STEVEN G. SKLAVER (237612)
ssklaver@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Phone: (310) 789-3100
Fax: (310) 789-3150

Class Counsel

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

EASTERN DIVISION

WILLIAM F. WREN and JOHN MURPHY, on behalf of themselves and others similarly situated,

Plaintiffs,

v.

TRANSAMERICA LIFE INSURANCE COMPANY,

Defendant.

Case No. 5:21-cv-00178-JGB-SP

DECLARATION OF SUSAN WASKIEWICZ REGARDING SETTLEMENT ADMINISTRATION

I, Susan Waskiewicz, hereby declare as follows:

1. I am a Project Manager at JND Legal Administration ("JND"). This Declaration is based upon my personal knowledge, as well as upon information provided to me by experienced JND employees and Class Counsel, and if called upon to do so, I could and would testify competently thereto.

2. JND is serving as the Settlement Administrator in the above-captioned litigation ("Action") for the purposes of administering the Settlement Agreement as ordered by the Court in its Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (Dkt. 211), dated July 30, 2026. Gina Intrepido-Bowden, a Vice President at JND, previously submitted a declaration on July 10, 2026 regarding the proposed notice plan (Dkt. 207-14), and a declaration on September 18, 2026 regarding settlement administration expenses (Dkt. 212-8).

SETTLEMENT CLASS DATA RECEIVED

3. On July 31, 2026, JND received a spreadsheet containing the names, mailing addresses, and policy numbers for 2,356 individuals identified as potential Settlement Class Members.

4. Prior to mailing notices, JND updated the Settlement Class Member contact information using data from the National Change of Address ("NCOA") database.[1] The Settlement Class Member data was promptly loaded into a database established for this Action.

NOTICE MAILING

5. On August 18, 2026, JND sent the Court-approved postcard Notice via U.S. Postal Service first-class mail to the 2,356 Class Members included in the class member data. A representative sample of that notice is attached hereto as **Exhibit A**.

6. Of the 2,356 Class Notices mailed, 20 were forwarded to updated

[1] The NCOA database is the official United States Postal Service ("USPS") technology product which makes changes of address information available to mailers to help reduce undeliverable mail pieces before mail enters the mail stream.

addresses by USPS. 138 Class Notices were returned to JND as undeliverable. For the undeliverable Class Notices, JND conducted advanced address searches and received updated address information for 36 Settlement Class Members. JND remailed the Class Notices to the 36 Settlement Class Members, and 6 have been returned as undeliverable. Thus, the Court-approved Class Notice reached approximately 95.4% of the Settlement Class Members by direct mail.

SETTLEMENT WEBSITE

7. On August 18, 2026, JND established a dedicated website for the Action (www.WrenCVISettlement.com), which hosts downloadable copies of important case documents (including, but not limited to, the Long Form Notice, Settlement Agreement, Class Action Complaint, and Order Granting Plaintiffs' Motion for Preliminary Approval), provides answers to frequently asked questions, key dates and includes contact information for the Settlement Administrator.

8. On September 21, 2026, JND posted Class Counsel's Motion for Attorneys' Fees, Reimbursement of Litigation Expenses, and Service Awards, and supporting documents onto the Settlement Website.

9. As of October 7, 2026, the website has tracked 3,204 unique users who registered 5,196 page views.

TOLL-FREE INFORMATIONAL LINE

10. On August 18, 2026, JND activated a case-specific toll-free number (1-888-305-6486) with both live operators and an interactive voice response ("IVR") for Settlement Class Members to call to obtain information about the Settlement. The telephone line and IVR are available twenty-four hours a day, seven days a week. Live operators are available Monday through Friday from 8:30 am to 5:00 pm Pacific Time.

11. As of October 7, 2026, the toll-free number has received 62 calls.

REQUESTS FOR EXCLUSION

12. The Class Notice informed recipients that any Settlement Class

Members who wished to exclude themselves ("opt out") from the Settlement could do so by submitting an exclusion request to the Settlement Administrator, postmarked on or before October 2, 2026.

13. As of October 7, 2026, JND has not received any requests for exclusion.

OBJECTIONS

14. The Class Notice informed recipients that any Settlement Class Members who wished to object to the Settlement could do so by filing an objection with the Court and serving it on Class Counsel and Counsel for Transamerica by October 2, 2026.

15. As of October 7, 2026, JND has not received any objections.

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

Executed this 8th day of October 2026, in Waukesha, Wisconsin.

Susan Waskiewicz

SUSAN WASKIEWICZ

EXHIBIT A

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

If you own or owned certain Direct Recognition Life insurance policies, you may be affected by a class action settlement with Transamerica Life Insurance Company

A court authorized this Notice.
This is not a solicitation from a lawyer.

A proposed settlement has been reached in a class action lawsuit called *Wren, et al. v. Transamerica Life Insurance Company*, Case No. 5:21-cv-00178-JGB-SP (C.D. Cal.) (the "Settlement").

Questions?
Visit www.WrenCVISettlement.com
or Call 1-888-305-6486

Wren v. TLIC Settlement Administrator
c/o JND Legal Administration
PO Box 91248
Seattle, WA 98111

«MailingBarcode»
Postal Service: Please do not mark barcode

«Name»
«Address1»
«Address2»
«City», «State» «PostalCode»
«Country»

What is this lawsuit about?

Plaintiffs allege that Defendant Transamerica Life Insurance Company ("TLIC") improperly failed to credit certain Cash Value Increases ("CVIs") to eligible Direct Recognition Life ("DRL") insurance policies and did not act in good faith regarding those CVIs. TLIC denies all allegations of wrongdoing and denies that it violated any law, breached any contract, or acted improperly in any way. The Court has not decided who is right. Instead, Plaintiffs and TLIC have agreed to settle to avoid the cost, delay, and risk of continued litigation.

Who is included?

Records indicate you may be a Settlement Class Member. You are a Settlement Class Member if:

- ✓ You own or owned a TLIC universal life insurance policy that was in effect on January 1, 2016;
- ✓ The policy was known by the product names "Direct Recognition Life 10" or "Direct Recognition Life 11", or by the attribute codes "DRL-10" or "DRL-11"; and
- ✓ The policy was established and defined by the provisions of a Group Master Policy, Group Insurance Certificate, and Issue Illustration.

What does the Settlement Provide?

The proposed Settlement provides for:

1. **$110 Million Settlement Fund** - TLIC has agreed to create a $110 million Settlement Fund. After deducting Settlement Administration Expenses, any Service Awards to the Class Representatives, any Class Counsel's fees and expenses awarded by the Court, and any other Court-approved payments, the remaining amount (the "Net Settlement Fund") will be distributed to Settlement Class Members based on a Court-approved Plan of Allocation. The amount each Settlement Class Member receives will depend on factors including the relative value of qualifying CVIs associated with the applicable policy or policies.
2. **Bonus Crediting Project** – TLIC will not rescind, revoke, or reverse certain credits it paid, and it has committed to pay, pursuant to a project it undertook in 2025 and 2026 as a result of this litigation under which it credited or will credit certain 30-Year Guaranteed CVIs.
3. **40-Year Guaranteed CVI Benefit** - TLIC has agreed that it will credit the 40-Year Guaranteed CVI for certain eligible DRL policies that remain in force on their 40-year policy anniversaries.
3. **Non-Contestability Benefit** -TLIC has agreed that it will not seek to void, rescind, cancel, declare void, or otherwise deny certain death claims submitted by Settlement Class Members based on alleged lack of insurable interest or alleged misrepresentations made in connection with the original application process.

Your Options.

Do Nothing: If you do nothing, you will remain in the Settlement Class. You will get certain benefits from the Settlement and will automatically get a payment in the mail if you are entitled to one. You will be bound by the Settlement, and you will give up your right to sue or continue to sue TLIC for the claims resolved or released in this case.

Exclude Yourself (Opt Out): If you opt out, you will get no cash payment from the Settlement. But you will keep your right to sue or continue to sue TLIC, at your own expense, for the claims resolved in this case. You must exclude yourself by **October 2, 2026**.

Object: If you do not exclude yourself, you can tell the Court what you don't like about the Settlement. The purpose of an objection is to persuade the Court not to approve the proposed Settlement. You will still be bound by the Settlement if it is approved. Objections must be filed by **October 2, 2026**.

Go to **www.WrenCVISettlement.com** for details on how to opt out or file an objection.

The Court's Fairness Hearing.

The Court will hold a hearing on November 9, 2026, to consider whether to approve the Settlement, a service award up to $25,000 for each Plaintiff, reimbursement of litigation expenses, and attorneys' fees not to exceed one-third of the gross benefits provided to the Settlement Class, to be paid directly from the Settlement Fund, as well as to consider any objections. The Court appointed Susman Godfrey L.L.P. and Bonnett Fairbourn Friedman & Balint, PC to represent the Settlement Class as Class Counsel. You or your attorney may attend the hearing at your own expense, but you are not required to do so.

More Information.

Complete information about your rights and options, as well as the Long Form Notice and the Settlement Agreement are available at **www.WrenCVISettlement.com**, by accessing the Court docket for this case, for a fee, through the Court's Public Access to Electronic Records (PACER) system at https://ecf.cacd.uscourts.gov/cgi-bin/ShowIndex.pl, or by visiting the office of the Clerk for the Court for United States District Court for the Central District of California, George E. Brown, Jr. Federal Building and United States Courthouse 3470 Twelfth Street, Riverside, CA 92501. You can also call toll-free at 1-888-305-6486, or write to: Wren v. TLIC Settlement Administrator, c/o JND Legal Administration, P.O. Box 91248, Seattle, WA 98111.



PLEASE DO NOT CONTACT THE COURT.

Carefully separate this Address Change Form at the perforation

Name: _____

Current Address: _____

_____

_____

Unique ID: «Name Number»

Place Stamp Here

Address Change Form

To make sure your information remains up-to-date in our records, please confirm your address by filling in the above information and depositing this postcard in the U.S. Mail.

Wren v. TLIC Settlement Administrator
c/o JND Legal Administration
PO Box 91248
Seattle, WA 98111