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**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.

CHANCELLOR HEALTH CARE, INC., an  
unknown business entity; CHANCELLOR  
HEALTH CARE OF CALIFORNIA VIII,  
INC., an unknown business entity; REVERE  
COURT MEMORY CARE, an unknown  
business entity; REVERE COURT  
ASSISTED LIVING COMMUNITY, an  
unknown business entity; and DOES 1  
through 100, inclusive,

Defendants.

Case No.: 34-2021-00296929-CU-OE  
GDS

Honorable Jill H. Talley  
Department 8A

**CLASS ACTION**

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

Reservation No: A-296929-003

Hearing Date: June 12, 2026  
Hearing Time: 9:00 a.m.  
Department: 8A

Complaint Filed: March 19, 2021  
FAC Filed: May 19, 2021  
Trial Date: None Set

**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 the named plaintiff 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 Defendants Chancellor Health Care, Inc., Chancellor Health Care of California VIII, Inc., Revere Court Memory Care, and Revere Court Assisted Living Community (collectively, “Defendants”) from approximately September 2019 to December 2020 as an hourly-paid, non-exempt employee. During my employment with Defendants, I performed work off-the-clock and experienced what I believe to be wage-and-hour issues, including and not limited to, performing work before clocking in and after clocking out, and short, late, interrupted, and/or missed meal periods and rest periods. Also, during my employment with Defendants, I learned about Defendants’ written and non-written operations and employment policies, procedures, and practices. To my understanding, Defendants’ policies and practices applied uniformly and in the same manner to all hourly-paid non-exempt employees.

3. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC for approximately **4 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. After speaking with the attorneys, I investigated class and representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **2 hours**. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

1           4.       Throughout the case, I have spent over **8 hours** communicating with my attorneys  
2 regarding the case and fulfilling my responsibilities as a class representative and PAGA  
3 representative, which included gathering documents concerning my employment with Defendants,  
4 reviewing documents with my attorneys, answering questions, providing guidance regarding the  
5 duties of other hourly-paid or non-exempt employees, and helping develop a strategy as to what  
6 documents and information to obtain from Defendants. I routinely checked in with my attorneys  
7 and their staff to make sure that they had all of my most current information and any additional  
8 information that I had obtained.

9           5.       As the matter progressed, I was available to answer any questions my attorneys had,  
10 and available to speak and meet with my attorneys whenever they needed me. I responded to them  
11 as quickly as possible and gave them as much information and identified as many documents as I  
12 could. I spent at least **6 additional hours** speaking with my attorneys about the case, identifying  
13 potential witnesses, providing my attorneys with documents and information concerning the case,  
14 and also describing policies, practices, and procedures of Defendants.

15           6.       As far as the settlement is concerned, I was available to review documents and  
16 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the  
17 Settlement Agreement and discussed the questions I had regarding the potential settlement with my  
18 attorneys before signing the settlement papers. I spent about **2 hours** reviewing the Memorandum  
19 of Understanding and Settlement Agreement and about **1 hour** asking questions and discussing the  
20 potential settlement with my attorneys before signing the settlement papers.

21           7.       I believe I have no interests which are inconsistent with the interests of the class and  
22 I have and will continue to adequately represent the class. I brought this lawsuit on behalf of  
23 myself and all other similarly situated hourly-paid or non-exempt employees to rectify legal  
24 wrongs I believe were being committed by Defendants. I believe the legal and factual issues for the  
25 class are typical of my own legal and factual issues.

26           8.       I understand that a settlement has been reached in my case and what my duties and  
27 responsibilities are as a class and PAGA representative. For example, I am aware that if the  
28 settlement is granted preliminary approval, the Court will certify a class for settlement purposes,

1 and likely appoint me as the representative of the class and my attorneys as counsel for the class. I  
2 also understand that my duties will include checking in on, monitoring, and conferring with my  
3 attorneys to facilitate the notice and settlement administration process, and to provide information  
4 that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate.  
5 Further, if any individuals who are potential class members contact me, I will take steps to have  
6 them referred to the Court-appointed settlement administrator so that these individuals may receive  
7 the necessary information and notice they may be eligible to receive in connection with the  
8 settlement and contemplated final approval hearing.

9         9. I believe that I have done everything that my attorneys have asked of me and have  
10 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class  
11 members and the State of California with respect to aggrieved employees. I have volunteered to  
12 represent and champion the interests of many other people with similar claims and injuries because  
13 of the importance of the case and the necessity that all class members and aggrieved employees  
14 benefit from the lawsuit equally. I understand that as a proposed class representative, and if  
15 formally appointed as a class representative, I have and continue to represent the interests of all  
16 members of the class in litigation to recover relief for the class. As an hourly-paid non-exempt  
17 employee of Defendants who was subject to the same policies, practices, and procedures as the  
18 other members of the class, I have claims that are typical of those of the class. I consider the  
19 interests of the class just as I would consider my own interests. I understand that I may need to put  
20 the interests of the class before my own interests, although I have no reason to believe that my  
21 interests are in conflict with the interests of the class. I understand that any resolution of the  
22 lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have  
23 participated, and continue to participate, in the lawsuit as necessary. I have actively followed and  
24 monitored the progress of the lawsuit, and have taken steps to make sure that the litigation is  
25 prosecuted by the skilled and effective attorneys that I have retained.

26         10. I think my efforts helped to get the result obtained in this matter, and as a potential  
27 class and PAGA representative, I respectfully request that the Court award me an enhancement  
28 award for my efforts in pursuing and participating in this matter, as well as my broader release of

1 claims. Taking into consideration the time that I have dedicated to this matter, I believe that this  
2 amount is reasonable.

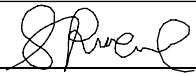
3 11. I am not related to anyone associated with Lawyers *for* Justice, PC.

4 12. I have not entered into any undisclosed agreements, nor have I received any  
5 undisclosed compensation in this matter. The only compensation I will receive is whatever amount  
6 the Court awards as an enhancement award, as well as my share of the settlement as a class  
7 member and aggrieved employee.

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

05/19/2026

10 Executed on this \_\_\_\_ day of \_\_\_\_\_ 2026, at Henderson, Nevada.

11   
12 Electronically Signed: 2026-05-19 21:16:47 UTC - 24.234.249.69  
Nintex AssureSign® 253870aa-f96b-49d0-b468-b4401455a791

Sandeep Purewal