

1
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

**DECLARATION 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 Declaration
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-Bowden Regarding Settlement Notice Program
19 Implementation (“Notice Decl.”) filed July 5, 2024, ECF No. 365, the Supplemental
20 Declaration of Gina Intrepido-Bowden Regarding Class Notice Implementation
21 (“Supplemental Decl.”) filed August 9, 2024, ECF No. 371-6, the Declaration of Gina
22 Intrepido-Bowden Regarding Compliance with the Class Action Fairness Act, 28 USC §
23 1715 (“CAFA Decl.”) filed August 28, 2024, ECF No. 376, and the Affidavit of Gina
24 Intrepido-Bowden Regarding Objections and Requests for Exclusion, filed September 3,
25 2024, ECF No. 378.¹ JND is serving as the Settlement Administrator in the above-
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 captioned litigation for the purposes of administering the Settlement Agreement, filed April
2 9, 2024, ECF No. 303-1, Ex. 1 (“Settlement Agreement”), preliminarily approved by the
3 Court in its Order Granting Preliminary Approval of Proposed Settlement, filed May 1,
4 2024, ECF No. 325 (“Preliminary Approval Order”).

5 3. This Declaration is being filed to provide an additional update to the Court
6 regarding objections and requests for exclusion per Paragraph 19 of the Preliminary
7 Approval Order.

8 **OBJECTIONS AND REQUESTS FOR EXCLUSION**

9 4. The Long Form Notice, Email Notice, and Publication Notices informed Class
10 Members that anyone who wanted to exclude themselves from the Settlement could do so
11 no later than July 15, 2024, anyone who wanted to object to the Settlement could do so no
12 later than August 19, 2024. The Long Form Notice mailed to mailing addresses for all
13 Class Properties provided explicit instructions regarding the process of objecting to any
14 part of the Settlement or requesting exclusion from the Settlement.

15 5. The Email and Publication Notices directed Class Members to the Settlement
16 Website, and the digital banner ads and the Publication Notice QR Code provided a link to
17 the Settlement Website for details on how to object to any part of the Settlement or to opt
18 out of it by mailing their written objections to the Court, Class Counsel, and Counsel for
19 Defendants. The Settlement Website contains all dates listed above in a user-friendly “Key
20 Dates” tab, an “Important Documents” tab that contains the Settlement-related documents
21 in this action, including the Settlement, the motions for preliminary and final approval, the
22 Plan of Allocation and the motion for approval of it, and Class Counsel’s motion for fees,
23 expenses, and service awards, and an “FAQ” tab with a drop-down menu that also contains
24 the objection and exclusion deadlines, a detailed description of the process to object or opt
25 out of the Settlement, and embedded links to the same documents listed in the Important
26 Documents tab. Finally, the Website contains a “Contact Us” tab that provides the
27 Settlement Administrator’s dedicated email address for this Settlement, a phone number,

1 and a mailing address should any Class Member have wish to contact the Settlement
2 Administrator for any reason.

3 6. As of September 12, 2024, JND has not received any objections to either the
4 Settlement, the Plan of Allocation, or Class Counsel’s motion for fees, expenses, and
5 service awards.

6 7. Initially, JND received 11 valid requests for exclusion and 6 invalid requests
7 for exclusion from the Settlement. The parties have agreed to accept the documents
8 received as of September 12, 2024 as a valid request for exclusion for APN 131-200-001
9 and as valid withdrawals of the requests for exclusion for APNs 131-010-026, 131-010-
10 066, and 131-030-018. As of September 12, 2024, a total of 8 initially valid exclusion
11 requests have been withdrawn. In addition, 4 initially invalid exclusion requests have been
12 corrected. Thus, as of September 12, 2024, there are a total of 7 valid requests for exclusion
13 and 2 invalid requests for exclusion. JND has conferred with Class Counsel and Counsel
14 for the Settling Parties, and all parties are in agreement regarding the current list of valid
15 and invalid requests for exclusion. A list of the final, valid exclusions are attached hereto
16 as **Exhibit A**. Lists of the invalid and withdrawn exclusion requests are attached hereto as
17 **Exhibit B**. These lists are complete and accurate as of September 12, 2024.

18 **CONCLUSION**

19 8. JND is continuing to implement the Settlement pursuant to the Settlement
20 Agreement and the Preliminary Approval order.

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

23 Executed on September 12, 2024 in Seattle, Washington.

24
25 

26
27 _____
GINA INTREPIDO-BOWDEN

EXHIBIT A

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

TIMELY AND VALID EXCLUSIONS

	<u>APN NUMBER</u>	<u>NAME</u>	<u>CITY/STATE</u>	<u>POSTMARK DATE</u>	<u>SIGNATURE TYPE</u>	<u>LAW FIRM SUBMITTING</u>
1.	081-150-002	The Land Trust for Santa Barbara County	Santa Barbara, CA	July 12, 2024	Wet	N/A
2.	081-150-028	The Land Trust for Santa Barbara County	Santa Barbara, CA	July 12, 2024	Wet	N/A
3.	131-200-013	Jack & Shannon Selvidge	Santa Maria, CA	May 29, 2024 [CURED August 13, 2024]	Wet	John Kenneth Dorwin
4.	131-200-002	Barak & Alyssa Moffitt Revocable Trust	Santa Maria, CA	July 12, 2024 [CURED September 11, 2024]	Wet	John Kenneth Dorwin
5.	131-200-003	Barak & Alyssa Moffitt and Lanny Zamora	Santa Maria, CA	July 12, 2024 [CURED September 11, 2024]	Wet	John Kenneth Dorwin
6.	131-200-001	Timothy Bennett	Santa Maria, CA	July 12, 2024 [CURED September 12, 2024]	Wet	N/A
7.	099-400-017	ZACA Preserve, LLC	Los Olivos, CA	July 10, 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

WITHDRAWN EXCLUSIONS

	<u>APN NUMBER</u>	<u>NAME</u>	<u>CITY/STATE</u>	<u>POSTMARK DATE</u>	<u>SIGNATURE TYPE</u>	<u>LAW FIRM SUBMITTING</u>
1.	083-430-033	TAK LLC	Casper, WY	July 15, 2024 [Withdrawn August 7, 2024]	Wet	N/A
2.	131-010-026	77 Broad Street LLC	Orange, CA	July 10, 2024 [Withdrawn September 12, 2024]	Wet	N/A
3.	131-010-066	77 Broad Street LLC	Orange, CA	July 10, 2024 [Withdrawn September 12, 2024]	Wet	N/A
4.	131-030-018	77 Broad Street LLC	Orange, CA	July 10, 2024 [Withdrawn September 12, 2024]	Wet	N/A
5.	131-030-003	Big River Real Estate, LLC	Coto De Caza, CA	July 11, 2024 [Withdrawn September 12, 2024]	Wet	Beudoin & Krause-Leemon, LLP
6.	131-030-019	Big River Real Estate, LLC	Coto De Caza, CA	July 11, 2024 [Withdrawn September 12, 2024]	Wet	Beudoin & Krause-Leemon, LLP
7.	131-030-021	Big River Real Estate, LLC	Coto De Caza, CA	July 11, 2024 [Withdrawn September 12, 2024]	Wet	Beudoin & Krause-Leemon, LLP
8.	131-030-039	Big River Real Estate, LLC	Coto De Caza, CA	July 11, 2024 [Withdrawn September 12, 2024]	Wet	Beudoin & Krause-Leemon, LLP