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11 Attorneys for Plaintiffs  
12 JOYCE WALKER, KIM BRUCE HOWLETT,  
and MURIEL SPOONER, on behalf of themselves  
13 and all others similarly situated

14  
15 UNITED STATES DISTRICT COURT  
16 CENTRAL DISTRICT OF CALIFORNIA  
17

18  
19 JOYCE WALKER, KIM BRUCE  
20 HOWLETT, and MURIEL SPOONER, on  
behalf of themselves and all others similarly  
21 situated

22 Plaintiffs,

23 vs.

24 LIFE INSURANCE COMPANY OF THE  
25 SOUTHWEST, a Texas corporation,

26 Defendant.  
27  
28

CASE NO.: CV 10-9198 JVS (RNBx)

Formerly Case No.: 3:10-cv-04852 JSW  
from Northern District of California

**PLAINTIFFS JOYCE WALKER'S, KIM  
BRUCE HOWLETT'S, AND MURIEL  
SPOONER'S RESPONSES TO LIFE  
INSURANCE COMPANY OF THE  
SOUTHWEST'S FIRST SET OF  
INTERROGATORIES**

1 PROPOUNDING PARTY : DEFENDANT LIFE INSURANCE COMPANY OF THE  
2 SOUTHWEST

3 RESPONDING PARTY : PLAINTIFFS JOYCE WALKER, KIM BRUCE  
4 HOWLETT, AND MURIEL SPOONER

5 SET NUMBER : ONE (1)

6 **RESPONSES TO INTERROGATORIES**

7 **INTERROGATORY NO. 1:**

8 Please state the name and street address of all persons to whom a LETTER was sent, and  
9 the date(s).

10 **RESPONSE TO INTERROGATORY NO. 1:**

11 Plaintiffs object to this interrogatory to the extent that it calls for disclosure of confidential  
12 or private information. Such information will be produced only pursuant to the terms of the  
13 parties' Protective Order in this matter.

14 Subject to and without waiving the foregoing objection, Plaintiffs respond:

15 A LETTER was sent to 364 individuals contained in the policyholder sample produced by  
16 LSW. The names and street addresses for each of the 364 individuals, as well as the dates on  
17 which the LETTER was sent to each individual, are included in the list attached to these responses  
18 as Exhibit A.

19 **INTERROGATORY NO. 2:**

20 With respect to each person identified in response to Interrogatory No. 1, please state if the  
21 content and substance of the LETTER (i.e., everything other than the recipient's name, address,  
22 etc.) was the same as that attached as Exhibit A; and if not, please state the content and substance  
23 of the LETTER.

24 **RESPONSE TO INTERROGATORY NO. 2:**

25 Yes.

26 **INTERROGATORY NO. 3:**

27 Please state the name and street address of all PUTATIVE CLASS MEMBERS who have  
28 had any COMMUNICATIONS with PLAINTIFFS.

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1 **RESPONSE TO INTERROGATORY NO. 3:**

2 Plaintiffs object to this interrogatory on the grounds that it calls for the disclosure of  
3 privileged information, including without limitation information subject the work-product  
4 doctrine, including without limitation strategic decisions by Plaintiffs and their counsel regarding  
5 with which PUTATIVE CLASS MEMBERS, if any, to communicate and the subjects of any such  
6 communications (except with respect to the initial LETTER sent to the 364 individuals identified  
7 in Plaintiffs' response to Interrogatory No. 1). Plaintiffs further object on the grounds that LSW  
8 already has disrupted Plaintiffs' ability to communicate with PUTATIVE CLASS MEMBERS to  
9 obtain evidence relevant to Plaintiffs' claims concerning class certification and merits, and that  
10 providing the names of PUTATIVE CLASS MEMBERS with whom Plaintiffs have  
11 communicated and the content and substance(s) of Plaintiffs' communications with those  
12 individuals would allow LSW further to disrupt Plaintiffs' ability to pursue their claims. Plaintiffs  
13 further object to this interrogatory to the extent that it calls for disclosure of confidential or private  
14 information. Such information, if produced, will be produced only pursuant to the terms of the  
15 parties' Protective Order in this matter. Plaintiffs also object to this interrogatory to the extent that  
16 it is duplicative of Interrogatory No. 1.

17 Except as described in Plaintiffs' response to Interrogatory No. 1 and as to the named  
18 Plaintiffs, Plaintiffs, relying on the foregoing objections, will not provide a response to this  
19 interrogatory.

20 **INTERROGATORY NO. 4:**

21 With respect to each person identified in response to Interrogatory No. 3, please state the  
22 content and substance(s) of all such communications.

23 **RESPONSE TO INTERROGATORY NO. 4:**

24 Plaintiffs object to this interrogatory on the grounds that it calls for the disclosure of  
25 privileged information, including without limitation information subject to the attorney-client  
26 privilege and/or the work-product doctrine, including without limitation strategic decisions by  
27 Plaintiffs and their counsel regarding with which PUTATIVE CLASS MEMBERS, if any, to  
28 communicate and the subjects of any such communications (except with respect to the initial

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1 LETTER sent to the 364 individuals identified in Plaintiffs' response to Interrogatory No. 1).  
2 Plaintiffs further object on the grounds that LSW already has disrupted Plaintiffs' ability to  
3 communicate with PUTATIVE CLASS MEMBERS for the purpose of obtaining evidence  
4 relevant to Plaintiffs' claims concerning class certification and merits, and that providing the  
5 names of PUTATIVE CLASS MEMBERS with whom Plaintiffs have communicated and the  
6 content and substance(s) of Plaintiffs' communications with those individuals would allow LSW  
7 further to disrupt Plaintiffs' ability to pursue their claims. Plaintiffs further object to this  
8 interrogatory to the extent that it calls for disclosure of confidential or private information. Such  
9 information, if produced, will be produced only pursuant to the terms of the parties' Protective  
10 Order in this matter.

11 Relying on these objections, Plaintiffs will not provide a response to this interrogatory.

12 **INTERROGATORY NO. 5:**

13 Please state the name and street address of all PUTATIVE CLASS MEMBERS who have  
14 retained Kasowitz, Benson, Torres & Friedman LLP, or any attorney affiliated therewith, to  
15 represent them in connection with the above-captioned lawsuit.

16 **RESPONSE TO INTERROGATORY NO. 5:**

17 The following PUTATIVE CLASS MEMBERS have retained Kasowitz, Benson, Torres  
18 & Friedman LLP to represent them in connection with the above-captioned lawsuit:

- 19
- 20 • Joyce Walker; 261 Sunswept Street, San Diego, CA 92114
  - 21 • Kim Bruce Howlett; 5048 San Joaquin Drive, San Diego, CA 92109
  - 22 • Muriel Spooner; 5048 San Joaquin Drive, San Diego, CA 92109

23 **INTERROGATORY NO. 6:**

24 Please state the name and street address of all persons to whom YOU intend to send the  
25 LETTER or other COMMUNICATIONS that are substantively similar to the LETTER, including  
26 any COMMUNICATIONS with PUTATIVE CLASS MEMBERS that request that PUTATIVE  
27 CLASS MEMBERS contact YOU or that purport to summarize YOUR claims in this litigation.  
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