



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CANDICE LUE,

Plaintiff,

- against -

JPMORGAN CHASE & CO., ALEX KHAVIN,  
FIDELIA SHILLINGFORD, JOHN VEGA,  
HELEN DUBOWY, PHILIPPE QUIX, THOMAS  
POZ, CHRIS LIASIS, MICHELLE SULLIVAN,  
and DOES 1 - 10, inclusive,

Defendants.  
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No. 16 Civ. 03207 (AJN)(GWG)

**DECLARATION OF  
BARUCH HOROWITZ**

BARUCH HOROWITZ, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury as follows:

1. I was employed by JPMorgan Chase Bank, N.A. ("Chase"), a subsidiary of JPMorgan Chase & Co., a Defendant in the above-captioned action. I know the facts testified to in this Declaration to be true based upon my own personal knowledge.
2. I am a Caucasian male.
3. I worked for Chase from approximately November 2005 to August 2014. From approximately December 2011 to August 2014, I was employed as an Associate in the Counterparty Risk Group ("CRG") of JPMorgan Asset Management, a business unit of Chase.
4. While employed as an Analyst in CRG, I had two supervisors: Jim Sexton ("Sexton") and, later, Alex Khavin ("Khavin"). Khavin joined the CRG at some point after I did.
5. Prior to Khavin joining the team, I was periodically directed by Jim Sexton to take minutes at the group's monthly CRG meeting and other meetings, and I did so. Once Khavin joined CRG, she also periodically directed me to take minutes at the group's monthly

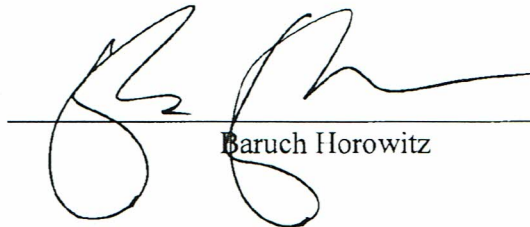
CRG meeting and other meetings. I did so. Subsequently, Khavin asked me to take the minutes on a "going-forward basis," and I did so for a period of time.

6. Additionally, Sexton and then Khavin directed me to prepare the materials for the monthly CRG meeting, including printing, organizing, sorting, collating, and stapling. I did so. Once I had completed these tasks, I typically e-mailed copies of the materials to everyone on the invite list of the monthly CRG meeting, including those attending remotely, and brought hard copies to the meeting to distribute to those attending in person. I am not aware that anyone else was assigned these tasks.

7. During my employment with Chase, I periodically worked from home. Prior to doing so, however, I contacted my group supervisor at the time for permission.

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

Dated: March 28, 2017  
Los Angeles, California



Baruch Horowitz