

# **EXHIBIT B**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

GARNET TURNER, individually and on )  
behalf of all others similarly situated, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
ALLSTATE INSURANCE COMPANY, )  
 )  
Defendant. )

CIVIL ACTION NUMBER:  
2:13-cv-00685-MEF-CSC

DECLARATION OF HEATHER DUMAS IN SUPPORT OF  
DEFENDANT'S MOTION TO DISMISS

I, Heather Dumas, hereby declare as follows:

1. I am the Human Resources Manager of the Benefits Design and Planning Team at Allstate Insurance Company. I am the Plan Administrator for all of Allstate's health and welfare plans and am responsible for administering those plans, including the Group Life and Accidental Death and Dismemberment Insurance Plan.
2. I submit this declaration in support of Allstate Insurance Company's Motion to Dismiss.
3. Exhibit A is a true and correct copy of the Allstate Group Life and Accidental Death and Dismemberment Insurance Plan, dated January 1995.

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

Executed on this 14<sup>th</sup> day of November, 2013.

  
\_\_\_\_\_  
Heather Dumas