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UNITED STATES DISTRICT COURT

**CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

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

18 Plaintiffs,

19 vs.

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

23 Defendant.

Case No.: CV 10-9198-JVS(RNBx)

**DECLARATION OF SETH A.
MOSKOWITZ IN SUPPORT OF
LSW'S RESPONSE TO COURT'S
ORDER TO SHOW CAUSE RE:
DECERTIFICATION**

DECLARATION OF SETH A. MOSKOWITZ

I, Seth A. Moskowitz, declare as follows:

1. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts and the State of New York. I am a Senior Associate at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Defendant Life Insurance Company of the Southwest (“LSW”) in the above-entitled action. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would testify competently thereto.

2. I arranged in a Microsoft Excel spreadsheet a list of all Paragon or Provider universal life insurance policies produced to Plaintiffs as described in the Declaration of Caitlin Monahan.

3. I used a random number generator located at www.random.org to generate a random number (the “Random Number”). I then matched that Random Number to the number assigned to each row in the Excel spreadsheet containing the list of policy numbers. I repeated this process once more to identify another sample policy file to submit to the Court.

4. Attached hereto as Exhibit A is a true and correct copy of the policy file for an indexed universal life insurance policy bearing Policy No. LS0285665 that was produced in this litigation.

