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*Counsel for Plaintiffs and the Proposed  
Settlement Class*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN MATEO**

ALABAMA DOE 1, ALABAMA DOE 2,  
INDIANA DOE, MISSOURI DOE, AND  
FLORIDA DOE, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiffs,

vs.

GILEAD SCIENCES, INC.,

Defendant.

Case No.: 20-CIV-03699

**DECLARATION OF NAINA KHANNA**

Dept: 22  
Judge: Hon. Danny Chou

CLASS ACTION

Action Filed: September 1, 2020  
Trial Date: None Set

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I, Naina Khanna, hereby declare under penalty of perjury and under the laws of California that the following is true and correct:

1. I respectfully submit this Declaration in support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement. The following is based on my personal knowledge, and if called upon to do so, I could and would competently testify thereto.

2. I am executive Director of the Positive Women's Network - United States of America (“PWN-USA”).

3. Founded in 2008, PWN-USA is a national membership body of women living with HIV and our allies that exists to strengthen the strategic power of women living with HIV in the U.S.

4. The HIV pandemic (globally and domestically) has been propelled by racism, poverty, misogyny and stigma. Destigmatizing HIV and destigmatizing the communities most impacted by HIV underlies all aspects of PWN-USA’s policy agenda.

5. PWN-USA has developed a policy agenda grounded in social justice and human rights.

1           6.       Our policy priorities are strategically chosen to fill gaps that we perceive in the  
2 landscape, including places we perceive opportunities to uplift the voices of people living with HIV.

3           7.       Our approach to policy advocacy centers the leadership and voices of communities  
4 that are directly and disproportionately impacted.

5           8.       Our members shape policy at the state and federal level, fighting stigma and  
6 discrimination, and calling for full rights and dignity for all people living with, and vulnerable to,  
7 HIV.

8           9.       PWN-USA members have served on key advisory and decision-making bodies that  
9 include the Presidential Advisory Council on HIV/AIDS, the CDC/HRSA Advisory Committee  
10 (CHAC), and numerous statewide and regional planning bodies.

11          10.       PWN-USA leads local, state, and federal advocacy and community organizing  
12 efforts on a range of human rights and social justice issues important to our members and aligned  
13 with our policy agenda.

14          11.       PWN-USA works in alignment with movement partners. We are proud to serve as an  
15 active member of the Act Now End AIDS Coalition, the AIDS United Public Policy Committee, the  
16 Black United Leadership Institute, the Health Not Prisons Collective, HIV Justice Worldwide, HIV  
17 Racial Justice Now, the Radical Communicators Network, and the U.S. People Living with HIV  
18 Caucus.

19  
20 Dated: December 14, 2022

Respectfully submitted,

DocuSigned by:

*Naina Khanna*

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Naina Khanna

Executive Director

Positive Women's Network-USA

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