

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

37 BESEN PARKWAY, LLC, on behalf of itself and all others similarly situated,)	Civil Action No. 15-cv-9924
)	
Plaintiff,)	
)	
vs.)	
)	
JOHN HANCOCK LIFE INSURANCE COMPANY (U.S.A.),)	
)	
Defendant.)	
)	

**DECLARATION OF STEVEN G. SKLAVER IN SUPPORT OF
PLAINTIFF'S BRIEF IN RESPONSE TO COURT'S FEBRUARY 13, 2019 ORDER**

I, Steven G. Sklaver, declare as follows:

1. I submit this declaration in support of Plaintiff's Brief in Response to Court's February 13, 2019 Order, in connection with the proposed class action settlement between Plaintiff 37 Besen Parkway, LLC, for itself and on behalf of the proposed Settlement Class, and defendant John Hancock Life Insurance Company (U.S.A.) ("Defendant," or "John Hancock").

2. Out of the 79,034 policies in the Settlement Class, 2,960 policies (approximately 3.7%) were issued before December 31, 1996, and are thus allegedly subject to the settlement in *Duhaime v. John Hancock Mutual Life Insurance Company*, 177 F.R.D. 45 (D. Mass 1997).

3. The estimated total proposed distribution to these 2,960 policies is \$1,424,239, or approximately 2.3% of the total distribution to the Class.

4. Class Counsel has performed an analysis of how removing these 2,960 from the distribution would affect the payment to the rest of the Class. In this analysis, a policy that is currently set to receive \$1,000 under the distribution would instead receive \$1,024.

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

DATED: February 25, 2019

/s/ Steven G. Sklaver
Steven G. Sklaver

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

37 BESEN PARKWAY, LLC, on behalf of itself and all others similarly situated,)	Civil Action No. 15-cv-9924
)	DECLARATION OF SERVICE
Plaintiff,)	
)	
vs.)	
)	
JOHN HANCOCK LIFE INSURANCE COMPANY (U.S.A.),)	
)	
Defendant.)	

I, Glenn C. Bridgman, declare:

1. I am over eighteen years of age, I am not a party to this action, and I am an employee with the law firm of Susman Godfrey L.L.P., in the Los Angeles, California office.
2. My business address is 1900 Avenue of the Stars, Suite 1400, Los Angeles, California 90067.
3. On February 25, 2019, I served a copy of the DECLARATION OF STEVEN G. SKLAVER IN SUPPORT OF PLAINTIFF’S BRIEF IN RESPONSE TO COURT’S FEBRUARY 13, 2019 ORDER via email upon the following persons:

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*Attorneys for Defendant,
 John Hancock Life Insurance Company (U.S.A.)*

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

Dated: February 25, 2019, at Los Angeles, California.

/s/ Glenn C. Bridgman

 Glenn C. Bridgman