



I, RIAN M. WROBLEWSKI, declare as follows:

1. I am an Investigative Analyst at Labaton Sucharow LLP (“Labaton”), counsel for City of Hialeah Employees’ Retirement System and New Bedford Contributory Retirement System, Court-appointed Lead Plaintiffs in the above-captioned securities class action (the “Action”).

2. I respectfully submit this Declaration in further support of Lead Plaintiffs’ Motion to Strike and Motion to Convert Defendants’ Motion to Dismiss the Amended Complaint into a Motion for Summary Judgment and to Open Discovery. I have personal knowledge of the matters set forth in this Declaration.

3. At Labaton’s request, I attempted to ascertain the original publication date of the presentation dated September 26, 2011, entitled “Genworth Australia – Mortgage Insurance.” See ECF No. 31, Ex. J.

4. Although Ex. J currently can be located at <http://investor.genworth.com/investors/events-andpresentations/Events-Calendar/default.aspx>, I determined that this web-page did not exist in 2011.


5. I further determined that Genworth Financial, Inc. (“Genworth”) used an external provider<sup>1</sup> to host investor relations materials from sometime before September 26, 2011 until at least August 21, 2013, instead of posting those materials on Investor.Genworth.com, where they currently reside. Some time on or after August 21, 2013, Genworth deleted the links to all files hosted by this external service provider, and re-uploaded them directly to Investor.Genworth.com.

---

<sup>1</sup> This provider is located at [http://phoenix.corporate-ir.net/phoenix.zhtml?c=175970&p=irol-presentationsarchive\\_pf](http://phoenix.corporate-ir.net/phoenix.zhtml?c=175970&p=irol-presentationsarchive_pf).

6. Because this external provider uses coding to block versions of the site from being archived, it was not possible to determine an accurate publication date for Ex. J.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 27th day of February, 2015 at New York, NY.

  
\_\_\_\_\_  
Rian M. Wroblewski

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 2, 2015.

s/ DOUGLAS R. BRITTON

DOUGLAS R. BRITTON

ROBBINS GELLER RUDMAN  
& DOWD LLP

655 West Broadway, Suite 1900

San Diego, CA 92101-8498

Telephone: 619/231-1058

619/231-7423 (fax)

E-mail: [dougb@rgrdlaw.com](mailto:dougb@rgrdlaw.com)

## Mailing Information for a Case 1:14-cv-02392-AKH

### Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Mario Alba , Jr**  
malba@rgrdlaw.com,e\_file\_ny@rgrdlaw.com,e\_file\_sd@rgrdlaw.com,drosenfeld@rgrdlaw.com
- **Jeffrey R. Alexander**  
jalexander@bftalaw.com
- **Douglas R. Britton**  
doughb@rgrdlaw.com,kathyj@rgrdlaw.com
- **Greg A. Danilow**  
greg.danilow@weil.com,MCO.ECF@weil.com,robert.ruff@weil.com,Lauren.Engelmyer@weil.com,Larkin.Kittel@weil.com
- **Jonathan Gardner**  
jgardner@labaton.com,lmehring@labaton.com,fmalonzo@labaton.com,acarpio@labaton.com,electroniccasefiling@labaton.com,agreenbaum@labaton.com
- **Caroline Jane Hickey**  
caroline.hickeyzalka@weil.com,mco.ecf@weil.com,Layne.Behrens@weil.com
- **Angelina Nguyen**  
anguyen@labaton.com,electroniccasefiling@labaton.com
- **William Stephen Norton**  
bnorton@motleyrice.com,mkimpson@motleyrice.com,kweil@motleyrice.com
- **Ashley M. Price**  
APrice@rgrdlaw.com,susanw@rgrdlaw.com
- **David Avi Rosenfeld**  
drosenfeld@rgrdlaw.com,e\_file\_ny@rgrdlaw.com,e\_file\_sd@rgrdlaw.com
- **Samuel Howard Rudman**  
srudman@rgrdlaw.com,e\_file\_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e\_file\_sd@rgrdlaw.com

### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)