

# **EXHIBIT D**



him if I had a claim against Jackson for its fee. Mr. Corley told me that, in his opinion, I did. I thus asked him to engage me as a client.

3. I have been involved in this case for its pendency. I have worked with Mr. Corley and Lew LeClair of McKool Smith, providing support and oversight during the prosecution of the case. I traveled to McKool Smith in Dallas, Texas, on four occasions, resulting in nearly one-thousand miles of travel. I have attended related court hearings in Sherman, Texas, and in New Orleans, Louisiana.

4. I support and approve of the settlement in this case, believing it to be in the best interests of the Class. The settlement amount is a significant recovery for Class Members. Other Class representatives and I always realized we would not get recovery except through a class action on behalf of a substantial number of Jackson customers. The settlement allows people like myself to obtain at least some refund of the withdrawal charges that we believe were improperly charged to us by Jackson.


5. The notice was received by me, and I found it understandable and user-friendly. Class Counsel have proven accessible and helpful with respect to providing information and assistance during the settlement process.

6. I feel I have been well-represented by Class Counsel, who have been incredibly tenacious and persistent in pursuing these claims against a highly sophisticated company like Jackson. The case was a long and bitter fight, requiring commitment and determination.

7. In addition to attending meetings and hearings, my role in this case has included sitting for my deposition and assisting with document production. Based on that work on behalf of all Class Members, I believe that an incentive fee of \$1,000 is fair and reasonable.

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

Executed this 27th day of April, 2021.

  
David Cruson