

Juli E. Farris (CSB No. 141716)  
jfarris@kellerrohrback.com  
KELLER ROHRBACK L.L.P.  
801 Garden Street, Suite 301  
Santa Barbara, CA 93101  
Telephone: (805) 456-1496  
Facsimile: (805) 456-1497

A. Barry Cappello (CSB No. 037835)  
abc@cappellonoel.com  
CAPPELLO & NOËL LLP  
831 State Street  
Santa Barbara, CA 93101-3227  
Telephone: (805)564-2444  
Facsimile: (805)965-5950

Robert J. Nelson (CSB No. 132797)  
rnelson@lchb.com  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: (415)956-1000  
Facsimile: (415) 956-1008

*Lead Trial Counsel*

*Class Counsel*  
*(additional counsel listed at signature)*

**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-DMG-JEMx

**NOTICE OF LODGING [PROPOSED]  
ORDER REGARDING FISHER AND  
PROPERTY CLASS SETTLEMENT  
AND DISPOSITION OF RESIDUAL  
FUNDS**

Judge: Hon. Dolly M. Gee

PLEASE TAKE NOTICE THAT Juli E. Farris, attorney for Plaintiffs, hereby lodges the attached [Proposed] Order Regarding Fisher and Property Class Settlement and Disposition of Residual Funds.

1 Dated: October 25, 2024

Respectfully submitted,

2 KELLER ROHRBACK L.L.P.

3  
4 By: /s/Juli E. Farris

Juli E. Farris

5 Juli Farris (CSB No. 141716)

6 Matthew J. Preusch (CSB No. 298144)

KELLER ROHRBACK L.L.P.

7 801 Garden Street, Suite 301

8 Santa Barbara, CA 93101

9 Telephone: (805) 456-1496

10 Facsimile: (805) 456-1497

Lynn Lincoln Sarko

11 (*Admitted Pro Hac Vice*)

12 Gretchen Freeman Cappio

13 (*Admitted Pro Hac Vice*)

14 Daniel Mensher

15 (*Admitted Pro Hac Vice*)

Raymond Farrow

16 (*Admitted Pro Hac Vice*)

KELLER ROHRBACK L.L.P.

17 1201 Third Ave, Suite 3400

18 Seattle, WA 98101

19 Telephone: (206) 623-1900

20 Facsimile: (206) 623-3384

1 Robert L. Lieff (CSB No. 037568)  
2 Elizabeth J. Cabraser (CSB No. 083151)  
3 Robert J. Nelson (CSB No. 132797)  
4 Wilson M. Dunlavey (CSB No. 307719)  
LIEFF CABRASER  
HEIMANN & BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: (415) 956.1000  
Facsimile: (415) 956.1008

8 *Class Counsel*

9  
10 A. Barry Cappello (CSB No. 037835)  
11 Leila J. Noël (CSB No. 114307)  
12 Lawrence J. Conlan (CSB No. 221350)  
13 David L. Cousineau (CSB No. 298801)  
CAPPELLO & NOËL LLP  
831 State Street  
Santa Barbara, CA 93101-3227  
Telephone: (805) 564-2444  
Facsimile: (805) 965-5950

16 *Lead Counsel for Plaintiff Class*  
17 *Lead Trial Counsel*

18 William M. Audet (CSB No. 117456)  
19 Ling Y. Kuang (CSB No. 296873)  
20 AUDET & PARTNERS, LLP  
21 711 Van Ness Avenue  
Suite 500  
22 San Francisco, CA 94102  
23 Telephone: (415) 568-2555  
Facsimile: (415) 568-2556

24 *Class Counsel*

**CERTIFICATE OF SERVICE**

I, Juli Farris, hereby certify that on October 25, 2024, I electronically filed the foregoing with the Clerk of the United States District Court for the Central District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Juli E. Farris

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Juli E. Farris (CSB No. 141716)  
jfarris@kellerrohrback.com  
KELLER ROHRBACK L.L.P.  
801 Garden Street, Suite 301  
Santa Barbara, CA 93101  
Telephone: (805) 456-1496  
Facsimile: (805) 456-1497

A. Barry Cappello (CSB No. 037835)  
abc@cappellonoel.com  
CAPPELLO & NOËL LLP  
831 State Street  
Santa Barbara, CA 93101-3227  
Telephone: (805)564-2444  
Facsimile: (805)965-5950

Robert J. Nelson (CSB No. 132797)  
rnelson@lchb.com  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: (415)956-1000  
Facsimile: (415) 956-1008

*Lead Trial Counsel*

*Class Counsel*  
*(additional counsel listed at signature)*

**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-DMG-JEMx

**[PROPOSED] ORDER REGARDING  
FISHER AND PROPERTY CLASS  
SETTLEMENT AND DISPOSITION  
OF RESIDUAL FUNDS**

Judge: Hon. Dolly M. Gee

After consideration of Plaintiffs' Status Report Regarding Fisher and Property Class Settlement and Disposition of Residual Funds, the Declaration of Genevieve Pierce, and related documents, and good cause appearing, IT IS HEREBY ORDERED:

1           1.     Payment of a Second Late Property Claim Distribution is approved. The  
2 Settlement Administrator is directed to pay each of the remaining Property Claims that  
3 are submitted on or before October 31, 2024, and that can be verified, in the order in  
4 which they are completed, without deficiencies. Any claims submitted after October 31,  
5 2024, or that remain deficient as of December 1, 2024, are rejected. No additional claims  
6 shall be considered;

7           2.     The balance of funds available for distribution remaining in the Property Net  
8 Settlement Fund once the Second Late Property Claim Distribution is complete shall be  
9 distributed as a Supplemental Distribution, in equal shares, to each of the Verified  
10 Property Claimants.

11          3.     In addition to the amounts previously approved, payment of up to \$63,580  
12 in additional administrative for the Property Class is authorized;

13          4.     To the extent any residual funds remain available for distribution after the  
14 Supplemental Distribution is completed (after the deduction of administrative fees and  
15 costs), the Court approves payment of a *cy pres* award to Santa Barbara Channelkeeper.

16          5.     Payment of a Second Late Fisher Distribution is approved. The Settlement  
17 Administrator is directed to pay each of the remaining Fisher Claims that are submitted  
18 on or before October 31, 2024, that can be verified, in the order in which they are  
19 completed, without deficiencies. To verify class membership, each claim form should be  
20 submitted together with copies of valid CDFW fishing licenses, or receipts for same: 1.  
21 for at least one year during the period January 1, 2010-May 19, 2015; 2. valid as of May  
22 19, 2015, the date of the Oil Spill, and, 3. for each year during the period May, 2015–  
23 May, 2020 for which the claimant seeks damages. Any claims submitted after October  
24 31, 2024, or that remain deficient as of December 1, 2024, are rejected. No additional  
25 claims shall be considered;

1           6.     The balance of funds available for distribution remaining in the Fisher Net  
2 Settlement Fund once the Second Late Fisher Claim Distribution is completed shall be  
3 distributed as a Supplemental Distribution, in equal shares, to each of the Verified Fisher  
4 Claimants.

5           7.     In addition to the amounts previously approved, payment of up to \$95,504.35  
6 in additional administrative costs and fees for the Fisher Class is authorized;

7           8.     To the extent any residual funds remain available for distribution after the  
8 Supplemental Distribution is completed (after deduction of administrative costs and fees),  
9 the Court approves payment of a *cy pres* award to the Commercial Fishermen of Santa  
10 Barbara.

11  
12           **IT IS SO ORDERED.**

13           Dated: \_\_\_\_\_

\_\_\_\_\_  
14           Hon. Dolly M. Gee  
15           United States District Judge

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28