

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Shannon Brocco

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 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

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 Hanah K Brock**

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 Hanah K Brock. 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- Tinley Park & Schaumburg and submitted a borrower
16 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 Devastated. I need relief to get even a used car, keep my 1 bedroom apartment over my
19 head, pay off my cat's surgery, and countless other bills. I can't have student debt from a scam
20 school continue to weigh me down.

21 Signed under the penalty of perjury.

22 January 24, 2023



23 _____
Hanah K Brock

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Melissa Brooks

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

Signed under the penalty of perjury.

January 24, 2023


Melissa Brooks

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 Brittany Broyles-
McMaster**

1. My name is Brittany Broyles-McMaster. 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.

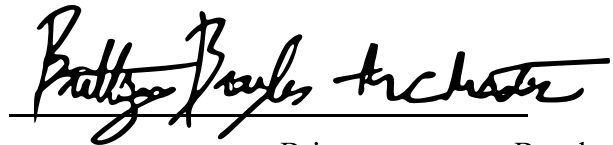
2. I attended Art Institute of Philadelphia and submitted a borrower defense application on or before June 22, 2022.

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

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

Signed under the penalty of perjury.

January 24, 2023



Brittany Broyles-

McMaster

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

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

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

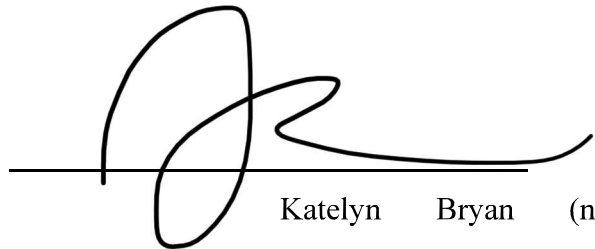
16 2. I attended Art Institute and submitted a borrower defense application on or before June 22,
17 2022.

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

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

22 Signed under the penalty of perjury.

23 January 23, 2023

24 

25 Katelyn Bryan (née
26 Coram)

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 Daniel Burke

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 Daniel Burke. 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.

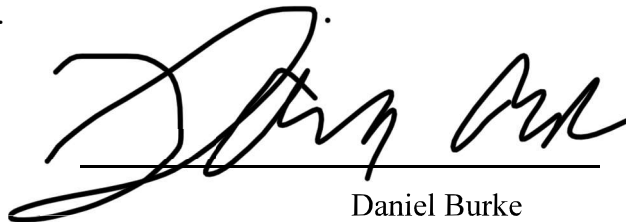
14 2. I attended University of Phoenix & Colorado Technical University and submitted a
15 borrower defense application on or before June 22, 2022.

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

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

19 Signed under the penalty of perjury.

20
21 January 24, 2023

22 
Daniel Burke

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 Leisyl Buxton**

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

23 Signed under the penalty of perjury.

24 January 24, 2023



25 _____
26 Leisyl Buxton

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 T r C d n**

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 Tara Cadman. 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 International Academy of Design and Technology Sanford town 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 The day I graduated from the international Academy of design and technology with my
19 bachelors in fashion design merchandising I was so e ceptionally proud. I thought I had truly
20 accomplished some thing, and had a bright future and career ahead of me. This blissful feeling
21 was short-lived and replaced by the sobering reality that my degree hurt my chances of getting
22 hired more than it helped. My school who promised to assist with job placement felt forwarding
23 hourly paid retail positions from indeed.com was a sufficient form of assisted job placement.
24 Graduating IADT I was left with \$56,000 in debt though I had been paying hundreds of dollars
25 every single month directly to the school for tuition. My student loan payments are \$500 a
26 month. This is a crippling payment, ta ing precedence over paying for health insurance, buying a
27 new car etc. It is a consistent life setback . Not only does the student loan debt I have incurred
28 hang over my head and I am consistently stressed about the ability to ma e this payment every
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 recogni e my credits earned through IADT, even though I was promised by
IADT during registration that they were recogni ed. 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



Tara Cadman

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Michael J Calvert

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 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

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 Peter Contreras

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 Peter Contreras. 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 Florida Coastal School of Law and submitted a borrower defense application on
15 or before November 16, 2022.

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

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

21 Signed under the penalty of perjury.

22 January 24, 2023



23 _____
24 Peter Contreras

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 Dallas Coulter

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.

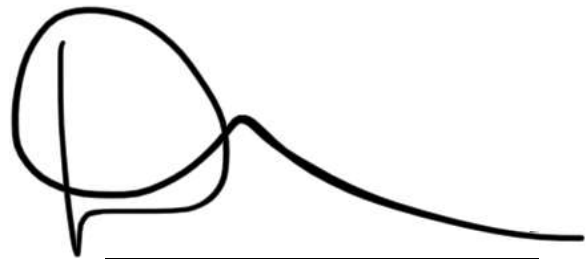
10 1. My name is Dallas Coulter. I submit this declaration in opposition to the Motion for Stay
11 filed by Intervenor Schools. If called upon to do so, I am willing and able to testify to the
12 information in this declaration.

13 2. I attended Art institute of California San Francisco and submitted a borrower defense
14 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 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
17 never get married. My credit is horrible because of the debt to income ratio caused by these loans.
18 I just wanna be able to live a regular life like most people are able to do. This is so unfair to be
19 stuck in this position with nothing to show for it.

20 Signed under the penalty of perjury.



21
22 January 24, 2023

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Dallas Coulter

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 Linda K Coyle**

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

22 Signed under the penalty of perjury.

Linda K Coyle

23 January 24, 2023

24 _____
25 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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Laura Dadich

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 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

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 Tamie Donham**

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 Tamie Donham. 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 Perdue University 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 I have endured enough financial harm due to the student loans I acquired while attending
19 a fraudulent school. I can't get a loan to purchase a home, my insurance rates are high, banks see
20 me as a risk when they pull my credit report due to my student loans. I'm currently living with my
21 family waiting for my loans to be discharged so I can purchase a home. I'm almost 53 years old
22 and do not have a place to call my own and it is due to my student loan balance. Why should I
23 have to be further harmed financially by a stay order, and asked to wait an unknown amount of
24 time again. I have been paying for my decision to attempt to better myself to have a better life
25 because I attended a school that committed fraud, misled it's students and destroyed the dreams
26 that I had for bettering myself or so I thought. Instead I have been stuck for years with an
27 overwhelming burden of debt that has held me back. I think I have waited long enough to have
28 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.

January 24, 2023


Deanna L Draper

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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 Marlo Duffy

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 Marlo Duffy. 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 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:

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

Signed under the penalty of perjury.



January 24, 2023

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 aggregate 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

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 Evans**

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

24 Signed under the penalty of perjury.

25 January 23, 2023

26 

27 Kimberly Evans

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 Chazsity Favela

1. My name is Chazsity Favela. 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, 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:

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

Signed under the penalty of perjury.

January 24, 2023



Chazsity Favela

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 Amber Garcia**

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

26 Signed under the penalty of perjury.

27 January 24, 2023

28 

Amber Garcia

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Yvette Getty

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 Yvette Getty. 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 November 16, 2022.

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

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

Signed under the penalty of perjury.

January 24, 2023


Yvette Getty

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 Tarah Gramza**

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 Tarah Gramza. 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 American Intercontinental 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 I continue to live with the crippling debt. Although payments may be deferred the debt
19 remains on my credit report which continues to limit my ability to use my credit, buy a home, buy
20 a car, and conduct general financial life decisions. I've been waiting for this debt to be addressed
21 with my BD application since 2016 when I filed. Waiting again, after years and years of abuse by
22 the department in failing to even review my application, and illegally denying my application in
23 2019, and now these schools want to continue more delays by inserting themselves into a lawsuit
24 that doesn't involve them, it's proposterous and is victimizing me even further. We trust the courts
25 to protect us.. please protect us from further abuse by these schools. I didn't even attend one of
26 these schools yet they are harming me further.

27 Signed under the penalty of perjury.

28 January 23, 2023



Tarah Gramza

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 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,
10 *Defendants.*

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)

23
24
25
26
27
28 Declaration of Ashten Griswold (Ashley Bolger)

Case No.: 19-cv-03674-WHA

Supp. A.272

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 Peter Contreras**

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 Peter Contreras. 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 Florida Coastal School of Law and submitted a borrower defense application on
16 or before November 16, 2022.

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

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

22 Signed under the penalty of perjury.



23 January 24, 2023

24 Peter Contreras

28

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 Tiffina L. Haigler**

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 Tiffina L. Haigler. 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.

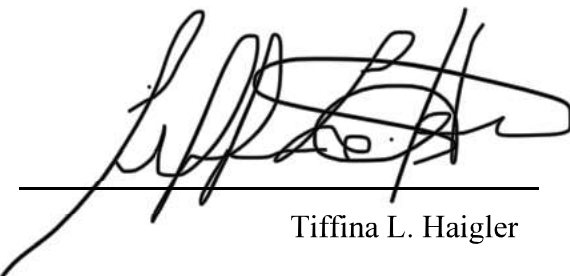
15 2. I attended South University and Capella University and submitted a borrower defense
16 application on or before June 22, 2022.

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

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

22 Signed under the penalty of perjury.

23 January 23, 2023

24 
25
26
27
28 Tiffina L. Haigler

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 Kenna Hamilton

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 Kenna Hamilton. 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.

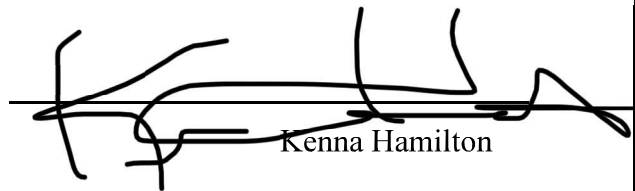
14 2. I attended Walden University and submitted a borrower defense application on or before
15 June 22, 2022.

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

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

25 Signed under the penalty of perjury.

26 January 24, 2023

27 
Kenna Hamilton

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 Sheena Harings

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 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.

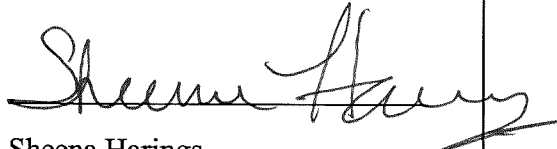
14 2. I attended Minnesota School of Business and submitted a borrower defense application on
15 or before June 22, 2022.

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
22 while I still worked full time, part time and cared for my grandmother with dementia. This was all
23 time and money wasted and now I am still suffering the effects with a huge debt going against me.
24 I just want to put this behind me and move on.

25 Signed under the penalty of perjury.

26 January 24, 2023

27 
28 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

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 Casey Hoffman**

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

21 Signed under the penalty of perjury.

22 January 23, 2023

23 *Casey Hoffman*
24 _____
25 Casey Hoffman

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.

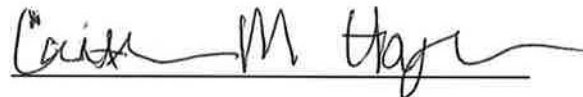
15 2. I attended The Illinois Institute of Art and submitted a borrower defense application on or
16 before June 22, 2022.

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

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

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

Mary James

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:

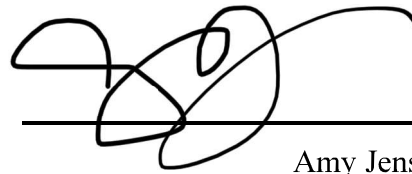
I am currently going into my last month of eligible forbearance and will have to make the decision to continue paying my loan or go into default. I have a commercially held FFELP loans that will not be paid back to me because I didn't pay into the federal government, but they will be forgiven if the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

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 Sonia Johnson**

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

24 Signed under the penalty of perjury.

25 January 24, 2023

26 
27 _____
28 Sonia Johnson

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Stella Johnson

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

Signed under the penalty of perjury.

January 24, 2023


Stella 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.

6 **DECLARATION OF Crystal Dawn**
7 **Kaulbars**

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

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

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

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

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

23 Signed under the penalty of perjury.

24 January 24, 2023



25 Crystal Dawn Kaulbars

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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 Kovach

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 Kovach. 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 Vet Med 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:

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

Signed under the penalty of perjury.

January 24, 2023


Mary Kovach

Declaration of Mary Kovach

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Case No.: 19-cv-03674-WHA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Wendie LaGamba

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 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

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~~

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 Chanté Laws

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 Chanté Laws. 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.

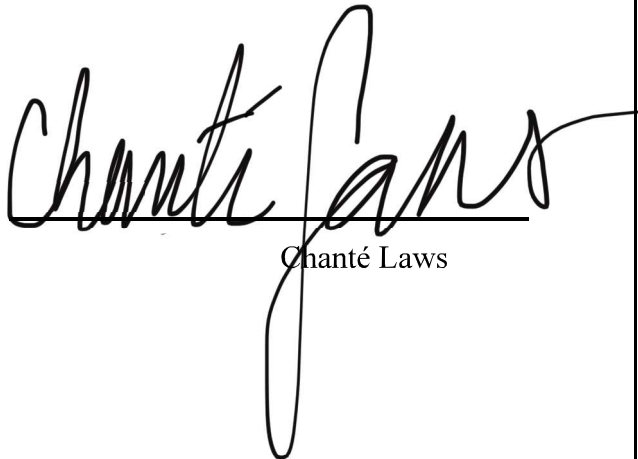
14 2. I attended Art institute of va beach and submitted a borrower defense application on or
15 before June 22, 2022.

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

17 The great news of the debt settlement will relieve my total debt ratio from \$90k to \$25k,
18 leaving my car note and a future for me to finally start up on purchasing a home. I am a single
19 mother and with todays inflation and trying to save for a better future for my family it's quite
20 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.

21 Signed under the penalty of perjury.

22
23 January 23, 2023

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28 Chanté Laws

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 James Leisure**

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

22 Signed under the penalty of perjury.

23 January 24, 2023

24 
25 _____
26 James Leisure
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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 David Leon**

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 David Leon. 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.

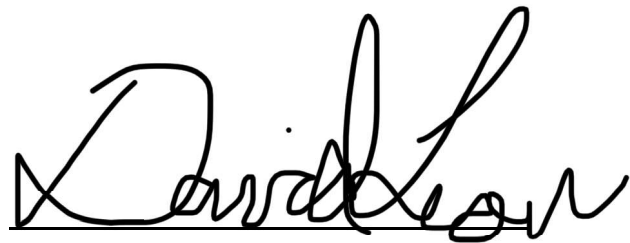
15 2. I attended DeVry University and submitted a borrower defense application on or before
16 June 22, 2022.

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

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

21 Signed under the penalty of perjury.

22 January 24, 2023



23 David Leon

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Denise Lucero

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 Denise Lucero. 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 Sacramento 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 applied for Borrowers Defense in 2019 after years of paying without reducing my owed balance. I am 64 years old and after a full lifetime of work now behind me (and an unexpected change of circumstances) I can't buy a home and cannot get approved for rental applications due to the lenders and bureaus using a percentage of the direct parent plus student loan of \$224,000 against my debt to income ratio. I recently retired and have reduced income. I was relying on the approved forgiveness and never thought I would end up homeless or be used against my will and without my permission as a pawn by unknown appellants when my school already admitted guilt and closed its doors. I don't want to pay for something we never received, and I don't want to wait until I am dead before there is actual relief. 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
2
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,
10 *Defendants*.

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
21 accumulating as soon as the loans were released. The school went after undereducated kids and
22 adults, promising to help their future but did the complete opposite.

23 Signed under the penalty of perjury.

24 January 24, 2023

25 
26 Perla J Lujan

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 Majerus

1. My name is Peter Majerus. 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 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:

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

Signed under the penalty of perjury.

January 24, 2023



Peter Majerus

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et. al*,
Plaintiffs,

Case No.: 19-cv-03674-WHA

v.

DECLARATION OF Jillian Marsala

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 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



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 Cory Martin

1. My name is Cory 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 The Art Institute of Charlotte and submitted a borrower defense application on or before June 22, 2022.

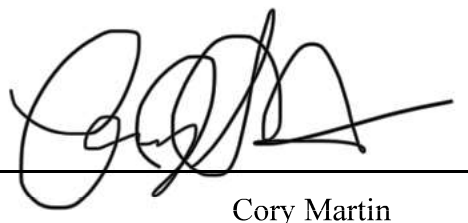
3. If the Court stays the Settlement Agreement, I will be affected in the following manner:

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

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

Signed under the penalty of perjury.

January 24, 2023


Cory Martin