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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 JOHN
MURPHY IN SUPPORT OF
CLASS COUNSEL'S MOTION
FOR ATTORNEYS' FEES,
REIMBURSEMENT OF
LITIGATION EXPENSES, AND
SERVICE AWARDS**

1 I, John Murphy, hereby declare as follows:

2 1. I submit this declaration in support of Plaintiffs' Motion for Attorneys'
3 Fees, Reimbursement of Litigation Expenses, and Service Awards in connection with
4 the proposed class action settlement between Plaintiffs William F. Wren and John
5 Murphy, individually and on behalf of the Settlement Class, and Defendant
6 Transamerica Life Insurance Company ("Transamerica").

7 2. I am an individual over the age of 18 and a resident of Indiana. I have
8 personal knowledge of the matters stated herein and, if called upon, I could and would
9 competently testify to them.

10 3. I am a named plaintiff and class representative appointed for purposes
11 of settlement in *Wren v. Transamerica Life Insurance Company*, No. 5:21-cv-00178-
12 JGB-SP, filed on February 1, 2021, in the United States District Court for the Central
13 District of California.

14 4. I was added as a named plaintiff to this case through the Amended
15 Complaint, filed on April 4, 2025, Dkt. 131, and the Corrected Amended Complaint
16 filed on June 4, 2025, Dkt. 140.

17 5. Over the past year-and-a-half, I have devoted significant time and effort
18 to this case, performing specific tasks to benefit the lawsuit and fulfill my role as a
19 class representative.

20 6. In March and April 2025, I had preliminary telephone conferences with
21 Susman Godfrey attorneys regarding this case. I reviewed a proposed amended
22 complaint, checking the accuracy of the factual allegations, and engaged in a search
23 for prior email correspondence with Transamerica. I also searched for and reviewed
24 my policy, policy statements, and related records.

25 7. In June 2025, to prepare for discovery and for my future deposition, I
26 had an in-person meeting with Susman Godfrey attorney Jason Bell regarding the
27 case, my records, and the duties expected of a class representative.

28 8. I continued to review drafts of litigation documents throughout the case,

1 including responses to Transamerica's interrogatories that were served on me.

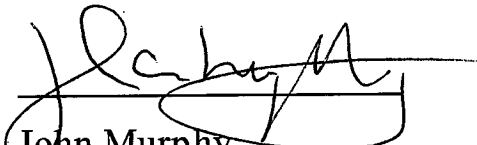
2 9. In late July 2025, I continued preparing for my deposition. That further
3 preparation included multiple telephone and videoconference meetings in August
4 2025 to discuss my records and recollections. On August 19, 2025, I attended and
5 testified at my deposition. In September 2025, I then reviewed the deposition
6 transcript and submitted errata.

7 10. Once the settlement was reached with Transamerica, I closely reviewed
8 the proposed settlement agreement and corresponded with Susman Godfrey
9 attorneys. I scrutinized the terms of the settlement, to ensure that class members were
10 receiving a fair result.

11 11. Over the course of the litigation, I estimate that I spent more than 30
12 hours searching for and reviewing documents, conferring with attorneys, staying
13 apprised of the litigation, and participating in discovery.

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

17 Executed this 2nd day of September, 2026, in Brownsburg, IN

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21 John Murphy
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Class Counsel

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**[PROPOSED] ORDER
GRANTING CLASS COUNSEL'S
MOTION FOR ATTORNEYS'
FEES, REIMBURSEMENT OF
LITIGATION EXPENSES, AND
SERVICE AWARDS**

1 WHEREAS, Plaintiffs William F. Wren and John Murphy, on behalf of
2 themselves and the Settlement Class, entered into a settlement (the “Settlement”)
3 with Defendant Transamerica Life Insurance Company (“Transamerica”);

4 WHEREAS, on July 30, 2026, the Court entered an Order Granting Motion
5 for Preliminary Approval of Settlement (“Preliminary Approval Order”). Dkt. 211.
6 Among other things, the Preliminary Approval Order authorized Class Counsel to
7 disseminate notice of the Settlement, the Final Approval Hearing, and related matters
8 to the Class. Notice was provided to the Class pursuant to the Preliminary Approval
9 Order, and the Court held a Final Approval Hearing on November 9, 2026;

10 WHEREAS, Class Counsel filed a motion for attorneys’ fees, reimbursement
11 of litigation expenses, and service awards for the named Plaintiffs;

12 NOW THEREFORE, having considered Class Counsel’s “Motion for
13 Attorneys’ Fees, Reimbursement of Litigation Expenses, and Service Awards,”
14 supporting materials, the proceedings at the Final Approval Hearing, and the
15 complete records and files in this matter,

16 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:**

17 1. The capitalized terms used herein shall have the meanings set forth in the
18 Settlement Agreement.

19 2. Class Counsel shall receive attorneys’ fees in the amount of
20 \$47,455,027, with the first \$5,835,397.97 paid from the separate escrow account
21 established under Paragraph 127 of the Settlement Agreement, and the remainder
22 paid from the Final Settlement Fund created by the Settlement, plus a *pro rata* share
23 of the interest earned on the Final Settlement Fund and the separate escrow account.

24 3. Class Counsel shall be reimbursed \$397,818.42 in costs and expenses
25 reasonably incurred in the prosecution and settlement of this litigation, to be paid
26 out of the Final Settlement Fund created by the Settlement.

27 4. The Settlement Administration Expenses through September 17, 2026 are
28 \$50,087.06. Under the terms of the Settlement Agreement, those costs are payable

1 out of the Final Settlement Fund. Any additional Settlement Administration Expenses
2 may be paid out of the Final Settlement Fund as they become due.

3 5. The Court shall entertain any supplemental application for reimbursement
4 of expenses incurred by Class Counsel on behalf of the Settlement Class.

5 6. Plaintiffs William F. Wren and John Murphy shall each be paid a service
6 award of \$25,000, payable out of the Final Settlement Fund.

7 7. This Order shall become effective immediately.

8
9 IT IS SO ORDERED.

10 Dated: _____
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12 _____
13 Hon. Jesus G. Bernal
14 UNITED STATES DISTRICT JUDGE
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