023

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Laura Sutton

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Laura Sutton. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

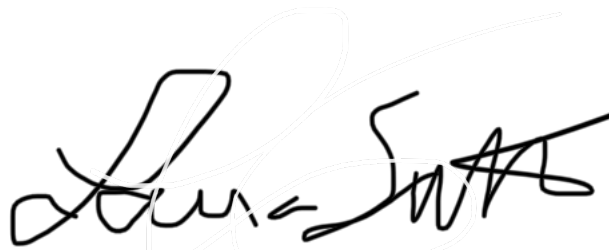
2. I attended University of Phoenix and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I am getting closer and closer to having my student debt back to what it should be with the schools that gave a me an honest chance. It means more nights of stressful sleep, waiting for our voice to be heard. For the for profit schools to to learn the consequences of taking advantage of students, without giving them the education to go father in the field, since most schools never take their credits, or the land them on the ground with a degree employers laugh at. This is not how the system should work. I hope the government looks into ending these schools once this is finished.

Signed under the penalty of perjury.

January 24, 2023



Laura Sutton

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Brie Terry

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Brie Terry. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended The Art Institute of Houston and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

It would put a financial delay on the life of me and my husband. We are having a tough time making ends meet now that he's been undergoing cancer treatment. A delay would mean even more uncertainty in getting at least one thing resolved.

Signed under the penalty of perjury.

January 24, 2023


Brie Terry

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1
2
3 THERESA SWEET, *et. al.*,
4 *Plaintiffs,*

Case No.: 19-cv-03674-WHA

5 v.

DECLARATION OF Rob Thomas

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
10 *Defendants.*

11 1. My name is Rob Thomas. I submit this declaration in opposition to the Motion for Stay filed
12 by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information
13 in this declaration.

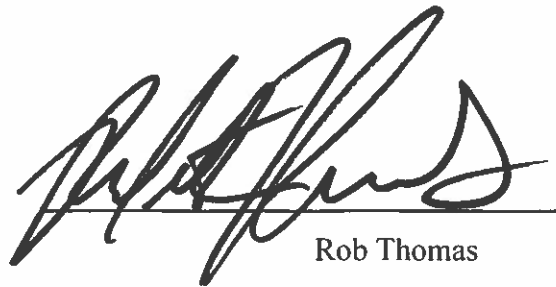
14 2. I attended ITT Tech and submitted a borrower defense application on or before June 22,
15 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 My partner and I are trying to buy our first home and start a family. I am almost 40 years
18 old and the debt from this school is one of the considerations that has stopped me from having a
19 child all these years. I'm getting to the point where I don't have much more time if I want to be a
20 dad some day and own a home. Finally getting rid of this debt will make those goals more realistic.

21 Signed under the penalty of perjury.

22 January 23, 2023

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Rob Thomas

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Dariah Truesdell

1. My name is Dariah Truesdell. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended The Art Institute of Philadelphia and submitted a borrower defense application on or before November 16, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I would be affected in that it doesn't move things forward to end a long and tumultuous process of holding these for profit schools accountable in the harm that they've caused for the millions of students that attended the schools. We were promised a lucrative future and many of us now myself included may work in different fields some not in the fields we studied, not wanting anything to do with higher education because of the way the schools essentially did not care about the quality of education students were receiving, only the profit and pleasing shareholders. Moving forward with the settlement would set a precedent that the tactics these schools used to profit off of students is not acceptable and that higher education shouldn't be a trap into debt.

Signed under the penalty of perjury.



January 24, 2023

Dariah Truesdell

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Nargiza Tulaganova

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

1. My name is Nargiza Tulaganova. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Argosy University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

It's been years I've been waiting for this because I'm unable to get any loan - not a car loan, nor personal loan. Because I have a \$142k student loan debt on my credit. And after these rough few roller coaster months and waiting on pins and needles, when we finally were so close, now this delay again! Why do we have to let these scam schools to destroy our lives. I feel I was robbed and taken advantage of! Why justice is taking so long:(

Signed under the penalty of perjury.

January 23, 2023

Nargiza Tulaganova

Nargiza Tulaganova

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

5 v.

6 MIGUEL CARDONA, in his official capacity as
7 Secretary of the United States Department of
8 Education, and THE UNITED STATES
9 DEPARTMENT OF EDUCATION,
10 *Defendants*.

Case No.: 19-cv-03674-WHA

DECLARATION OF Tasha Virtue

11 1. My name is Tasha Virtue. I submit this declaration in opposition to the Motion for Stay
12 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
13 information in this declaration.

14 2. I attended Concorde Career Institute and submitted a borrower defense application on or
15 before June 22, 2022.

16 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

17 My credit has taken a terrible turn. I'm not even working in the field I went to school for
18 almost 20 years ago. I can't afford a house and live in a substandard motel converted to a room
19 and there's toxic black mold. My bank won't give me a loan to get a house because my credit is
20 poor due to this useless loan. The recruiter persisted and I eventually caved in and signed my life
21 away only to not get certified in my position but the school no longer stands yet I'm 10 thousand
22 in debt and doesn't look good for me especially as an African American female I already have a
23 lot of odds stacked against me and prolonging this, I am being evicted because I can't afford my
24 rent so I'm literally on the street homeless in a month and for what? I was promised a quality
25 education by these capitalist jerks and have nothing to show for it. Quite a fraud and somewhat
26 predatory and racist as well. I was targeted because I couldn't afford a four year college and was
27 just 6 months out of high school when this lady Sandra got my phone number and harassed me
28 all day. I was enrolled less then a week later in class. Thanks America for nothing

Signed under the penalty of perjury.

January 24, 2023



Tasha Virtue

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Rebecca Webster**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Rebecca Webster. I submit this declaration in opposition to the Motion for
13 Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended Academy of Oriental Medicine at Austin (Now AOMA Graduate School of
16 Integrative Medicine) and submitted a borrower defense application on or before June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 A delay will cause me further emotional distress and financial harm. I applied in 2017
19 and have waited 6 years for a definitive answer. I will already be waiting another 6 months from
20 the settlement effective date for a decision on my loans. It is mentally burdening to not know if
21 and when I will receive a decision on my application or how many more years it will take.
22 Further delay may cause any forgiveness that I might receive to fall into 2025 where I will have a
23 substantial tax burden for any forgiven loans. This will cause me further financial harm and
24 currently I do not know if I should plan for this or not. It is difficult to make any personal
25 financial decisions at all, present or future, without knowing the final decision on my borrower
26 defense application. That decision can only move forward with the resolution of this case.

27 Signed under the penalty of perjury.

28 January 24, 2023

Rebecca Webster

Rebecca Webster

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, *et. al*,
4 *Plaintiffs*,

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Gianna West**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants*.

12 1. My name is Gianna West. I submit this declaration in opposition to the Motion for Stay filed
13 by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information
14 in this declaration.

15 2. I attended University of Phoenix and submitted a borrower defense application on or before
16 June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 I am retired and caring for my special needs granddaughter that I will have to care for until
19 I pass. My income is fixed and I am trying to buy a house so she will have something when I go.
20 The loans are lowering the amount I can spend on a house.

21 Signed under the penalty of perjury.

22 January 23, 2023

23 *Gianna West*
24 _____
25 Gianna West

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Alicia Poshard White

1. My name is Alicia Poshard White. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

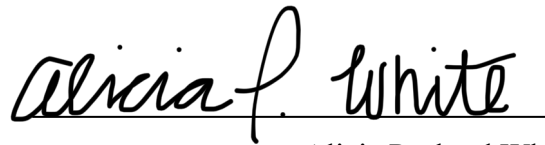
2. I attended International Academy of Design and Technology and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

This debt has affected the majority of my adult life. Now at a time when I should be co-signing on my home with my husband or at an age I shouldn't need help to take a loan out for a car or business, I'm unable to do so without the endless and embarrassing questions of why I'm so far in debt and why financial institutions can't give me loans and allow me to sign with my husband. It's a black cloud constantly shadowing over every good thing in my life. Barely making interest payments alone takes valuable monies that could be used towards groceries, memories, and other debt that has varied due to payments being fed to a degree that is invalid. I'm ready to get my life back. I'm ready to live the life my degree promised and failed to uphold. I'm ready to feel like an equal and held to a higher standard than these fraudulent schools were. They failed me, they failed my peers and have no remorse and hold no responsibility.

Signed under the penalty of perjury.

January 24, 2023



Alicia Poshard White

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Jamie White

1. My name is Jamie White. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Westwood College and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I would be majorly impacted by a delay in relief, as it stands the amount I owe in student loans is well over 100k for just an associates degree. For a family of 6 , the monthly payment for this significantly affects our family's quality of life. My husband is active duty military and we have a limited income. Ready to put this all behind me. 20 year old me, first in my family to go to college, defrauded and now financially ruined.

Signed under the penalty of perjury.

January 23, 2023



Jamie White

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

**DECLARATION OF Amanda Shea
Williams**

1. My name is Amanda Shea Williams. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Art Institute Dallas & Minnesota and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

We have been affected since graduation, 2006 for me. If the lies by greedy corporations & corporation by private colleges in cahoots with big lenders to systematically rob & basically enslave our nation's youth for DECADES, probably rest of our natural working lives for many of us, wasn't bad enough, Sallie Mae is responsible for me being forced to live for almost a decade (3/2006-12/2014) with my life in limbo, with an officially "decreased" status on all major credit bureaus. This is not normal & NO one should ever have to go through all I did. This not only costed me thousands of dollars, but changed my life in unexplainable ways. I was in a deep depression, and never was before or after this. No one knew how to help me resolve this, and it took months of my life to figure out how to eventually solve.

The predatory lending has went on long enough. Murderers receive speedier trials & results sooner than this. Let our countries middle class get on with our lives. Every day that passes, WE pay in multiple ways. We are not large corporations. Each day is another day we'll never get back, and we will never get back all we lost. The least we may receive is justice now.

Signed under the penalty of perjury.

January 24, 2023



Amanda Shea Williams

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Shante Williams

1. My name is Shante Williams. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Berkeley College NYC and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I was the first in my family to attend college. I graduated in 2007. Attending for profit college, Berkeley NYC left me with spiraling debt and no job leads as a new graduate. Sixteen years later, I'm still in debt and buying a home just seems unattainable. As a young African American woman, it has been quite difficult to make a living wage to match that of my white peers within the same industry. My hope is that the elimination of this student debt will bring me one step closer to the American dream.

Signed under the penalty of perjury.

January 24, 2023



Shante Williams

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et. al*,
Plaintiffs,

v.

MIGUEL CARDONA, in his official capacity as
Secretary of the United States Department of
Education, and THE UNITED STATES
DEPARTMENT OF EDUCATION,
Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF Tiffany Winder

1. My name is Tiffany Winder. I submit this declaration in opposition to the Motion for Stay filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the information in this declaration.

2. I attended Keiser University and submitted a borrower defense application on or before June 22, 2022.

3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

I have been praying for years to get this resolved. My application has been pending since 2019 already. The scam has already damaged so much of my life I can never recover back. This relief was needed years ago. Any further delay continues to ruin families, households, and positive futures even further. This is so very painful. Arthur Keiser is a ruthless person who continues with greed and immorally acts out of selfishness. Broken hearts across our country.

Signed under the penalty of perjury.

January 24, 2023



Tiffany Winder

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 THERESA SWEET, et. al,
4 *Plaintiffs,*

Case No.: 19-cv-03674-WHA

5 v.

6 **DECLARATION OF Lonya Wordlaw**

7 MIGUEL CARDONA, in his official capacity as
8 Secretary of the United States Department of
9 Education, and THE UNITED STATES
10 DEPARTMENT OF EDUCATION,
11 *Defendants.*

12 1. My name is Lonya Wordlaw. I submit this declaration in opposition to the Motion for Stay
13 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
14 information in this declaration.

15 2. I attended The Illinois Institute of Art/ Devry University and submitted a borrower defense
16 application on or before June 22, 2022.

17 3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

18 Let's be realistic how is it that these schools already caused us life changing negative
19 affects like credit been messed up and not being able to get cars, houses, credit cards etc and
20 they've wronged so many students financially I've had garnishments taken in bad faith not good
21 and now when it's been so long overdue for us to finally get the relief we been deserved they are
22 still prolonging things making it impossible to gain things we been lacking. I'm furious and
23 delaying us is only making our trust even more questionable. Life has already been hard having
24 so much debt and then the fact that we went in debt and had our credit scores lowered and payed
25 money into a fraudulent school the court system needs TO ISSUE THE SETTLEMENT NOW.
26 This is going on 4 years LONG ENOUGH PLEASE if it's your kids or the parents being
27 wronged you'd want immediate relief. We've been ignored by the borrowers defense for way too
28 long. It's January 18th 2023 time is up now pay is back NOW AND DELETE IT OFF OUR
CREDIT.

Signed under the penalty of perjury.

January 24, 2023



Lonya Wordlaw