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15 *Attorneys for Plaintiffs, on behalf of the*  
16 *Putative Class, the State of California*  
17 *and Aggrieved Employees*

18 **SUPERIOR COURT OF CALIFORNIA**  
19 **COUNTY OF ALAMEDA**

20 KHAYO SISHI, SANDEEP PUREWAL,  
21 VANESSA BARBER, and CHERRA REDD on  
22 behalf of the Putative Class, the State of  
23 California and Aggrieved Employees;

24 *Plaintiffs,*

25 v.

26 ESKATON PROPERTIES INCORPORATED,  
27 CALIFORNIA HEALTHCARE  
28 CONSULTANTS, INC., and DOES 1-100,  
29 inclusive;

30 *Defendants.*

Case No.: RG21100764

Hon. Eumi Lee  
Dept. 512

**DECLARATION OF PLAINTIFF  
SANDEEP PUREWAL IN SUPPORT OF  
MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: July 28, 2023

Time: 9:30 a.m.

Dept.: 512

Complaint Filed: June 2, 2021

1 **DECLARATION OF SANDEEP PUREWAL**

2 I, Sandeep Purewal, declare as follows:

3 1. I am a Named Plaintiff in *Sishi, et al. v. Eskaton Properties Incorporated, et al.*,  
4 pending in the Superior Court of California, County of Alameda. I am over the age of eighteen. The  
5 following statements are based on my personal knowledge. If called on to do so, I could and would  
6 testify competently thereto.

7 2. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class  
8 Action Settlement in this action.

9 3. I was employed by Defendants as a non-exempt employee from approximately June  
10 2017 to January 2018. I was employed by Defendants as a dishwasher and my duties included, for  
11 example, washing dishes after patient meals.

12 4. I experienced issues in my employment with Defendants, including Defendants'  
13 failure to pay for all hours worked, as well as meal and rest break issues, among wage and hour  
14 violations.

15 5. As a result of these issues, I believed that I experienced unpaid wages violations and  
16 decided to contact Lawyers for Justice, PC. I understand that Schneider Wallace Cottrell Konecky  
17 LLP and Capstone Law, APC are also co-counsel in this action.

18 6. I knew that there was no guarantee that I would be successful in this case, and that  
19 there was a significant chance of protracted litigation. I understood I could potentially be liable for  
20 fees and costs. I also understood that I could have to spend a significant amount of time in the  
21 discovery process.

22 7. Additionally, I realized that my name would be on the action, and that this  
23 information would be visible to others.

24 8. Nonetheless, I felt strongly that Defendants had unlawful wage and hour policies  
25 and/or practices. Therefore, I decided to proceed as a representative plaintiff and file a class action  
26 lawsuit in the Superior Court of California, County of Sacramento. I understood that I would serve  
27 as a Named Plaintiff and class representative in a class action.

28 9. I worked with my attorneys to answer questions and review facts about my  
29 employment with Defendants so that they could draft the complaint. We filed a class action case in  
30 the Superior Court of California, County of Sacramento on August 23, 2021. I was aware that an  
31 amendment to the complaint in *Sishi, et al. v. Eskaton Properties Incorporated, et al.* would add me  
32 as a Named Plaintiff in this action, where I would serve as a class representative as well as a

1 representative employee for claims under the California Labor Code Private Attorneys General Act  
2 (“PAGA”).<sup>1</sup> I understood that serving as a representative of the Class members and Aggrieved  
3 Employees meant putting their interests above my own.

4 10. After the proposed Class Action Settlement Agreement and Release was reached, I  
5 reviewed the terms. I also carefully reviewed Addendum A and Addendum B to the Settlement. I  
6 discussed the Settlement with my attorneys. I spent time evaluating the proposed outcome to assure  
7 that it was fair. Based on my own review and my attorneys’ evaluation and recommendation, I  
8 believe the Settlement is fair and reasonable. I signed the Settlement on October 13, 2022, and the  
9 addenda thereto on November 5, 2022 and December 21, 2022.

10 11. Throughout this action, I have been in communication with my attorneys to keep  
11 apprised of the status of the litigation. I have kept up-to-date on the status at every phase.

12 12. In sum, I have been an active participant in this litigation since the inception of the  
13 case I filed in the Superior Court of California, County of Sacramento. I worked with my attorneys  
14 to prepare the complaint, stayed informed of the settlement decisions, and otherwise remained in  
15 contact with my attorneys. I have been involved with this litigation for nearly two years, and during  
16 that time I estimate that I have contributed at least 2-4 hours of my own time to the prosecution of  
17 these claims.

18 13. By participating in this case as a plaintiff, I placed myself at personal risk. For  
19 example, I faced: (a) risk to my reputation in my community as a result of stepping forward publicly  
20 in a class and PAGA action; (b) risk to my reputation as it concerns my future employment  
21 opportunities; (c) risk that I would be subject to intrusive discovery and time demands in this  
22 litigation; and (d) risk that I would have to pay defense costs if I lost this case. Nevertheless, I chose  
23 to face these risks to challenge the way that Defendants treated their employees.

24 14. I ask that the Court award an incentive award of \$5,000 to compensate me for the  
25 amount of time I spent on this case, the risks undertaken, the fact that I am providing a general  
26 release of my rights against Defendants, and for the benefit being provided by the Settlement to the  
27 Class, the Labor and Workforce Development Agency, and the Aggrieved Employees.

28  
29 I declare under penalty of perjury under the laws of the State of California that the foregoing  
30

31 <sup>1</sup> Plaintiff Barber, Plaintiff Redd, and I initiated our own actions against Defendants. After further investigation and  
32 meeting and conferring, the Parties in *Sishi* agreed that the cases should be consolidated and myself, as well as Plaintiffs  
Barber and Redd should be added to the First Amended Complaint. The Court ultimately granted the Parties’ stipulation  
for leave to file a Second Amended Complaint to incorporate these additional Plaintiffs and their claims, and the Second  
Amended Complaint was filed on September 13, 2022.

1 is true and correct and is based upon my personal knowledge.

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Executed on 06 / 28 / 2023 in Henderson, Nevada.



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Sandeep Purewal