	<i>i</i> I		
1	JUSTIN T. BERGER (SBN 250346) COTCHETT, PITRE & McCARTHY, LLP		
2	San Francisco Airport Office Center 840 Malcolm Road		
3	Burlingame, CA 94010 Telephone: (650) 697-6000		
4	Facsimile: (650) 697-0577 jberger@cpmlegal.com		
5	ALEXANDER S. ELSON		
6	NATIONAL STUDENT LEGAL DEFENSE NETWORK 1701 Rhode Island Ave. NW		
7	Washington, DC 20036		
8	Telephone: (202) 734-7495 alex@defendstudents.org		
9	DAVID BALTMANIS MINER, BARNHILL & GALLAND, P.C.	RYAN MILLER MINED PARNHILL & CALLAND D.C.	
10	325 N. La Salle St., Suite 350 Chicago, IL 60654	MINER, BARNHILL & GALLAND, P.C. 44 E. Mifflin St., Suite 803	
11	Telephone: (312) 751-1170	Madison, WI 53703 Telephone: (608) 255-5200	
12	dbaltmanis@lawmbg.com	rmiller@lawmbg.com	
13	Attorneys for Plaintiffs and the Proposed Class		
14	UNITED STATES DISTRICT COURT		
15	NORTHERN DISTRICT OF CALIFORNIA		
16	Andrew Print Dr.		
17	JESSICA FULLER, et al.,	Case No. 3:23-CV-01440-AGT	
18	Plaintiffs,	DECLARATION OF JANET BAHENA IN SUPPORT OF PLAINTIFFS' REPLY IN	
19	VS.	SUPPORT OF THEIR SECOND MOTION	
20 21	BLOOM INSTITUTE OF TECHNOLOGY, et al.,	TO REMAND OR IN THE ALTERNATIVE FOR LEAVE TO CONDUCT JURISDICTIONAL DISCOVERY	
22	Defendants.		
23			
24			
25			
26			
27			
28	DECLARATION OF JANET BAHENA IN SUR SUPPORT OF THEIR SECOND MOTION TO		
	FOR LEAVE TO CONDUCT JURISDICTIONAL DISCOVERY		
	Case No. 3:23-CV-01440-AGT		

1	I, Janet Bahena, declare:	
2	1. I am a paralegal with Miner, Barnhill & Galland, P.C. working on the above-captioned	
3	matter.	
4	2. Attached to this Declaration as Exhibit A is a true and correct copy of the agreement,	
5	with redactions to identifying information, entered into in January 2022 by a BloomTech student to	
6	finance their BloomTech tuition. The student contacted our firm in association with the above-	
7	captioned matter and provided the agreement.	
8	I declare under penalty of perjury that the foregoing is true and correct.	
9		
10	Dated: May 24, 2023	
11	Dry /o/ Langt Dahana	
12	By: <u>/s/ Janet Bahena</u> JANET BAHENA	
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28	DECLARATION OF JANET BAHENA IN SUPPORT OF PLAINTIFFS' REPLY IN SUPPORT OF THEIR SECOND MOTION TO REMAND OR IN THE ALTERNATIVE FOR LEAVE TO CONDUCT JURISDICTIONAL DISCOVERY	

Case No. 3:23-CV-01440-AGT