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

4 GREY FOX, LLC, *et al.*,
5 Plaintiffs,

6 v.

7 PLAINS ALL AMERICAN PIPELINE,
8 L.P. *et al.*,
9 Defendants.

Case No. 2:16-CV-03157-PSG-JEM

**AFFIDAVIT OF GINA INTREPIDO-
BOWDEN REGARDING
OBJECTIONS AND REQUESTS FOR
EXCLUSION**

Honorable Philip Gutierrez

10
11 I, Gina Intrepido-Bowden, declare as follows:

12 1. I am a Vice President at JND Legal Administration (“JND”). This Affidavit
13 is based on my personal knowledge, as well as upon information provided to me by
14 experienced JND employees and, if called upon to do so, I could and would testify
15 competently thereto.

16 2. I previously submitted the Declaration of Gina Intrepido-Bowden re:
17 Settlement Notice Program (“Intrepido-Bowden Decl.”) filed April 9, 2024, ECF No. 303-
18 2, the Declaration of Gina Intrepido-Bowen Regarding Settlement Notice Program
19 Implementation (“Notice Decl.”) filed July 5, 2024, ECF No. 365, the Supplemental
20 Declaration of Gina Intrepido-Bowen Regarding Class Notice Implementation
21 (“Supplemental Decl.”) filed August 9, 2024, ECF No. 371-6, and the Declaration of Gina
22 Intrepido-Bowen Regarding Compliance with the Class Action Fairness Act, 28 USC §
23 1715 (“CAFA Decl.”) filed August 28, 2024, ECF No. 376.¹ JND is serving as the
24 Settlement Administrator in the above-captioned litigation pursuant to the Court’s
25 Preliminary Approval Order filed May 1, 2024. ECF No. 325 at ¶ 9.

26
27 ¹ All capitalized terms not defined herein have the meanings given to them in the Intrepido-
28 Bowden Decl. and Notice Decl., unless otherwise indicated.

1 3. This Affidavit is being filed to notify the Court of objections and requests
2 for exclusion per Paragraph 19 of the Preliminary Approval Order.

3 **OBJECTIONS AND REQUESTS FOR EXCLUSION**

4 4. The Direct Email, Direct Mail, and Publication Notices informed Class
5 Members that anyone who wanted to exclude themselves from the Settlement could do so
6 no later than **July 15, 2024**, and anyone who wanted to object to the Settlement could do
7 so no later than **August 19, 2024**. The Long Form Notice provided explicit instructions
8 regarding the process of objecting to the Settlement or requesting exclusion from the
9 Settlement. The Direct Email and Publication Notices directed Class Members to the
10 Settlement Website and the digital banner ads and the Publication Notice QR Code
11 provided a link to the Settlement Website for details on how to object or request exclusion
12 by mailing their written objections to the Court, Class Counsel, and Counsel for
13 Defendants. The Settlement Website was updated continuously with all relevant filings in
14 this action, including the Settlement, the motions for preliminary and final approval, the
15 motion for fees, costs, and service awards, the Plan of Allocation and the motion for
16 approval of it, relevant declarations in support of those motions, and Plaintiffs' Omnibus
17 Response in Support of those motions.

18 5. As of September 3, 2024, JND has not received any objections to the
19 Settlement, the Plan of Allocation, or Class Counsel's motion for fees, costs, and service
20 awards.

21 6. As of September 3, 2024, JND has received 10 timely and valid exclusion
22 requests and 6 invalid exclusion requests. JND notified all of those who submitted invalid
23 exclusion requests and received 1 corrected exclusion request in response, resulting in a
24 total of 11 timely and valid exclusion requests and 5 invalid exclusion requests. JND also
25 received 1 timely and valid exclusion request that has since been withdrawn. Lists of the
26 valid and invalid exclusion requests are attached hereto as **Exhibits A and B**, respectively.
27 These lists are complete and accurate as of September 3, 2024.

CONCLUSION

7. JND is continuing to implement the Settlement pursuant to the Settlement Agreement and the Preliminary Approval Order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 3, 2024 in Seattle, Washington.

GINA INTREPIDO-BOWDEN

State of Washington

County of King

Signed or attested before me on September 3, 2024 by Gina Intrepido-Bowen.

Signature



Notary
Title

My appointment expires: May 14, 2028

EXHIBIT A

LAS FLORES PIPELINE SYSTEM SETTLEMENT
(USDC CENTRAL DISTRICT OF CALIFORNIA, CASE NO. 16-cv-03157 PSG (JEM))

TIMELY AND VALID EXCLUSIONS

	<u>JND ID NUMBER</u>	<u>NAME</u>	<u>CITY/STATE</u>	<u>POSTMARK DATE</u>	<u>SIGNATURE TYPE</u>	<u>LAW FIRM SUBMITTING</u>
1.	NSEHL-G49N2	77 Broad Street LLC	Orange, CA	July 10, 2024	Wet	N/A
2.	NC3N2-YXM8L	77 Broad Street LLC	Orange, CA	July 10, 2024	Wet	N/A
3.	NAGK6-WMQ8P	77 Broad Street LLC	Orange, CA	July 10, 2024	Wet	N/A
4.	NW82Y-BT37E	ZACA Preserve, LLC	Los Olivos, CA	July 10, 2024	Wet	N/A
5.	NZCS5-9X7RT	Big River Real Estate, LLC	Coto De Caza, CA	July 11, 2024	Wet	Beaudoin & Krause-Leemon, LLP
6.	NRM4E-HQN2C	Big River Real Estate, LLC	Coto De Caza, CA	July 11, 2024	Wet	Beaudoin & Krause-Leemon, LLP
7.	NGRZK-SWDQ6	Big River Real Estate, LLC	Coto De Caza, CA	July 11, 2024	Wet	Beaudoin & Krause-Leemon, LLP
8.	N6YZL-MQ2AF	Big River Real Estate, LLC	Coto De Caza, CA	July 11, 2024	Wet	Beaudoin & Krause-Leemon, LLP
9.	NRLAH-D7ZYB	The Land Trust for Santa Barbara County	Santa Barbara, CA	July 12, 2024	Wet	N/A
10.	NMUR8-6CN7X	The Land Trust for Santa Barbara County	Santa Barbara, CA	July 12, 2024	Wet	N/A
11.	N8D9G-X53NH	Jack & Shannon Selvidge	Santa Maria, CA	May 29, 2024 [CURED August 13, 2024]	Wet	John Kenneth Dorwin

WITHDRAWN EXCLUSIONS

	<u>JND ID NUMBER</u>	<u>NAME</u>	<u>CITY/STATE</u>	<u>POSTMARK DATE</u>	<u>SIGNATURE TYPE</u>	<u>LAW FIRM SUBMITTING</u>
1.	NY7UJ-9GSDV	TAK LLC	Casper, WY	July 15, 2024 [Withdrawn August 7, 2024]	Wet	N/A

EXHIBIT B



LAS FLORES PIPELINE SYSTEM SETTLEMENT

(USDC CENTRAL DISTRICT OF CALIFORNIA, CASE NO. 16-cv-03157 PSG (JEM))

INVALID EXCLUSIONS

	<u>JND ID NUMBER</u>	<u>NAME</u>	<u>CITY/STATE</u>	<u>POSTMARK DATE</u>	<u>SIGNATURE TYPE</u>	<u>LAW FIRM SUBMITTING</u>	<u>REASON DEFECTIVE</u>
1.	N/A	77 Broad Street LLC	Orange, CA	July 10, 2024	Wet	N/A	Non-Class Property
2.	N/A	77 Broad Street LLC	Orange, CA	July 10, 2024	Wet	N/A	Non-Class Property
3.	NLM5V-NPJF8	Barak & Alyssa Moffitt Revocable Trust	Santa Maria, CA	July 12, 2024	Wet	John Kenneth Dorwin	Missing Class Member Telephone Number
4.	NXQ3K-DMA67	Barak & Alyssa Moffitt and Lanny Zamora	Santa Maria, CA	July 12, 2024	Wet	John Kenneth Dorwin	Missing Class Member Telephone Number
5.	NXJ4F-7NLTQ	Timothy Bennett	Santa Maria, CA	July 12, 2024	Wet	N/A	Missing Class Member Telephone Number; Only Signed by One of Multiple Property Owners