

BOYAMIAN LAW, INC.

Michael H. Boyamian, SBN 256107
 Armand R. Kizirian, SBN 293992
 550 North Brand Boulevard, Suite 1500
 Glendale, California 91203
 Telephone: (818) 547-5300
 Facsimile: (818) 547-5678
 Email(s): michael@boyamianlaw.com
 armand@boyamianlaw.com

Joseph Lavi, SBN 209776
 Vincent C. Granberry, SBN 276483
 Jeffrey D. Klein, SBN 297296
 Cassandra A. Castro, SBN 334238

LAVI & EBRAHIMIAN, LLP.

8889 West Olympic Boulevard, Suite 200
 Beverly Hills, California 90211
 Telephone: (866) 470-2189
 Email(s): jlavi@lelawfirm.com
 vgranberry@lelawfirm.com
 jklein@lelawfirm.com
 ccastro@lelawfirm.com

Attorneys for Plaintiffs Kimberly Cordero, Chandra Aexander,
 individually, and on behalf of all others similarly situated

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

Coordinated Proceedings:

HUMANA MARKETPLACE WAGE AND
 HOUR CASES

Included Actions:

Cordero v. Humana MarketPoint, Inc. Alameda
 County Superior Court Case No. 24CV098568

Alexander v. Humana MarketPoint, Inc. Los
 Angeles Superior Court Case No. 25STCV10591

Alexander v. Humana MarketPoint, Inc. Los
 Angeles Superior Court Case No.
 25STCV17572.

CASE NO. 24CV098568

*[Assigned for all purposes to Hon. Carolyn B.
 Kuhl Dept.:12]*

UNLIMITED JURISDICTION

**DECLARATION OF PLAINTIFF
 KIMBERLY CORDERO IN SUPPORT
 OF MOTION FOR PRELIMINARY
 APPROVAL**

Hearing:

Date: September 10, 2026

Time: 10:30 a.m.

Dept: 12

Complaint Filed: November 6, 2024

FAC Filed: June 30, 2025

DECLARATION OF PLAINTIFF KIMBERLY CORDERO

I, Kimberly Cordero, hereby declare and state as follows:

1. I am one of the named Plaintiffs in this lawsuit against Defendants Humana Inc., Humana At Home, Inc. Humana At Home1, Inc., and Humana Marketpoint, Inc. (“Defendants”) and I submit this declaration in support of Plaintiffs’ Unopposed Motion for Order Provisionally Certifying Settlement Class and Preliminarily Approving Class Action Settlement. I am a competent adult and was employed by Defendant as a runner during the relevant time period. I have personal knowledge of the facts set forth herein, and if called as a witness to testify to them, I could and would do so competently.

2. I am the proposed class representative in this action. I declare that I have no interests that are adverse to members of this class and that I am similarly situated to the other members of the class by common interests. My claims are typical to the claims of the class, I possess the same interests as other members of this class, and I have suffered the same injury as the other members of this class. I am willing assist the lawyers prosecuting this class action by performing any task they ask of me.

3. I commenced my employment with Defendants in or around February of 2022 and separated from Defendants in or around November of 2023. I primarily worked from home as a Direct Marketing Sales Agents. My primary duties as a Direct Marketing Sales agent were to sell insurance to Defendants’ customers, perform maintenance activities on policies I had sold to Defendants’ customers, respond to customers’ inquiries about policy terms and features, and deal with general branding/marketing related activities for Defendant. Throughout my tenure with Defendant, I was misclassified as salaried employee.

4. I was required to meet sales goals and quotas. For inbound calls I was required to make 150-200 sales a week. For outbound calls I was required to make 78 sales a week.

5. Prior to commencing this lawsuit, I contacted my current attorney to question Defendant’s employment practices at Humana.. I accepted the opportunity to act as a lead representative on behalf of other employees of Defendants in this action, whom I believed were

being subjected to labor law violations. I also was unhappy about the circumstances of my separation from Defendant's employment. I believe I was terminated for unlawful reasons. I understood from my discussions with my attorneys that what I know and felt is entirely different from what I can prove in a court of law. Although presented with the opportunity, I did not want to pursue any case on an individual basis and instead did so as a representative action so that I could help my fellow co-workers recover for what I believed were improper practices.

6. Specifically, I questioned Defendants' policies or practices of failing to pay wages for all hours worked by employees including failing to pay premium wages to employees who were denied rest breaks and meal periods; failing to pay overtime compensation; failing to reimburse necessary business expenses; and failing to issue its employees accurately itemized wage statements. I felt as though I was required to clock out for meal breaks or acknowledge taking a rest breaks when the breaks were superficial as we were too pressed for time to take one.

7. I felt as though that my experiences interacting with my supervisors were not right and did not give me a sense of satisfaction that Defendants were ensuring that Direct Marketing Sales Agents, like myself, were being paid for all the hours, that we worked or that we were being given the necessary breaks. Through many discussions with my lawyers, and through my own research on the Internet, I learned these may be illegal practices and that employees, like myself, might have recourse for them.¹

8. By bringing this lawsuit, and throughout its course, I have put the interests of other employees ahead of my own. I gave a general release for individual claims which I had not pursued, but I also knew that I could also be responsible for paying Defendant's attorneys' fees and costs if it did not. My goal in bringing this lawsuit was to obtain a recovery on behalf of all employees who were subjected to the same practices, and even more importantly, to put an end to what I believed were illegal practices on the part of Defendants. I believe I have achieved both through this lawsuit and settlement.

¹ Although the preservation of my attorney-client privilege requires that I refrain from revealing the specifics of my communications with my attorneys, I understand that the privilege is not waived by stating generally the matters that I have discussed with my attorneys.

9. I am very happy about the results of this litigation. I am satisfied that Defendants are compensating other Class Members for unpaid wages and Aggrieved Employees for penalties that I believe we are due. In addition, I reviewed the settlement agreement to ensure it served the best interests of the class.

10. At the onset of this case, I spent time over the phone with my attorney explaining what I understood to be the policies and procedures of Defendant and how they were applied to Sales Employees such as myself. While I did not attend the mediation in person, I was kept informed of the status through multiple phone calls and text messages in an effort to assist my lawyers with information that helped bring about the settlement. I kept actively involved with the status of this case throughout the litigation process, tracking the status of the case and participating as much as possible.

11. While I have not maintained detailed time records of my activities in connection with this litigation, I believe that I have spent a total of approximately 25 hours assisting my attorneys with the preparation of this case and doing work and investigation of the facts independent from my attorneys both before and during this case.

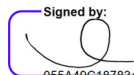
12. Before this litigation commenced, and throughout its course, I also spent approximately 5 hours gathering, organizing, and reviewing documents and information for this lawsuit. I sifted through many of my own documents and reviewed information produced by Defendants as part of this litigation.

13. Taking the initiative with this case was very risky for me, both professionally and financially. I put principal first and took a tremendous risk by filing this lawsuit against my former employer at the time. I am quite confident that pursuing this lawsuit will result in future reputational harm to me. There is a stigma associated with suing one's former employer. I suspect I may be adversely affected when it comes to obtaining future employment, as employers who discover that I sued Defendant in a representative action will likely avoid hiring me. It is also true that prospective employers in this computer age "Google" and/or do extensive background checks and have access to court databases to see if applicants have ever filed a lawsuit or ever have been sued.

14. My interests in bringing this lawsuit are the same as those of all other employees similarly situated to me. I want Defendant to change its labor practices going forward and to fully compensate current and former employees. I declare, under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

15. Lastly, I have not entered into any undisclosed agreements nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever the amount the Court awards as an enhancement payment, as well as my share of the settlement fund as a Class Member. My wrongful termination claims are wholly unique to me and have not been leveraged against the Class claims in any way. These unique claims are being separately negotiated and resolved through individual settlement agreements and releases, independent of the Class claims. Therefore, I remain fully adequate to represent the Settlement Class.

Executed on this 6th day of June 2026 at Riverside, California.

Signed by:

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 Kimberly Cordero