

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

SIDNEY LYLES,

Plaintiff,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

Case No. _____

**DECLARATION OF
WES PORTER
IN SUPPORT OF NOTICE OF
REMOVAL**

I, Wes Porter, declare as follows:

1. I am a Territory Sales Leader, Southeast Region for Allstate Insurance Company (“Allstate”), the named Defendant in this action. I submit this Declaration in support of Allstate’s Notice of Removal. The statements made herein are based on my personal knowledge, as well as my review of relevant documents.

2. Allstate is an Illinois corporation. Its principal office and headquarters are located at 2775 Sanders Road in Northbrook, Illinois.

3. On August 31, 2020, Gwendolyn Fuller, General Counsel for the State of South Carolina’s Department of Insurance, accepted service of the Complaint on Allstate’s behalf.

4. Although the allegations in the Complaint are categorically untrue, the relief requested by Lyles exceeds \$75,000. Specifically, Lyles claims losses that include the value of his Allstate Exclusive Agency and his economic interest in the Allstate customers he serviced under his Allstate Exclusive Agency Agreement (“Book of Business”). The Book of Business

generated over \$75,000 annually in both premiums and commissions and, as such, far exceeds the jurisdictional minimum of this Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 29 day of September, 2020.

A handwritten signature in black ink, appearing to be "M. K. ...", is written over a horizontal line.