

EXHIBIT 4

STATE OF NORTH CAROLINA
MECKLENBURG COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19 CVS 21128

BUCKLEY LLP,)
)
)
 Plaintiff,)
)
 v.)
)
)
 SERIES 1 OF OXFORD INSURANCE)
 COMPANY NC LLC,)
)
 Defendant.)
_____)

DECLARATION OF JONATHAN C. SU

1. I am a partner in the White Collar Defense & Investigations Practice of Latham & Watkins LLP (“Latham”). I am licensed to practice law in the District of Columbia and Virginia. In my practice at Latham, I advise corporations, boards of directors and individuals on investigations conducted by the Department of Justice, the Congress, the Securities and Exchange Commission, and other federal agencies. I conduct internal investigations regarding a wide range of alleged misconduct, including corruption, financial irregularities and sexual misconduct, and I represent clients in related litigation. Prior to joining Latham, I served as Special Counsel to the President of the United States, as a federal prosecutor in the U.S. Attorney’s Office for the District of Maryland, and as a law clerk to the Hon. Ronald M. Gould of the U.S. Court of Appeals for the Ninth Circuit, and the Hon. Julian Abele Cook, Jr. of the U.S. District Court for the Eastern District of Michigan.

2. In December 2017, BuckleySandler LLP, now known as Buckley LLP (the “Firm”) retained Latham to investigate certain allegations that Andrew Sandler, then-Chairman of the Firm, had engaged in inappropriate conduct towards several women at the Firm over the course of years. I

was one of the partners from Latham who worked on the matter.

3. The Firm retained Latham, in our capacities as attorneys, to perform a number of legal functions in connection with the investigation into the allegations against Mr. Sandler, including interviewing witnesses and reviewing documents relating to the allegations, researching and analyzing potential legal claims against the Firm in light of the allegations, advising on possible remedial measures depending on the outcome of the investigation, advising the Firm on the drafting of Mr. Sandler's retirement agreement, and advising the Firm on its policies and procedures regarding sexual harassment. Latham continued to provide legal advice to Buckley regarding some of these issues after the investigation of Mr. Sandler ended in February 2018.

4. Every internal investigation is unique and the nature of the legal advice and services provided to the client vary substantially depending on the circumstances. Accordingly, Latham's engagement letter described the scope of the representation as "in connection with an internal review of a personnel matter," which was intended to cover a broad range of legal advice and services that Latham might need to provide to Buckley in connection with the allegations against Mr. Sandler. The engagement letter also made clear that Latham was retained to provide legal advice: "Our responsibilities under this agreement are to provide legal counsel and assistance to you in accordance with this letter."

5. Based on past experience with sexual harassment investigations, Latham reasonably anticipated from the outset of the investigation that there might be potential litigation against the Firm as a result of the allegations, and therefore, investigated the facts and conducted legal research and analysis regarding potential claims to prepare for any such litigation.

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



Jonathan C. Su

Date: October 2, 2020