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SUPERIOR COURT FOR THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

MINA PARWANI, an individual, on behalf of
herself and on behalf of all persons similarly
situated, and on behalf of the State of California as
a private attorney general,

Plaintiff,

v.

SACRAMENTO CHINESE COMMUNITY
SERVICE CENTER, INC., a Corporation; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO.: 24CV016097

**DECLARATION OF MINA PARWANI IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Hearing Date: December 19, 2025

Hearing Time: 9:00 a.m.

Judge: Hon. Jill H. Talley

Dept.: 23

Date Action Filed: August 14, 2024

Trial Date: Not set

1 I, Mina Parwani, declare as follows:

2 1. I am over the age of eighteen, a Plaintiff and a proposed Class Representative in the above-entitled
3 matter. I submit this declaration in support of the Motion for Preliminary Approval of Class Settlement
4 and in support of my application for a class representative service payment.

5 2. I have personal knowledge of all the facts stated herein. I could and would competently testify
6 under oath to these facts in court if requested to do so.

7 3. I have worked for the defendant Sacramento Chinese Community Service Center, Inc. ("SCCSC")
8 in California since December of 2021, and during that time period I have been classified by SCCSC as a
9 non-exempt employee.

10 4. I retained my attorneys who are experienced in both class action and PAGA representative action
11 litigation and claims against employers for violations of the California Labor Code. I have no personal
12 relationship or family ties to my attorneys or any officer of the Court. I am not aware of having any actual
13 or potential conflicts of interest with another class member in this case. I am not aware of any other
14 pending matter or action asserting claims that will be extinguished or adversely affected by this settlement.

15 5. I decided to file this class action lawsuit and be a plaintiff/class representative because I felt that
16 my legal rights as an employee and others like me were violated. For example, I was forced to work off
17 the clock, as I regularly arrived at work approximately 30 minutes early and began working with students.
18 Despite this, I was instructed by my managers not to clock in until my exact shift start time. Further, I was
19 required to prepare lesson plans for students while off the clock, and I was not compensated for that time,
20 which occurred frequently. I never received compliant meal and rest breaks which were often late,
21 interrupted, or missed completely. Additionally, I was paid bonuses and project payments, but these
22 payments were not included in my regular rate for the paying of overtime and sick pay. Further, I was not
23 reimbursed for the use of my personal cell phone, personal computer, nor home internet, which were
24 essential tools necessary to perform my job duties.

25 6. I spoke to my attorneys several times and discussed how SCCSC implemented its company
26 policies and procedures. I also assisted my attorneys in their investigation into my claims by providing
27 them documents and answering their questions. I reviewed the complaint before it was filed and was
28 given access to an electronic file sharing program that alerted me via email when important documents

1 were filed so that I could review them and keep up with the developments in the case which I understood
2 was one of my duties as a class representative. I could also access court filings from this case on my
3 attorney's law firm website. Also, I was informed that SCCSC had the right to take my deposition, and
4 that the preparation and deposition itself could take multiple days. Although my deposition was not taken,
5 I feel I would have been adequately prepared and comfortable to give testimony on my experiences.

6 7. Even though this action is in the process of settling, I was and remain prepared to perform all the
7 duties of a class representative. I understand that as a class representative I have assumed a fiduciary
8 responsibility to prosecute this class action on behalf of the absent class members. I have understood that
9 as a fiduciary, I have a duty to prosecute this action for the benefit of the class members and surrender any
10 right to compromise the group action for an individual gain.

11 8. I understood that being a plaintiff/class representative in this case meant that I was seeking
12 damages not only for myself but also other current and/or former non-exempt employees working for
13 SCCSC in California who make up the class. I felt that these individuals were not aware of their labor
14 law rights and even if they were they would probably be apprehensive about speaking up or even simply
15 because of the time, effort and risk involved in filing a class action lawsuit.

16 9. I understood that being a part of this lawsuit involved risks. For example, my attorneys explained
17 to me that if the case went to trial and we lost, I could be held responsible to pay for all or part of the
18 attorney fees and costs paid by SCCSC to defend this lawsuit. Also, I knew there was a risk that future
19 employers, if they ever find out about this lawsuit, could hold it against me or downgrade me as a potential
20 hire. As a named Plaintiff in this case it would not be difficult for a future employer to become aware that
21 I sued a former employer for labor law violations. Ultimately, I decided these risks were worth it and
22 decided to fight for my rights and the rights of others regardless of the risks, time and effort I spent on this
23 case.

24 10. During the lawsuit I stayed in touch with my attorneys by phone and email. I also kept up to date
25 on important developments by reviewing court filings that were made available to me electronically as I
26 described above.

27 11. A mediation took place on July 21, 2025, with Steve Serratore, Esq., a well-respected and
28 experienced mediator of wage and hour class actions. After the mediation the parties were able to come

1 to an agreement to settle the action. I communicated with my attorneys regarding the terms of the
2 settlement which was reached between the parties and understood that I was representing absent class
3 members and therefore wanted the best possible result to be obtained for the class members and I believe
4 a very positive result was in fact achieved via settlement. I reviewed and signed the Memorandum of
5 Understanding and when the final settlement agreement was ready, I reviewed it closely and signed it.

6 12. I have been actively involved with this lawsuit performing the duties described above. Although
7 I did not keep time records, I was in regular contact with my attorneys, reviewed court filings and spent a
8 significant amount of time on the issues presented during the lawsuit and in the settlement process. I
9 estimate that I spent approximately 30-40 hours working on this case up until this point. I believe I have
10 been diligent and have done what is expected of a named plaintiff and a proposed class representative to
11 date, and will continue to do so. I have and always will maintain the best interest of the class members.

12 13. My attorneys explained to me that the settlement process involves a two-step review by the Court
13 to determine whether the settlement is fair before approving the settlement. I know this process also
14 involves notifying all class members of the settlement terms and of their rights to make a claim for their
15 settlement share, to opt out of the settlement or to object to the settlement.

16 14. I believe I did the right thing by filing this case on behalf of the class members who, subject to
17 court approval, are in line to receive monetary payments as a result of this case and settlement. This is
18 money they may never have ever gotten if I did not pursue this action on their behalf. I feel significant
19 personal satisfaction to know that I played a role in the class members being entitled to monetary payments
20 as a result of the filing of this lawsuit. I also believe that the requested class representative service award
21 of \$15,000 from the settlement is fair compensation for the work I performed and the risks I undertook.

22 15. As part of the settlement, it was necessary for me to sign a general release of claims I may have
23 against SCCSC. I believe the class representative service payment I have requested provides me with some
24 compensation for this agreed release.

25 16. In light of all the time and effort I have spent on this case, the risk I undertook by suing a former
26 employer, the exposure to being responsible for paying SCCSC costs in the event we did not win the case,
27 the reputational risk that future employers may hold this lawsuit against me, the general release and in
28 light of the size of the settlement, I believe the request for \$15,000 as a class representative service

1 payment is fair and reasonable.

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

4 Executed on 11/05/2025, at Sacramento ,CA.
5 (date) (city, state)

6
7 
8 Mina Parwani (Nov 5, 2025 18:12:55 PST)
9 Mina Parwani