

1 Douglas P. Dehler (admitted Pro Hac Vice)
 2 Gregory W. Lyons (admitted Pro Hac Vice)
 3 O'NEIL, CANNON, HOLLMAN,
 4 DEJONG & LAING S.C.
 5 111 East Wisconsin Avenue,
 6 Suite 1400
 7 Milwaukee, Wisconsin 53202
 8 Telephone: (414) 276-5000
 9 Facsimile: (414) 276-6581
 10 E-Mail: doug.dehler@wilaw.com
 11 E-Mail: greg.lyons@wilaw.com

12 Gretchen M. Nelson (SBN 112566)
 13 Gabriel S. Barenfeld (SBN 224146)
 14 NELSON & FRAENKEL LLP
 15 601 S. Figueroa Street, Suite 2050
 16 Los Angeles, CA 90017
 17 Telephone: (844) 622-6469
 18 Facsimile: (213) 622-6019
 19 E-Mail: gnelson@nflawfirm.com
 20 E-Mail: gbarenfeld@nflawfirm.com

21 *Attorneys for Plaintiff Manuel I. Figueroa, M.D.,*
 22 *and the Proposed Class*

23 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
 24 **COUNTY OF LOS ANGELES**

25 MANUEL I. FIGUEROA, M.D., for and on
 26 behalf of himself and other persons similarly
 27 situated,

28 Plaintiff,

vs.

MOLINA HEALTHCARE OF
 CALIFORNIA, INC.,

Defendant.

Case No. BC645344
 (Hon. Kenneth R. Freeman, Dept. 14)

CLASS ACTION

**DECLARATION OF MANUEL I.
 FIGUEROA, M.D. IN SUPPORT OF
 MOTION FOR APPROVAL OF
 ATTORNEYS' FEES AND INCENTIVE
 AWARD FOR CLASS
 REPRESENTATIVE**

Date: November 9, 2023
 Time: 10:30 a.m.
 Place: Dept. 14, Spring Street Courthouse

Action filed: December 30, 2016
 Trial Date: Not set

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I, Manuel I. Figueroa, M.D., do hereby declare as follows:


1. I am the Plaintiff in this class action case. I make this declaration based on my personal knowledge.

2. I brought this lawsuit for the benefit of my fellow class members despite the concern that doing so could negatively affect my practice and despite the possibility that being the lead plaintiff could bring me unwanted, negative attention.

3. Throughout the pendency of this case, my staff and I have devoted significant time and effort to help class counsel successfully prosecute this case, including, without limitation, by meeting with class counsel to discuss the basis for this case; by providing documents and information necessary to support the filing of this lawsuit; by reviewing and providing feedback on the pleadings in this matter; by reviewing and providing information about my practice's claims and encounters patients covered by Molina plans; by reviewing and analyzing documents produced by Molina in this litigation; and by participating in the full-day mediation that took place in connection with this matter. I have undertaken these tasks while keeping the best interests of the class in mind and sought to do what is in the best interests of all class members.

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

Executed this 23 day of December, 2022, at Los Angeles, California.

By  _____
Manuel I. Figueroa, M.D.

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189

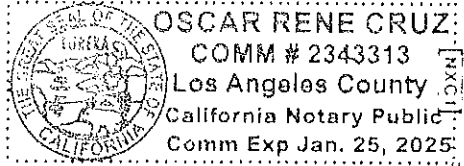
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Los Angeles)
On 12-23-2022 before me, Oscar Rene Cruz, Notary Public
Date Here Insert Name and Title of the Officer
personally appeared Mandel I. figueroa
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Oscar R. Cruz
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document
Title or Type of Document: Declaration is a motion for approval of attorneys' fees and incentive award for class rep Document Date: _____
Number of Pages: 2 Signer(s) Other Than Named Above: None

Capacity(ies) Claimed by Signer(s)
Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____
Signer Is Representing: _____

Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____
Signer Is Representing: _____

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2 **PROOF OF SERVICE**

3 I, the undersigned, declare:

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18
5 and not a party to the within action; my business address is 601 So. Figueroa St., Suite 2050, Los
6 Angeles, California 90017.

7 On December 23, 2022, I served the foregoing documents described as follows:

8 **DECLARATION OF MANUEL I. FIGUEROA, M.D. IN SUPPORT OF MOTION**
9 **FOR APPROVAL OF ATTORNEYS' FEES AND INCENTIVE AWARD FOR**
10 **CLASS REPRESENTATIVE**

11 on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes
12 addressed as stated on the attached service list, and in the manner stated below:

13 X **BY ELECTRONIC SERVICE**

14 served by e-mail through Case Anywhere: I attached a true and correct copy of the above-entitled
15 document(s) to Case Anywhere by electronic transfer for service on all counsel of record by
16 electronic service pursuant to the Order Authorizing Electronic Service. This service complies
17 with C.C.P. §1010.6.

18 **BY MAIL:**

19 I am "readily familiar" with the firm's practice of collection and processing
20 correspondence for mailing. Under that practice, it would be deposited with the U.S.
21 Postal Service on that same day with postage thereon fully prepaid at Los Angeles,
22 California in the ordinary course of business. I am aware that on motion of the party
23 served, service is presumed invalid if postal cancellation date or postage meter date is
24 more than one day after date of deposit for mailing in affidavit.

25 **BY PERSONAL SERVICE:**

26 I caused to be delivered such envelope by hand to the offices of the addressee.

27 **BY FEDERAL EXPRESS OR OVERNIGHT CARRIER**

28 X (State) I declare under penalty of perjury under the laws of the State of California that
the above is true and correct.

Executed on December 23, 2022, at Los Angeles, California.

26 KARINA TORRES
27 (Type or Print Name)

Karina Torres
(Signature)

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SERVICE LIST
Figueroa, M.D. v. Molina Healthcare of California, Inc., et al.
Case No. BC645344

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|---|--|
| Douglas P. Dehler Gregory W. Lyons O'NEIL, CANNON, HOLLMAN, et al. 111 East Wisconsin Ave., Suite 1400 Milwaukee, Wisconsin 53202-4870 Phone: (414) 276- 5000 Fax: (414)276- 6581 doug.dehler@wilaw.com greg.lyons@wilaw.com | Attorneys for Plaintiffs Manuel I. Figueroa, M.D., and the Proposed Class |
| Quyen L. Ta KING & SPALDING LLP 101 Second Street, Suite 1000 San Francisco, California 94105 Telephone: (415) 318-1227 Facsimile: (415) 318-1300 Email: qta@kslaw.com | Attorneys for Defendant Molina Healthcare of California, Inc |
| Craig H. Bessenger KING & SPALDING LLP 633 West Fifth Street, Suite 1600 Los Angeles, California 90071 Telephone: (213) 443-4355 Facsimile: (213) 443-4310 Email: cbessenger@kslaw.com | Attorneys for Defendant Molina Healthcare of California, Inc |