

Marcus J. Bradley, Esq. (SBN 174156)
Kiley L. Grombacher, Esq. (SBN 245960)
Lirit A. King, Esq., (SBN 252521)
BRADLEY/GROMBACHER, LLP
31365 Oak Crest Drive, Suite 240
Westlake Village, California 91361
Telephone: (805) 270-7100
Facsimile: (805) 270-7589
mbradley@bradleygrombacher.com
kgrombacher@bradleygrombacher.com
lking@bradleygrombacher.com

Sahag Majarian II, Esq. (SBN 146621)
LAW OFFICES OF SAHAG MAJARIAN II
18250 Ventura Boulevard
Tarzana, California 91356
Telephone: (818) 609-0807
Facsimile: (818) 609-0892
sahagii@aol.com

Attorneys for Plaintiff, ARIANA CARRANZA and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

In re: Healthnet/Centene cases

Case No.: JCCP 5225

Coordinated Actions:

**DECLARATION OF ARIANA CARRANZA
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL**

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

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

DECLARATION OF ARIANA CARRANZA

I, Ariana Carranza, declare as follows:

1. I am a resident of Carson, California. I am a former employee of Defendants, Health Net of California, Inc./Centene Corporation (hereinafter “Defendants”) and a Plaintiff in this case. I am over the age of 18. I have personal knowledge of the following facts, if called to testify, I could and would testify competently to them.

2. I am familiar with the work involved in prosecuting the class action against my former employers and worked closely with my attorneys in prosecuting the action and in obtaining the relief provided by the settlement. I am familiar with the law and motion matters, discovery conducted, settlement discussions, and have participated in all stages of the litigation.

3. I was employed at Defendants as a non-exempt “Customer Service Support Representative” in California from approximately November 2016 until January 4, 2019.

4. I have participated in all aspects of this litigation from pre-litigation investigation through settlement discussions. I have had numerous discussions with my attorneys over the course of this matter.

5. I spent a considerable amount of time learning about California labor laws, deciding whether remedial action should be taken, how it should be taken, and searching for attorneys. I located experienced wage and hour attorneys and met with them to determine if I would retain them to handle my case. They spent many hours with me discussing this case and the law. In the end, I decided to vindicate not only my own rights but also those of my former co-workers by filing a class-action lawsuit.

6. I have been personally involved and have been diligent in assisting Class Counsel identify Defendants’ unlawful practices. I searched for, and produced, multiple documents that I had from my employment and helped my attorneys understand the company structure so that they could determine who else would have helpful information about the policies and practices.

7. On April 6, 2021, Defendants took my deposition, which lasted three hours, not including a 30-minute recess in between.

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1 8. I have worked with my counsel to prepare the lawsuit documents, aid in informal and
2 formal discovery, and prepare for the mediation in support of this case.

3 9. In advance of the mediation, I spent a significant amount of time working with my
4 attorneys to provide information and even more time searching for, organizing and producing
5 documents related to my work for Defendants. I also reviewed the pages of records that Defendants
6 produced regarding my work for them. Our damages calculation for mediation was based on my input
7 on these records and also on additional documents and data that Defendants provided to my attorneys
8 in response to our mediation requests. In preparation for our mediation, I had a series of phone
9 conversations and email exchanges with my attorneys to go over my understanding of these documents
10 and data as well.

11 10. On November 18, 2021, we had a mediation in this case, along with Plaintiff Alvarez
12 against Defendants. I made sure that I was available during the mediation for any questions that might
13 come up. The mediation lasted the entire day and at the end of it the parties reached a settlement in
14 principle which was memorialized in a Memorandum of Understanding. My attorney explained to me
15 the basic terms of the settlement.

16 11. After the mediation, I participated in several conversations with my attorneys regarding
17 the drafting of the formal settlement agreement. As part of the settlement agreement, I am releasing
18 any and all claims I have against Defendants, not just those relating to this case. I understand that this
19 release is broader than that which applies to the other Class Members and Aggrieved Employees.

20 12. During the finalization process of the Settlement Agreement, I extensively reviewed
21 its terms to understand the settlement process and its fairness for the Class.

22 13. I have fairly represented the absent Class and herein request that the Court approve this
23 settlement and confirm me as a Class Representative. I feel I have always maintained the best interest
24 of the Class while performing my class representative duties. I am not aware of any conflicts of interest
25 that prevent me from being confirmed as a Class Representative in this lawsuit.

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1 14. I am not related in any way to my lawyers or any other member of the firm that is
2 representing me. I have no business dealings or other involvement beyond this lawsuit and this
3 representation. I have not been promised any money or inducement to serve as the Class
4 Representative in this action.

5 15. I understand that as part of this class action settlement, I am required to provide
6 Defendants with a full and complete release of all claims, known and unknown, and that this is
7 something that other class members do not have to provide. I understand that this means that I will be
8 giving up any claims I may have against the Defendants. I have agreed to this term as I believe this
9 was in the best interests of the class and this settlement.

10 16. I believe that the Class Action Settlement obtained on behalf of the Plaintiff Class is
11 excellent, because there are issues and risks with continuing litigation. I strongly support the
12 settlement in this matter. Throughout this case, I have always kept the best interests of the Class in
13 mind over my own. I had no claim that was incompatible to the Class.

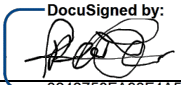
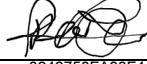
14 17. As discussed above, I actively participated in the litigation of this action on behalf of
15 myself and the Settlement Class. As a Class Representative, I participated in all stages of the litigation
16 and have been continually kept apprised of all aspects of the litigation. I estimate that I have spent
17 between 35-40 hours in the litigation of this case.

18 18. In addition to the hours spent participating in the prosecution of this case, I took a huge
19 risk by coming forward and filing this class action. If I lost the case and had to pay Defendants'
20 litigation costs, it would have been financially devastating to me.

21 19. Likewise, I faced the risk that initiating and pursuing the case could potentially hurt
22 my future employment possibilities with another employer. Any prospective employer doing a cursory
23 internet search on me and my employment history may learn of my role in this litigation. I thus risk
24 the potential stigma of being a class representative in a class action labor dispute which may affect
25 my future employability.

26 20. Even with the risks, I have taken my responsibilities as Class Representative
27 seriously, dedicated significant amounts of my personal time, and performed my duties seriously. I
28 also remain committed to continue doing so through the resolution of the case.

1 I declare under penalty of perjury and under the laws of the State of California that the
2 foregoing is true and correct. This declaration was executed on 10/5/2022,
3 in Carson, California.

4  DocuSigned by:
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6 Ariana Carranza
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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	