

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

The Estates of Gene B. Lokken, et al.,

Plaintiffs,

vs.

UnitedHealth Group, Inc., et al.,

Defendants.

Civil File No. 23-cv-03514-JRT/SGE

PLAINTIFFS' UNOPPOSED MOTION FOR SUBSTITUTION OF PARTIES

Plaintiffs move this Court, pursuant to Fed. R. Civ. P. 25(A), to substitute Plaintiff William Hull with Barbara Hull and Lora Powell, co-executors of the Estate of William Hull. This Motion is based upon the Memorandum of Law and upon all the files, records, and proceedings in this matter.

Dated: July 6, 2026

Respectfully submitted,

/s/ David W. Asp

Karen Hanson Riebel (#0219770)

David W. Asp (#0344850)

Simeon A. Morbey (#0391338)

Derek C. Waller (#0401120)

Emma Ritter Gordon (#0404000)

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Ryan J. Clarkson (CA #257074)

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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

The Estate of Gene B. Lokken, et al.,

Plaintiffs,

vs.

UnitedHealth Group, Inc., et al.,

Defendants.

Civil File No. 23-cv-03514-JRT/SGE

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION FOR
SUBSTITUTION OF PARTY**

Plaintiffs bring this Motion, pursuant to Fed. R. Civ. P. 25(a), to substitute Barbara B. Hull and Lora K. Powell, co-executors of the Estate of William Hull, for the deceased Plaintiff William Hull.

1. Plaintiff William Hull ("Plaintiff") filed the First Amended Complaint (ECF No. 34) against Defendants on April 5, 2024.

2. On February 15, 2026, Plaintiff's Counsel discovered that Plaintiff passed away on February 13, 2026, in Lake Forest, California. *See* Declaration of Barbara Hull ("Hull Decl.") ¶ 2.

3. Plaintiff left a duly executed and witnessed Last Will and Testament dated March 27, 2023, naming his wife, Barbara B. Hull, and daughter, Lora K. Powell, as co-executors of his estate. Hull Decl. ¶ 5.

4. Plaintiff was domiciled in California at the time of his death. Hull Decl. ¶ 3. Under California law, Plaintiff's filed claims are not extinguished upon his death. The

California Code of Civil Procedure provides that “a cause of action for or against a person is not lost by reason of the person’s death, but survives subject to the applicable limitations period.” Cal. Code Civ. P. § 377.20(a).

5. California law allows the decedent’s personal representative to continue this action on the decedent’s behalf. Cal. Code Civ. P. § 377.31.

6. Mrs. Barbara Hull has executed and filed a declaration, under penalty of perjury, testifying to these facts. *See* Hull Decl. ¶¶ 1–7.

7. A certified copy of Plaintiff’s Certificate of Death is attached to Mrs. Hull’s declaration. *See* Hull Decl. Exh. 1.

8. Barbara B. Hull and Lora K. Powell, as Executors of the Estate of William Hull, respectfully request that the Court enter an order permitting them to be substituted as Plaintiff in this matter and continue the pending claims on behalf of William Hull.

Dated: July 6, 2026

Respectfully submitted,

/s/ David W. Asp

Karen Hanson Riebel (#0219770)

David W. Asp (#0344850)

Simeon A. Morbey (#0391338)

Derek C. Waller (#0401120)

Emma Ritter Gordon (#0404000)

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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

THE ESTATE OF GENE B. LOKKEN,
GLENNETTE KELL, DARLENE
BUCKNER, CAROL CLEMENS, FRANK
CHESTER PERRY, THE ESTATE OF
JACKIE MARTIN, JOHN J. WILLIAMS,
AS TRUSTEE OF THE MILES AND
CAROLYN WILLIAMS 1993 FAMILY
TRUST, and WILLIAM HULL,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC.,
UNITED HEALTHCARE, INC.,
NAVIHEALTH, INC. and Does 1-50,
inclusive,

Defendants.

Civil File No. 23-cv-03514-JRT/SGE

DECLARATION OF BARBARA B. HULL

I, Barbara B. Hull, declare as follows:

1. I am over the age of 18 years. I have personal knowledge of the facts contained in this declaration, and if called as a witness, I could and would testify competently to the truth of the facts stated herein.
2. I am the wife of William Hull, who died on February 13, 2026, in Lake Forest, California.
3. At the time of Mr. Hull's death, he was domiciled in Lake Forest, California.
4. No proceeding is now pending in California for administration of Mr. Hull's estate.

5. Mr. Hull left a duly executed and witnessed Last Will and Testament dated March 27, 2023, naming me and our daughter Lora K. Powell as executors of his will. The powers granted to us as executors of Mr. Hull's will include the authority: "to identify, gather, value, secure, manage and distribute assets, to maintain records, to settle and wind up business affairs, to pay just debts, to file necessary tax returns, to redirect mail, to cancel services, to establish trusts, and to carry out wishes as set forth in this Will."
6. Lora K. Powell and I are Mr. Hull's successors in interest as defined in Section 377.11 of the California Code of Civil Procedure, and we succeed Mr. Hull's interest in this action.
7. No other persons have a superior right to be substituted for Mr. Hull in the pending action or proceeding.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 27, 2026, in Lake Forest, California.

Barbara B. Hull
Barbara B. Hull (Mar 27, 2026 16:37:37 PDT)

Barbara B. Hull

2026.03.23 Declaration of Barbara Hull

Final Audit Report

2026-03-27

Created:	2026-03-27
By:	Jolen Medwid (jmedwid@clarksonlawfirm.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAACIp-PrSolUuYMEDVtfDM9DmDmUlczZ3

"2026.03.23 Declaration of Barbara Hull" History

-  Document created by Jolen Medwid (jmedwid@clarksonlawfirm.com)
2026-03-27 - 11:27:37 PM GMT
-  Document emailed to Barbara B. Hull (bbhullslp@cox.net) for signature
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-  Email viewed by Barbara B. Hull (bbhullslp@cox.net)
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-  Document e-signed by Barbara B. Hull (bbhullslp@cox.net)
Signature Date: 2026-03-27 - 11:37:37 PM GMT - Time Source: server
-  Agreement completed.
2026-03-27 - 11:37:37 PM GMT

EXHIBIT

1

STATE OF CALIFORNIA									
CERTIFICATION OF VITAL RECORD									
COUNTY OF ORANGE									
HEALTH CARE AGENCY									
3052026033232		CERTIFICATE OF DEATH				3202630002653			
STATE FILE NUMBER									
LOCAL REGISTRATION NUMBER									
1. NAME OF DECEDENT - FIRST (Given)									
WILLIAM									
2. MIDDLE									
M									
3. LAST (Family)									
HULL									
AKA, ALSO KNOWN AS - Include full AKA (FIRST, MIDDLE, LAST)									
WILLIAM MARION HULL									
4. DATE OF BIRTH mm/dd/yyyy									
[REDACTED]									
5. AGE Yrs.									
87									
6. SEX									
M									
7. DATE OF DEATH mm/dd/yyyy									
02/13/2026									
8. HOUR 24-hour									
0951									
9. BIRTH STATE/FOREIGN COUNTRY									
MO									
10. SOCIAL SECURITY NUMBER									
[REDACTED]									
11. EVER IN U.S. ARMED FORCES									
YES ☐ NO ☒ UNK ☐									
12. MARITAL STATUS/PROF. at Time of Death									
MARRIED									
13. DECEDENT'S RACE - Up to 3 races may be listed (see worksheet on back)									
WHITE									
14. EDUCATION - Highest Level/Degree									
MASTER'S									
15. WAS DECEDENT HISPANIC/LATINO/SPANISH? (If yes, see worksheet on back)									
YES ☐ NO ☒									
16. USUAL OCCUPATION - Type of work for most of life. DO NOT USE RETIRED									
INDUSTRIAL ENGINEER									
17. KIND OF BUSINESS OR INDUSTRY (e.g., grocery store, road construction, employment agency, etc.)									
AEROSPACE									
18. YEARS IN OCCUPATION									
47									
19. DECEDENT'S RESIDENCE (Street and number, or location)									
24961 CALLE VECINAD									
20. CITY									
LAKE FOREST									
21. COUNTY/PROVINCE									
ORANGE									
22. ZIP CODE									
92630									
23. YEARS IN COUNTY									
39									
24. STATE/FOREIGN COUNTRY									
CA									
25. INFORMANT'S NAME, RELATIONSHIP									
BARBARA BAKER HULL, WIFE									
26. INFORMANT'S MAILING ADDRESS (Street and number, or rural route number, city or town, state and zip)									
24961 CALLE VECINAD, LAKE FOREST, CA 92630									
27. NAME OF SURVIVING SPOUSE/SPOUSE-PROF									
BARBARA									
28. MIDDLE									
BAKER									
29. LAST (BIRTH NAME)									
HULL									
30. BIRTH STATE									
IA									
31. NAME OF PARENT-1/FIRST									
WARREN									
32. MIDDLE									
HULL									
33. LAST (BIRTH NAME)									
SULLIVAN									
34. BIRTH STATE									
MO									
35. NAME OF PARENT-2/FIRST									
IVA									
36. MIDDLE									
SULLIVAN									
37. LAST (BIRTH NAME)									
SULLIVAN									
38. BIRTH STATE									
MO									
39. DEPOSITION DATE mm/dd/yyyy									
02/19/2026									
40. PLACE OF FINAL DISPOSITION									
RES BARBARA BAKER HULL									
24961 CALLE VECINAD, LAKE FOREST, CA 92630									
41. TYPE OF DISPOSITION									
CREMATE/RESIDENCE									
42. SIGNATURE OF EMBALMER									
NOT EMBALMED									
43. LICENSE NUMBER									
-									
44. NAME OF FUNERAL ESTABLISHMENT									
PACIFIC CREMATION SERVICES									
45. LICENSE NUMBER									
FD2241									
46. SIGNATURE OF LOCAL REGISTRAR									
REGINA CHINSIO-KWONG, DO									
47. DATE mm/dd/yyyy									
02/19/2026									
48. PLACE OF DEATH									
DECEDENT'S RESIDENCE									
104. COUNTY									
ORANGE									
105. FACILITY ADDRESS OR LOCATION WHERE FOUND (Street and number, or location)									
24961 CALLE VECINAD									
106. CITY									
LAKE FOREST									
107. CAUSE OF DEATH									
Enter the chain of events - diseases, injuries, or complications - that directly caused death. DO NOT enter terminal events such as cardiac arrest, respiratory arrest, or venous thromboembolism without showing the etiology. DO NOT ABBREVIATE.									
IMMEDIATE CAUSE (Final disease or condition resulting in death)									
(A) GUNSHOT WOUND OF THE HEAD									
108. DEATH REPORTED TO CORONER									
YES ☒ NO ☐									
109. TIME REPORTED TO CORONER									
MINS 26-00742-LD									
110. BIOPSY PERFORMED?									
YES ☐ NO ☒									
111. AUTOPSY PERFORMED?									
YES ☐ NO ☒									
112. USED IN DETERMINING CAUSE?									
YES ☐ NO ☐									
113. OTHER SIGNIFICANT CONDITIONS CONTRIBUTING TO DEATH BUT NOT RESULTING IN THE UNDERLYING CAUSE GIVEN IN 107									
NONE									
114. WAS OPERATION PERFORMED FOR ANY CONDITION IN ITEM 107 OR 113? (If yes, list type of operation and date)									
NO									
115. SIGNATURE AND TITLE OF CERTIFIER									
[REDACTED]									
116. LICENSE NUMBER									
[REDACTED]									
117. DATE mm/dd/yyyy									
[REDACTED]									
118. TYPE ATTENDING PHYSICIAN'S NAME, MAILING ADDRESS, ZIP CODE									
[REDACTED]									
119. I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSE STATED									
MANNER OF DEATH									
Natural ☐ Accident ☐ Homicide ☐ Suicide ☒ Hanging ☐ Poisoning ☐ Could not be determined ☐									
120. INJURED AT WORK?									
YES ☐ NO ☒ UNK ☐									
121. INJURY DATE mm/dd/yyyy									
02/13/2026									
122. HOUR 24-hour									
UNK									
123. PLACE OF INJURY (e.g., home, construction site, wooded area, etc.)									
HOME									
124. DESCRIBE HOW INJURY OCCURRED (Events which resulted in injury)									
SELF-INFLICTED HANDGUN WOUND									
125. LOCATION OF INJURY (Street and number, or location, and city, and zip)									
24961 CALLE VECINAD, LAKE FOREST, CA 92630									
126. SIGNATURE OF CORONER / DEPUTY CORONER									
ERICA CHAVEZ									
127. DATE mm/dd/yyyy									
02/17/2026									
128. TYPE NAME, TITLE OF CORONER / DEPUTY CORONER									
ERICA CHAVEZ, DEP CORONER									
STATE REGISTRAR									
A B C D E									
FAX AUTH#									
CENSUS TRACT									

CERTIFIED COPY OF VITAL RECORDS

005713997

STATE OF CALIFORNIA
COUNTY OF ORANGE

SS

DATE ISSUED

FEBRUARY 20, 2026

This is a true and exact reproduction of the document officially
registered and placed on file in the office of the VITAL RECORDS
SECTION, ORANGE COUNTY HEALTH CARE AGENCY.REGINA CHINSIO-KWONG, DO
HEALTH OFFICER
ORANGE COUNTY, CALIFORNIA

This copy not valid unless prepared on engraved border displaying seal and signature of Registrar.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

UNITED STATES DISTRICT COURT
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The Estate of Gene B. Lokken, et al.,

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Defendants.

Civil File No. 23-cv-03514-JRT/SGE

PLAINTIFFS' MEET AND CONFER STATEMENT

Pursuant to Local Rule 7.1(a), Plaintiffs' counsel met and conferred with counsel for Defendants via email on April 2, 2026. On April 28, 2026, Defendants agreed not to oppose a motion for the substitution of the personal representatives of Plaintiff William Hull, with a full reservation of all defenses.

Dated: July 6, 2026

Respectfully submitted,

/s/ David W. Asp

Karen Hanson Riebel (#0219770)

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Simeon A. Morbey (#0391338)

Derek C. Waller (#0401120)

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Civil File No. 23-cv-03514-JRT/SGE

PLAINTIFFS' UNOPPOSED MOTION FOR SUBSTITUTION OF PARTIES

Plaintiffs move this Court, pursuant to Fed. R. Civ. P. 25(A), to substitute Plaintiff Carol Clemens with John Clemens. This Motion is based upon the Memorandum of Law and upon all the files, records, and proceedings in this matter.

Dated: July 6, 2026

Respectfully submitted,

/s/ David W. Asp

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Civil File No. 23-cv-03514-JRT/SGE

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION FOR
SUBSTITUTION OF PARTIES**

Plaintiffs bring this Motion, pursuant to Fed. R. Civ. P. 25(a), to substitute John Clemens, the Personal Representative of the Estate of Carol Clemens, for deceased Plaintiff Carol Clemens.

1. Plaintiff Carol Clemens ("Plaintiff") filed the First Amended Complaint (ECF No. 34) against Defendants on April 5, 2024.

2. On March 13, 2026, Plaintiff's Counsel discovered that Plaintiff passed away on January 3, 2026, in Lake City, Minnesota. *See* Declaration of John Clemens ("Clemens Decl.") ¶ 2.

3. Plaintiff left a duly executed and witnessed Last Will and Testament dated August 21, 2020, naming her husband, John Clemens, as her Personal Representative. Clemens Decl. ¶ 5.

4. Plaintiff was domiciled in Minnesota at the time of her death. Clemens Decl. ¶ 3. Under Minnesota law, Plaintiff's filed claims are not extinguished upon her death. *See Nelson v. Holland*, N.W.2d 446, 449–50 (Minn. App. 2009).

5. Minnesota law allows the decedent's personal representative to continue this action on the decedent's behalf. Minn. Court R. 25.01(a).

6. Mr. John Clemens has executed and filed a declaration, under penalty of perjury, testifying to these facts. *See* Clemens Decl. ¶¶ 1–7.

7. A certified copy of Plaintiff's Certificate of Death is attached to Mr. Clemens' declaration. *See* Clemens Decl. Exh. 1.

8. John Clemens, as Personal Representative of the Estate of Carol Clemens, respectfully requests that the Court enter an order permitting John Clemens be substituted as Plaintiff in this matter and continue the pending claims on behalf of Carol Clemens.

Dated: July 6, 2026

Respectfully submitted,

/s/ David W. Asp

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**UNITED STATES DISTRICT COURT
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THE ESTATE OF GENE B. LOKKEN,
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BUCKNER, CAROL CLEMENS, FRANK
CHESTER PERRY, THE ESTATE OF
JACKIE MARTIN, JOHN J. WILLIAMS,
AS TRUSTEE OF THE MILES AND
CAROLYN WILLIAMS 1993 FAMILY
TRUST, and WILLIAM HULL,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC.,
UNITED HEALTHCARE, INC.,
NAVIHEALTH, INC. and Does 1-50,
inclusive,

Defendants.

Civil File No. 23-cv-03514-JRT/SGE

DECLARATION OF JOHN CLEMENS

I, John Clemens, declare as follows:

1. I am over the age of 18 years. I have personal knowledge of the facts contained in this declaration, and if called as a witness, I could and would testify competently to the truth of the facts stated herein.
2. I am the husband of Carol Clemens, who died on January 3, 2026, in Lake City, Minnesota.
3. At the time of Mrs. Clemens' death, she was domiciled in Mazeppa, Minnesota.
4. No proceeding is now pending in Minnesota for administration of Mrs. Clemens' estate.

5. Mrs. Clemens left a duly executed Last Will and Testament dated August 21, 2020, naming me as personal representative of her estate.
6. I am Mrs. Clemens' successor in interest, and I succeed Mrs. Clemens' interest in this action.
7. No other person has a superior right to be substituted for Mrs. Clemens in the pending action or proceeding.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 21, 2026, in Wabasha, Minnesota.

John Clemens
John Clemens (Mar 21, 2026 09:12:33 CDT)
John Clemens

2026.03.20 Declaration of John Clemens ISO Mtn. to Sub.

Final Audit Report

2026-03-21

Created:	2026-03-20
By:	Jolen Medwid (jmedwid@clarksonlawfirm.com)
Status:	Signed
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"2026.03.20 Declaration of John Clemens ISO Mtn. to Sub." History

-  Document created by Jolen Medwid (jmedwid@clarksonlawfirm.com)
2026-03-20 - 11:06:32 PM GMT
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Signature Date: 2026-03-21 - 2:12:33 PM GMT - Time Source: server
-  Agreement completed.
2026-03-21 - 2:12:33 PM GMT

EXHIBIT

1

STATE OF MINNESOTA
CERTIFICATION OF VITAL RECORD**CERTIFICATE OF DEATH**

STATE FILE NUMBER 2026-MN-000135

DECEDENT	CAROL SUSAN CLEMENS
LAST NAME BEFORE FIRST MARRIAGE	LAQUA
ALSO KNOWN AS	
SOCIAL SECURITY NUMBER	
SEX	FEMALE
BORN	
PLACE OF BIRTH	WABASHA MINNESOTA
DATE OF DEATH	JANUARY 03, 2026
PLACE OF DEATH	MAYO CLINIC HEALTH SYSTEM - LAKE CITY NURSING HOME LAKE CITY GOODHUE MINNESOTA
MARITAL STATUS	MARRIED
SPOUSE	JOHN
LAST NAME BEFORE FIRST MARRIAGE	CLEMENS
RESIDENCE	MAZEPPA WABASHA MINNESOTA
PARENT	VIOLA SCHULTZ
PARENT	LEO LAQUA
FUNERAL HOME	MAXON FAMILY CREMATION AND LIFE CELEBRATIONS
DISPOSITION	CREMATION
CAUSE OF DEATH	
IMMEDIATE	ALZHEIMER'S DISEASE
UNDERLYING	
OTHER CONTRIBUTING CONDITIONS	
MANNER	NATURAL
MEDICAL CERTIFIER	DANIEL ESTUARDO SANCHEZ PELLEGER, M.D. 200 1ST STREET SW, ROCHESTER, MINNESOTA, 55905

THIS RECORD HAS NOT BEEN AMENDED

THIS IS A TRUE AND CORRECT RECORD OF DEATH REGISTERED IN THE MINNESOTA OFFICE OF VITAL RECORDS.



55A-000370197

MR&C Certificate ID
16527710

FILED: JANUARY 03, 2026

Molly Mulcahy Crawford
Molly Mulcahy Crawford
STATE REGISTRAR

ISSUED: JANUARY 06, 2026

OLMSTED COUNTY LICENSE BUREAU

THIS CERTIFICATE IS VALID ONLY WHEN PRINTED ON OFFICIAL WATERMARKED
SECURITY PAPER WITH A SECURITY THREAD AND STATE SEAL OF MINNESOTA.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE



**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

The Estate of Gene B. Lokken, et al.,

Plaintiffs,

vs.

UnitedHealth Group, Inc., et al.,

Defendants.

Civil File No. 23-cv-03514-JRT/SGE

PLAINTIFFS' MEET AND CONFER STATEMENT

Pursuant to Local Rule 7.1(a), plaintiffs' counsel met and conferred with counsel for defendants via email on April 2, 2026. On April 28, 2026, Defendants agreed not to oppose a motion for the substitution of the personal representative of Plaintiff Carol Clemens, with a full reservation of all defenses.

Dated: July 6, 2026

Respectfully submitted,

/s/ David W. Asp

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