

## **Bayou Corne Sinkhole Land Class Action**

### **United States District Court for the Eastern District of Louisiana**

## **Persons who owned uninhabited land and/or certain businesses near the Bayou Corne sinkhole may be affected by a proposed class action settlement.**

*A federal court authorized this legal notice. This is not a solicitation from a lawyer.*

- A settlement has been reached with two parties in a class action lawsuit about the Bayou Corne sinkhole in the Bayou Corne/Grand Bayou area of Assumption Parish, Louisiana. A \$10 million settlement fund has been established to pay amounts to holders of valid claims as well as lawyers' fees and costs approved by the Court.
- You may be included in the Class if, on or about August 3, 2012, you owned uninhabited land, including land with camps or structures that are not occupied as permanent residences, within a two mile radius of the Center Of The Sinkhole. Also, the following businesses are included in the Class: Tee's Silk Screening, Cutting Edge Hair Salon, Laser Construction, Brenda Romero, Automotive Remodeling Service, Town & Country Holding Company, LLC, Beryl Gomez Realty, and Cajun Land Realty. Certain persons are specifically not included in the Class, even though they may have owned property or businesses near the Center Of The Sinkhole on or about August 3, 2012.
- You may receive a payment only if you file a valid claim. If you do not file a valid claim, you will get no payment.
- Your legal rights are affected whether you act or do not act. Read this notice carefully.

<b>YOUR LEGAL RIGHTS AND OPTIONS:</b>	
<b>SUBMIT A CLAIM</b>	The only way to ask for and receive a payment from this settlement. Claims must be postmarked on or before May 31, 2018.
<b>EXCLUDE YOURSELF</b>	Get no payment from this settlement. This is the only option that allows you to be part of any other lawsuit against Occidental and Vulcan and certain others about the legal claims in this case. Any request to exclude yourself from the settlement must be postmarked on or before April 16, 2018.
<b>OBJECT</b>	Write to the Court about why you do not like the settlement. Objections must be postmarked on or before April 16, 2018.
<b>GO TO A HEARING</b>	The Court will hold a Fairness Hearing, which will start at 9:30 a.m. on May 9, 2018.
<b>DO NOTHING</b>	Get no payment. Give up rights to be part of any lawsuit against Occidental and Vulcan and certain others about the legal claims being settled.

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- These rights and options – **and the deadlines to exercise them** – are explained in this notice. Full details are included in the Settlement Agreement (“Agreement”) and other documents posted on the website at [www.sinkholelandclass.com](http://www.sinkholelandclass.com).
- The Court in charge of this case still has to decide whether to approve the settlement before any claims are paid. A claims process for dividing the settlement fund among claimants will begin May 31, 2018. Please be patient.

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## BASIC INFORMATION

### 1. Why has this notice been issued?

A Court has authorized this notice because you have a right to know about the proposed settlement of certain claims in this class action lawsuit, including the right to claim money, and about all your options, before the Court decides whether to give “final approval” to the settlement. If the Court approves the settlement, and after any appeals are resolved, amounts will be paid to holders of valid claims. This notice explains the lawsuit, the settlement, your legal rights, what benefits are available, who may be eligible for them, and how to get them.

Judge Jay C. Zainey in the United States District Court for the Eastern District of Louisiana is overseeing the case. The case is known as “*Lisa T. Leblanc, et al. v. Texas Brine Company, LLC, et al.*,” C.A. No. 12-2059-JCZ-MBN, and consolidated cases. The people who sued are called the plaintiffs. The parties they are suing, Texas Brine Company, LLC (“Texas Brine”) and Occidental Chemical Corporation are called the defendants. This notice involves a proposed settlement with two of the parties, Occidental Chemical Corporation and certain others (“Occidental”) and Legacy Vulcan, LLC and certain others (“Vulcan”).

### 2. What is this lawsuit about?

This class action lawsuit generally stems from the Sinkhole Occurrence, defined as the multi-acre sinkhole that occurred on or about August 3, 2012 near the Oxy-Geismar No. 3 brine well in Assumption Parish, Louisiana, in the general vicinity of Bayou Corne and Louisiana Highway 70, including any associated subsidence, other earth movement or geological activity. The Plaintiffs claim that they suffered injuries and property damage because of the Sinkhole Occurrence. The Plaintiffs further claim that the Defendants are legally responsible for these injuries and damage and they thus want compensation from the Defendants.

### 3. Why is the case a class action?

In a class action, one or more people or entities, called class representatives, sue on behalf of people who have similar claims. All of these people are a “Class” or “Class Members.” One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

### 4. Why is there a settlement?

The Class Members and Occidental and Vulcan agreed to a settlement to avoid the cost and risk of future trials and appeals, and so that the people allegedly affected can get compensation, in exchange for releasing Occidental and Vulcan and certain others from all liability and dismissing this lawsuit and the settled claims with prejudice. Occidental and Vulcan deny any wrongdoing, and the settlement does not mean that Occidental and Vulcan did anything wrong or that Occidental and Vulcan violated any laws. The class representatives and the lawyers representing them think the settlement is best for all Class Members.

Texas Brine Company, LLC is not a party to this settlement. This class action settlement does not dismiss the Class claims against Texas Brine.

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### **5. Who are the class representatives?**

The Court has approved the following people to represent the Class: (a) Michael Landry, (b) Leah Payne, and (c) Mary Russo.

### **WHO IS IN THE SETTLEMENT**

To see if you will be affected by this settlement or if you can get anything from this settlement, you first have to determine if you are a Class Member.

### **6. How do I know if I am a part of the settlement?**

Generally, you may be a Class Member if, on or about August 3, 2012, you either: (a) owned uninhabited land situated within a two mile radius of the Center of the Sinkhole, or (b) owned one of a list of businesses that operated within a two mile radius of the sinkhole. More information, including the list of businesses, is provided in the “Court’s Class definition” section below in question 7.

More detailed descriptions of the Class and the Agreement are available at [www.sinkholelandclass.com](http://www.sinkholelandclass.com) and in the official records of these proceedings on file with the Clerk of Court for the United States District Court for the Eastern District of Louisiana, Room C151, 500 Poydras Street, New Orleans, Louisiana 70130.

### **7. The Court’s Class definition.**

The Court specifically decided that Class be defined as follows.

“Class” or “Class Members” means any person or entity (a) who are or were, at or after the time of the Sinkhole Occurrence, owners of, and any person or entity holding the right to sue on behalf of owners of, uninhabited land, including land with camps or structures that are not occupied as permanent residences, within a two mile radius of the Center Of The Sinkhole, including owners of, and any person or entity holding the right to sue on behalf of owners of, the Hebert Tracts; and (b) the following businesses: Tee’s Silk Screening, Cutting Edge Hair Salon, Laser Construction, Brenda Romero, Automotive Remodeling Service, Town & Country Holding Company, LLC, Beryl Gomez Realty, and Cajun Land Realty. The persons and entities specifically listed in Exhibit A to the Agreement are excluded from the Class.

The capitalized terms Sinkhole Occurrence, Center of the Sinkhole, and Hebert Tracts are defined in the Agreement that is posted at [www.sinkholelandclass.com](http://www.sinkholelandclass.com). Exhibit A to the Agreement is also available on the website.

### **8. Are there exceptions to being included?**

Yes. The following are not included as Class Members: (a) Grand Bayou Management LLC; Super Stop Enterprises, LLC; Robert Sunshine, LLC and Roland J. Robert Distributor, Inc. (b) The State of Louisiana and all of its political subdivisions including any public entity. (c) Plaintiffs who opted out of the March 25, 2014 Settlement Agreement in *Leblanc, et al. v. Texas*

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Brine Company, LLC, et al. (d) Named Plaintiffs in the following cases:

1. Florida Gas Transmission Company, LLC v. Texas Brine Company, LLC, et al., No. 34316 (23rd Judicial District).
2. Crosstex Energy Service, LP, et al. v. Texas Brine Company, LLC, et al., No. 34202 (23rd Judicial District).
3. Pontchartrain Natural Gas System et al. v. Texas Brine Company, LLC, et al., No. 34265 (23rd Judicial District).

(e) Plaintiffs in the Susan Russo Marchand et al. v. Texas Brine Co. et al., No. 34270 (23rd Judicial District), but only with respect to their interests in the Russo Tract, which is described as: Tract R-1 (Russo): A certain tract or parcel of land containing 21.00 acres, situated in the Northeast Quarter of Section 39, Township 12 South, Range 13 East, Assumption Parish, Louisiana, and being bounded now or formerly as follows: North by Louis Dupre, East and South by Charles Triche, et al, and West by Estate of Edward Hebert. (f) Dennis P. Landry, Patricia Landry, nor any businesses owned by these persons including, but not limited to, Dennis P. Landry, Inc. dba Sportsman's Landing and Cajun Cabins & RV Sites of Bayou Corne. (g) The following entities with respect to property owned within two miles from the Center of the Sinkhole: any defendant named in this Action and any petrochemical industry entities, including Bridgeline Storage Company LLC; Texas Brine Company, LLC and related entities; Axiall, LLC; Occidental Chemical Corporation and related entities; Dow Chemical and related entities, including UCAR and Dow Hydrocarbon Resources, Inc.; Hawthorn Oil and Gas Corporation; Dalen Resources Oil and Gas Company; K/D/S Promix LLC; and Crosstex Processing Services. (h) Anyone who received money from the "early buy-out" program with Texas Brine; i.e., who received payment under the March 25, 2014 Settlement Agreement in *Leblanc, et al. v. Texas Brine Company, LLC, et al.*, E.D. La. No. 12-2059 and consolidated cases. (i) Any Claims amongst the Defendants in the Action.

Of course, if you are not included within the Court's Class definition (*see* question 7 above), you are not included in the settlement and you do not need to take any further action.

### **9. I'm still not sure if I am included.**

If you are not sure whether you are included in the Class, you can visit the website at [www.sinkholelandclass.com](http://www.sinkholelandclass.com), call 1-504-581-9065 for more information, or write to: Class Counsel, 338 Lafayette Street, New Orleans, LA 70130.

## **THE SETTLEMENT BENEFITS – WHAT YOU GET**

### **10. What does the settlement provide?**

Occidental and Vulcan have established a \$10,000,000 settlement fund from which valid claims from Class Members, as well as lawyers' fees and costs, will be paid, as approved by the Court. The Agreement, available at the website and in the official records of these proceedings on file with the Clerk of Court, describes all of the details about the proposed settlement.

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The “Administrator” (*see* question 12 below) will recommend to the Court that at least 50% of the settlement fund, plus the interest accrued thereon, be reserved to pay (a) litigation and settlement costs, (b) attorneys’ fees for work in litigating the case and obtaining settlement, and (c) awards for Class Representatives and trial representatives. Any funds remaining after paying individual claims, litigation and settlement costs, attorneys’ fees, and awards for Class Representatives and trial representatives will not be given back to Occidental or Vulcan.

### **11. What can I get from the settlement?**

The amount of each payment to claimants will be based, in part, on the total number of claims received and on the extent of damages suffered. The exact amount that you could receive from the settlement cannot be determined at this time.

### **12. Who will oversee the settlement fund?**

An independent “Administrator” will oversee the settlement fund. The Honorable Ralph Tureau, retired judge from the Louisiana 23<sup>rd</sup> Judicial District, has been appointed by the Court to be the Administrator. The Administrator will recommend to the Court how to allocate the settlement fund among the Class Members if and when the Court gives final approval to the settlement. (*See* the section on “The Court’s Fairness Hearing” below.)

## **THE CLAIMS PROCESS**

### **13. How can I get a payment?**

Class Members can submit their claims via United States mail, postage prepaid, to the Administrator, at:

Bayou Corne Land Class Claims  
P.O. Box 1239  
Gonzales, La 70707-1239

All claims must be postmarked on or before **May 31, 2018**. The Administrator has proposed exactly what you will need to provide to prove your claim and receive a payment. You must use the proof of claim form prepared by the Administrator in order to file a valid claim. You may obtain the proof of claim form by calling 1-504-581-9065 or going to [www.sinkholelandclass.com](http://www.sinkholelandclass.com).

The Administrator also will review each claim and propose how much money to pay each claimant based on a formula that he will recommend to the Court. If you timely submit a valid claim, the Administrator will send you a letter to tell you the proposed amount, if any, you are to receive. In this letter, the Administrator will also tell you what else you may need to do in order to receive a payment and how to object if you do not like your proposed payment. The Administrator will decide how much money each Class Member who files a valid claim gets.

Each Class Member must submit a separate claim form. The legal representative of a Class Member who is deceased or who is a minor may submit a claim form on behalf of that Class Member. You cannot be included on someone else’s claim form.

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### 14. When would I get my payment?

The Court has scheduled a hearing on May 9, 2018, to decide whether to approve the settlement. If the Court approves the settlement, there may be appeals. It is always uncertain whether these appeals can be resolved, and resolving them can take time. Payments to holders of valid claims cannot be made until the appeal process is finished, the settlement is final, and the allocation process has been completed. Please be patient.

### 15. What am I giving up to get a payment or stay in the Class?

Even if you do not get money from the settlement, if the settlement becomes final, you will release Occidental and Vulcan and certain related parties from all liability for any claims that are being settled. That means you cannot sue Occidental and Vulcan and certain others ever again for these claims and your claims will be dismissed with prejudice. (This lawsuit and other relevant lawsuits also will be dismissed with prejudice, at least as to Occidental and Vulcan.) The specific claims you will be releasing are described in Section 2.5 of the Agreement that is available at the website and in the official records of these proceedings on file with the Clerk of Court. You will also agree to certain obligations in favor of Occidental and Vulcan and certain related parties (*see, e.g.*, Sections 10.1 through 10.4 of the Agreement), including but not limited to indemnifying Occidental, Vulcan, and certain other parties for money they may be required to pay to Texas Brine and related parties arising from the claims of Class Members. The Agreement describes the relevant lawsuit(s), the released Claims, and your obligations with specific descriptions, in necessarily accurate legal terminology, so read it carefully. Talk to Class Counsel (*see* the section on “The Lawyers Representing You”) or your own lawyer if you have questions about the relevant lawsuit(s), the Released Claims, the sale of your immovable property, and your obligations, or what they mean.

## EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this settlement, but you want to keep the right to sue or continue to sue Occidental and Vulcan and others over the legal issues being settled in this case, then you must take steps to get out of the Class. This is called asking to be excluded from—or sometimes called “opting out” of—the Class. Any Class Members who do not request exclusion in a request postmarked by the April 16, 2018 deadline will be bound by all of the judgments made by the Court, whether favorable or not.

### 16. If I exclude myself, can I get money from the settlement?

No. If you exclude yourself, do not write to the Class claims office to request a payment. If you ask to be excluded, you will not get any settlement payment, and you cannot object to the settlement. But you may sue, continue to sue, or be part of a different lawsuit against Occidental and Vulcan in the future. You will not be bound by the settlement in this lawsuit. If you exclude yourself, you will no longer be represented by Class Counsel and you will have to take independent action to protect your interests.

### 17. If I do not exclude myself, can I sue later?

No. Unless you exclude yourself, you give up the right to sue Occidental and Vulcan and certain others for all the claims that this settlement resolves. You must exclude yourself from this Class to start or continue your own lawsuit or to be part of any different lawsuit relating to these claims.



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### 18. How do I get out of the settlement?

If you wish to be excluded from the settlement you must, in writing, in a request postmarked by April 16, 2018, state that you want to be excluded from the Occidental and Vulcan class settlement. You must include (a) your name, (b) the last four digits of your social security number, (c) your date of birth, (d) your current residential address, (e) your mailing address, if different, from your current residence address, (f) the address of the property you own that makes you a Class Member, (g) your email address if you have one, and (h) your telephone numbers (day time, night time, and cell). You must sign and date your request to be excluded. If you send in an exclusion request on behalf of someone else, you must include all of the above information, sign and date the request and describe the capacity in which you are acting (for example, mother, father, succession representative, etc.). If you have a lawyer, please provide his/her name, address, and telephone number on your exclusion request. Your lawyer cannot sign an exclusion request for you, and you cannot exclude a class or group of Class Members. You can't ask to be excluded on the phone or at the website. Any exclusion requests must be sent via United States mail, postage prepaid, to the following address and must be postmarked on or before **April 16, 2018**:

Bayou Corne Land Class Exclusion  
P.O. Box 1239  
Gonzales, La 70707-1239

## THE LAWYERS REPRESENTING YOU

### 19. Do I have a lawyer in this case?

The Court has appointed the following lawyers to represent Class Members as "Class Counsel": Calvin C. Fayard, Jr., Fayard & Honeycutt, 519 Florida Avenue SW, Denham Springs, LA 70726; Lawrence J. Centola, III, Martzell, Bickford & Centola, 338 Lafayette Street, New Orleans, LA 70130; Matthew B. Moreland, Becnel Law Firm, LLC, 106 W. Seventh St., Reserve, LA 70084; and Richard Perque, Law Offices of Richard Perque, LLC, 700 Camp St., New Orleans, LA 70130.

If you want to be represented by a lawyer of your choosing, you may hire one at your own expense. If you need assistance with your claim, Class Counsel will assist you. To contact Class Counsel, call 1-504-581-9065 or write to: Class Counsel, 338 Lafayette Street, New Orleans, Louisiana 70130.

### 20. How will the lawyers be paid?

The lawyers will ask for a fee not to exceed thirty-three and 1/3 (33 1/3%) percent of the \$10,000,000 settlement fund, or \$3,333,333, and for reimbursement of their out-of-pocket costs incurred in litigating the claims being settled, not to exceed \$250,000. Class Counsel will ask the Court to award these amounts from the settlement fund for their work in litigating the case and obtaining the settlement. The Court may award less than the requested amounts to Class Counsel.

## OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the settlement or some part of it.

### 21. How do I tell the Court if I do not like the settlement?

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If you are a Class Member, you can object to the settlement if you do not like it or certain parts of it. You must give reasons why you think the Court should not approve the settlement. The Court will consider your views if you properly submit an objection on time. To object, prepare a written statement of the specific reasons you object to the settlement. Please clearly indicate that you are objecting to the Bayou Corne Land Class Settlement, C.A. No. 12-2059-JCZ-MBN. You must file a written objection (“Objection Form”) with the Court and mail a copy to Class Counsel, Occidental, and Vulcan, at the addresses set forth below. Your Objection Form must be postmarked by April 16, 2018. You must set forth in the Objection Form your full name, telephone number, email address, provide proof of membership in the Class, and provide a description of any property wholly or partially located within the Class area in which you have an ownership interest. In addition to the above, Objectors must state in their Objection Form the reasons for objecting, including any supporting materials, papers, or briefs that the Objector wishes the Court to consider, and a statement whether the Objector intends to appear in Court at the final fairness hearing on May 9, 2018 at 9:30, either with or without separate counsel. You must also include the name and address of any witnesses to be presented at the fairness hearing, together with a statement as to the matters on which they wish to testify and a summary of the proposed testimony. Subject to the Court's discretion, any Class Member shall be entitled to be heard in Court at any hearing (whether individually or through separate counsel), or to object to the Settlement Agreement, provided that such Class Member submits written notice of the Class Member's objection in compliance with the deadline and other requirements specified in this notice and in Section 7.4 of the Agreement. Class Members who fail to file and serve timely written objections in the manner specified above shall be deemed to have waived any objections.

You must sign and date your objection. If you have a lawyer, please provide his/her name, address, and telephone number on your objection. You can hire your own lawyer, at your own expense, to appear with or without you at the Fairness Hearing; but you or your lawyer do not have to appear at the Fairness Hearing in order for the Court to consider your objection. If you or your lawyer intends to speak at the Fairness Hearing about your objection, you also must submit a notice of intent to appear with your objection materials. Any objection must be sent via United States mail, postage prepaid, to the following address and must be postmarked on or before **April 16, 2018**:

Bayou Corne Land Class Objections  
P.O. Box 1239  
Gonzales, La 70707-1239

To obtain a form to use to submit your objection, please visit [www.sinkholelandclass.com](http://www.sinkholelandclass.com).

### **22. What is the difference between objecting and excluding yourself from the settlement?**

Objecting is simply telling the Court that you do not like something about the settlement. You can object only if you are a Class Member and you stay in the Class. Excluding yourself is telling the Court that you do not want to be part of the Class. If you exclude yourself, you cannot object to the settlement or to the attorneys' fees or costs, because the case no longer affects you, and you will not receive any settlement payment.

## **THE COURT'S FAIRNESS HEARING**

The Court will hold a hearing to decide whether to approve the settlement.

### **23. When and where will the Court decide whether to approve the settlement?**

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The Court has scheduled a Fairness Hearing starting at 9:30 a.m. on **May 9, 2018**, in Courtroom C467 of the New Orleans Courthouse for the United States District Court for the Eastern District of Louisiana, 500 Poydras Street, New Orleans, Louisiana 70130. (The hearing may be moved to a different date or time without additional notice to Class Members, so it is a good idea to check [www.sinkholelandclass.com](http://www.sinkholelandclass.com).) At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. The Court will consider whether to approve the settlement, any requested attorneys' fees, expenses, etc., and awards for class representatives. If there are objections, the Court will consider them.

### **24. Do I have to come to the hearing?**

No. Class Counsel will answer questions the Court may have. But, you are welcome to come to court at your own expense. You may also have your own lawyer attend (at your expense), but it is not required.

### **25. May I speak at the hearing?**

You can only speak at the Fairness Hearing if you file a timely objection to the settlement following the procedures set forth in this notice (*see*, "Objecting to the Settlement" above) and you include with your objection a notice of intent to appear. The date and time of the hearing is shown in question 23 above. You cannot speak at the Fairness Hearing if you exclude yourself.

## **IF YOU DO NOTHING**

### **26. What happens if I do nothing at all and the settlement is approved?**

If you do nothing and the settlement is approved, you will not receive any benefits from the settlement. And you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Occidental and Vulcan and certain others about the claims being settled, ever again. The Agreement contains more detail regarding the scope of the Claims being released. Again, in order to receive settlement benefits, you must timely file a valid proof of claim form.

## **GETTING MORE INFORMATION**

### **27. How do I get more information?**

This notice summarizes the proposed settlement. More details are in the Agreement. You can visit the website at [www.sinkholelandclass.com](http://www.sinkholelandclass.com) or the Clerk of Court's office at Room C151, 500 Poydras Street, New Orleans, Louisiana 70130, where you will find the Agreement, other documents about the settlement, information about the claims process, and other information about the case. Or, you may call 1-504-581-9065 or write to: Class Counsel, 338 Lafayette Street, New Orleans, Louisiana 70130.