

# **EXHIBIT E**

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

DAVID CRUSON AND JOHN DENMAN

*Plaintiffs,*

v.

JACKSON NATIONAL LIFE INSURANCE  
COMPANY

*Defendant.*

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

JURY TRIAL

**DECLARATION OF JOHN DENMAN IN SUPPORT OF MOTIONS FOR FINAL  
APPROVAL OF CLASS-ACTION SETTLEMENT AND FOR ATTORNEYS' FEES,  
SERVICE AWARDS, AND COSTS**

I, John Denman, declare:

1. I submit this declaration in support of the settlement that has been presented to the Court and in support of the service award of \$1,000. 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. I first became aware of this case in April of 2018 when I was asked by my financial advisor, Mike Reynolds, if I would serve as a class representative in a claim against Jackson National Life Insurance Company. Mr. Reynolds explained to me the manner in which Jackson charged me a penalty fee for an excess partial withdrawal from my Jackson National

Life Variable Annuity. After listening to Mr. Reynolds's explanation, I asked him if I had a claim against Jackson for its fee. Mr. Reynolds told me that, in his opinion, I did. I thus asked him to call Mr. Corley and tell him that I would serve as a class representative.

3. Since then, I have stayed involved in this case. I have worked with Mr. Corley and Lew LeClair of McKool Smith, providing support and oversight during the prosecution of the case. I have had many telephone conversations with Mr. Corley about the case. I worked with Mr. Corley and a third-party vendor to search my computer for key terms. The third-party vendor conducted the search and provided its results to, according to my understanding, Jackson's legal counsel. I also worked with Mr. Corley and Mr. Reynolds to set up my deposition. I understand that my deposition was canceled because of the parties reaching a settlement.

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. I believe I would not get any 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.

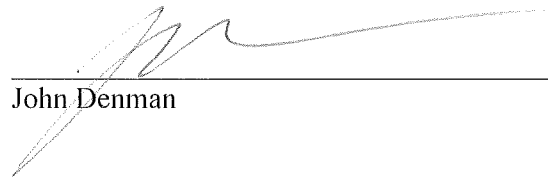
5. The notice was received by me, and I found it understandable and user-friendly. Class Counsel have proven accessible and helpful with respect to providing information and assistance during the settlement process.

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 facilitating the work of the third-party vendor, my role in this case has included preparing for my deposition. 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.



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John Denman