

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

ADVANCE TRUST & LIFE ESCROW
SERVICES, LTA, as securities
intermediary for LIFE PARTNERS
POSITION HOLDER TRUST, and
ALICE CURTIS, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

RELIASTAR LIFE INSURANCE
COMPANY,

Defendant.

Civ. No.: 0:18-cv-2863-DWF-BRT

**DECLARATION OF RYAN T. WEISS IN SUPPORT OF UNOPPOSED
MOTION FOR APPROVAL OF FORM AND MANNER OF CLASS NOTICE**

I, Ryan T. Weiss, hereby declare as follows:

1. I am a member in good standing of the State Bar of New York and Texas, and am admitted *pro hac vice* in the United States District Court for the District of Minnesota. I am an attorney in the law firm of Susman Godfrey L.L.P. and counsel of record for the plaintiffs in the above-captioned action. I have personal knowledge of the facts set forth herein, and if called as a witness, would testify competently thereto.

2. I make this declaration in support of Plaintiffs' Motion to Approve the Form and Manner of Class Notice.

3. On April 25, 2022, Class Counsel sent counsel for Defendant ReliaStar Life Insurance Company ("RLIC") draft versions of the proposed short-form and long-form notices attached as Exhibits 2 and 3 to the Declaration of Jennifer Keough. On April 28,

2022, RLIC's counsel informed Class Counsel that they had reviewed the notices and sent edits. RLIC's counsel also informed Class Counsel that they would not oppose Class Counsel's motion to approve the form and manner of notice.

4. On April 28, 2022, Counsel for RLIC informed Class Counsel that by May 25, 2022, RLIC would provide Class Counsel with a list of class members and their last known addresses.

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

Executed this 28th day of April, 2022, at Houston, Texas.

/s/ Ryan T. Weiss _____

Ryan T. Weiss (*Pro Hac Vice*)
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