<u>United States District Court for the Central District of California</u> *Andrews et al. v. Plains All American Pipeline, L.P. et al.*, No. 2:15-cv-04113 (PSG:JEM)

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. You are <u>not</u> being sued. This is not a solicitation from a lawyer.

Para una notificación en español, visite: www.PlainsOilSpillSettlement.com
Dể 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 a class action lawsuit involving a coastal oil spill in 2015, near Santa Barbara.
- Plaintiffs claim that Plains All American Pipeline L.P. and Plains Pipeline L.P. ("Defendants") caused an
 underground pipeline to rupture, resulting in an oil spill along the coast in Santa Barbara County on May
 19, 2015 that washed up onto coastal properties and beaches. Plaintiffs also claim that the oil spill caused
 the residents of coastal homes to lose the use and enjoyment of their homes, and caused damage to the
 fishing industry.
- A Property Class was previously certified by this Court. This Notice provides information regarding the \$46 million Property Class Settlement. The Settlement is also on behalf of certain 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.
- If your property was leased as of May 19, 2015 (the date of the oil spill), you are requested to forward this Notice to the leaseholder.
- You are no longer a Property Class Member if you previously excluded yourself from the Property Class during the initial notice period, or entered a separate settlement with Defendants for which you signed a full release.

PLEASE READ THIS NOTICE CAREFULLY. THE SETTLEMENT WILL AFFECT YOUR RIGHTS IF YOU ARE A MEMBER OF THE PROPERTY CLASS.

| YOUR LEGAL RIGHTS AND OPTIONS | | | | |
|-------------------------------|--|---|--|--|
| FILE A CLAIM | Receive a payment from the Settlement Be bound by the Settlement | Submit online or postmarked on or before October 31, 2022 | | |
| Овјест | Tell the Court what you do not like about the Settlement You and any lawyer(s) representing, advising, or in any way assisting you in connection with your objection must appear and speak at the Final Approval Hearing You will still be bound by the Settlement, and you may still file a Claim | Served/Filed no later than August 19, 2022 | | |
| Do Nothing | Receive no payment from the Settlement Be bound by the Settlement | | | |

- This Notice explains your rights and options and the deadlines to exercise them.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be distributed to all qualifying Class Members who timely submit a Claim Form, only if the Court approves the Settlement and after potential appeals are resolved.

WHAT THIS NOTICE CONTAINS

| Basic | Information | 4 |
|--------|---|-----|
| 1. | Why was this Notice issued? | 4 |
| 2. | What is this case about? | 4 |
| 3. | Why is there a Settlement? Error! Bookmark not define | ed. |
| Who's | s Included In The Settlement? | 4 |
| 4. | How do I know if I am in the Class? | 4 |
| The S | ettlement Benefits | 5 |
| 5. | What does the Settlement provide? | 5 |
| 6. | How will the lawyers be paid? | 5 |
| 7. | What are the reasons for the Settlement? | 6 |
| How 7 | Γο Get Benefits | 7 |
| 8. | How will I find out how much money I am personally getting? | 7 |
| 9. | How can I get a payment? | 7 |
| 10. | Am I definitely going to get money from this Settlement? | 8 |
| The L | awyers Representing You | 8 |
| 11. | Do I have a lawyer in the litigation? | 8 |
| Exclu | sions | 8 |
| 12. | Can I exclude myself from this Settlement? | 8 |
| Objec | ting To The Settlement | 8 |
| 13. | How do I object to the Settlement? | 8 |
| Oblig | ations and Released Claims | 10 |
| 14. | What are my rights and obligations under the Settlement? | 10 |
| 15. | What claims will be released by the Settlement? | 10 |
| Final | Approval Hearing | 10 |
| 16. | May I attend the Final Approval Hearing? | 10 |
| 17. | Do I have to come to the Final Approval Hearing? | 10 |
| Gettir | ng More Information | 11 |
| 18. | How can I get more information? | 11 |

BASIC INFORMATION

1. Why was this Notice issued?

A Federal Court authorized this Notice because you have a right to know about this proposed Settlement and about all of your options before the Court decides whether to give final approval to the Settlement. This Notice explains the lawsuit, the proposed Property Class Settlement Amount of \$46,000,000, your legal rights, and the hearing ("Final Approval Hearing") to be held by the Court to consider the fairness, reasonableness, and adequacy of the Settlement between the certified Property Class (as defined above) and Defendants.

The Honorable Chief Judge Philip S. Gutierrez of the United States District Court for the Central District of California is overseeing this case. The case is called *Andrews et al. v. Plains All American Pipeline, L.P. et al.*, Case No. 2:15-cv-04113. The persons who have filed the class action lawsuit and were appointed by the Court as Property Class Representatives are Baciu Family LLC, Alexandra Geremia, Jacques Habra, and Mark and Mary Kirkhart. (The Court appointed additional Class Representatives to represent the Fisher Class.) As explained above, the Defendants in the lawsuit are Plains All American Pipeline, L.P. and Plains Pipeline, L.P. ("Plains").

2. What is this case about?

On May 19, 2015, an underground pipeline known as Line 901 ruptured, resulting in a discharge of crude oil along the coast near Refugio State Beach in Santa Barbara County.

Plaintiffs allege that owners and lessors of certain residential beachfront property or property with a private easement to beaches were unable to fully use and enjoy their properties as a result of the spill, because oil from the spill washed up onto their properties or onto neighboring beaches. See Question 7 below. Plains denies any claims of wrongdoing and disputes Plaintiffs' claims.

Plaintiffs filed this case in 2015, and this case has been actively litigated since then. Trial was set to begin on June 2, 2022.

3. Why is there a Settlement?

The Court has not decided whether Plaintiffs or Defendants should win this litigation. Plaintiffs and Defendants do not agree on whether Plaintiffs would have prevailed on any of their claims against Plains at trial. They also do not agree on the amount of damages, if any, that would be recoverable if the Class prevailed on the claims alleged at trial. Instead, both sides agreed to the Settlement. That way, they avoid the uncertainties and expenses associated with continuing the litigation, and Class Members will get compensation sooner rather than later, if at all. Here, the \$46 million Property Class Settlement represents over half of claimed compensatory damages. Counsel appointed by the Court to represent the Property Class believe that this is an exceptionally strong Settlement given the claims and defenses at issue in this long-fought litigation and that the Property Class Settlement represents a substantial portion of the damages alleged on behalf of the Property Class. For more information, please see Question 7, below.

WHO'S INCLUDED IN THE SETTLEMENT?

4. How do I know if I am in the Class?

The Court has decided that everyone who owned or leased a property that fits the following description is a member of the Property Class:

• Residential beachfront properties on a beach and residential properties with a private easement to a beach (collectively "Included Properties") where oil from the 2015 Santa Barbara oil spill washed up, and where

the oiling was categorized as Heavy, Moderate or Light, as identified in Exhibit A to Plaintiffs' renewed motion [ECF 300-3, Ex. 14 of the Action].

Exhibit A and the properties referred to in this exhibit are located at www.PlainsOilSpillSettlement.com, under the tab "Important Documents".

As described in the Settlement Agreement, those excluded from the Property Class are Defendants, any entity or division in which Defendants have a controlling interest, and their legal representatives, officers, directors, employees, assigns and successors; and the judge to whom this case is assigned, the judge's staff, and any members of the judge's immediate family.

In addition, you are no longer a Property Class Member if you previously excluded yourself from the Property Class during the initial notice period, or entered a separate settlement with Plains for which you signed a full release.

The proposed Settlement, if approved by the Court, will settle all claims of the Property Class against Plains.

PLEASE NOTE: Receipt of this Notice does not mean that you are a Class Member or that you will be entitled to receive a payment from the Settlement. If you are a Class Member and you wish to participate in the distribution of proceeds 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 on or before October 31, 2022. See Question 9 for more information.

THE SETTLEMENT BENEFITS

5. 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") that is described in the next section of this Notice.

If you are entitled to relief under the Property Class Settlement, the Settlement Administrator will determine the portion of the Property Class Common Fund payable to you pursuant to the Court-approved Plan of Distribution.

A more detailed description of the Property Class Settlement can also be found in the Settlement Agreement at www.PlainsOilSpillSettlement.com.

6. How will the lawyers be paid?

Class Counsel (see Question 11 below) 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 \$15,180,000), plus their litigation expenses (not to exceed \$1.3 million from the Property Settlement), and interest earned on these amounts, at the same rate as earned by the Property Class Common Fund. (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.) Since the first case was filed in June 2015, Class Counsel have expended considerable time and effort prosecuting this case, including preparing for trial, retaining and working with specialized experts on a variety of issues, including the pipeline's integrity, how much oil spilled, where the oil traveled, and how much damage the spill caused. These specialized experts included scientists, engineers, an economist, and a property appraiser. Class Counsel have advanced all of the expenses incurred during the litigation of this case, with the expectation

that they would be reimbursed if they succeeded in obtaining a recovery for the Class. Class Counsel will also ask the Court to award up to \$15,000 to each Class Representative as a service award, in recognition of their considerable time and effort spent on behalf of the Class in achieving this Settlement. Each Class Representative assisted Class Counsel with building the factual record and case strategy, cooperated with discovery including the production of records, submitted to depositions and travel to the district in which the lawsuit was filed.

The Court may award less than the amount requested by Class Counsel. Under the Settlement Agreement, any amount awarded to Class Counsel or Class Representatives will be paid out of the Property Class Common Fund.

Class Counsel will file their motion for attorneys' fees and expenses no later than July 29, 2022 and a copy of the motion will also be available at www.PlainsOilSpillSettlement.com.

7. What are the reasons for the Settlement?

The Settlement was reached after years of contested litigation, including at the motion to dismiss, class certification, and summary judgment stages. The Parties also completed fact and expert discovery and were preparing for trial to commence on June 2, 2022. Nevertheless, a jury has not rendered any verdict in connection with Plaintiffs' claims against Plains. Instead, Plaintiffs and Plains have agreed to this Settlement to avoid the cost, delay, and uncertainty of further litigation.

As in any litigation, Plaintiffs and the Class would face an uncertain outcome if they did not agree to a Settlement. If Plaintiffs succeeded at trial, Plains would likely file appeals that would postpone final resolution of the case for years. Continuation of the litigation against Plains could result in a judgment greater than this Settlement. Conversely, continuing the case could result in no recovery at all or a recovery that is less than the amount of the Settlement.

Plaintiffs' principal reason for entering into the Settlement with Plains is the substantial benefit to the Class now, without further risk or the delays inherent in continued litigation. The \$46 million Property Class Settlement Amount must be considered against the significant risk that a smaller recovery—or, indeed, no recovery at all—might be achieved after trial, and likely appeals, a process that could last several years into the future. The Settlement provides a substantial award for Class Members, without protracted delay.

Plaintiffs and Class Counsel believe that this Settlement is fair and reasonable to the Class for several reasons. First, Plaintiffs and Class Counsel believe that \$46 million is a significant recovery. Second, if the Settlement becomes final, the Class will receive a certain and prompt monetary recovery. Third, Class Counsel believe that the significant and immediate benefits of the Settlement, when weighed against the significant risk, delay, and uncertainty of continued litigation, are a very favorable result for the Class.

Plains has denied and continues to deny the claims alleged by Plaintiffs. Plains admits that oil leaked from Line 901, and that some of that oil reached the Pacific Ocean, but disputes the amount of oiling and the amount of damage that the oiling caused. For Plains, the principal reason for the Settlement is to eliminate the burden, expense, uncertainty and risks inherent in any litigation, especially in complex cases such as this. Plains has determined that it is desirable and beneficial that the lawsuit be settled in the manner and upon the terms and conditions set forth in the Settlement Agreement.

THE COURT HAS NOT RULED AS TO WHETHER PLAINS PIPELINE IS LIABLE TO PLAINTIFFS OR TO THE CLASS. THIS NOTICE IS NOT INTENDED TO BE AN EXPRESSION OF ANY OPINION BY THE COURT WITH RESPECT TO THE TRUTH OF THE ALLEGATIONS IN THE LAWSUIT OR THE MERITS OF THE CLAIMS OR DEFENSES ASSERTED. THIS NOTICE IS SOLELY TO ADVISE YOU OF THE PROPOSED SETTLEMENT OF THIS LAWSUIT AS TO PLAINS PIPELINE AND YOUR RIGHTS IN CONNECTION WITH THAT SETTLEMENT.

HOW TO GET BENEFITS

8. How will I find out how much money I am personally getting?

Class Counsel will submit the proposed Plan of Distribution to the Court by no later than June 26, 2022 and post it at www.PlainsOilSpillSettlement.com.

The Plan of Distribution for each class property is based upon both Plaintiffs' expert Dr. Igor Mezić's oil transport model showing the extent to which coastal properties and beaches experienced oiling and Plaintiffs' damages expert Dr. Randall Bell's determination of the value of the premium paid to live on the beach that was lost as a result of the oiling. The Plan of Distribution for the Property Class will consider the above factors—the value of the property's beachfront premium and the number of days and the level of oiling in allocating the award to each Class Member.

If the Settlement is approved by the Court, the Net Settlement Fund will be distributed to eligible Class Members who timely submit valid Claim Forms in accordance with a Court-approved Plan of Distribution. Class Members who do not timely submit valid Claim Forms will not share in the Net Settlement Fund, but will otherwise be bound by the Settlement. The Court may approve the proposed Plan of Distribution, or modify it, without Class. The Plan of Distribution will additional notice to the be made www.PlainsOilSpillSettlement.com, and any order modifying the Plan of Distribution will be posted on that website. The Plan of Distribution is intended to compensate Property Class Members who lost the value of their property's beachfront premium as a result of the 2015 Line 901 oil spill.

The Settlement Administrator will determine your qualifications to receive money from the Property Class Settlement and will also determine the amount of any distribution you will receive from the Settlement based upon your Claim Form and other available information, including available property data. Distributions will be made to Property Class Members after all claims have been processed, after the Court has finally approved the Settlement, and after any appeals are resolved.

If you are dissatisfied with the distribution determinations, you may ask the Court, which retains jurisdiction over all Property Class Members and the claims administration process, to decide the issue by submitting a written request. The Court has reserved jurisdiction to allow, disallow, or adjust the claim of any Class Member on equitable grounds.

9. How can I get a payment?

In order to get a payment from the Settlement, Class Members must timely complete and return a Claim Form. Claim Forms are 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 by the Settlement Administrator. Read the instructions carefully; fill out the Claim Form; sign it; and mail or submit it online so that it is postmarked (if mailed) to the address below or received (if submitted online) on or before October 31, 2022. You do not need to contact Class Counsel.

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

Email: <u>info@PlainsOilSpillSettlement.com</u> <u>www.PlainsOilSpillSettlement.com</u> Telephone: 1-844-202-9486

If you do not submit a timely Claim Form with all of the required information, you will not receive a payment, but you will still be bound in all other respects by the Settlement, the Judgment, and the release contained in them.

10. Am I definitely going to get money from this Settlement?

No. There will be no payments if the Settlement Agreement is not approved by the trial court and the appellate court, if it is appealed. If the Settlement Agreement is not approved, the lawsuit will proceed against Plains as if the Settlement Agreement had not been entered. If the Settlement is approved, you might not get money because you might not be a Class Member.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in the litigation?

Yes. The Court has appointed Lieff Cabraser Heimann Bernstein LLP, Keller Rohrback L.L.P., and Cappello & Noel LLP, and Audet & Partners, LLP ("Class Counsel") to be the attorneys representing the Property Class and Fisher Class. Class Counsel believe, after conducting an extensive investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense. If you wish to contact your Court-appointed lawyers, their contact information is below.

Robert J. Nelson LIEFF CABRASER HEIMANN BERNSTEIN LLP 275 Battery Street, 29th Floor San Francisco, CA 94111-3339 (415) 956-1000

> A. Barry Cappello CAPPELLO & NOËL LLP 831 State Street Santa Barbara, CA 93101 (805) 564-2444

Juli E. Farris
KELLER ROHRBACK L.L.P.
801 Garden Street
Santa Barbara, CA 93101
(805) 456-1497

William M. Audet AUDET & PARTNERS, LLP. 711 Van Ness Ave, Suite 500 San Francisco, CA 94102 (415) 568-2555

EXCLUSIONS

12. Can I exclude myself from this Settlement?

No. If you are a Class Member because you satisfy the Class definition, and you did not previously opt out of the 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.

OBJECTING TO THE SETTLEMENT

13. How do I object to the Settlement?

If you are a Class Member, you can object to the Settlement in writing if you do not like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must file your letter or brief with the Clerk of the Court, at United States District Court for the Central District of California, First Street Courthouse, 350 West 1st Street, Los Angeles, California 90012-4565, stating that you object to the Settlement in *Andrews et al. v. Plains All American Pipeline, L.P. et al.*, No. 2:15-04113 (PSG) and identify all your reasons for your objections. You should include citations and supporting evidence and attach any materials that you rely on for your objections.

If you have your own lawyer, they must file an appearance in this case and submit your objection through the Court's e-filing system. Your letter or brief must also include:

- (1) Your name, current address, and telephone number;
- (2) Proof of class membership including documents such as property records;
- (3) A statement indicating whether the objection is to the proposed Settlement, the Plan of Distribution, the application for attorneys' fees and expenses, and/or the Class Representative service award;
- (4) A statement of the factual and legal reasons for your objection and whether it applies only to you, to a subset of the Property Class, or to the entire Property Class;
- (5) Identify all class action settlements by name, date, and court to which you have previously objected;
- (6) The name and contact information of any and all lawyers representing, advising, or in any way assisting you in connection with your objection;
- (7) Copies of all documents that you wish to submit in support of your position; and
- (8) Your signature.

You must also file your objection with the Court and mail or deliver a copy of your letter or brief to Class Counsel and Plains' Counsel listed below by certified mail postmarked no later than **August 19, 2022**. Finally, for an objection to be valid, you and any lawyer(s) representing, advising, or in any way assisting you in connection with your objection must appear and speak at the Final Approval Hearing. If you hire an attorney (at your own expense) to represent you for purposes of objecting, your attorney must serve a notice of appearance on counsel listed below and file it with the Court (at the address set out above) by no later than **August 19, 2022**.

| Class Counsel | Counsel for Defendants |
|--|---|
| Robert J. Nelson LIEFF CABRASER HEIMANN BERNSTEIN LLP 275 Battery Street, 29th Floor San Francisco, CA 94111-3339 (415) 956-1000 | Henry Weissmann MUNGER TOLLES & OLSON LLP 350 S. Grand Avenue, 50 th Floor, Los Angeles, CA 90071 (213) 683-9150 |
| Juli E. Farris KELLER ROHRBACK L.L.P. 801 Garden Street Santa Barbara, CA 93101 (805) 456-1497 | |

Any Class Member who does not make their objection in the manner provided above will be deemed to have waived such objection and will forever be foreclosed from making any objection to the fairness or adequacy of the proposed Settlement as set forth in the Settlement Agreement, to the Plan of Distribution, or to the award of fees and expenses to Class Counsel or any service awards to Plaintiffs, unless otherwise ordered by the Court.

Class Members do not need to appear at the Final Approval Hearing or take any other action to indicate their approval.

OBLIGATIONS AND RELEASED CLAIMS

14. What are my rights and obligations under the Settlement?

If you are a Property Class Member and did not exclude yourself from the Property Class during the initial notice period, you may receive the benefit of the Settlement by submitting a Claim Form, and you will be bound by the terms of the Settlement described in this Notice and the Settlement Agreement, upon final approval by the Court.

15. What claims will be released by the Settlement?

If the Settlement is approved by the Court, the Court will enter a Judgment. If the Judgment becomes Final pursuant to the terms of the Settlement Agreement, all Class Members will be deemed to have, and by operation of the Final Judgment will have, fully, finally, and forever released, relinquished, and discharged any and all claims of any kind or nature whatsoever for any property damage or any economic losses of any kind or nature whatsoever against Plains arising from the May 19, 2015 Oil Spill, including claims for victims' restitution. The specific claims you are giving up against Plains are described in the Settlement Agreement at www.PlainsOilSpillSettlement.com. The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions you can talk to the lawyers listed in Question 11 for free or you can, of course, talk to your own lawyer if you have questions about what this means.

FINAL APPROVAL HEARING

16. May I attend the Final Approval Hearing?

Yes. The Court will hold a Final Approval Hearing on September 16, 2022, at 1:30 p.m. Pacific Time, 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 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. The Court may adjourn or continue the Final Approval Hearing without further notice to Members of the Class.

Any Class Member may appear at the Final Approval Hearing, provided they have complied with the procedures described in Question 13, above.

Unless otherwise directed by the Court, any Class Member who does not object in the manner provided will be deemed to have waived all objections to this Settlement and will be barred from raising (in this or any other proceeding or on any appeal) any objection and any untimely objection will be barred.

17. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have, but you are welcome to come at your own expense. If you send a comment, you do not have to come to Court to talk about it. However, if you object to the Settlement, you do have to come to the hearing, along with any lawyer who has represented or otherwise advised you. See Question 13.

GETTING MORE INFORMATION

18. How can I get more information?

This Notice summarizes the Settlement. You can get more details and print the Settlement Agreement at 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. Before doing so however, please read this full Notice carefully. You may also call Class Counsel listed in response to Question 11.

Please do not call the Court or the Court Clerk's Office to inquire about this Settlement as they cannot answer your questions.

DATED: MAY 25, 2022

BY ORDER OF THE COURT HON. PHILIP S. GUTIERREZ UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA