

1 Wylie A. Aitken, State Bar No. 37770
wylie@aitkenlaw.com
2 **AITKEN ♦ AITKEN ♦ COHN**
3 3 MacArthur Place, Suite 800
4 Santa Ana, CA 92808
Telephone: (714) 434-1424
Facsimile: (714) 434-3600

5 Lexi J. Hazam, State Bar No. 224457
lhazam@lchb.com
6 **LIEFF CABRASER HEIMANN**
7 **& BERNSTEIN, LLP**
8 275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-100

9 Stephen G. Larson, State Bar No. 145225
slarson@larsonllp.com
10 **LARSON, LLP**
11 600 Anton Blvd., Suite 1270
Costa Mesa, CA 92626
12 Telephone: (949) 516-7250
Facsimile: (949) 516-7251

13 *Interim Co-Lead Counsel for Plaintiffs and the Proposed Classes*
14 *[Additional Counsel Appear on Signature Page]*

15
16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **SOUTHERN DIVISION**

19
20 **PETER MOSES GUTIERREZ, JR.,**
et al.,

21 Plaintiffs,

22 v.

23 **AMPLIFY ENERGY CORP., et al.,**

24 Defendants.
25

Case No. 8:21-CV-01628-DOC(JDEx)

**NOTICE OF MOTION AND
MOTION FOR APPROVAL OF
PLAINTIFFS' PLANS OF
DISTRIBUTION**

Date: April 24, 2023
Time: 8:30 a.m.
Judge: David O. Carter
Room: 10A

1 TO ALL THE PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on April 24, 2023, at 8:30 a.m., or as soon
3 thereafter as the matter may be heard by the Honorable David O. Carter in
4 Courtroom 10A of the above-entitled court, located at 411 West Fourth Street,
5 Santa Ana, California, 92701, Plaintiffs will and hereby do move the Court,
6 pursuant to Rule 23 of the Federal Rules of Civil Procedure, for an Order approving
7 the Plan of Distribution for the Fisher Class (Dkt. 621-1), the Plan of Distribution
8 for the Property Class (Dkt. 621-2), and the Plan of Distribution for the Waterfront
9 Tourism Class (Dkt. 621-3). This motion is based on the attached supporting
10 memorandum; the pleadings, papers, and records on file in this action, including
11 those submitted in support of Plaintiffs' Motion for Preliminary Approval (Dkt.
12 476) and concurrently-filed Motion for Final Approval; any further papers filed in
13 support of this motion; and arguments of counsel.

14
15 Dated: January 25, 2023

Respectfully submitted,

17 /s/ Lexi J. Hazam
Lexi J. Hazam

18
19 /s/ Wylie A. Aitken
Wylie A. Aitken

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21 /s/ Stephen G. Larson
Stephen G. Larson

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Wylie A. Aitken, Sate Bar No. 37770
Darren O. Aitken, State Bar No. 145251
Michael A. Penn, State Bar No. 233817
Megan G. Demshki, State Bar No. 306881
AITKEN ♦ AITKEN ♦ COHN
3 MacArthur Place, Suite 800
Santa Ana, CA 92808
Telephone: (714) 434-1424
Facsimile: (714) 434-3600

Lexi J. Hazam, State Bar No. 224457
Elizabeth J. Cabraser, State Bar No. 083151
Robert J. Nelson, State Bar No. 132797
Wilson M. Dunlavey, State Bar 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

Kelly K. McNabb, *admitted pro hac vice*
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
250 Hudson Street, 8th Floor
New York, NY 10013-1413
Telephone: (212) 355-9500
Facsimile: (212) 355-9592

Stephen G. Larson, State Bar No. 145225
slarson@larsonllp.com
Steven E. Bledsoe, State Bar No. 157811
sbledsoe@larsonllp.com
Rick Richmond, State Bar No. 194962
rrichmond@larsonllp.com
Paul A. Rigali, State Bar No. 262948
prigali@larsonllp.com
LARSON, LLP
600 Anton Blvd., Suite 1270
Costa Mesa, CA 92626
Telephone: (949) 516-7250
Facsimile: (949) 516-7251

Interim Settlement Cass Counsel

1 Wylie A. Aitken, State Bar No. 37770
wylie@aitkenlaw.com
2 **AITKEN ♦ AITKEN ♦ COHN**
3 3 MacArthur Place, Suite 800
4 Santa Ana, CA 92808
Telephone: (714) 434-1424
Facsimile: (714) 434-3600

5 Lexi J. Hazam, State Bar No. 224457
lhazam@lchb.com
6 **LIEFF CABRASER HEIMANN**
7 **& BERNSTEIN, LLP**
8 275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-100

9 Stephen G. Larson, State Bar No. 145225
slarson@larsonllp.com
10 **LARSON, LLP**
11 600 Anton Blvd., Suite 1270
Costa Mesa, CA 92626
12 Telephone: (949) 516-7250
13 Facsimile: (949) 516-7251

14 *Interim Settlement Case Counsel*

15 *[Additional Counsel Appear on Signature Page]*

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17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **SOUTHERN DIVISION**

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25 Defendants.

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**MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
MOTION FOR APPROVAL OF
PLAINTIFFS' PLANS OF
DISTRIBUTION**

26 Date: April 24, 2023
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TABLE OF CONTENTS

	Page
I. INTRODUCTION.....	1
II. ARGUMENT	1
A. The Plans pay Class Members directly, or through a simple and fair claims process.....	2
B. The Plans are fair, reasonable, and adequate.	4
1. <i>Fisher Class</i>	4
2. <i>Property Class</i>	5
3. <i>Waterfront Tourism Class</i>	6
III. CONCLUSION	8

1 **I. INTRODUCTION**

2 Plaintiffs have reached a proposed Settlement that provides \$34 million to
3 the Fisher Class, \$9 million to the Property Class, and \$7 million to the Waterfront
4 Tourism Class. *See* Settlement, Dkt. 476-4 (Ex. 1 to Decl. of Lexi Hazam in
5 support of Motion for Preliminary Approval). Pursuant to the Court’s Preliminary
6 Approval Order (Dkt. 599), Plaintiffs filed their Plans of Distribution for each Class
7 on December 16, 2022 (Dkt. 621), and now file this motion for approval of each of
8 those Plans. *See* Dkt. 599, Preliminary Approval Order, ¶ 26.

9 Plaintiffs’ proposed Plans of Distribution for the Fisher Class, Property
10 Class, and Waterfront Tourism Class should each be approved as fair, adequate, and
11 reasonable. They establish a straightforward process for compensating class
12 members—including issuing checks directly to the members of the Fisher Class,
13 Property Class, and certain members of the Waterfront Tourism Class—anchored in
14 Plaintiffs’ experts’ classwide damages models. For those members of the
15 Waterfront Tourism Class who will not be issued checks directly, the claims
16 process is streamlined and user-friendly. The Plans distribute funds based
17 principally on the claimants’ fractional shares of the total losses, and they treat
18 Class members equitably relative to one another.

19 **II. ARGUMENT**

20 As part of its review of a proposed settlement, the trial court should consider
21 “the effectiveness of any proposed method of distributing relief to the class,
22 including the method of processing class-member claims.” Fed. R. Civ. P.
23 23(e)(2)(C)(ii). “A claims processing method should deter or defeat unjustified
24 claims, but the court should be alert to whether the claims process is unduly
25 demanding.” Fed. R. Civ. P. 23(e), 2018 adv. comm. note. The goal is for
26 settlement funds to be distributed “in as simple and expedient a manner as
27 possible.” *Hilsley v. Ocean Spray Cranberries, Inc.*, 2020 WL 520616, at *7 (S.D.
28 Cal. Jan. 31, 2020) (quoting 4 William B. Rubenstein, *Newberg on Class Actions*

1 § 13:53 (5th ed. Dec. 2021 update)).

2 Likewise, Rule 23(e)(2)(D) asks whether “the proposal [for distribution
3 among class members] treats class members equitably relative to each other.”
4 Relevant considerations may include “whether the apportionment of relief among
5 class members takes appropriate account of differences among their claims, and
6 whether the scope of the release may affect class members in different ways that
7 bear on the apportionment of relief.” Fed. R. Civ. P. 23(e)(2), 2018 adv. comm.
8 note.

9 Fundamentally, “[a]ssessment of a plan of allocation of settlement proceeds
10 in a class action under Fed. R. Civ. P. 23 is governed by the same standards of
11 review applicable to the settlement as a whole – the plan must be fair, reasonable,
12 and adequate.” *In re Illumina, Inc. Sec. Litig.*, 2021 WL 1017295, at *4 (S.D. Cal.
13 Mar. 17, 2021) (citing *Class Plaintiffs v. City of Seattle*, 955 F.2d 1268, 1284–85
14 (9th Cir. 1992)). The plan “need only have a reasonable, rational basis, particularly
15 if recommended by experienced and competent class counsel.” *Jenson v. First Tr.*
16 *Corp.*, 2008 WL 11338161, at *9 (C.D. Cal. June 9, 2008) (citation omitted); *see*
17 *also In re Lithium Ion Batteries Antitrust Litig.*, 2020 WL 7264559, at *12 (N.D.
18 Cal. Dec. 10, 2020).

19 **A. The Plans pay Class Members directly, or through a simple and**
20 **fair claims process.**

21 For all three Classes, the Plans provide relief simply, fairly, and quickly.

22 Fisher Class Members will be issued checks directly, obviating the need for a
23 claims process altogether. The Settlement Administrator will utilize California
24 Department of Fish and Wildlife (“CDFW”) Landing Records previously obtained
25 by Class Counsel to identify Fisher Class members, and to establish each Fisher
26 Class Member’s pro rata share of the Settlement, based upon their fishing activity
27 before and after the Spill. Dkt. *See* 621-1 (Proposed Plan of Distribution for the
28 Fisher Class), ¶ 30. To prevent double recovery, awards will be offset by payments

1 Class Members have already received through the OPA claims process. *Id.* ¶ 38.

2 Likewise, each Property Class Member will be issued a check directly. The
3 Settlement Administrator has obtained real property records to identify all real
4 properties in the class definition. Dkt. 621-2 (Proposed Plan of Distribution for the
5 Real Property Class), ¶ 23. Each property will be allocated the same share of the
6 settlement's value, but their recovery may differ if subject to an offset, such as an
7 OPA payment. *Id.* ¶ 26.

8 Certain members of the Waterfront Tourism Class will be issued a check
9 directly, including businesses that engage in whale-watching cruises, sunset cruises,
10 party boats, six-pack charters, other luxury boat rentals and charters, and hotels.
11 Dkt. 621-3 (Proposed Plan of Distribution for the Waterfront Tourism Class), ¶ 25.
12 Here, too, the Settlement Administrator has previously obtained records to identify
13 these Waterfront Tourism Class members, and will establish each member's pro-
14 rata share of the Settlement based upon their business's performance before the
15 Spill, while taking into account OPA payments. *Id.* ¶ 24.

16 Certain categories of Waterfront Tourism Class Members—bait and tackle
17 shops, surf schools, food and beverage establishments, and retail establishments—
18 will have to submit claims because their portion of the classwide damages cannot
19 be determined in the same manner through publicly available information. *Id.* ¶ 26.
20 These Class Members can file their claims electronically on the settlement website,
21 www.OCSpillSettlement.com, using their unique identifier contained on their short-
22 form notice. *Id.* If Class Members lose their notice or a potential Class Member did
23 not receive a notice, they may contact the Settlement Administrator to determine
24 eligibility and, if appropriate, receive a new identifier. *Id.* ¶ 27. Additionally, all
25 notice materials, including the extensive social media campaign, direct Class
26 Members to the settlement website, which directs Class Members to contact the
27 Settlement Administrator to request a new claim form. Claims administrator will
28 accept any form of documents that demonstrate revenue for the third quarter of

1 2021, in “whatever form they are kept in the normal course of business.” *Id.* Here,
2 too, if a Class Members has received money through the OPA process, the
3 Administrator will adjust their share to prevent double recovery. *Id.* ¶ 13.

4 **B. The Plans are fair, reasonable, and adequate.**

5 **1. *Fisher Class***

6 The Fisher Class is composed of fishers operating in the CDFW fishing
7 blocks that Plaintiffs allege were oiled by the Spill, and fish processors who re-sold
8 fish from those blocks. *See* Dkt. 621-1 (Proposed Plan of Distribution for the Fisher
9 Class), ¶ 16. At trial, Plaintiffs intended to prove classwide damages through their
10 expert Dr. Peter Rupert’s difference-in-differences model that calculates the lost
11 catch due to the Spill, from which Dr. Rupert then calculates lost profits. Following
12 a favorable verdict, allocation of class-wide damages would follow and be guided
13 principally by the detailed CDFW landings data. This was exactly the same
14 methodology, developed by the same expert, in the Refugio Oil Spill litigation.
15 *Andrews et al v. Plains et al*, 15-CV-04113, Dkt. 951-1 (Proposed Plan of
16 Distribution for Fisher Class) ¶ 61 (C.D. Cal. June 27, 2022). This Plan is also
17 based on the similar plan developed for and approved in that litigation.

18 As in *Plains*, the Plan of Distribution for the Fisher Class is appropriately
19 anchored in this methodology. *First*, the Fisher Net Settlement Amount is divided
20 between Fishers/Vessels and Fish Processors based on Dr. Rupert’s analysis of how
21 profits derived from gross catch are generally distributed in the fishing industry. *See*
22 Dkt. 621-1 (Proposed Fisher Plan) ¶ 16. Dr. Rupert’s analysis determined that the
23 Processor Share should be approximately 10% of the Fisher Net Settlement
24 Amount. After allocating to Processors, the remainder of the Fisher Net Settlement
25 Amount will be allocated to Fishers and Vessels, also pursuant to Dr. Rupert’s
26 analysis. *Id.*, ¶¶ 15, 28, 36.

27 *Second*, each entity or individual’s pro-rata share of the Processor Share,
28 Vessel Share, and/or Fisher Share is calculated by taking the Processor, Vessel, or

1 Fisher’s average annual proportional share of the catch in comparison to other
2 individuals or entities in that category. In sum, calculating individualized payment
3 amounts for the Fisher Class is economically and administratively feasible in this
4 case because of the CDFW data.

5 Courts have consistently found that a plan of distribution that awards
6 fractional shares is fair, reasonable and adequate. *See, e.g., In re High-Tech Emp.*
7 *Antitrust Litig.*, 2015 WL 5159441, at *8 (N.D. Cal. Sept. 2, 2015) (finding a plan
8 of distribution that provided each class member with a “fractional share” based on
9 each class member’s total base salary received during the alleged conspiracy period
10 to be “cost-effective, simple, and fundamentally fair”) (citation omitted); *In re Elec.*
11 *Carbon Prods. Antitrust Litig.*, 447 F. Supp.2d 389, 404 (D.N.J. 2006) (finding a
12 pro rata distribution to claimants based on their direct purchases to be “eminently
13 reasonable and fair to the class members”).

14 Class Counsel currently estimates an average payment of approximately
15 \$8,500, but notes that this number could vary considerably based on the percentage
16 of fish catch.¹

17 **2. Property Class**

18 The Property Class is comprised of residential properties that front shoreline,
19 including harbors, that was allegedly oiled and/or closed. Plaintiffs allege that all
20 Class Properties suffered a nuisance as a result of this oiling.

21 Property Class Members will receive checks by mail for equal portions of the
22 Property Class Settlement Fund (net after fees and costs). As in *Plains*, no Property
23 Class Member will have to prove they had oil on their property. But unlike in
24 *Plains*, Property Class Members will not have to file claims—all Property Class
25 Members who do not opt out and who have not released their claims in exchange
26

27 ¹ This calculation, and those for the Property Class and Waterfront Tourism Class
28 detailed below, assumes that the Court awards the requested fees and costs sought
by Interim Settlement Counsel, and seeks to account for OPA payments made to
date.

1 for an OPA payment will be sent a check. The proposed equal distribution to
2 Property Class Members is reasonable, efficient, and equitable. Setting aside oiling
3 or other physical trespass on individual Class Members' properties, all Property
4 Class Members are similarly situated with regard to the impact of harbor and beach
5 closures, which affected all similarly and has no single centralized data source like
6 the CDFW from which to determine each member's proportional share of the
7 aggregate damage. An equal distribution—without claims required—is simpler than
8 the variable property class distribution in *Plains*, which required significant expert
9 costs to calculate the proportional loss of use value of each property and
10 administrative costs to administer a claims process. *See Plains*, Dkt. 951-2 (June
11 27, 2022) (Proposed Plan of Distribution for Property Class). For the Property Class
12 in this case, such expensive calculation and administration processes would be a
13 larger proportion of a smaller fund, reducing the payments available to all Class
14 Members.

15 Courts regularly approve settlements distributing equal payments from a
16 common fund. *See, e.g., Koenig v. Lime Crime, Inc.*, No. CV 16-503 PSG, 2018
17 WL 11358228, at *4 (C.D. Cal. Apr. 2, 2018) (approving payment of equal shares
18 for portion of settlement); *S. California Gas Leak Cases*, No. BC601844, (Cal.
19 Super. Ct. April 29, 2022) (granting final approval to settlement distributing \$40
20 million fund equally to class of property owners affected by gas leak).²

21 Class Counsel currently estimates an average payment of approximately
22 \$670 per property.

23 3. *Waterfront Tourism Class*

24 Class Counsel identified ten categories of businesses in the Waterfront
25

26 ² Mot. at 3, *S. California Gas Leak Cases*, No. BC601844, (Cal. Super. Ct. Mar.
27 28, 2022) (available at
28 <https://www.porterranchpropertyclass.com/Docs/Plaintiffs%E2%80%99%20Motion%20for%20Final%20Approval%20of%20Class%20Settlement%20and%20Plaintiffs%E2%80%99%20Motion%20for%20Attorneys%20Fees,%20Lit.pdf>)

1 Tourism Class. *See* Dkt. 621-3. They are (1) marina or “landing” operations
2 servicing fishing and sightseeing vessels, (2) whale and/or dolphin watch vessels
3 and sunset cruise vessels, (3) vessels providing sportfishing operations (with more
4 than 6 passengers and requiring a Coast Guard Certification of Inspection), (4) “six-
5 pack” fishing vessels offering charters for 6 or fewer anglers, (5) bait and tackle
6 shops, (6) surf schools, (7) leisure boat rentals/charters, (8) hotel and lodging
7 accommodations, (9) food and beverage establishments, and (10) retail
8 establishments within the class definition. *See* Dkt. 621-3 (Proposed Waterfront
9 Tourism Plan), Ex. 3.

10 The total estimated lost profits of each Waterfront Tourism Business
11 category during the Damages Period was calculated by examining financial
12 information provided by the Settlement Class Representatives combined with
13 publicly available research such as advertised vessels and capacity (“seats”),
14 reported hotel occupancy and average daily room rates, and consumer spending
15 research conducted for local municipalities. By adding up the estimated lost profits
16 of each category, the total estimated lost profits for the Waterfront Tourism Class
17 has been determined. Accordingly, the pro rata share of the Settlement funds
18 allocated to each category has been determined by taking each category’s estimated
19 lost profits as a percentage of the total estimated lost profits of the entire Waterfront
20 Tourism Class. *Id.*

21 Many Waterfront Tourism Class Members, like the Fisher Class, will receive
22 checks by mail based on their share of aggregate damages for their category of
23 business. This is true for entities engaged in whale and/or dolphin watching/sunset
24 cruising, sportfishing operations, “six-pack” fishing, leisure boat rentals/charters,
25 and hotel and lodging accommodations. The allocation of Settlement funds within
26 these categories will be determined by calculating each entity’s pro-rata share of the
27 total number of seats (for boats) or rooms (for hotels) multiplied by the Net
28 Waterfront Tourism Distribution Balance for each respective category. *Id.* The

1 marina and landing entities will similarly not need to file claims. These entities will
2 receive a percentage of the funds allocated to the entities being serviced through the
3 Marinas.

4 Surf schools, food and beverage entities, bait and tackle shops, and other
5 retail establishments will be required to submit a simple claim form and
6 accompanying revenue information for the third and fourth quarters of 2021 in
7 order to determine each entity's class member's eligibility and pre-Spill market
8 share of its respective category. After the claims deadline, the Settlement
9 Administrator will calculate the relative shares of damages for these Class Members
10 and distribute awards pro rata. From this information, the Settlement Administrator
11 will determine the allocation of the Net Waterfront Tourism Distribution Balance
12 for each respective category. *Id.* As with the other Classes, the Settlement
13 Administrator will account for OPA offsets, if any, to prevent double recovery.

14 Given the lack of public information regarding these Class members, and the
15 variability among them, it is more economical, efficient, and fair for them to submit
16 their damages than for Plaintiffs to attempt to estimate them. *See, e.g., Roberts v.*
17 *AT&T Mobility LLC*, No. 15-cv-03418-EMC, Dkt. 215 at 4 (N.D. Cal. Aug. 20,
18 2021) (granting final approval to settlement in which one group of class members
19 received automatic payments and another had to submit claim forms); *Patti's Pitas,*
20 *LLC v. Wells Fargo Merch. Servs., LLC*, No. 1:17-CV-04583 (AKT), 2021 WL
21 5879167, at *2 (E.D.N.Y. July 22, 2021) (same).

22 Class Counsel currently estimates an average payment of approximately
23 \$409 per hotel room, \$497 per boat seat, and \$2,500 per other retail business.³

24 **III. CONCLUSION**

25 For the reasons stated above, Plaintiffs respectfully request that the Court
26

27 ³ The estimated \$2,500 recovery per other retail business, which includes surf
28 schools, food and beverage entities, bait and tackle shops, and other retail
establishments assumes a 100% claims rate. This number could vary significantly
based on the number of claims submitted.

1 approve the Fisher Class Plan of Distribution, the Property Class Plan of
2 Distribution and the Waterfront Tourism Plan of Distribution as fair, adequate, and
3 reasonable.

4
5 Dated: January 25, 2023

Respectfully submitted,

6 /s/ Lexi J. Hazam
Lexi J. Hazam

7
8 /s/ Wylie A. Aitken
Wylie A. Aitken

9
10 /s/ Stephen G. Larson
Stephen G. Larson

11
12 Wylie A. Aitken, State Bar No. 37770
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Facsimile: (714) 434-3600

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& BERNSTEIN, LLP
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Telephone: (415) 956-1000
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23 **LIEFF CABRASER HEIMANN**
& BERNSTEIN, LLP
24 250 Hudson Street, 8th Floor
25 New York, NY 10013-1413
26 Telephone: (212) 355-9500
27 Facsimile: (212) 355-9592
28

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Stephen G. Larson, State Bar No. 145225
slarson@larsonllp.com
Steven E. Bledsoe, State Bar No. 157811
sbledsoe@larsonllp.com
Rick Richmond, State Bar No. 194962
rrichmond@larsonllp.com
Paul A. Rigali, State Bar No. 262948
prigali@larsonllp.com
LARSON, LLP
600 Anton Blvd., Suite 1270
Costa Mesa, CA 92626
Telephone: (949) 516-7250
Facsimile: (949) 516-7251

Interim Settlement Class Counsel

2734262.2