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ELECTRONICALLY FILED  
 Superior Court of California  
 County of Santa Cruz  
 4/11/2023 10:26 AM  
 Clerk of the Court by Deputy,  
~~Declan Salsedo~~

12 Attorneys for Plaintiff  
 13 The People of the State of California

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 15 **COUNTY OF SANTA CRUZ**

17 THE PEOPLE OF THE STATE OF  
 18 CALIFORNIA,

19 Plaintiff,

20 vs.

21 SANTA CRUZ SKILLED NURSING, INC.,  
 doing business as HEARTS & HANDS, POST  
 22 ACUTE CARE & REHAB CENTER; SANTA  
 CRUZ SKILLED NURSING CENTER, LLC;  
 23 SEA COAST HEALTH CARE  
 MANAGEMENT, LLC, a California Limited  
 24 Liability Company; VITAL REHAB  
 SERVICES, INC. a California Limited  
 25 Liability Company; CARE MUST HOSPICE,  
 a California corporation; A.J. RANA, an  
 26 individual; TRILOCHAN SINGH, an  
 27 individual, and DOES 1-50, inclusive,  
 Defendants.

Case No. 19CV02767

**STIPULATION FOR ENTRY OF FINAL  
JUDGMENT AND INJUNCTION**

Dept: 5  
 Judge: Hon. Timothy Volkmann

Trial Date: None set  
 Action Filed: September 12, 2019

1 Plaintiff, the People of the State of California, through its attorneys, Rob Bonta, Attorney  
2 General of the State of California, by Supervising Deputy Attorney Joel Samuels, and Jeffrey S.  
3 Rosell, District Attorney for the County of Santa Cruz, by Assistant District Attorney Douglas  
4 Allen (the “People” or “Plaintiff”), and SANTA CRUZ SKILLED NURSING CENTER, INC.  
5 (sued herein as Santa Cruz Skilled Nursing Inc.), doing business as, HEARTS & HANDS, POST  
6 ACUTE CARE & REHAB CENTER (hereinafter “Hearts & Hands” or “Defendant”) appear  
7 herein through its attorneys, Hooper, Lundy & Bookman, P.C., by Scott Kiepen and Katrina  
8 Pagonis, enter into this Stipulation for Entry of Final Judgment (hereinafter “Stipulation”) as  
9 follows:

10 IT IS HEREBY STIPULATED AND AGREED THAT:

11 1. This Court has jurisdiction of the subject matter hereof and the parties to this  
12 Stipulation for Entry of Final Judgment and Injunction and that venue is proper in Santa Cruz  
13 County.

14 2. Defendant acknowledges that it has been represented by legal counsel throughout all  
15 of the negotiations which preceded the execution of this Stipulation, and that it has executed this  
16 Stipulation with the consent and on the advice of such counsel.

17 3. The Final Judgment and Injunction (“Judgment”), a true and correct copy of which  
18 is attached hereto as Exhibit 1, may be entered by any judge of the Santa Cruz County Superior  
19 Court. The People may submit the Judgment to any judge of the Superior Court for approval and  
20 signature, based on this Stipulation, during the Court's *ex parte* calendar or on any other *ex parte*  
21 basis, without notice to or any appearance by Defendant which notice and right to appear  
22 Defendant hereby waives.

23 4. Remaining named defendants other than SANTA CRUZ SKILLED NURSING  
24 CENTER, INC. (sued herein as Santa Cruz Skilled Nursing Inc.), doing business as, HEARTS &  
25 HANDS, POST ACUTE CARE & REHAB CENTER are hereby stipulated to be dismissed  
26 without prejudice.  
27  
28

1           5. Plaintiff and Defendant (collectively, the “Parties”) hereby waive their right to move  
2 for a new trial and further waive their right to appeal from the Judgment, except that Plaintiff and  
3 Defendant each agree that this Court shall retain jurisdiction as set forth in the Judgment.

4           6. The Parties stipulate and consent to the entry of the Judgment jointly and voluntarily  
5 as a compromise of disputed claims and defenses, without trial or adjudication of any issue of fact  
6 or law, without the Judgment constituting evidence of or an admission by Defendant regarding  
7 any issue of fact or violation of law alleged in the Complaint on file herein.

8           7. Defendant denies any liability, wrongdoing, and/or fault regarding all allegations  
9 asserted in the Complaint, including, but not limited to, violation of any laws, statutes, or  
10 regulations, and any other liability or wrongdoing alleged against Defendant by the People.

11           8. The individuals signing below represent that they have been authorized by the  
12 parties they represent to sign this Stipulation.

13           9. This Stipulation may be executed in counterparts, and the Parties agree that an  
14 electronic signature shall be deemed to be, and shall have the full force and effect as, an original  
15 signature.

16 Signatures on next page:  
17

18 X

19 X

20 X

21 X

22 X

23 X

24 X

25 X

26 X

27 X

28

1 Dated: 4/6/2023

Attorneys for Plaintiff, the People of the State  
of California

ROB BONTA  
Attorney General of California

DocuSigned by:

*Joel Samuels*

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Joel Samuels, Supervising Deputy Attorney  
General

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4  
5  
6 Dated: 4/6/2023

JEFFREY S. ROSELL, District Attorney for  
the County of Santa Cruz

DocuSigned by:

*Douglas Allen*

1EE9A52400CB4A9...

Douglas B. Allen  
Assistant District Attorney

11  
12  
13 Attorneys for Defendant, SANTA CRUZ  
SKILLED NURSING CENTER, INC. (sued  
14 herein as Santa Cruz Skilled Nursing Inc.),  
15 doing business as, HEARTS & HANDS,  
POST ACUTE CARE & REHAB CENTER

16 Dated: March 14, 2023

HOOPER, LUNDY & BOOKMAN, P.C.

*Scott J. Kiepen*

18 Scott J. Kiepen  
19 Attorneys for Defendant SANTA CRUZ  
SKILLED NURSING CENTER, INC.

20 Defendant,

21 Dated: March 14, 2023

SANTA CRUZ SKILLED NURSING  
CENTER, INC.

*TRILOCHAN SINGH*

24 TRILOCHAN SINGH, PRESIDENT AND CEO