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**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
(Western Division)**

CLIFTON W. MARSHALL, et al.,

*Plaintiffs,*

v.

NORTHROP GRUMMAN  
CORPORATION, et al.,

*Defendants.*

Case No. 16-CV-6794 AB (JCx)

**DECL. OF KURT C. STRUCKHOFF  
IN SUPPORT OF PLAINTIFFS'  
MEMORANDUM IN OPPOSITION  
TO DEFENDANTS' MOTION IN  
LIMINE**

Hon. André Birotte Jr.

1 I, Kurt C. Struckhoff, of lawful age, declare as follows:

2 1. I am one of the attorneys in the law firm of Schlichter, Bogard & Denton  
3 LLP, which represents the Plaintiffs in this case. I am licensed to practice in the  
4 States of Missouri and Illinois, as well as numerous federal courts. I am admitted  
5 *pro hac vice* in the above-referenced matter. If called as a witness, I could and  
6 would competently testify to the facts set forth below as I know them to be true  
7 based upon my own personal knowledge or upon my review of the records and files  
8 maintained by the firm in the regular course of its representation of Plaintiffs in this  
9 case.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the  
11 deposition of Dr. Steve Pomerantz taken on October 29, 2018.

12 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the  
13 deposition of David Witz taken on November 7, 2018.

14 4. Attached hereto as Exhibit 3 is a compilation of revised reliance  
15 spreadsheets of calculations previously performed by Plaintiffs' experts, Dr. Steve  
16 Pomerantz, Mr. David Witz, and Mr. Martin Schmidt. Dr. Pomerantz's original  
17 spreadsheet calculating the Plan's annual returns was previously filed as Ex. J (Doc.  
18 172-8). These spreadsheets have been revised to update the Plan's annual returns  
19 based on discrepancies identified by Defendants in their Memorandum of Points  
20 and Authorities in Support of Defendants' Motion in *Limine*. See Doc. 172-1 at 11.  
21 The spreadsheets have been converted to PDF format for filing purposes.

22 5. Attached hereto as Exhibit 4 is a true and correct copy of the  
23 Administrative Services Master Contract, which was a publicly admitted trial  
24 exhibit (Tr. Ex. 97) in *In re Northrop Grumman ERISA Litig.* See No. 06-6213,  
25 Doc. 748 at 8 (C.D. Cal. Mar. 20, 2017).

26 6. Attached hereto as Exhibit 5 is a true and correct copy of a document titled  
27 "Explanation of General Northrop Grumman Services Provided to Qualified Plan",  
28 which was produced by Defendants as NGC0286711.

