

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

PHT HOLDING I LLC, and ALICE
CURTIS, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RELIASTAR LIFE INSURANCE
COMPANY,

Defendant.

Civ. No.: 18-cv-2863 DWF/TNL

DECLARATION OF
JENNIFER M. KEOUGH
REGARDING SETTLEMENT
ADMINISTRATION EXPENSES

I, Jennifer M. Keough, declare as follows:

1. I am the Chief Executive Officer of JND Legal Administration LLC (“JND”). This declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees and Susman Godfrey L.L.P. (“Class Counsel”), and if called upon to do so, I could and would testify competently thereto.

2. JND is serving as the Settlement Administrator¹ in the above-captioned litigation (“Action”) for the purposes of administering the Joint Stipulation and Settlement Agreement (“Settlement Agreement”) preliminarily approved by the Court in its Order Preliminarily Approving Class Action Settlement. Dkt. 266.

3. I previously submitted Declarations regarding the Proposed Notice Plan (dated April 28, 2022) and the Proposed Settlement Notice Program (dated July 20, 2023). Dkt. Nos. 218 & 260. This additional declaration is being filed to report on the Settlement

¹ Capitalized terms used and not otherwise defined herein shall have the meanings given to such term in the Joint Stipulation and Settlement Agreement. Dkt. 259-2.

Administration Expenses that JND has incurred for this matter and to provide an update on JND's estimated remaining Settlement Administration Expenses.

4. Settlement Administration Expenses includes all Class Notice and administrative fees, costs, or expenses incurred in administering the Settlement. As of August 31, 2023, JND has incurred \$177,179.45 in Settlement Administration Expenses.

5. JND estimates that its remaining Settlement Administration Expenses are expected to be approximately \$145,000 – \$170,000, including work in connection with benefit distribution and administration completion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 21, 2023



Jennifer M. Keough