

NOTICE OF CLASS ACTION

**Please read this carefully.
It may affect your legal rights.**

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1. Why should I read this notice?

Your rights may be affected in a lawsuit titled *Patricia Lee, individually and on behalf of all others similarly situated, v. Southern California University for Professional Studies*, Case No. 05 CC 00274 (Superior Court, Orange County, California). This notice is given by order of the judge.

The purpose of this notice is to inform you that the judge has certified this case as a class action and that you have the right to opt out.

2. What is the lawsuit about?

Plaintiff Patricia Lee enrolled as a student at Southern California University for Professional Studies (“SCUPS”). Later, she was administratively terminated for not completing the program of study for which she enrolled.

Plaintiff alleges that, upon her termination, SCUPS should have given her a refund of all or part of her tuition but SCUPS failed to do so. Plaintiff alleges that SCUPS misrepresented in its literature how it would calculate a tuition refund, so that former SCUPS students who did get a refund did not get the right amount and those former students who did not receive any refund are entitled to one.

Plaintiff Lee seeks relief for herself and the class based on theories of violation of the California Consumers Legal Remedies Act, California’s unfair competition law, and California’s false advertising law.

Defendant SCUPS denies all of plaintiff Lee’s allegations and maintains it has no liability in this lawsuit. SCUPS denies that it has breached any obligations to plaintiff Lee or to the class members. SCUPS also denies that plaintiff Lee and the class members are entitled to damages, restitution, or any other relief from SCUPS.

Plaintiff Lee’s allegations, claims, and legal theories and defendant SCUPS’s defenses have not been proved. Trial is currently scheduled for September 17, 2012. At trial, either side could win on the merits.

3. Who is in the class?

The judge ordered that this case proceed as a class action and defined the class as follows:

All individuals who enrolled in SCUPS pursuant to a written enrollment agreement not containing an arbitration clause, who paid tuition and then terminated (voluntarily or involuntarily) from their program at SCUPS, and did not receive a pro rata refund of their tuition less the application fee, and who either (a) terminated their program of study having completed 60% or less of the program of study; or (b) did not request all materials in writing after having received the first lesson. Individuals whose claims are barred by applicable statutes of limitation are excluded as are employees of SCUPS.

The judge appointed plaintiff Lee as the class representative.

4. Can class members opt out of the lawsuit?

Yes. Class members can opt out of the lawsuit by personally signing the opt-out postcard and mailing it to the notice administrator: KCC Class Actions Services, LLC, at *Patricia Lee v. Southern California University for Professional Studies*, Case No. 05 CC 00274, c/o Kurtzman Carson Consultants LLC, P.O. Box 6177, Novato, CA 94948-6177.

Your request to opt out must be received no later than January 5, 2012. Unsigned requests will not be accepted. You cannot sign the request for another person (unless that person is a minor or incapacitated and you are his or her parent or guardian).

5. What are the consequences of opting out or not opting out?

The Class will consist of those members who do not opt out. Any final judgment in this litigation will be binding on all Class members. If the Class prevails, members of the Class will receive relief as may be ordered by the judge. Likewise, if SCUPS prevails, members of the Class would be bound by the judgment and could not sue SCUPS for the same claim.

By electing to opt out, (i) you will not share in any recovery that may be paid to Class members if the Class obtains a recovery; (ii) you will not be bound by any further orders or judgments entered for or against the Class; and (iii) you may present any claims you have against SCUPS by filing your own lawsuit at your own expense.

If you remain in the Class, the judge appointed lawyers to represent the Class’s interest. They are:

<p>Jean C. Wilcox, Esq. Hershorin & Henry LLP 27422 Portola Pkwy, Ste 360 Foothill Ranch, CA 92610 Phone: 949.859.5600 Fax: 949.859.5680 jeanw@hhlawgroup.com www.hhlawgroup.com</p>	<p>Anthony Lanza, Esq. Lanza & Smith PLC 3 Park Plaza, Ste 1650 Irvine, CA 92614 Phone: 949.221.0490 Fax: 949.221.0027 tony@lanzasmith.com www.lanzasmith.com</p>	<p>Cliff Cantor, Esq. Law Offices of Clifford A. Cantor, P.C. 627 208th Ave. SE Sammamish, WA 98074 Phone: 425.868.7813 Fax: 425.732.3752</p>
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Alternatively, you may hire your own lawyer.

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If the Class loses, neither plaintiff Lee nor any other Class members will be liable for Class counsel's attorney fees.

If the plaintiff Class prevails, plaintiff Lee will request that the judge award attorneys' fees and expenses. Any such award may be made only upon order of the judge. At the judge's discretion, such an award may be made directly against SCUPS or it may be made as a portion of funds recovered for the Class.

If the parties agree to settle this class action, the settlement cannot become effective without notice to the Class members so they have an opportunity to object, and then a fairness hearing will be conducted by the judge.

6. Where do I get additional information?

Additional information is available by writing attorney Jean C. Wilcox, one of Class counsel, at the address shown previously in paragraph 5. Class counsel represent the Class's interest and will keep your communications confidential if/as required.

For more detailed information, you may review the pleadings, records, and other papers on file in this lawsuit, which may be inspected during regular business hours at the Clerk's Office in the Orange County Superior Court, 751 W. Santa Ana Blvd., Dept. CX-105, Santa Ana, CA 92701.

Please do not contact the judge.

Dated: December 6, 2011

This notice has been approved and ordered to be given by
Superior Court Judge Nancy Wieben Stock