

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ELIZABETH RUSSETT, BETH CALABRESE, and  
JAN BULLARD, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

THE NORTHWESTERN MUTUAL LIFE  
INSURANCE COMPANY,

Defendant.

Civil Action No. 7:19-cv-07414-KMK

**DECLARATION OF JAN BULLARD IN SUPPORT OF PLAINTIFFS' MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND MOTION FOR  
ATTORNEYS' FEES, COSTS, EXPENSES, AND INCENTIVE AWARDS**

I, Jan Bullard, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an adult over the age of 18 and a resident of the State of New York. I am a Class Representative in the lawsuit entitled *Russett, et al. v. The Northwestern Mutual Life Insurance Company*, Case No. 19-cv-07414-KMK, currently pending in the United States District Court for the Southern District of New York. I make this Declaration in support of (i) the Motion for Final Approval of Settlement, and (ii) the Motion for Attorneys' Fees, Costs, Expenses, and Incentive Awards. The statements made in this Declaration are based on my personal knowledge and, if called as a witness, I could and would testify thereto.

2. For many years, I have been a policy owner of a life insurance account with Defendant. Since at least 2016, Defendant charged me a Service Charge to pay my monthly premiums by mail, which I paid.

3. I assisted with the litigation of this case by detailing my account history and the

Service Charges associated therewith. Specifically, I described to my lawyers my relationship as a policy owner with Defendant, and the Service Charges I paid. I also provided my lawyers with documentation confirming the same.

4. I also worked with my attorneys to prepare the Class Action Complaint. I carefully reviewed the Class Action Complaint for accuracy and approved it before it was filed.

5. During the course of this litigation, I kept in regular contact with my lawyers. Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case. We also discussed case strategy, anticipated motions, document and deposition discovery, mediation, and the prospects of settlement. Furthermore, when appropriate, I informed my attorneys of additional facts for their research and consideration.

6. I also coordinated with my lawyers to search for documents that Defendant was likely to request in formal discovery, such as copies of my billing statements. I was also prepared to testify at deposition and trial, if necessary.

7. My lawyers have kept me well informed in regard to the efforts to resolve this matter. I discussed the Class Action Settlement Agreement with them and gave my approval prior to signing it.

8. Based on the interactions and my relationship with my attorneys, I believe they have fairly and adequately represented me and the Settlement Class and will continue to do so.

9. Throughout this litigation, I understood that, as a Class Representative, I have an obligation to protect the interests of other Settlement Class Members and not act just for my own personal benefit. I do not have any conflicts with other Settlement Class Members. I have done my best to protect the interests of other Settlement Class Members and will continue to fairly and adequately represent the Settlement Class to the best of my ability.

10. I estimate that I spent approximately 30 hours working with my lawyers on this case.

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

Executed this 7<sup>th</sup> day of July 2020 at Auburn, New York.

  
Jan Bullard (Jul 7, 2020 12:18 EDT)

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Jan Bullard






# 2020.07.07 Bullard Declaration

Final Audit Report

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