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*Attorneys for Plaintiff and the Class*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SACRAMENTO**

SANDEEP PUREWAL, individually, and on  
behalf of other members of the general  
public similarly situated and on behalf of  
other aggrieved employees pursuant to the  
California Private Attorneys General Act;

Plaintiff,

vs.

ACC SENIOR SERVICES, an unknown  
business entity; ASIAN COMMUNITY  
CENTER OF SACRAMENTO VALLEY,  
INC., an unknown business entity; and  
DOES 1 through 100, inclusive,

Defendants.

Case No. 34-2020-00285518

Honorable Jill H. Talley  
Department 23

**CLASS ACTION**

**DECLARATION OF SANDEEP  
PUREWAL IN SUPPORT OF  
PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: May 9, 2024  
Time: 9:00 a.m.  
Department: 23

Complaint Filed: September 22, 2020  
FAC Filed: November 20, 2020  
Trial Date: None Set

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**DECLARATION OF SANDEEP PUREWAL**

I, **Sandeep Purewal**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by and Defendants ACC Senior Services and Asian Community Center of Sacramento Valley, Inc. (together, "Defendants") as an hourly-paid, non-exempt employee, from approximately May 2019 to approximately April 2020, in the State of California, County of Sacramento. I decided to seek legal advice about my experiences working for Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Defendants were held accountable for not properly compensating employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately 6 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for approximately 8 hours discussing my situation and class actions in general, and what it meant to be a named plaintiff and a class representative.

3. I have spent over approximately 25 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which has included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, and providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and to provide them with any additional information that I had obtained.

4. Throughout the case, I was available to answer any questions my attorneys had,

1 and available to speak and meet with my attorneys whenever they needed me. I responded to  
2 them as quickly as possible and gave them as much information and identified as many  
3 documents as I could. I spent at least 20 additional hours speaking with my attorneys about the  
4 case, identifying potential witnesses, providing my attorneys with documents and information  
5 concerning the case, and also describing policies, practices, and procedures of Defendants.

6 5. As far as the settlement is concerned, I was available to review documents and  
7 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement agreement  
8 and about 2 hours asking questions and discussing the potential settlement with my attorneys  
9 before signing the settlement agreement.

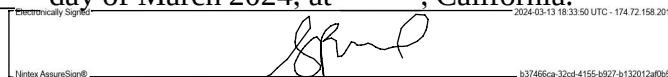
10 6. I believe that I have done everything that my attorneys have asked of me and tried,  
11 to the best of my ability, to seek relief for the general public similarly situated and on behalf of  
12 other aggrieved employees. I think my efforts helped to get the result obtained in this case, and  
13 as a class representative, I respectfully request that the Court approve and award me an  
14 Enhancement Payment in the amount of 10,000.00 for my efforts and active participation in the  
15 case, and broader release of claims. Taking into consideration the time that I dedicated to this  
16 case, I believe that this amount is reasonable.

17 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

18 8. I have not entered into any undisclosed agreements, nor have I received any  
19 undisclosed compensation in this case. The only compensation I will receive is an Enhancement  
20 Payment, if approved by the Court, as well as any portion of the settlement to which I may be  
21 entitled as an aggrieved employee and/or class member.

22 I declare under penalty of perjury under the laws of the State of California that the  
23 foregoing is true and correct.

24 Executed this 03/13/2024 day of March 2024, at Sacramento, California.

25  2024-03-13 18:33:50 UTC - 174.72.158.201  
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26 Sandeep Purewal