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11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **SOUTHERN DIVISION**

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

18 Plaintiffs,

19 vs.

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

22 Defendant.

Case No.: 10-09198 JVS(RNBx)

DECLARATION OF JOEL FLEMING  
IN SUPPORT OF LIFE INSURANCE  
COMPANY OF THE SOUTHWEST'S  
REPLY IN SUPPORT OF ITS MOTION  
TO APPOINT A SPECIAL MASTER

Judge James Selna  
Courtroom: 10C

**DECLARATION OF JOEL FLEMING**

I, Joel Fleming, declare as follows:

1. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts, the State of California and before this Court. 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 respectfully submit this Declaration in support of Defendant Life Insurance Company of the Southwest (“LSW”)’s Reply In Support of Its Motion to Appoint a Special Master. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would testify competently thereto.

3. Attached hereto as Exhibit A is a true and correct copy of an email chain between Kim Howlett, Muriel Spooner and Steve Burgess bearing the Bates numbers HS001010-14.

4. Attached hereto as Exhibit B is a true and correct copy of a March 5, 2013 email sent by counsel for Plaintiffs to counsel for LSW.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 8th day of April, 2013, at Boston, Massachusetts.

By: /s/ Joel Fleming  
Joel Fleming

**CERTIFICATE OF SERVICE**

I am a resident of the Commonwealth of Massachusetts, 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, 60 State Street, Boston, Massachusetts 02109. On March 18, 2013 I served the within document(s):

**DECLARATION OF JOEL FLEMING IN SUPPORT OF LIFE INSURANCE COMPANY OF THE SOUTHWEST'S REPLY IN SUPPORT OF ITS MOTION TO APPOINT A SPECIAL MASTER; EXHIBITS THERETO**

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

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

I 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.

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