

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

CONNIE HOWARD, YADIRA YAZMIN
HERNANDEZ, and DEBORAH
REYNOLDS, on behalf of themselves and
all other persons similarly situated,
Plaintiffs,

v.

LABORATORY CORPORATION OF
AMERICA and LABORATORY
CORPORATION OF AMERICA
HOLDINGS,
Defendants.

Case No. 1:23-cv-758-WO-JEP

**DECLARATION OF HUNTER
HUGHES IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

I, Hunter Hughes, make the following declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am a mediator at Hunter ADR, a leading mediation practice centered in San Diego, California. With the express consent of all parties, I submit this declaration in support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement.

2. I have mediated substantially more than a thousand cases over my career, including data privacy class actions.

3. On two different occasions—September 5, 2025 (in person) and September 26, 2025 (by Zoom)—I mediated the above-captioned case.

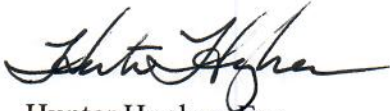
4. In advance of the September 5, 2025 mediation, both parties submitted letter briefs outlining their respective positions. In my view, both sides had sufficient information to negotiate in an informed way.

5. Settlement negotiations were challenging. The parties reached an agreement in principle only after multiple rounds of arm's length negotiation. Negotiations continued even after the two mediation sessions over which I presided. As I understand it, the parties took an additional

three to four months to agree on a term sheet memorializing a settlement in principle.

6. Based on my experience as a mediator, I have no basis to conclude that the settlement is not a fair, reasonable, and adequate resolution of litigation that would otherwise be expensive, time-consuming, and uncertain.

Dated: 3/30/2026



Hunter Hughes, Esq.