

EXHIBIT D

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
101 CALIFORNIA STREET, SUITE 2300
SAN FRANCISCO, CALIFORNIA 94111

1 KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
2 CHARLES N. FREIBERG (SBN 70890)
3 BRIAN P. BROSNAHAN (SBN 112894)
4 JACOB N. FOSTER (SBN 250785)
5 101 California Street, Suite 2300
6 San Francisco, California 94111
7 Telephone: (415) 421-6140
8 Facsimile: (415) 398-5030

6 LEVINE & MILLER
7 HARVEY R. LEVINE (SBN 61879)
8 CRAIG A. MILLER (SBN 116030)
9 LEVINE & MILLER
10 550 West C Street, Suite 1810
11 San Diego, CA 92101-8596
12 Telephone: (619) 231-9449
13 Facsimile: (619) 231-8638

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

15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA

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

22 Plaintiffs,

23 vs.

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

26 Defendant.

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 THIRD SET OF
INTERROGATORIES, NUMBER 9**

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 : THREE (3)

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 9:

6 State the name(s) of the person(s) whose handwriting appears on HOWLETT EXHIBIT 12
7 and the date(s) on which the handwritten markings were made.

RESPONSE TO INTERROGATORY NO. 9:

9 Plaintiffs object to this interrogatory on the grounds that it seeks information that is
10 irrelevant.

11 Subject to and without waiving the foregoing objection, Plaintiffs respond as follows:

12 The handwritten markings contained under the headings "Premium Expense Charge,"
13 "Cost of Insurance," "Other Deductions," and "Total Expense and Deductions," were made by
14 Jo Anne Childress, a secretary employed by Kasowitz, Benson, Torres & Friedman LLP.
15 Ms. Childress made the handwritten markings at the direction of Brian P. Brosnahan, Esq.,
16 because her handwriting is more legible than Mr. Brosnahan's. Ms. Childress copied handwritten
17 markings that Mr. Brosnahan had made on a different copy of HOWLETT EXHIBIT 12. The
18 handwritten markings in the form of "Ex. 12" contained above the Bates No. LSW 00094172 were
19 made by Charles N. Freiberg, Esq. The handwritten markings contained on the exhibit sticker
20 affixed to HOWLETT EXHIBIT 12 were made by the court reporter, Corey W. Anderson. All of
21 the handwritten markings were made on the date of the deposition, May 10, 2012.

22 Dated: June 14, 2012

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP,

23
24 By: 
25 CHARLES N. FREIBERG
26 BRIAN P. BROSNAHAN
27 JACOB N. FOSTER

28 Attorneys for Plaintiffs

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