

In The Matter Of:
Joyce Walker, et al. v.
Life Insurance Company of the Southwest, et al.

Susan Rusnock
April 11, 2007

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JOYCE WALKER, KIM BRUCE CLASS ACTION
HOWLETT, and MURIEL SPOONER,
on behalf of themselves and
all others similarly situated, CASE NO. CV 10-9198
JVS (RNBx)
Plaintiffs,

v

LIFE INSURANCE COMPANY OF THE JSW from Northern
SOUTHWEST, a Texas Corporation, District of
Defendant. California

VIDEOTAPED DEPOSITION OF SUSAN RUSNOCK

Wednesday, May 2, 2012, 1:36 p.m.

WILMER CUTLER PICKERING HALE and DORR LLP

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Boston, Massachusetts 02109

- - Lisa Marie Phipps, RPR - -

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21
22
23
24
25

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11

1 excluding LSW's financial relationship with
2 such parties, commission structure, and
3 compensation?

4 A. Yes.

5 Q. And are there any other topics you are here to
6 testify on today?

7 A. No.

8 MR. PERLA: Counsel, I just want to
9 make it clear for the record that you correctly
10 identified the topics for which she is here in
11 their entirety; but in accordance with my
12 correspondence to Mr. Brosnahan, she is also
13 available for questioning on Topics 1 through 5
14 and I may provide you with a copy of that
15 letter if you need it.

16 MR. FOSTER: I'll take a copy. And
17 that's for the purposes of nonrequired
18 disclosures given policyholders; is that
19 correct?

20 MR. PERLA: That is correct, just
21 stated another way for the purposes other than
22 for which Miss McDonald was here.

23 MR. FOSTER: Okay. Understood.

24 Q. What did you do to prepare for this
25 deposition?