

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

GILEAD SCIENCES, INC. and GILEAD
SCIENCES IRELAND UC,

Plaintiffs,

-against-

CITY PLUS CARE PHARMACY INC.
D/B/A HEAL THE WORLD PHARMACY,
NABILA CHAUDHARY, QAISER
CHAUDHARY and HAMZA
CHAUDHARY,

Defendants.

Case No.: 1:25-cv-01469-RER-RML

DECLARATION OF NABILA CHAUDHARY

Pursuant to 28 U.S.C. § 1746, I, NABILA CHAUDHARY, state under penalty of perjury:

1. I am a named Defendant herein. I make this Declaration in opposition to Gilead's Motion for Case-Ending Sanctions.

2. I have never had any connection to any counterfeit Biktarvy.

3. I was the nominal owner of City Plus Care Pharmacy dba Heal the World ("HTW") from 2019 until January 24, 2022, when I sold it to Shumaila Arslan.

4. I never was involved in any way in any aspect of HTW other than signing documents that my husband, Qaiser, provided for my signature. Qaiser managed HTW until I sold it on January 24, 2022.

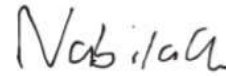
5. On December 20, 2021, at Qaiser's direction, I entered into an agreement to sell HTW to Shumaila Arslan ("Shumaila"). **Exhibit A** (Asset Purchase Agreement).

6. On January 24, 2022, Shumaila and I consummated the sale, and I transferred my ownership to Shumaila. **Exhibit B** (Bill of Sale). In exchange, Shumaila made her initial payment

to me of \$100,000. **Exhibit C** (cancelled check). That was the end of my ownership and Qaiser's control over HTW. Hamza continued to work there in the over the counter section and doing pickups and deliveries.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on January 19, 2026



NABILA CHAUDHARY