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Attorneys for Plaintiff Flora Candelaria Alvarez and the Class
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SACRAMENTO**

In re: Healthnet/Centene cases

Case No.: JCCP 5229

Coordinated Actions:

**DECLARATION OF FLORA CANDELARIA
 ALVAREZ IN SUPPORT OF PLAINTIFF'S
 MOTION FOR PRELIMINARY APPROVAL
 OF CLASS ACTION SETTLEMENT**

Flora Candelaria Alvarez, et. al. v. Health
 Net of California Inc.
 34-2020-00289192; Sacramento Superior
 Court

Date: December 2, 2022
 Time: 9:00 A.M.
 Dept.: 25

Ariana Carranza, et. al. v. Health Net of
 California, Inc.; Centene Corporation
 20STCV14774; Los Angeles Superior
 Court

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DECLARATION OF FLORA CANDELARIA ALVAREZ

I, Flora Candelaria Alvarez, declare as follows:

1. I am an individual over the age of 18. I am the named Plaintiff in the above-referenced action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was started working with Defendant Health Net of California Inc. ("Defendant") in August 2012.

3. During my employment with Defendant, I received wage statements that included shift differential and overtime wages but did not identify the correct number of hours worked and/or rate of pay.

4. I understand that this action was brought on behalf of all current and former non-exempt employees in California who suffered similar violations of the Labor Code.

5. I understand that it is my responsibility to act in the best interest of the Class. I am not aware of any conflicts that exist between my interests and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

6. I have discussed the terms of the settlement with my attorneys, and based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the entire Class.

7. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of Defendants' practices. To date, I have performed a number of tasks in my role as the representative. This includes the following:

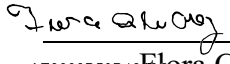
- a. Meeting with my attorneys to discuss this case and the facts involved, including numerous telephonic meetings at various stages of the lawsuit;
- b. Gathering documents related to this case;
- c. Reviewing documents, including my declaration and the settlement agreement;
- d. Regularly providing information to my attorneys and responding to any questions;

e. Remaining available during settlement negotiations; and

f. Reviewing and executing the settlement agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 4th day of November 2022, at Sacramento, California.

DocuSigned by:

AE3893B50D131210 Flora Candelaria Alvarez

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss.
4 COUNTY OF LOS ANGELES)

5 I am employed in the County of Los Angeles, State of California. I am over the
6 age of 18 and not a party to the within action. My business address is 31365 Oak Crest
Drive, Suite 240, Westlake Village, CA 91361.

7 On November 7, 2022, I served the foregoing document described as:

- 8 **1) PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY**
9 **APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT;**
10 **MEMORANDUM OF POINTS AND AUTHORITIES**
11 **2) DECLARATION OF MARCUS J. BRADLEY IN SUPPORT**
12 **3) DECLARATION OF MAX W. GAVRON IN SUPPORT**
13 **4) DECLARATION OF LARRY W. LEE IN SUPPORT**
14 **5) DECLARATION OF WILLIAM L. MARDER IN SUPPORT**
15 **6) DECLARATION OF PLAINTIFF FLORA CANDELARIA IN SUPPORT**
16 **7) DECLARATION OF PLAINTIFF ARIANA CARRANZA IN SUPPORT**
17 **8) DECLARATION OF SEAN HARTRANFT RE: QUALIFICATIONS OF ILYM GROUP,**
18 **INC. AND SETTLEMENT ADMINISTRATOR**
19 **9) [PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS AND**
20 **REPRESENTATIVE ACTION SETTLEMENT**

21 on all interested parties in said action:

22 **SEE ATTACHED SERVICE LIST**

23 [X] **(VIA US MAIL)** I caused such envelope(s) to be deposited in the mail at Westlake
24 Village, California with postage thereon fully prepaid. I am "readily familiar" with the
25 firm's practice of collection and processing correspondence for mailing. It is deposited
26 with the U.S. Postal Service on that same day in the ordinary course of business. I am
27 aware that on motion of party served, service is presumed invalid if postal cancellation
28 date or postage meter date is more than one day after date of deposit for mailing in
affidavit.

[X] **(VIA ELECTRONIC MAIL)** I delivered the aforementioned document (s) by
electronic mail to the parties' email addresses as they are known to me on the attached
Service List. My email address is sboucher@bradleygrombacher.com. I did not receive,
within a reasonable period of time, any indication that the transmission was not
successful.

I declare under penalty of perjury under the laws of the State of California that the above
is true and correct.

Executed on November 7, 2022 at Westlake Village, California.



Suzette Boucher

**Healthnet/Centene Cases
Sacramento Superior Court
Coordination Proceeding JCCP No. 5225**

Mailing List

(Via Electronic Mail Only) Steven S. Groode, Esq. Barbara A. Blackburn, Esq. Nathaniel H. Jenkins, Esq. Masada, Chopi, Esq. LITTLER MENDELSON 500 Capitol Mall, Suite 2000 Sacramento, CA 95814 SGroode@littler.com BBlackburn@littler.com NJenkins@littler.com SMasada@littler.com	Attorney for Defendants, HEALTH NET OF CALIFORNIA, INC. and CENTENE CORPORATION
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(Via U.S. Mail Only) Chair, Judicial Council of California Administrative Office of The Courts Attn: Office of Appellate Court Services (Civil Case Coordination) 455 Golden Gate Avenue, 5th Floor San Francisco, CA 94102-3688	
(Via U.S. Mail Only) The Honorable Jill H. Talley Superior Court of California, County of Sacramento 720 Ninth Street, Dept. 25 Sacramento, CA 95814	