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Attorneys for Plaintiff INA ROSSON,
on behalf of herself and 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,

v.

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 to the Hon. Lauri A. Damrell, Dept.
22]*

**DECLARATION OF EVE HOWE IN
SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Information:

Date: March 14, 2025

Time: 9:00 AM

Dept.: 22

1 **DECLARATION OF EVE HOWE**

2 I, Eve Howe, declare:

3 1. I am an attorney licensed to practice law in the state of California and have been
4 admitted to practice before this Court. I am an attorney with the law firm Lavi & Ebrahimian, LLP,
5 Counsel for Plaintiff Ina Rosson in this action, and I am an attorney assigned to work on this case.
6 Based on my assignment to this case and familiarity with the file and action in this matter, I have
7 personal knowledge of the matters stated herein and if called and sworn as a witness, I would and
8 could competently testify under oath thereto. I am a member in good standing of all State and
9 Federal District Courts of California.

10 2. This Declaration is submitted in support of Plaintiffs' Motion for Preliminary
11 Approval of the Class Action and PAGA Settlement.

12 **EXPERIENCE OF CLASS COUNSEL:**

13 3. The attorneys at our office are experienced and qualified to evaluate the class claims
14 and to evaluate settlement versus trial on a fully informed basis, and to evaluate the viability of the
15 defenses. The partner of the firm who was lead counsel on this matter, Mr. Joseph Lavi, has been
16 practicing law for over twenty years. Mr. Vincent Granberry, another senior attorney with our firm,
17 graduated from Arizona State University Sandra Day O'Connor College of Law in 2010 and has
18 been practicing law for over thirteen years. Mr. Lavi, Mr. Granberry, myself, and the other
19 members of my firm, have almost exclusively practiced in the area of labor and employment law.
20 Mr. Lavi has handled numerous cases in all aspects of employment and labor law, including state
21 and federal class actions, including wrongful termination, retaliation, and harassment actions. Mr.
22 Granberry has been in practice with the law firm of Lavi & Ebrahimian, LLP since April 2014.
23 Super Lawyers Magazine has selected Mr. Granberry as a Southern California Rising Star in 2016
24 through 2025 in the area of Plaintiff's employment litigation and as one of the Up-and-Coming 100
25 attorneys in the same field in 2018 and again from 2020 - 2024. Mr. Granberry has been involved in
26 numerous cases in all aspects from trial through trial and appeal, including California and Federal
27 class actions, wrongful termination, discrimination, harassment and retaliation cases. Mr. Lavi has

1 tried both labor and employment cases in State and Federal court, and has argued before various
2 Court of Appeals, on employment issues such as validity of Arbitration Agreements, Application of
3 Res Judicata in class action cases as well as other employment issues. Mr. Lavi has also been a
4 panelist and/or speaker for various Employment Law Continuing Legal Education Panels on issues
5 of employment law trials, how to proceed and conduct trials as well as proving and winning
6 punitive damages. Mr. Lavi has also been named a Southern California Super Lawyer in the area of
7 Plaintiff's employment litigation-class action from 2011-2025. Mr. Lavi has been approved as
8 class counsel by both federal and state Courts. Mr. Lavi, Mr. Granberry, myself, and the other
9 attorneys at Lavi & Ebrahimiian who are available to assist us in this case if needed are fully capable
10 of adequately and fairly representing Plaintiffs and the proposed class in this matter. Lavi &
11 Ebrahimiian, LLP, has been appointed Class Counsel in over fifty contested proceedings including
12 the following:

13 a. *Ischak v. Kaiser Foundation Hospitals, Inc.*, Los Angeles Superior Court
14 Case No. BC343535;

15 b. *Santana v. El Pollo Loco, Inc.*, Los Angeles Superior Court Case No.
16 BC369846;

17 c. *Edlin, et al. v. Fuddruckers, Inc.*, United States District Court, Central
18 District of California, Case No. CV-07-3678-ABC;

19 d. *Chavez, et al. vs. CEC Entertainment, Inc. d/b/a Chukee-Cheeses*, Los
20 Angeles Superior Court Case No. BC380996;

21 e. *Bustamante, et al. v. Teamone Employment Specialists*, Los Angeles Superior
22 Court Case No. BC383266;

23 f. *Cervantes, et al. v. Kaiser Foundation Hospitals, Inc.*, Alameda Superior
24 Court Case No. RG 0265835;

25 g. *Seng Savang v. Club One Casino*; Fresno Superior Court Case No.
26 05CECG02189;

27 h. *Norman, et al. v. Movado Retail Group, Inc.*, United States District Court,
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1 Central District of California, Case No. CV08-06691 SVW (PLA);

2 i. *Shand v. G.A.L.A., Inc. dba Giorgio Armani*, Los Angeles Superior Court
3 Case No. BC342588;

4 g. *Solis v. Plycraft Industries, Inc.*, Los Angeles Superior Court Case No.
5 BC374816;

6 h. *Campos v. HWB Carwash, Inc.*, Los Angeles Superior Court Case No.
7 BC378990;

8 i. *Acosta, et al. v. Texwood Industries*, United States District Court, Central
9 District of California, Case No. CV07-3237-DDP (PLAX);

10 h. *Arevalo v. Gruma Corporation*, Los Angeles Superior Court Case No.
11 BC410322;

12 j. *Burrola v. American Promotional Events*, Los Angeles Superior Court Case
13 No. BC412315;

14 k. *Cortez v. Trader Distribution Services*, Los Angeles Superior Court Case No.
15 BC397208;

16 l. *Cueva v. Allied Industries, Inc.*, Los Angeles Superior Court Case No.
17 BC399431;

18 m. *Del Toro v. Petco Animal Supplies, Inc.*, San Diego Superior Court Case No.
19 37-2009-00103626-CU-OE-CTL;

20 n. *Garcia v. Home Cooking, Inc.*, Los Angeles Superior Court Case No.
21 BC451148;

22 o. *Alcantar v. Amerimax Building Products, Inc.*, United States District Court,
23 Central District of California, Case No. CV 10-8916 DDP (CWx);

24 p. *Arancivias v. Clougherty Packaging, LLC dba Farmer John*, Los Angeles
25 Superior Court Case No. BC432406;

26 q. *Barajas v. Menzies Aviation, Inc.*, United States District Court, Central
27 District of California, Case No CV-10-02315-JEM;

1 r. *Barrera v. BHFC Operating, LLC dba Bottega Louie*, Los Angeles Superior
2 Court Case No. BC462603;
3 s. *Camacho v. American Textile Maintenance Co.*, Los Angeles Superior
4 Court Case No. BC452570;
5 t. *Cortes v. Monsanto Company*, Ventura Superior Court Case No. 56-2010-
6 00366952-CU-OE-VTA;
7 u. *Escobar v. Aero-Electric Connector, Inc.*, Los Angeles Superior Court Case
8 No. BC421009;
9 v. *Gomez v. Bacara Resort & Spa*, Santa Barbara Superior Court Case No.
10 1341987;
11 w. *Gonzalez v. Ashley Furniture Industries, Inc.*, Los Angeles Superior Court
12 Case No. BC425708;
13 x. *Gonzalez v. Burrtec Waste Industries, Inc.*, Los Angeles Superior Court Case
14 No. BC436879;
15 y. *Gutierrez v. Visterra Credit Union*, Riverside Superior Court Case No.
16 RIC10020183;
17 z. *Hernandez v. Kruse & Son, Inc.*, Los Angeles Superior Court Case No.
18 BC411849;
19 aa. *Lopez v. Tecno Industrial Engineering*, Los Angeles Superior Court Case No.
20 BC411134;
21 bb. *Lowanga v. Continental Currency Services, Inc.*, Orange County Superior
22 Court Case No. 30-2011-0044011-CU-OE-CXC;
23 cc. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
24 District of California, Case No. CV 10-0415 ODW (FMOx)
25 dd. *Lozada v. Classic Party Rentals, Inc.*, Los Angeles Superior Court Case No.
26 BC443792;
27 ee. *Madrid v. OPI Products, Inc.*, Los Angeles Superior Court Case No.

1 BC451489;

2 ff. *Martinez v. J. Fletcher Creamer & Son, Inc.*, United States District Court
3 Case No. CV 10-0968-PSG-FMOX;

4 gg. *Martinez v. Administaff Companies II, L.P.*, Los Angeles Superior Court Case
5 No. BC425799;

6 hh. *Martinez v. Morgans Hotel Group Management, LLC*, Los Angeles Superior
7 Court Case No. BC446744;

8 jj. *Sanchez v. La Brea Bakery, Inc.*, Los Angeles Superior Court Case No.
9 BC456420;

10 ii. *Montenegro v. Ruggeri Marble and Granite, Inc.*, United States District
11 Court, Central District of California, Case No. CV-10-00711 JFW (PLAx);

12 kk. *Reed v. 99 Cents Only Stores*, Los Angeles Superior Court Case No.
13 BC436793;

14 ll. *Santos v. Noble Management Group-California, LLC*, United States District
15 Court, Central District of California, Case No. CV 10-2594 DSF (VBKx)

16 mm. *Taylor v. U.S. Healthworks Holding Company, Inc.*, Orange County Superior
17 Court Case No. 30-2011-00473505;

18 nn. *Valencia Diaz v. Gene Wheeler Farms, Inc.*, Los Angeles Superior Court
19 Case No. BC436235;

20 oo. *Zad-Behtooie v. Valley Village*, Los Angeles Superior Court Case No.
21 BC451490;

22 pp. *Bell v. Aidells Sausage Company, Inc.*, Alameda Superior Court Case No.
23 RG10523946;

24 qq. *Negrete v. Cenveo, Inc.*, United States District Court, Central District of
25 California, Case No. CV 11-09543 DSF (MRWx);

26 rr. *Bejar v. Exopack-Ontario, Inc.*, Orange County Superior Court Case No. 30-
27 2011-00518396-CU-OE-CXC;

1 ss. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
2 District of California, Case No. CV 10-0415 ODW (FMOx);

3 tt. *Sparks v. Larry Flynt dba Hustler Casino*, Los Angeles Superior Court Case
4 No. BC320172;

5 uu. *Morris v. Chevron Stations, Inc.*, Los Angeles Superior Court Case No.
6 BC361380;

7 vv. *Marino v. BP West Coast Products, LLC*, Los Angeles Superior Court Case
8 No. BC357987.

9 **CONTRIBUTION OF PLAINTIFF AND REASONABLENESS OF THE REQUESTED**

10 **ENHANCEMENT AWARD:**

11 4. It is imperative that Plaintiff Ina Rosson obtain just compensation for the time, effort
12 and risk associated with her fiduciary duties as a class representative and named Plaintiff. I believe
13 that the named Plaintiff performed considerable services on behalf of the Class, since she searched
14 for an attorney, collected and gathered the requested documents and information, wage statements
15 and/or pay stubs, met with us, made herself available each and every single time that we called her
16 in order to answer questions about Defendants' policies and procedures produced in discovery or
17 discussed during conversations with opposing counsel or raised in pleadings filed in this matter.
18 The named Plaintiff provided Class Counsel with factual information needed to prepare the
19 complaints. She collected relevant documents and produced those documents to Class Counsel. She
20 continued to be engaged in continued settlement negotiations that were ultimately required to reach
21 a settlement in this case. I believe that the service award request of \$10,000 to Plaintiff ("Class
22 Representative Service Payment") as a service award is fair and reasonable. As such, the requested
23 payment is warranted for her time and effort when the class members are able to receive significant
24 benefits for her efforts, as well as the fact that she put herself at significant risk for liability for costs
25 in this matter if Defendants were the prevailing party in the litigation as well as for retaliation by
26 other employers who may discover and find it to be unappealing that she was class representative in
27 a lawsuit against Defendants, her former employer. At this point in the approval process, the

1 requested service payment should be approved to allow the Class Members an opportunity to object
2 to the requested Class Representative Service Payment.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing is
4 true and correct. Executed this 14th day of February 2025, at Beverly Hills, California.

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/s/ Eve Howe

Eve Howe

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