

EXHIBIT B

DONNA MORGAN

NOVEMBER 7, 2011

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JOYCE WALKER, KIM BRUCE	X CLASS ACTION
HOWLETT, and MURIEL SPOONER,	X
on behalf of themselves and	X
all others similarly situated,	X CASE NO. CV 10-9198 JVS (RNBx)
Plaintiffs,	X
	X Formerly Case No.: 3:10-cv-04852
v.	X JSW from Northern District of
	X California
LIFE INSURANCE COMPANY OF THE	X
SOUTHWEST, a Texas Corporation,	X
Defendant.	X

VIDEOTAPED DEPOSITION OF DONNA MORGAN

Monday, November 7, 2011, 9:05 a.m.

WILMER CUTLER PICKERING HALE and DORR LLP

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-- Ivy L. Natanson, RPR --

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ALSO PRESENT:

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1 MS. ROBINSON: Objection.

2 A. Yes.

3 Q. Can you think of any situation where a
4 communication to the public that goes to more
5 than one person and mentions an LSW product
6 would not be required to be submitted?

7 A. Generally speaking, no.

8 Q. What do you mean by "generally speaking"? Can
9 you think of any situation where it would not
10 be required to be submitted?

11 A. It all depends on the content of the piece.

12 Q. So can you give me an example of a piece that
13 LSW would not require to be submitted?

14 MS. ROBINSON: Objection.

15 A. No, I cannot.

16 Q. Can you think of any type of content that
17 mentioned an LSW product and went to more than
18 one member of the public that LSW would not
19 require to be submitted?

20 A. No, I cannot.

21 Q. Okay. So to your knowledge, there's no
22 material that would go to more than one member
23 of the public and mention an LSW product that
24 LSW would not require to be submitted?

25 MS. ROBINSON: Objection.

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1 COMMONWEALTH OF MASSACHUSETTS

2 MIDDLESEX, ss.

3 I, Ivy L. Natanson, Registered Professional
4 Reporter and Notary Public duly commissioned and
5 qualified in and for the Commonwealth of
6 Massachusetts, do hereby certify that there came
7 before me on the 7th day of November 2011 the person
8 hereinbefore named, who was by me duly sworn to
9 testify to the truth and nothing but the truth of
10 their knowledge touching and concerning the matters
11 in controversy in this cause; that they were
12 thereupon examined upon their oath, and their
13 examination reduced to typewriting under my
14 direction and that the deposition is a true record
15 of the testimony given by the deponent.

16 I further certify that I am neither
17 attorney nor counsel for, nor related to or employed
18 by, any of the parties to the action in which this
19 deposition is taken, and further that I am not a
20 relative or employee of any attorney or counsel
21 employed by the parties hereto or financially
22 interested in this action.

23 In Witness Whereof, I have hereunto set my
24 hand and affixed my seal this 8th day of November
25 2011.

Notary Public
My Commission Expires:
September 13, 2013

Errata Sheet to Deposition of Donna Morgan

Page/Line	Change
Page 32, line 3	Add "and is submitted to the Advertising Review Unit (ARU)" to end of sentence
Page 34, line 22	Between "it, it" add "and if it was submitted to the ARU"
Page 40, line 2	Change answer to "It depends"
Page 40, line 7	Change answer to "Yes, if it goes to more than one person"
Page 43, line 7	Add "if submitted to the ARU" to end of sentence
Page 43, line 16	Between "products that" add "and it was going to more than one person"
Page 45, line 1	Add "if submitted to the ARU and going to more than one person" to end of sentence
Page 45, line 3	Add "if submitted to the ARU and going to more than one person" to end of sentence
Page 45, line 5	Add "if submitted to the ARU and going to more than one person" to end of sentence
Page 58, line 1	Change answer to "NASD Series 6, NASD Series 7"
Page 58, line 21	Add "and/or other broker-dealers" to end of sentence
Page 64, line 14	Add "if it is submitted to the ARU" to end of sentence
Page 64, line 16	After "telemarket," add "and if they are submitted to the ARU"
Page 64, line 19	Add "if it is submitted to the ARU" to end of sentence
Page 65, line 15	Add "if it goes to more than one person and was submitted to the ARU" to end of sentence

Page 79, line 9	Change answer to "I don't know."
Page 109, line 25	Change "Joan" to "Jo"
Page 123, line 13	Add "if it is submitted to the ARU" to end of sentence
Page 336, line 20	Delete "my producers"

Signed: *Danna Mayan*

Date: 12/13/11