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LLC
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF RIVERSIDE**
10

11 REGINIA SAM, individually, and on behalf of
other members of the general public similarly
12 situated;

13 Plaintiff,

14 vs.

15 CONCORDANCE HEALTHCARE
SOLUTIONS, LLC, an unknown business entity;
16 and DOES 1 through 100, inclusive,

17 Defendants.
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RESERVATION ID # 228226958054

Case No. CVRI2102017

Date: November 15, 2022
Time: 8:30 a.m.
Place: Dept. 1
Judge: Hon. Craig G. Riemer
[Assigned for all purposes]

**DECLARATION OF DOREEN
NERSESIAN IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
SETTLEMENT**

[Assigned for all purposes to
The Honorable Craig G. Riemer, Dept. 1]

Action Filed: April 29, 2021
Trial Date: None

1 **DECLARATION OF DOREEN NERSESIAN**

2 I, Doreen Nersesian, declare and state as follows:

3 1. I am currently employed by Concordance Healthcare Solutions, Inc. (the
4 "Company"), a named defendant in this action as its Executive Vice President – Human Resources,
5 a position I have held since June 2016. As Executive Vice President – Human Resources, I am
6 generally familiar with (i) the locations where the Company employs individual in the State of
7 California, (ii) the Company's California workforce.

8 2. This declaration is based on my personal knowledge, and/or information that
9 transmitted to me by employees of the Company with personal knowledge of the information
10 transmitted. That information was obtained by them in the regular course of business, and they
11 transmitted the information to me at my request and under my direction and control.

12 3. The following statements are true for the period April 29, 2017 to the present.
13 During this period, substantially all of the Company's hourly employees in California have a high
14 school diploma from an accredited high school in the United States, or a GED. They regularly use
15 both spoken and written English in the course of their work. Some employees are English/Spanish
16 bilingual, and may prefer to use Spanish in certain circumstances. As a courtesy, the Company
17 sometimes provides official communications, such as legally-required workplace postings,
18 information regarding available employee benefit programs, in both English and Spanish. Other
19 written communications, such as the employee handbook, are provided in English only. No other
20 languages are commonly used in the workplace or for communications between management and
21 the Company's hourly employees in California. The large majority of these employees are
22 between the ages of 25-40 years old, with a small minority either younger than 25 years or older
23 than 40 years.

24 4. I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct, and that this declaration was executed on this 22nd day of September
26 2022 at Earth City, Missouri.

27 

28 Doreen Nersesian