

# **DECLARATION**

Hon. Salvador Mendoza, Jr.

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17 UNITED STATES DISTRICT COURT  
18 EASTERN DISTRICT OF WASHINGTON  
19 AT YAKIMA

20 CYNTHIA HARVEY and STEVEN A.  
21 MILMAN, individually and on behalf  
22 of all others similarly situated,

23 Plaintiffs,

24 v.

25 CENTENE CORPORATION,  
26 COORDINATED CARE  
CORPORATION, and SUPERIOR  
HEALTHPLAN, INC.,

Defendants.

No. 2:18-cv-00012-SMJ

DECLARATION OF TRICIA  
DINKELMAN

DECLARATION OF TRICIA  
DINKELMAN - 1  
(Case No. 2:28-cv-00012-SMJ)

95756048.1 0046830-00002

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I, Tricia Dinkelman, hereby testify and declare as follows:

1. I am over the age of eighteen and competent to testify to and have personal knowledge of the matters contained herein. If called as a witness I could and would testify competently to the following:

2. I am employed by Centene Management Company, LLC as its Vice President of Tax. Through my work in this position, I have gained personal knowledge of the matters contained herein relating to the relationships between Centene Corporation and its subsidiaries.

3. Centene Corporation is a publicly traded corporation incorporated in Delaware with its principal place of business in St. Louis, Missouri.

4. Centene Corporation is a holding company. It does not sell insurance in Washington or in any other state.

5. Centene Corporation is not licensed to do business or to sell insurance in Washington, and it does not do so.

6. Centene Corporation does not have any offices, employees or bank accounts in Washington.

1           7.     Centene Corporation has not designated an agent for service of  
2 process in Washington.

3  
4           8.     Centene Corporation is not licensed to sell insurance in Texas, and it  
5 does not do so.

6           9.     Centene Corporation does not have any offices, employees or bank  
7 accounts in Texas.

8  
9           10.    Centene Corporation is governed by a nine-member board of  
10 directors. Eight of the board's members are independent directors.

11  
12          11.    Centene Corporations' directors receive high-level information  
13 regarding the financial performance of Centene Corporation's subsidiaries.

14          12.    Centene Corporation's directors are not responsible for managing the  
15 day-to-day operations of Centene Corporation's subsidiaries.

16  
17          13.    None of the persons who would have been involved in the facts  
18 alleged in this case are Centene Corporation employees, as Centene Corporation is  
19 only a holding company.

20  
21          14.    Coordinated Care Corporation is an Indiana Corporation  
22 headquartered in Indianapolis, Indiana.

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24          15.    Coordinated Care Corporation is a wholly-owned subsidiary of  
25 Centene Corporation.

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DECLARATION OF TRICIA  
DINKELMAN - 3  
(Case No. 2:28-cv-00012-SMJ)

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1           16. Coordinated Care Corporation and Centene Corporation are distinct  
2 corporate entities.

3  
4           17. Coordinated Care Corporation is licensed to do business and sell  
5 insurance in Washington and Indiana.

6           18. Coordinated Care Corporation is governed by a nine-member board of  
7 directors, none of whose members are also directors of Centene Corporation.

8  
9           19. Coordinated Care Corporation's board of directors meets regularly  
10 and keeps its own minutes and agendas.

11  
12           20. Coordinated Care Corporation maintains separate accounts and meets  
13 all reserve requirements set by the Washington Office of the Insurance  
14 Commissioner.

15  
16           21. Superior HealthPlan, Inc. is a Texas Corporation headquartered in  
17 Austin, Texas.

18           22. Superior HealthPlan, Inc. is a wholly-owned subsidiary of Centene  
19 Corporation.

20  
21           23. Superior HealthPlan, Inc. and Centene Corporation are distinct  
22 corporate entities.

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24           24. Superior HealthPlan, Inc. is licensed to do business and sell insurance  
25 in Texas and only in Texas.

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DECLARATION OF TRICIA  
DINKELMAN - 4  
(Case No. 2:28-cv-00012-SMJ)

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1 25. Superior HealthPlan, Inc. does not have any offices, employees or  
2 bank accounts in Washington.

3  
4 26. Superior HealthPlan, Inc. has not designated an agent for service of  
5 process in Washington.

6 27. Superior HealthPlan, Inc. is governed by a nine-member board of  
7 directors. Only one of those members is also a director Centene Corporation.

8  
9 28. Superior HealthPlan, Inc.'s board of directors meets regularly and  
10 keeps its own minutes and agendas.

11  
12 29. Superior HealthPlan, Inc. maintains separate accounts and is  
13 adequately capitalized to conduct its insurance business.

14  
15  
16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed on 9 March, 2018.

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\_\_\_\_\_  
Tricia Dinkelman

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DECLARATION OF TRICIA  
DINKELMAN - 5  
(Case No. 2:28-cv-00012-SMJ)

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