

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

BRIGHTON TRUSTEES, LLC,
AS TRUSTEE, *et al.*,

Plaintiffs,

v.

GENWORTH LIFE AND ANNUITY INSURANCE
COMPANY,
Defendant.

Civil No. 3:20cv240 (DJN)

**DECLARATION OF GINA INTREPIDO-BOWDEN REGARDING SETTLEMENT
ADMINISTRATION EXPENSES**

I, GINA M. INTREPIDO-BOWDEN, declare and state as follows:

1. I am a Vice President at JND Legal Administration (“JND”). This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees, and if called upon to do so, I could and would testify competently thereto.

2. JND is serving as the Settlement Administrator¹ in the above-captioned litigation (“Action”) for the purposes of administering the Joint Stipulation and Settlement Agreement (“Settlement Agreement”) preliminarily approved by the Court in its Order Preliminarily Approving Class Action Settlement (“Preliminary Approval Order”), dated June 3, 2022.

3. I previously submitted Declarations regarding the Proposed Settlement Notice Program (dated May 9, 2022) and the Proof of Mailing Class Notice and Proof of Long-Form Notice

¹ Capitalized terms used and not otherwise defined herein shall have the meanings given such terms in the Joint Stipulation and Settlement Agreement.

Pursuant to the Order Preliminarily Approving the Class Action Settlement (dated June 24, 2022). ECF No. 132-1 and ECF 138-1. This additional Declaration is being filed to report on the Settlement Administration Expenses that JND has incurred for this matter and to provide an update on JND's estimated remaining Settlement Administration Expenses.

SETTLEMENT ADMINISTRATION EXPENSES

4. Settlement Administration Expenses includes all Class Notice and administrative fees, costs or expenses incurred in administering the Settlement. As of June 30, 2022, JND has incurred \$26,826.81 in Settlement Administration Expenses.

5. JND estimates that its remaining Settlement Administration Expenses are expected to be approximately \$90,000 - \$105,000, including work in connection with benefit distribution and administration completion.

I declare under penalty of perjury under the laws of the State of Virginia that the foregoing is true and correct.

Executed on July 8, 2022, at Philadelphia, PA.



GINA M. INTREPIDO-BOWDEN