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Attorneys for Plaintiff

**SUPERIOR COURT FOR 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 PAGA 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-CU-OE-GDS

Honorable Russell L. Hom
Department 24

CLASS ACTION

**DECLARATION OF SANDEEP PUREWAL
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Notion of Motion and Motion for Preliminary
Approval of Class Action Settlement; Declaration
of Proposed Class Counsel (Jeremy Stern);
Declaration of Proposed Class Representative
(Sandeep Purewal); and [Proposed] Order filed
concurrently herewith]

Date:
Time:
Department: 24

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

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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.

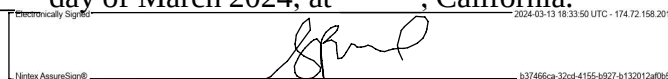
10 6. I believe that I have done everything that my attorneys have asked of me and tried,
11 to the best of my ability, to seek relief for the general public similarly situated and on behalf of
12 other aggrieved employees. I think my efforts helped to get the result obtained in this case, and
13 as 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