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*Attorneys for Plaintiff and the Class*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

JOE S. YEARBY, on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

AMERICAN NATIONAL INSURANCE  
COMPANY,

Defendant.

Case No. 3:20-cv-09222-EMC

**DECLARATION OF BRYAN  
NICHOLSON**

1 I, Bryan Nicholson, declare:

2 1. I am an individual over the age of 18. I have personal knowledge of the facts set  
3 forth below and if called to testify I could and would do so competently.

4 2. I serve as the executive director for the Life Insurance Settlement Association  
5 (“LISA”). My business address is 1800 M Street, NW, Suite #400S, Washington, DC, 20036.

6 3. This declaration is submitted in support for approval of LISA as the *cy pres* recipient  
7 of the unclaimed proceeds from the class action settlement.

8 4. Founded in 1994, LISA is the oldest and largest organization representing  
9 participants in the life settlement industry. The mission of LISA is to advance the highest standards  
10 of practice and professional development for the industry and to educate consumers and advisors  
11 about life settlements as an alternative to lapse or surrender of a life insurance policy.


12 5. LISA’s membership, consisting of brokers, providers, financing entities, and service  
13 providers, does business in all 50 states and have contributed conceptual as well as detailed  
14 language to laws governing the industry in every regulated state.

15 6. LISA assists stakeholders by providing educational material to policyholders and  
16 their advisors interested in availing themselves of life settlement options other than surrendering  
17 their policies or letting them lapse. LISA helps to create materials that help seniors move through  
18 the initial decision-making steps they should consider as they evaluate the life settlement option.  
19 LISA also responds in real time to inquiries from seniors to permit them to make decisions on an  
20 educated basis.

21 7. Any amount paid to the LISA as a *cy pres* award will be used to promote improved  
22 public information and awareness and help to create a competitive marketplace that delivers a  
23 valuable financial service to consumers. LISA would use funds from a *cy pres* award to support  
24 general administration of LISA’s planned or forthcoming activities, including communications  
25 targeted at policyholders in the interest of educating them about life settlement options as an  
26 alternative to policy lapse or surrender.

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

3  
4 Dated: August 7, 2025

5 By:   
6 Bryan D. Nicholson