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L.P. and PLAINS PIPELINE, L.P.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

KEITH ANDREWS, an individual, et al.,

Plaintiffs,

v.

PLAINS ALL AMERICAN PIPELINE,
L.P., a Delaware limited partnership, et al.,

Defendants.

Case No. 2:15-cv-04113-PSG-JEMx

**STIPULATION TO EXTEND
DEADLINE TO DISTRIBUTE
SETTLEMENT FUNDS**

Judge: Hon. Philip S. Gutierrez

1 The parties to the above-entitled action, by and through their respective counsel
2 of record, hereby stipulate as follows:

3 Whereas, on September 20, 2022, this Court granted Final Approval of the
4 Settlement of this Action on behalf of the Fisher Class (Dkt. 951-1) and Property Class
5 and separately approved Plans of Distribution for each Class;

6 Whereas the Plans of Distribution contemplate that the Settlement Administrator
7 “shall complete all work required to allow or deny each Claim” within 180 days of the
8 deadline for filing claims “or as otherwise directed by Class Counsel or this Court,” and
9 that “this period may be extended if necessary, subject to Court approval” (Dkt 951-1
10 ¶60, Dkt 951-2 ¶56);

11 Whereas, the deadline for submission of claims expired on October 31, 2022,
12 meaning that the 180 day period described above expires on May 18, 2023;

13 Whereas, the Plans of Distribution also state that Claimants whose claims are
14 rejected shall be given 30 days after receiving notice of the rejection to contest the
15 decision and provide any supporting designation may contest the rejection;

16 Whereas, the Plans of Distribution also contemplate that “after expiration of the
17 180-day period set forth above, including review of contested claims” the Settlement
18 Administrator shall determine the total number of Verified Claims, the Fixed and
19 Variable share allocations and recovery for each Claim;

20 Whereas, the Settlement Administrator has been reviewing claims and supporting
21 documentation diligently as claims were submitted, has determined the current number
22 of Verified Claims, has issued notice to claimants whose submissions appear deficient,
23 and is still in the process of receiving and reviewing contested claims and supplemental
24 materials submitted by Claimants;

25 Whereas, as of May 18, 2023, the thirty day deadline to respond to the notice of
26 deficiency has not yet expired for some Claimants;

27 Whereas, the deadline for distribution of funds after review of contested claims is
28 not clearly defined in the Plans of Distribution;

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Dated: May 18, 2023

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1 In accordance with Local Rule 5-4.3.4(A)(2)(i), the filer attests that each of the
2 above signatories has concurred in the filing of this document.

3 Dated May 18, 2023.
4

5 By: /s/ Juli E. Farris
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11 **CERTIFICATE OF SERVICE**

12 I, Juli Farris, hereby certify that on May 18, 2023, I electronically filed the
13 foregoing with the Clerk of the United States District Court for the Central District of
14 California using the CM/ECF system, which shall send electronic notification to all
15 counsel of record.
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17 /s/ Juli E. Farris
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

KEITH ANDREWS, an individual, et al.,
TIFFANI ANDREWS, an individual,

Plaintiffs,

v.

PLAINS ALL AMERICAN PIPELINE,
L.P., a Delaware limited partnership, et al.,

Defendants.

Case No. 2:15-cv-04113-PSG-JEMx

**[PROPOSED] ORDER GRANTING
EXTENDING DEADLINE TO
DISTRIBUTE SETTLEMENT FUNDS**

Judge: Hon. Philip S. Gutierrez

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

After consideration of the parties’ stipulation and good cause appearing therefore,
IT IS HEREBY ORDERED as follows:

The deadline to distribute settlement funds to Verified Claimants in the Fisher Class
and Property Class Settlements shall be July 31, 2023, except by further Order of this
Court.

IT IS SO ORDERED.

Dated: _____

Honorable Philip S. Gutierrez