EXHIBIT B

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

DAVID CRUSON AND JOHN DENMAN

Plaintiffs,

Civil Action No. 4:16-CV-912-ALM

v.

JACKSON NATIONAL LIFE INSURANCE COMPANY

Defendant.

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JURY TRIAL

DECLARATION OF HILARY CRANMORE OF JACKSON NATIONAL LIFE INSURANCE COMPANY IN SUPPORT OF MOTION FOR FINAL APPROVAL OF <u>CLASS-ACTION SETTLEMENT</u>

I, Hilary Cranmore, declare:

- 1. I am employed as an Assistant Vice President of Jackson National Life Insurance Company. In that capacity, I have coordinated Jackson's mailing of notices to Class Members in this case. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.
- 2. On February 9, 2021, the Court approved a notice plan under which Jackson agreed to send notices to Class Members who are current Jackson customers. ECF No. 138. On March 1, the Court modified the plan. ECF No. 141. Jackson has conformed to this plan in its entirety.

- 4. On or before March 26, 2021, Jackson mailed 47,692 long-form notices to Class Members, or their advisors, who have current accounts with Jackson or its affiliate Jackson National Life Insurance Company of New York ("Jackson New York"). The source of the Class Members' identities was the account data regularly maintained by Jackson and Jackson New York. These notices were mailed to the current address on file for each such Class Member. Jackson also provided Class Members access to the notices through the Electronic Filing Cabinet system available on each Class Member's online account.
- 5. Jackson provided its account data to the Court-approved Claims Administrator, Heffler Claims Services LLC (now Kroll, LLC), for the mailing of notices to Class Members who no longer have accounts with Jackson or Jackson New York.
- 6. Jackson further sent the long-form notices to the broker-dealers identified in Jackson's systems as having been involved with Class Member Policies. Jackson provided the notice information to these broker-dealers because Class Members might turn to such persons or entities for information on the Settlement and because the broker-dealers should be prepared to direct their clients to Kroll or Class Counsel. In total, Jackson contacted 310 broker-dealer offices by mail and 158 by phone and email.
- 7. Jackson also prepared its customer-service center to receive calls from Class Members who received the notices. Jackson has directed these callers to Kroll or Class Counsel, as appropriate, for information on the Settlement.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27th day of April, 2021.

Hilary Crapmore