

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SIMON BERNSTEIN IRREVOCABLE)	
INSURANCE TRUST DTD 6/21/95,)	
)	
Plaintiff,)	
v.)	Case No. 13 cv 3643
)	
HERITAGE UNION LIFE INSURANCE)	Honorable Amy J. St. Eve
COMPANY,)	Magistrate Mary M. Rowland
)	
Defendant.)	
-----)	
<i>et al.</i>		

DEFENDANT'S FED. R. CIV. P. 26(a)(1) DISCLOSURES

Defendant Jackson National Life Insurance Company, by and through its attorneys, hereby makes the following disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):

(i) Persons with relevant information

1. Heirs and relatives of Simon Bernstein, decedent, including but not limited to, Ted Bernstein and Eliot Bernstein, may have discoverable information relating to the subject life insurance policy; its administration; its owners, trustees and beneficiary designations; and the issues raised in the pending claims, counterclaims and third-party claims.
2. Unknown former employees of Heritage Union Life Insurance Company may have discoverable information relating to the subject life insurance policy; its administration; its owners, trustees and beneficiary designations; and the issues raised in the pending claims, counterclaims and third-party claims.
3. Unknown former employees of United Bank of Illinois, First American National Bank, and LaSalle Bank may have discoverable information relating to the subject life insurance policy; its administration; its owners, trustees and beneficiary designations; and the issues raised in the pending claims, counterclaims and third-party claims.
4. Attorneys in Florida handling the Estate of Simon Bernstein, decedent, may have discoverable information relating to the subject life insurance policy; its administration; its owners, trustees and beneficiary designations; and the issues raised in the pending claims, counterclaims and third-party claims.

(ii) Relevant documents to be used as proof in Jackson's possession

Jackson will be producing the non-privileged records in its possession relating to the subject policy.

(iii) Damages

Not applicable.

(iv) Insurance

Not applicable.

**JACKSON NATIONAL LIFE INSURANCE
COMPANY,**

By: /s/ Alexander D. Marks
One of Its Attorneys

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CERTIFICATE OF SERVICE

The undersigned, an attorney, states that on October 1, 2013 he caused a copy of the foregoing Rule 26 Disclosures to be served electronically upon the following:

Adam M. Simon
The Simon Law Firm
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Eliot Bernstein
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/s/ Alexander D. Marks