

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

Thrift Development Corporation,

Plaintiff,

v.

American International Group, Inc.;
Chartis, Inc., and American Home Assurance
Co.,

Defendants.

Civil Action No. 8:12-cv-00861-BHH

**DECLARATION OF GARY THRIFT IN SUPPORT OF PLAINTIFF'S PETITION FOR
AWARD OF ATTORNEYS' FEES AND EXPENSES AND SERVICE AWARD**

I, Gary Thrift, declare:

1. I am the president of Thrift Development Corporation, the named plaintiff and class representative in this case.
2. I submit this declaration in support of Plaintiff's Petition for Award of Attorney's Fees and Expenses and Service Award. I have personal knowledge of the matters set forth herein and could competently testify thereto.
3. I and members of my staff at Thrift Development took an active role in this case and expended considerable time participating in and assisting with the case as requested by counsel. Specifically, I or members of my staff engaged in the following activities:
 - a. Gathering documents for the investigation of this case, including copies of my insurance policies, premium audits, and loss run reports;
 - b. reviewing and approving the complaint filed in this case;
 - c. reviewing and approving various other pleadings filed in the case,

including motions and responses to motions;

d. reviewing and approving various correspondence in this case;

e. remaining further informed about the case through periodic communications with counsel, including telephone calls and email correspondence;

f. reviewing and approving discovery requests and responses in this case;

g. gathering documents from Thrift Development's files for production in this case, including over 1,600 pages of documents related to Thrift Development's workers' compensation insurance;

h. becoming more educated about ex-mods and their impacts on workers' compensation insurance premiums;

i. becoming educated about class actions and the role of class representatives;

j. preparing for and having my deposition taken; and

k. reviewing and approving the settlement agreement in this case and the preliminary approval motion.

4. I estimate that I and members of my staff devoted approximately 40 hours engaging in the activities listed above.

5. I believe that the settlement is fair, reasonable, adequate and in the best interests of the class members.

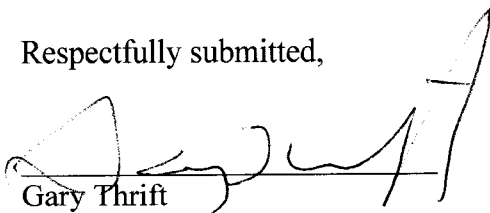
6. I have never been promised any compensation for performing my duties as a plaintiff and class representative. I understand, however, that the parties have requested that the Court award me \$5000 for my time and efforts on behalf of the class. I will be most appreciative if the Court determines that my efforts on behalf of the Class in commencing and assisting with

the prosecution of this action warrant an award in that amount.

7. I also support Class Counsel's request for attorney's fees and costs. I have been impressed by the representation Class Counsel provided to me and other class members. The lawyers I have communicated with have always been professional and made sure to keep me informed about the status of the litigation. I am very appreciative of the results Class Counsel's efforts achieved.

I declare under penalty of perjury under the laws of the state of South Carolina that the foregoing is true and correct.

Respectfully submitted,



Gary Thrift
President, Thrift Development Corporation

September 23, 2015
Seneca, South Carolina