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Attorney for Plaintiff GURPREET SANGHA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF STANISLAUS

GURPREET SANGHA, on behalf of herself and other aggrieved employees,

Plaintiff,

v.

PACIFIC CARE SALIDA, LLC, a California limited liability company; PACIFIC CARE FACILITIES, LLC, a California limited liability company; PACIFIC CARE II INC., a California corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. CV-25-011178

[Assigned for All Purposes to the Honorable John R. Mayne]

DECLARATION OF GURPREET SANGHA IN SUPPORT OF UNOPPOSED MOTION FOR APPROVAL OF PAGA SETTLEMENT

Hearing Date:	November 13, 2026
Time:	8:30 a.m.
Department:	21
Complaint Filed:	November 12, 2025
Trial Date:	None Set

DECLARATION OF GURPREET SANGHA

I, Gurpreet Sangha, declare as follows:

1. I am Plaintiff and the named PAGA representative in this action, *Sangha v. Pacific Care Salida, LLC, et al*., Stanislaus County Superior Court, Case No. CV-25-011178. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called as a witness.

2. I was employed by Defendants as a non-exempt Certified Nursing Assistant at Pacific Care facilities in Salida and Modesto from approximately February 2023 through February 2025.

3. During my employment, I personally experienced the practices alleged in this case. Among other things, I was required to use my personal cell phone on a daily basis without reimbursement for logging my time in the Gusto timekeeping application and for work-related communications. I also experienced problems with meal periods and rest periods, including on long shifts, and timekeeping and pay practices that did not accurately account for all of my work and compensation. These practices also affected my wage statements and final pay. During my employment, I also observed that these issues were common among other non-exempt employees.

4. I brought this PAGA action in my name on behalf of the State of California and other aggrieved employees. I understood that doing so involved accepting the responsibilities of serving as the named representative, including putting my name on a public lawsuit, actively assisting my attorney, and remaining involved throughout the case. I have taken those responsibilities seriously and will continue to do so throughout the remainder of this process.

5. Since retaining my attorney, I have been actively involved in the case. For instance, I spent many hours searching for, reviewing, and organizing documents to send to my attorney, and speaking with my attorney regarding the facts of the case. I have maintained regular contact with my attorney and received updates from him. I provided my attorney with information whenever he requested it. When we engaged in private mediation in June 2026, I helped prepare for the mediation and attended and participated in it. If the case did not settle, I was also prepared and willing to testify, participate in a deposition, appear in court, and otherwise continue assisting in the litigation as necessary. My attorney kept me informed about all settlement negotiations, including with respect to the mediation and proposed

settlement. I have conferred extensively with my attorney about the proposed settlement. I remain willing to assist through the settlement approval and administration process.

6. I was never offered anything to serve as the PAGA representative, and I understand that my responsibilities as the PAGA representative continue until the litigation is fully resolved. I understand that my attorney will request a $7,500 service award for my efforts in serving as the PAGA representative and that any service award is subject to the Court's approval.

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

Executed on Oct 21, 2026, at Delhi, California.

Gurpreet Sangha