

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)

JEROME SKOCHIN, SUSAN SKOCHIN and )	Civil Action No. 3:19-cv-00049-REP
LARRY HUBER, Individually and on Behalf )	
of All Others Similarly Situated, )	<u>CLASS ACTION</u>
)	
Plaintiffs, )	
)	
vs. )	
)	
GENWORTH LIFE INSURANCE )	
COMPANY, and GENWORTH LIFE )	
INSURANCE COMPANY OF NEW YORK, )	
)	
Defendants. )	
)	

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**DECLARATION OF SUSAN SKOCHIN IN SUPPORT OF FINAL APPROVAL OF  
PROPOSED SETTLEMENT AND REQUEST FOR SERVICE PAYMENT**

I, Susan Skochin, declare pursuant to 28 U.S.C. §1746 as follows:

1. My name is Susan Skochin. I am over the age of 18, and I am competent to give testimony. The statements contained herein are based upon my own personal knowledge and are true and correct.

2. I am one of named plaintiffs in the above-captioned action. I submit this Declaration in support of final approval of the proposed settlement of this action, and my request for Genworth's payment to me of a service award for my service as a class representative in this case, subject to the Court's approval.

3. All during my counsel's pre-suit investigation of this case, and since I joined this case as a named plaintiff, I have understood, and currently understand, that my obligations as a class representative include placing the interests of the class ahead of my own. I have consistently demonstrated my commitment by pursuing this litigation actively and diligently. I preserved data and documents in accordance with my obligations, and I devoted many dozens of hours on behalf of the class.

4. I worked with my counsel, principally Brian D. Penny of Goldman Scarlato & Penny, P.C., to draft each of the complaints filed in this action, approving each complaint before they were filed with the Court.

5. I reviewed all of the document requests and interrogatories that Genworth served on me with Mr. Penny, and worked with him to provide careful, correct answers to the interrogatories and to search for, collect, and produce responsive documents concerning my claims and Genworth's defenses, including extremely sensitive information regarding my financial and medical circumstances.

6. On September 11, 2019, I spent the better part of the day meeting with Mr. Penny in order to prepare for my deposition the following day. I had also done extensive preparation prior to this meeting to prepare for my deposition, including taking a deep-dive into documents I produced in discovery, my written discovery responses, and the complaints filed on my behalf. I also spoke on the phone with Mr. Penny on several occasions prior to our in-person meeting to begin preparing for my deposition.

7. My deposition was taken from 3:07 PM to 6:34 PM on September 12, 2019 in Philadelphia, Pennsylvania. Following the deposition, Mr. Penny forwarded me a copy of the transcript of my deposition, which I thoroughly reviewed for accuracy.

8. Between August and October 2019, I spoke on several occasions with Mr. Penny about the attorneys' ongoing mediation efforts with mediator Rodney Max to attempt to settle the litigation. I was very well informed of the negotiations as they progressed and was given ample opportunity to comment on and ask questions about the settlement reached, which I did.

9. Simply put, my attorneys made certain that I stayed fully informed throughout the pendency of the case. My attorneys sent me drafts of all major court filings, communicated case developments with me frequently, and worked very hard to prepare me so that I was ready for my deposition and was fully informed before making a decision whether to accept the proposed settlement negotiated by my counsel and Genworth's counsel.

10. In my opinion, the settlement with Genworth provides the class with a fair and well-deserved result following the impact of Genworth's actions. Indeed, it is my firm belief that we obtained virtually all of the relief we sought in this case – *i.e.*, the ability to make an informed decision, based on all material facts, regarding our Genworth long-term care insurance policies. In addition, I full support and approve Class Counsel's fee and expense application to the Court.

Absent Class Counsel's tireless and highly professional work and advocacy on both my behalf and on behalf of the Class, the excellent settlement proposed to the Court would not have been achieved.

I declare under penalty of perjury under the laws of the United States that the foregoing facts are true and correct and that this declaration was executed this 15<sup>th</sup> day of May, 2020.

*Susan Skochin*

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Susan Skochin

**CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2020, I filed the foregoing pleading or paper through the Court's CM/ECF system, which sent a notice of electronic filing to all registered users.

*/s/ Jonathan M. Petty*

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Jonathan M. Petty (VSB No. 43100)

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