

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

DONNA L. SOTO, ADMINISTRATRIX OF)	
THE ESTATE OF VICTORIA L. SOTO, <i>et al.</i>)	
)	
Plaintiffs,)	
VS.)	Civil Action No.
)	
BUSHMASTER FIREARMS)	
INTERNATIONAL, LLC a/k/a FREEDOM)	
GROUP, INC. a/k/a REMINGTON OUTDOOR)	
GROUP, INC, <i>et al.</i>)	
)	
Defendants.)	

DECLARATION OF JONATHAN P. WHITCOMB, ESQ.

I, Jonathan P. Whitcomb, declare under penalty of perjury that the following is true and correct:

1. I am a licensed practicing attorney in the State of Connecticut. I have been retained by Defendants, Remington Arms Company, LLC and Remington Outdoor Company, Inc. to defend them in the above-captioned lawsuit.

2. I have been licensed to practice law in Connecticut since 1990. During that time, I have represented parties in numerous personal injury and wrongful death actions filed in Connecticut State courts and the United States District Court, District of Connecticut. In my practice, I routinely provide to clients my evaluation of the potential monetary value of personal injury and wrongful death claims in Connecticut courts.

3. I have reviewed the allegations and claims made for personal injury and wrongful death damages by the Plaintiffs in their Complaint in this case.

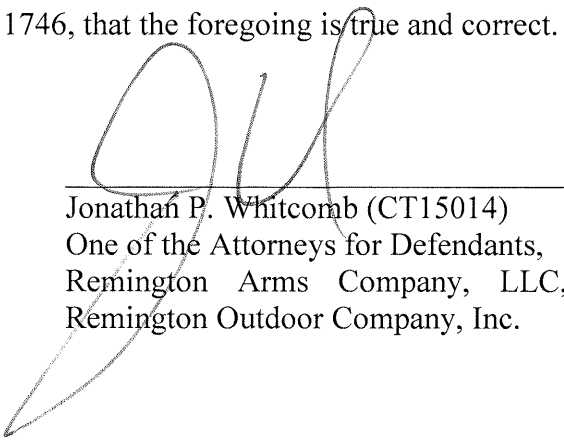
4. Four of the Plaintiffs are the Estates of adults killed, with criminal intent, by Adam Lanza in the December 14, 2012 shooting at Sandy Hook Elementary School in Newtown, Connecticut: Victoria Soto, Rachel D'Avino, Mary Sherlach and Lauren Rousseau. Each of the Estates seeks recovery under the Connecticut Wrongful Death Act for their decedent's terror, ante-mortem pain and suffering, destruction of the ability to enjoy life's activities, destruction of earning capacity, death and funeral expenses. In my opinion, the monetary value of each of these wrongful death claims exceeds \$75,000 in a Connecticut court. In addition, the husband of Mary Sherlach, William D. Sherlach, seeks to recover damages for the loss of his wife's society and companionship. In my opinion, the monetary value of his damages likely exceeds \$75,000 in a Connecticut court.

5. Five of the Plaintiffs are the Estates of children killed, with criminal intent, by Adam Lanza in the December 14, 2012 shooting at Sandy Hook Elementary School in Newtown, Connecticut: Dylan Hockley, Benjamin Wheeler, Jesse Lewis, and Noah Pozner. Each of the Estates seeks recovery under the Connecticut Wrongful Death Act for their decedent's terror, ante-mortem pain and suffering, destruction of the ability to enjoy life's activities, destruction of earning capacity, death and funeral expenses. In my opinion, the monetary value of each of these wrongful death claims exceeds \$75,000 in a Connecticut court.

6. Plaintiff Natalie Hammond survived the criminal shooting by Adam Lanza, but sustained "severe, permanent and painful [gunshot] injuries to her left calf, left foot, left thigh and left hand." She seeks recovery for terror, pain and suffering, destruction of the ability to enjoy life's activities, destruction of earning capacity and medical expenses. In my opinion, the monetary value of her claim exceeds \$75,000 in a Connecticut court.

I, Jonathan P. Whitcomb, declare under penalty of perjury under the laws of the United States of America, and pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on: January 14, 2015



Jonathan P. Whitcomb (CT15014)
One of the Attorneys for Defendants,
Remington Arms Company, LLC, and
Remington Outdoor Company, Inc.

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