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Attorneys for Plaintiffs Joanne Rodelle Lawhorn,
and Joseph Ortegon, on behalf of themselves and
all others similarly situated

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

ERIK HUFFMAN, NAJUAH
MUDAHY, INA ROSSON, JOANNE
RODELLE LAWHORN and MANUAL
JOSEPH ORTEGON, individuals, on
behalf of themselves and on behalf of all
persons similarly situated and on behalf
of the State of California, as private
attorney general,

Plaintiffs,

vs.

CENTENE MANAGEMENT
COMPANY LLC, a Limited Liability
Company; HEALTH NET, LLC, a
Limited Liability Company and DOES 1
through 50, inclusive,

Defendants.

Case No. 34-2022-00322629

[Assigned for all purposes to the Hon. Lauri A.
Damrell - Dept. 22]

**DECLARATION OF MANUEL JOSEPH
ORTEGON**

DECLARATION OF MANUEL JOSEPH ORTEGON

I, Manuel Joseph Ortegon, declare as follows:

1. I am one of the Plaintiffs and proposed Class Representatives in the matter styled, *Huffman, et al v. Centene Management Company LLC, et al*, Case No. 34-2022-00322629. I know the facts declared herein to be true of my own personal knowledge and if called as a witness, I could and would competently testify thereto.

2. I was employed by Defendant Centene from on or about July 2017 through on or about February 4, 2022, and occupied a non-exempt position as a pharmacy technician.

3. Prior to retaining the law firm of James Hawkins APLC to redress the grievances that I had against Defendant Centene, James Hawkins APLC informed me of the advantages and disadvantages of litigation, and of my responsibilities as both a Plaintiff and a Class Representative.

4. By deciding to litigate my claims as part of this class action, I agreed to pursue not only my own potential wage and hour claims, but the claims of all similarly situated employees, and to put the interests of the class ahead of my own. I pledged to participate actively in the lawsuit.

5. As a Class Representative, I am aware that I represent the interest of the class members in this litigation and of my fiduciary duty to the putative class members. I am not aware of any interests adverse to the interests of the proposed class members, and I am, and have been, committed to vigorously prosecuting the case on behalf of the class. I have adhered to my commitment and duty to the class including foregoing the opportunity to settle my individual claims against Defendant Centene early on in this litigation.

6. As a Class Representative, I continuously interacted with my attorneys to discuss the status of the case. I provided relevant oral and documentary information necessary to prosecute this case. By way of example, I searched for and provided relevant documents pertaining to my employment with Defendant Centene and engaged in multiple discussions with my attorneys regarding my employment. Those discussions included, but were not limited to, the

following topics: the policies, practices and specific working conditions at Centene. I have also had numerous discussions with my attorneys regarding the progress of this case and assisted in preparation for and was available during the mediation. Since before the actual filing of the lawsuit to date, I have spent approximately ten (10) to fifteen (15) hours on this case.

7. By agreeing to bring this action, I formally accepted the responsibilities of representing the interests of class members in California and willingly chose to assume risks and potential costs that I alone might have to bear if judgement would have been rendered in favor of Centene.

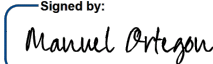
8. As part of the Class Action Settlement, I also signed a general release releasing all claims I have or may have against Defendants, which is far broader than the release by the class members.

9. I also risked the potential stigma of being the named plaintiff in a representative action labor dispute which could affect my further employability in the industry or with any prospective employer who learns of my lawsuit against a former employer.

10. The incentive payment for being a class representative, subject to court approval, is Ten Thousand Dollars (\$10,000). I believe that this amount is fair and reasonable in light of the efforts and time I have put into this matter, and the risks of litigating this class action as a class representative which has resulted in a very favorable outcome to the class members. This incentive payment is also in consideration for executing a general release of all my claims against Defendants.

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

Dated: February 17, 2025

Signed by:

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 Manuel Joseph Ortegon