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IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

NATHAN SURRETT, individually and on behalf of all other similarly situated individuals, and on behalf of herself only, JENNIFER ADAMS f/k/a JENNIFER SCHUSTER,

Plaintiffs,

v.

WESTERN CULINARY INSTITUTE, LTD; LE CORDON BLEU NORTH AMERICA, INC.; and CAREER EDUCATION CORPORATION,

Defendants.

Case No. 0803-03530

LIMITED JUDGMENT

Judge Stephen Bushong

LIMITED JUDGMENT

WHEREAS, Plaintiffs Nathan Surret and Jennifer Adams filed a complaint against Defendants Western Culinary Institute, Ltd.; Le Cordon Bleu North America, Inc.; and Career Education Corporation (collectively, “Defendants”) in this pending class action litigation (the “Action”), on behalf of themselves and a class of certain former Le Cordon Bleu Portland students;

WHEREAS, Plaintiffs and certain class members agreed to a settlement of all claims against Defendants, in accordance with a Settlement Agreement dated February 2, 2018 (the “Agreement”), and this Court entered an order finally approving the settlement on 6/18/2018 (the “Final Approval Order”);

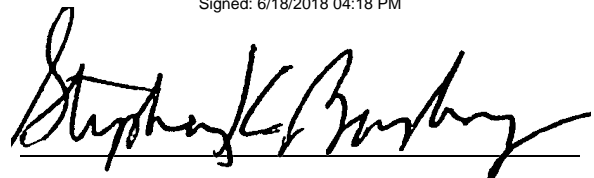
1 WHEREAS, the Order requires the Court to dismiss, with prejudice the claims of
2 Plaintiffs Nathan Surrett, Jennifer Adams, and the “Settlement Subclass,” as defined by the Final
3 Approval Order, from this Action;

4 WHEREAS, all class members who opted out of the class or the Agreement, who are
5 listed in Exhibit 1 to this Limited Judgment, are not included in the Settlement Subclass and,
6 therefore, not subject to this Limited Judgment;

7 WHEREAS, pursuant to ORCP 32 D, the Order authorizes entry of a Limited Judgment
8 dismissing, with prejudice, the claims of Plaintiffs Nathan Surrett, Jennifer Adams, and the
9 Settlement Subclass;

10 NOW, THEREFORE, it is hereby ordered, adjudged and declared that the Action shall
11 be, and hereby is, dismissed with prejudice as to Plaintiffs Nathan Surrett, Jennifer Adams, and
12 the Settlement Subclass and without costs, disbursements, or attorney’s fees to any party except
13 as set out in the Final Approval Order.

Signed: 6/18/2018 04:18 PM



Circuit Court Judge Stephen K. Bushong

21 Submitted By:
22 Stephen F. English, OSB No. 1730843
23 **Perkins Coie LLP**
24 Attorney for Defendants
Western Culinary Institute, Ltd. and
Career Education Corporation

1 **CERTIFICATE OF READINESS**

2 **Pursuant to UTCR 5.100**

3 The submission is ready for judicial signature because:

4 1. Each opposing party affected by this order or judgment has stipulated to the order
5 or judgment, as shown by each opposing party's signature on the document being submitted.

6 2. Each opposing party affected by this order or judgment has approved the order or
7 judgment, as shown by signature on the document being submitted or by written confirmation or
8 approval sent to me.

9 3. I have served a copy of this order or judgment on all parties entitled to service and:

10 a. No objection has been served on me.

11 b. I received objections that I could not resolve with the opposing party
12 despite reasonable efforts to do so. I have filed a copy of the objections I
13 received and indicated which objections remain unresolved.

14 c. After conferring about objections _(opposing party)__ agreed to
15 independently file any remaining objection.

16 4. The relief sought is against an opposing party who has been found in default.

17 5. An order of default is being requested with this proposed judgment.

18 6. Service is not required pursuant to subsection (3) of this rule, or by statute, rule or
19 otherwise.

20 7. This is a proposed judgment that includes an award of punitive damages and notice
21 has been served on the Director of the Crime Victims' Assistance Section as required by
22 subsection (4) of this rule.

23 DATED: June 12, 2018

PERKINS COIE LLP

24 By: s/ Stephen F. English

25 Stephen F. English, OSB No. 730843

26 *Attorney for Defendants*

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1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies under penalty of perjury under the laws of the State of
3 Oregon that, on June 12, 2018, they caused to be served on the person(s) listed below a true copy
4 of the **LIMITED JUDGMENT** in the manner shown:

5 David F. Sugerman
6 David F. Sugerman Attorney PC
7 707 SW Washington Street, Suite 600
8 Portland, OR 97205

Tim Alan Quenelle
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Attorneys for Plaintiff Adams

8 Amy Johnson
9 Amy Johnson Attorney-at-Law
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11 Portland, OR 97215

Attorneys for Plaintiff Surrect and the Class

12 By **U.S. mail**, first-class postage prepaid, from Portland, Oregon.

13 By **Email**

14 **PERKINS COIE LLP**

15 By: *s/ Stephen F. English*

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