

If you owned or leased Residential Beachfront Property or had a Private Easement to a Beach affected by the 2015 Santa Barbara Oil Spill, you may be entitled to a payment from a class action settlement

A Federal Court authorized this Notice.

*Para una notificación en español, visite: www.PlainsOilSpillSettlement.com
Để nhận thông báo tiếng Việt, vui lòng truy cập: www.plainsoilspillsettlement.com
如需中文通知, 请访问: www.plainsoilspillsettlement.com*

A Settlement has been reached in the class action lawsuit claiming that Plains All American Pipeline L.P. and Plains Pipeline L.P. (“Plains” or “Defendants”) caused an underground pipeline to rupture, resulting in an oil spill along the coast in Santa Barbara County on May 19, 2015. Plaintiffs allege that owners and lessees were unable to use and enjoy their properties as a result of the spill because oil washed up onto their properties and onto beaches adjacent to their properties. Plains denies any claims of wrongdoing and disputes Plaintiffs’ claims. A Property Class was previously certified by this Court. This Notice provides information regarding the \$46 million Property Class Settlement. A settlement has also been reached on behalf of commercial fishers and fish processors (“the Fisher Class Settlement”). The Fisher and Property Class Settlement, if approved by the Court, will resolve all remaining claims in the class action litigation pending in the United States District Court for the Central District of California.

You are a Property Class Member if you owned or leased residential beachfront property or property with a private easement to a beach where oil from the 2015 Santa Barbara oil spill washed up and the oiling was categorized as heavy, moderate, or light. You can find out if your property is included by going to www.PlainsOilSpillSettlement.com, where a list of properties Plaintiffs claim were impacted is posted.

What does the Settlement provide?

The Property Class Settlement, if approved, will result in the creation of a cash settlement fund of \$46,000,000 (the “Property Class Settlement Amount”). The Property Class Settlement Amount, together with any interest earned thereon, is the “Property Class Common Fund.” The Property Class Common Fund less (a) any Taxes and Tax Expenses; (b) any Notice and Administration Expenses; and (c) any attorneys’ fees and costs and any service awards to Class Representatives in connection with their representation of the Class, awarded by the Court (the “Net Settlement Fund”), will be distributed to eligible Class Members pursuant to a proposed plan of distribution (“Plan of Distribution”). If you are entitled to relief under the Property Class Settlement, the Settlement Administrator will determine the portion of the Property Class Net Settlement Fund payable to you pursuant to the Court-approved Plan of Distribution.

What are the reasons for the Settlement?

The Court has not decided whether Plaintiffs or Defendants should win this Litigation. The Settling Parties do not agree on whether Plaintiffs would have prevailed on any of their claims against Plains, or the amount of damages, if any, that would be recoverable if the Class prevailed on the claims alleged. Instead, both sides agreed to the Settlement after years of contested litigation, including at the motion to dismiss, class certification, and summary judgment stages. The Parties had also completed substantial discovery and were preparing for trial to commence on June 2, 2022.

Who represents the Class?

Updated Legal Notice

The Court has appointed Lieff Cabraser Heimann Bernstein LLP, Keller Rohrback L.L.P., Cappello & Noel LLP, and Audet & Partners, LLP (“Class Counsel”) to be the attorneys representing the Class. You will not be charged for these lawyers. Class Counsel will apply to the Court for an award of attorneys’ fees in an amount not to exceed 33% of the total amount of the Property Class Settlement (or \$15,180,00), plus their litigation expenses (not to exceed \$1.3 million). (Class Counsel’s fee and litigation expenses application will also include a request for an equivalent percentage from the Fisher Class Settlement, plus additional litigation expenses.) If you want to be represented by your own lawyer, you may hire one at your own expense.

What do I need to do to?

If you are a Class Member and you wish to get money from the Settlement, you are required to submit a Claim Form available at www.PlainsOilSpillSettlement.com, or by calling the toll-free number 1-844-202-9486 to request that a hard copy Claim Form be mailed to you. Your Claim Form and if necessary, any required supporting documentation as set forth therein must be postmarked (if mailed) or submitted online **on or before October 31, 2022**.

Plains Oil Spill Settlement
c/o JND Legal Administration
P.O. Box 91450
Seattle, WA 98111

Email: info@PlainsOilSpillSettlement.com
www.PlainsOilSpillSettlement.com
Telephone: 1-844-202-9486

If you are a Class Member you may object or tell the Court what you do not like about the Settlement. You will still be bound by the Settlement, and you may still file a Claim. Objections must be served/filed no later than **August 19, 2022**. Go to www.PlainsOilSpillSettlement.com for details on how to object to the Settlement.

If you are a Class Member and you did not previously opt out of the Property Class or enter a separate settlement with Plains for which you signed a full release, you are a member of the Class and you will be bound by the release of claims as part of the Settlement. The Property Class was first certified on April 17, 2018, and you previously had an opportunity exclude yourself. If you did not exclude yourself then, you may not exclude yourself now.

What happens next?

The Court will hold a Final Approval Hearing on **September 16, 2022, at 1:30 p.m. Pacific**, before the Honorable Phillip S. Gutierrez at the United States District Court for the Central District of California, First Street Courthouse, 350 West 1st Street, Courtroom 6A, 6th Floor, Los Angeles, California 90012-4565. At the hearing the Court will determine whether: (1) the Settlement as set forth in the Settlement Agreement for \$46,000,000 in cash should be approved by the Court as fair, reasonable and adequate; (2) the Judgment as provided under the Settlement Agreement should be entered; (3) to award Class Counsel attorneys’ fees and expenses out of the Property Class Common Fund and, if so, in what amount; (4) to award Plaintiffs’ service awards (Class Counsel is requesting \$15,000 for each Property Class Representative) in connection with their representation of the Class out of the Property Class Common Fund and, if so, in what amount; and (5) the Plan of Distribution should be approved by the Court.

How do I get more information?

For more details and to print the Settlement Agreement go to www.PlainsOilSpillSettlement.com. You may also write with questions or notify the Settlement Administrator regarding address changes to *Plains Oil Spill Settlement* c/o JND Legal Administration, P.O. Box 91450, Seattle, WA 98111, email at Info@PlainsOilSpillSettlement.com or call the Settlement Administrator at 1-844-202-9486.