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Board of Directors

CONFIDENTIAL

Sikh Temple - San Francisco Bay Area
300 Gurdwara Road
Fremont, CA 94536

Re: *Singh, et al. v. Singh, et al.*
Alameda Superior Court Case No.: HG19024582

Dear Board of Directors:

We are writing on behalf of our clients, Harminder Singh, Kuljit Singh and Arvinder Kaur (collectively "Singh/Kaur"). On or about June 26, 2019, Jasdev Singh and Jaspreet Singh Atwal filed a Petition against Singh/Kaur in the Alameda Superior Court (*Singh, et al. v. Singh, et al.* Alameda Superior Court Case No.: HG19024582). This petition solely related to their role as a board member of the Sikh Temple - San Francisco Bay Area ("Temple").

California Corporations Code section 317 provides in relevant part as follows:

A corporation shall have power to indemnify any person who was or is a party or is threatened to be made a party to any proceeding (other than an action by or in the right of the corporation to procure a judgment in its favor) by reason of the fact that the person is or was an agent of the corporation, against expenses, judgments, fines, settlements, and other amounts actually and reasonably incurred in connection with the proceeding if that person acted in good faith and in a manner the person reasonably believed to be in the best interests of the corporation ...

This is a case where Singh/Kaur are named essentially because of their status as board members—at all times they acted in good faith and there is not a hint of evidence otherwise. Accordingly, this is written demand that the Sikh Temple reimburse all attorneys' fees and costs related to the above-referenced lawsuit incurred by our client. Upon the Temple's acknowledgment that invoices will be so reimbursed, we will be happy to forward the invoices and respond to any questions about them to facilitate their payment.