

Joseph Lavi, Esq. (SBN 209776)
Vincent C. Granberry, Esq. (SBN 276483)
Jeffrey D. Klein, Esq. (SBN 297296)
Daniel U. Frydman, Esq. (SBN 330067)
LAVI & EBRAHIMIAN, LLP
8889 W. Olympic Blvd., Suite 200
Beverly Hills, California 90211
Telephone: (310) 432-0000
Facsimile: (310) 432-0001
Email: jlavi@lelawfirm.com
vgranberry@lelawfirm.com
jklein@lelawfirm.com
dfrydman@lelawfirm.com

Attorneys for Plaintiff CHANDRA ALEXANDER,
on behalf of herself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT

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]*

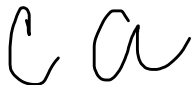
**DECLARATION OF CHANDRA
ALEXANDER IN SUPPORT OF
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing:
Date: September 10, 2026
Time: 10:30 a.m.
Dept: 12

Judge: Hon. Carolyn B. Kuhl

Date Filed: November 6, 2024
FAC Filed: June 30, 2025

**DECLARATION OF CHANDRA ALEXANDER IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**



DECLARATION OF CHANDRA ALEXANDER

I, Chandra Alexander, declare,

1. I am over the age of 18 and am a Plaintiff and a class representative in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. I worked for Defendant HUMANA MARKETPOINT, INC. ("Defendant"), as a non-exempt employee from approximately June of 2024, through February of 2025.

3. I understand this is a class action lawsuit where I represent the interests of all hourly, non-exempt employees of Defendant who worked for Defendant in California during the Class Period.

4. I have actively participated in this lawsuit by searching for an attorney since approximately March of 2025, meeting with my attorneys in this case for evaluation of my case, to retain them, and to discuss policies and practices of Defendant. I also spent time searching for policies and other documents that were given to me during my employment. I responded to all of my attorneys' telephone inquiries and met with them to provide information about my employment and my experiences and my understanding about the operations of Defendant. During the mediation session, I made myself available and provided any information needed from me. Once the settlement agreement was finalized, I spent time reviewing and discussing the settlement agreement with my attorneys before signing it. Since I first began searching for attorneys regarding my employment with Defendant, I estimate that I have spent approximately 45-50 hours on this lawsuit which includes time spent searching for attorneys, searching for documents and policies to help the lawsuit, providing those documents and information to my attorneys, responding to my attorneys telephone calls and requests to meet them to provide them with more information about different aspects of my employment and experiences, speaking with my attorneys to evaluate my case and to provide information and sign documents, making myself available during the mediation session, reviewing the settlement agreements, and reviewing and providing information for this declaration.

5. I also understand that if there was a trial, I would need to be present at trial and follow any other request from the court. I have tried to support the case by responding to my attorneys when



1 I was needed and providing them with any requested information. I will continue to respond to any
2 requests from my attorneys or the court. I know that I took a risk by filing this lawsuit because, if I
3 lost, then I would have been responsible for the costs of the case. I also would have lost income if I
4 had to take work time off to come to trial or any other hearings. I also knew future employers may
5 learn of the lawsuit and view me negatively because I hired an attorney and sued my employer when
6 I thought my rights were violated.

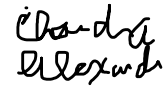
7 6. I understand that the settlement we have reached in this case must be finally approved
8 by the Court and I must protect the interests of any and all hourly, non-exempt employees of
9 Defendant who worked for Defendant in California during the Class Period.

10 7. I do not have any interest that is adverse to the interests of the other class members.

11 8. I believe that, based on my contributions to this lawsuit, my active engagement
12 throughout this process, the risks that I have undertaken on behalf of the class, and the successful
13 result for the class members, the Class Representative Service Award is fair and reasonable.

14 I declare under penalty of perjury, under the laws of the State of California, that the foregoing
15 is true and correct. Executed this 29th day of June 2026, in Beverly Hills, California.

16
17 Dated: June 29, 2026



Chandra Alexander