

**CHIMICLES SCHWARTZ KRINER
& DONALDSON-SMITH LLP**

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Counsel for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

RACHEL CONDRY, JANCE HOY, CHRISTINE
ENDICOTT, LAURA BISHOP, FELICITY
BARBER, and RACHEL CARROLL on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

UnitedHealth Group Inc.; UnitedHealthcare, Inc.;
UnitedHealthcare Insurance Company;
UnitedHealthcare Services, Inc.; and UMR, Inc.,

Defendants.

Case No.: 3:17-cv-00183-VC

**DECLARATION OF KIMBERLY
DONALDSON-SMITH IN SUPPORT
OF PLAINTIFFS' REPLY IN
SUPPORT OF PLAINTIFFS'
MOTION TO GRANT REQUEST FOR
INTERVENTION AND FOR LEAVE
TO FILE THIRD AMENDED
COMPLAINT**

**Date: November 21, 2019
Time: 10:00 am
Place: Courtroom 4**

Honorable Vince G. Chhabria

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I, Kimberly Donaldson-Smith, hereby declare and state as follows:

1. I am a Partner of the firm of Chimicles Schwartz Kriner & Donaldson-Smith LLP, counsel for Plaintiffs, Rachel Condry, Jance Hoy, Christine Endicott, Laura Bishop, Felicity Barber, and Rachel Carroll, and Proposed Intervenor, Teresa Harris.

2. I have personal knowledge of the facts set forth below, and if called as a witness, I could and would competently testify to them.

3. Attached hereto as Exhibit A is a true and correct copy of UHC_189910-189943.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 30, 2019

By: /s/ Kimberly Donaldson-Smith
Kimberly Donaldson-Smith
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