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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 WILLIAM F.
WREN IN SUPPORT OF CLASS
COUNSEL'S MOTION FOR
ATTORNEYS' FEES,
REIMBURSEMENT OF
LITIGATION EXPENSES, AND
SERVICE AWARDS**

1 I, William F. Wren, 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 California. 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. Over the past five years, I have devoted significant time and effort to
15 this case, performing specific tasks to benefit the lawsuit and fulfill my role as class
16 representative.

17 5. After Transamerica notified me in 2016 that Transamerica would not
18 credit the Cash Value Increases for my policy because of the *Oakes* settlement, I
19 began investigating whether there were potential claims against Transamerica. I spent
20 substantial time researching my policy, the *Oakes* settlement, and Transamerica's
21 conduct. Through this research, I eventually contacted counsel at Bonnett, Fairbourn,
22 Friedman & Balint, P.C. and began a dialogue regarding potential claims against
23 Transamerica.

24 6. While considering claims against Transamerica, I searched for,
25 collected, and reviewed my policy documents, many of which were decades old. I
26 diligently reviewed the draft complaint, checking the accuracy of the factual
27 allegations.

28 7. After the complaint was filed in February 2021, and while this litigation

1 was pending, I stayed apprised of the litigation and actively participated in the case.
2 After the Court granted Transamerica's motion for summary judgment, in
3 preparation for the appeal, I reviewed the filings and other relevant documents.

4 8. Following the Ninth Circuit's decision reversing and remanding to this
5 Court, I gathered additional documents. As the case entered discovery, I reviewed
6 draft discovery responses and assisted counsel in the search for and production of my
7 own documents. I ultimately reviewed responses to two sets of interrogatories
8 totaling nineteen requests, including two sets of supplemental responses.

9 9. To prepare for the filing of the Amended Complaint in April 2025, I
10 reviewed the draft pleading for the accuracy of the factual allegations.

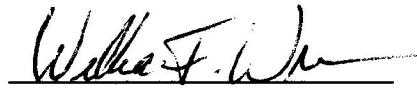
11 10. During the summer of 2025, I began preparing for my deposition. That
12 preparation included videoconference meetings in August 2025 to discuss my records
13 and recollections, as well as an in-person meeting in September 2025. On September
14 11, 2025, I attended and testified at my deposition.

15 11. Once the settlement was reached with Transamerica, I closely reviewed
16 the proposed settlement agreement and corresponded with Susman Godfrey attorneys
17 numerous times, by email and over phone calls. I scrutinized the terms of the
18 settlement, to ensure that class members were receiving a fair result.

19 12. Over the course of the litigation, I estimate that I spent between 200 and
20 250 hours searching for and reviewing documents, researching potential claims
21 against Transamerica, conferring with attorneys, staying apprised of the litigation,
22 and participating in discovery.
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1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed this 2 day of September, 2026, in RAVELLE CUCAMONGA

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