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Attorneys for Plaintiff Zenaya White

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

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

Plaintiffs,

vs.

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

Defendants.

Case No.: RG21100764

Hon. Eumi Lee  
Dept. 512

**DECLARATION OF ZENAYA WHITE IN  
SUPPORT OF MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: July 28, 2023  
Time: 9:30 a.m.  
Place: Department 512

Complaint Filed: June 2, 2021

**DECLARATION OF ZENAYA WHITE**

I, Zenaya White, hereby declare as follows:

1. I am over eighteen years old and unless the context indicates otherwise, I have personal knowledge of the following facts and if called as a witness, I could and would testify competently to them. I am the named plaintiff in the action entitled *White v. Eskaton*, No. 34-2021-00302048 (Sacramento County Superior Court), and a representative for the Settlement Class. I make this declaration in support of the Motion for Final Approval of Class Action Settlement.

2. I was employed by Defendants Eskaton Properties Incorporated and California Healthcare Consultants, Inc. ("Defendants") as an hourly paid, non-exempt Resident Care Associate from approximately May 2019 to July 2020. My job duties included assisting residents with hygiene tasks, such as eating, walking, talking changing clothes, and showering; providing memory care to patients; and conducting skill-building activities with patients.

3. I decided to file my lawsuit because I had a number of grievances against Defendants stemming from their labor policies. These grievances are set forth in detail in my operative Complaint and my letter to California Labor and Workforce Development Agency ("LWDA").

4. Prior to filing my action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendants.<sup>1</sup> During those conferences, my attorneys provided me with an overview of how those claims would be litigated, and generally educated me about the nature of complex/representative litigation, and my role as the representative Plaintiff.

5. After retaining my attorneys, I spent considerable time on the phone discussing the facts of my case with my attorneys. I discussed the facts related to my employment with Defendants, including discussing my job duties and responsibilities, my job position, the hours and days I worked, and how I was compensated.

6. My attorneys provided me with a draft of the Complaint for my review and approval. I closely reviewed the Complaint to ensure accuracy and completeness. Following the filing of the

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<sup>1</sup> Although the preservation of my attorney-client privilege requires that I refrain from revealing the specifics of my communications with my attorneys, I understand that the privilege is not waived by stating generally the matters that I have discussed with my attorneys.

1 Complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly contacted  
2 my attorneys to stay current on the status of the litigation, and to discuss my attorneys' progress in  
3 prosecuting the claims.

4 7. I have worked to the best of my ability to prosecute my action on behalf of the LWDA  
5 and employees, always considering their interests just as I would consider my own interests. I believe  
6 representative class and PAGA actions are important tools to assure compliance with the law even where  
7 an individual's losses may be relatively small. I have no interests which are inconsistent with the interests  
8 of the class.

9 8. When I agreed to represent other non-exempt employees performing duties for  
10 Defendants in the State of California, I understood it was my duty to be readily available and to  
11 participate actively in this case. I knew that I would be required to review documents, search for  
12 documents and produce them to my attorneys, answer written questions, potentially answer oral  
13 questions and testify truthfully under oath, and be available to appear in court, if necessary.

14 9. I understood that I needed to maintain awareness of the status and progress of the  
15 lawsuit.

16 10. Since initiating this lawsuit until now, I have kept aware of the status of the lawsuit and  
17 provided my attorneys with information used by them in the litigation. I have spent large amounts of  
18 time and effort pursuing my claims and the claims of the other employees from the time I retained my  
19 attorneys to the present date.

20 11. I have carefully reviewed the terms of the proposed settlement. My attorneys explained  
21 the specifics of how the settlement would work and I accepted the settlement only after I had spent time  
22 evaluating the proposed outcome to assure that it was fair. Based on my attorneys' evaluation and  
23 recommendation, and my own review, I believe the settlement is fair and reasonable and adequately  
24 compensates Class Members.

25 12. In summary, over the course of this litigation I have spent a significant amount of time  
26 conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement  
27 and related documents. I estimate that I have spent between 25 and 35 hours assisting my attorneys in the  
28 prosecution and settlement of my lawsuit.

1           13.     Throughout this case, I have not sought individual benefits from the lawsuit. Rather, I  
2 prosecuted my lawsuit because I wanted to hold Defendants accountable for their unlawful conduct. I  
3 believe that I have fulfilled my responsibilities, and I will continue to fulfill those responsibilities, to the  
4 best of my ability, until the conclusion of the case.

5           14.     I am committed to this case and will continue to make myself available as needed in the  
6 settlement process.

7  
8           I declare under penalty of perjury under the laws of the State of California that the foregoing is  
9 true and correct. Executed on [Date] 6/27/2023, at [City] Dublin, California.

DocuSigned by:

Zenaya Samone White

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Zenaya White