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Attorneys for Plaintiff Flora Candelaria Alvarez and the Class
(Additional counsel on following page)

**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 LARRY W. LEE 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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I, Larry W. Lee, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Diversity Law Group, counsel of record for Plaintiff Flora Candelaria Alvarez (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Class Counsel has zealously represented the interests of the Class. I have spent significant time researching and pursuing the claims that have been alleged in this action. I have no conflict with the Class.

3. Both Class Counsel and defense counsel have a great deal of experience in wage and hour class action litigation. Class Counsel has been approved as class counsel on a number of prior cases, have litigated numerous other class action cases, and are competent to represent the Class.

4. I was retained based upon a contingency fee arrangement wherein Plaintiff's counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiff failed to prevail on this case, counsel for Plaintiff would have spent a significant amount of time, money and other resources without any benefit or return. In addition, had Plaintiff also failed to prevail in the present case, Defendant would have been able to seek costs in connection with their defense of the case.

5. Based on my experience, I support the proposed settlement as fair, adequate, and reasonable.

6. I am one of the primary attorneys on this matter. My qualifications are as follows: I received my J.D. from Arizona State University College of Law in 2003. During law school, I was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude from Arizona State University College of Law in the top 10% of my class. While I was in law school, I was the Associate Managing Editor of the Arizona State University College of Law, Law Journal. Upon graduation, I practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment

1 defense law firm that represents a significant number of Fortune 500 companies.

2 7. My firm's primary focus is employment law. I have handled a number of wage
3 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
4 encompasses cases in the Los Angeles Superior Court, the Orange County Superior Court, Santa
5 Clara Superior Court, Monterey Superior Court, Sonoma Superior Court, San Francisco County
6 Superior Court, the San Diego County Superior Court, and the United States District Courts for
7 the Central, Eastern, Southern, and Northern Districts of California.

8 8. I have been named as Class Counsel in a number of class actions that have been
9 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
10 Francisco County, and other counties, and the United States District Court for the Central
11 District of California, including the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*,
12 San Francisco Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*,
13 Orange County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of
14 California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange
15 County Superior Court, Judicial Council Coordination Proceeding No. 4480; *Hernandez v. CVS*
16 *Corp. et al.*, Judicial Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito
17 County Superior Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey*
18 *Peninsula*, Monterey County Superior Court Case No. 17CV003452; *DirecTv Wage and Hour*
19 *Cases*, Santa Clara Superior Court Judicial Council Coordination Proceeding No. 4850; *Perez v.*
20 *Standard Drywall, Inc.*, Alameda County Superior Court Case No. RG15761142; and *Davis v.*
21 *Nugget Market, Inc.*, Yolo County Superior Court Case No. CV-18-558.

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

24 Executed on this November 4, 2022, at Los Angeles, California.

25 

26 _____
27 Larry W. Lee
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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
(Via Electronic Mail Only) Max W. Gavron, Esq. Larry W. Lee, Esq. DIVERSITY LAW GROUP, P.C. 515 S. Figueroa Street, Suite 1250 Los Angeles, CA 90071 mgavron@diversitylaw.com lwlee@diversitylaw.com William L. Marder , Esq. POLARIS LAW GROUP 501 San Benito Street, Suite 200 Hollister, CA 95023 Tel: (831) 531-4214 Fax: (831) 634-0333 bill@polarislawgroup.co	Attorneys for Plaintiff FLORA CENDELARIA ALVAREZ
(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	