

JONATHAN A. SHAPIRO (257199)
WILMER CUTLER PICKERING HALE AND DORR LLP
950 Page Mill Road
Palo Alto, CA 94304
Tel: (650) 858-6101
Fax: (650) 858-6100
jonathan.shapiro@wilmerhale.com

ANDREA J. ROBINSON (PRO HAC VICE)
TIMOTHY J. PERLA (PRO HAC VICE)
WILMER CUTLER PICKERING HALE AND DORR LLP
60 State Street
Boston, MA 02109
Tel: (617) 526-6000
Fax: (617) 526-5000
andrea.robinson@wilmerhale.com
timothy.perla@wilmerhale.com
Attorneys for Defendant Life Insurance
Company of the Southwest

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

JOYCE WALKER, KIM BRUCE
HOWLETT, and MURIEL SPOONER
on behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

LIFE INSURANCE COMPANY OF
THE SOUTHWEST, a Texas
corporation, and DOES 1-50,

Defendant.

Case No.: 10-09198 JVS(RNBx)

**DECLARATION OF SETH
MOSKOWITZ IN OPPOSITION TO
PLAINTIFFS' EX PARTE
APPLICATION FOR AN ORDER
SHORTENING TIME**

Magistrate Judge Robert N. Block

Courtroom: 6D

DECLARATION OF SETH MOSKOWITZ

I, Seth Moskowitz, declare as follows:

1. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts. I am an Associate at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Defendant in the above-entitled action. I submit this Declaration in opposition to Plaintiffs' *Ex Parte* Application for an Order Shortening Time. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would testify competently thereto.

2. LSW has produced documents from 10 different custodians since January 1, 2012.

3. Attached hereto as Exhibit A is a true and correct copy of an excerpt from the transcript of a hearing in this matter on September 14, 2011.

I declare under the penalty of perjury that the foregoing is true and correct.
Executed this 24th day of February, 2012, at Boston, Massachusetts.

By: /s/ Seth Moskowitz
Seth Moskowitz

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Wilmer Cutler Pickering Hale and Dorr LLP, 950 Page Mill Road, Palo Alto, CA 94304. On February 24, 2012 I served the within document(s):

DECLARATION OF SETH MOSKOWITZ IN OPPOSITION TO PLAINTIFFS' EX PARTE APPLICATION

I placed the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Palo Alto, CA addressed as set forth below.

I personally caused to be emailed the document(s) listed above to the person(s) at the address(es) set forth below.



I electronically filed the document(s) listed above via the CM/ECF system.

Brian P. Brosnahan
Charles N. Freiberg
Jacob Foster
KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
101 California Street, Suite 2300
San Francisco, CA 94111
cfreiberg@kasowitz.com

Harvey R. Levine
LEVINE & MILLER
550 West C. Street, Suite 1810
San Diego, CA 92101-8596
lsmh@levinelaw.com

/s/ Jonathan A. Shapiro
Jonathan A. Shapiro