

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

**In Re: Oil Spill by the Oil Rig
“Deepwater Horizon” in the Gulf of
Mexico, on April 20, 2010**

* **MDL NO. 2179**

*

* **SECTION J**

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This Document Relates To:

* **HONORABLE CARL J.**

* **BARBIER**

No. 15-4143, 15-4146 & 15-4654

*

* **CHIEF MAGISTRATE JUDGE**

* **JOSEPH C. WILKINSON, JR.**

*

**DECLARATION OF MICHELLE M. LA COUNT
REGARDING HESI AND TRANSOCEAN ASSIGNED
CLAIMS SETTLEMENT ALLOCATIONS AND DISTRIBUTION**

I, MICHELLE M. LA COUNT, declare as follows:

1. I am a Senior Project Manager at Epiq Class Action and Claims Solutions, Inc.² (formerly an Assistant Director of Operations at Garden City Group, LLC [“GCG”]). GCG was engaged by the Court appointed Old Class Claims Administrator to assist him in implementing the Proposed HESI and Transocean Punitive Damages and Assigned Claims Class Action Settlements. Pursuant to the Court’s April 12, 2016 Preliminary Approval Order as to the Proposed HESI and Transocean Punitive Damages and Assigned Claims Class Action Settlements (the “Preliminary Approval Order”), GCG was authorized to act as the Class Notice

² GCG was acquired by Epiq as of June 15, 2018 and is now continuing operations as part of Epiq.

Administrator in connection with the Settlements filed in MDL-2179.¹ The following statements are based on my personal knowledge and information provided by other experienced GCG employees working under my supervision, and, if called on to do so, I could and would testify competently thereto.

MAILING OF THE NOTICE

2. As set forth in the Declaration of Stephen J. Cirami (the “Cirami Declaration”), 442,464 Notices were mailed by First-Class US Mail and 75,355 Email Notices were transmitted to potential Old and New Class members on June 15, 2016, after establishing a mailing list that included potential class members eligible to participate in the Assigned Claims Settlements by HESI and Transocean payable to eligible Old Class members and the Punitive Damages Settlements payable to eligible New Class members.

3. As of October 9, 2018, a total of 482,640 Notices were mailed to potential New and Old Class members.

TELEPHONE HOTLINE

4. As more fully described in the Cirami Declaration, GCG (and now as part of Epiq) established and continues to maintain a toll-free telephone number (1-877-940-7792) and Interactive Voice Response (“IVR”) system to accommodate potential Old and New Class members who have questions about the Settlements.

¹ All terms with initial capitalization not otherwise defined herein have the meanings ascribed to them in the HESI Punitive Damages and Assigned Claims Settlement Agreement as amended on September 2, 2015, as well as the Transocean Punitive Damages and Assigned Claims Settlement Agreement dated May 29, 2015 (the “Settlements”).

As of October 9, 2018, GCG has received 33,068 calls to the toll-free helpline including 16,571 calls with a call center operator.

WEBSITE

5. GCG established and is maintaining a website (www.GulfSpillPunitiveDamagesSettlement.com) dedicated to the Settlements to assist potential Old and New Class members.

6. The Old Class Claims Administrator has provided GCG with updates to post to the public website along with administrative forms, frequently asked questions, Court Status Reports, and Court Orders, including the Order Capping Individual Attorneys' Fees in the HESI and Transocean Punitive Damages and Assigned Claims Settlement Agreements [Rec. Doc. 24470].

7. GCG also established a dedicated email address, Questions@GulfSpillPunitiveDamagesSettlement.com, to assist with questions.

PROCEDURES FOLLOWED IN COMPILING THE CLAIMS DATA FROM EXISTING CLAIM DETERMINATIONS AND ADJUSTMENTS MADE

8. Initial Data Compilation. Pursuant to the direction of the Old Class Claims Administrator, GCG copied the payment data from the Deepwater Horizon Economic and Property Damages Settlement ("DHEPDS") Court Supervised Settlement Program ("CSSP") to the HESI/Transocean Distribution Database (the "Database"). The data was further adjusted as detailed below.

9. Court-Appointed Neutrals' Settlements. Court-appointed Neutrals' settlement values were appended to the existing CSSP records for claims identified as withdrawn and settled with the Court-appointed Neutrals prior to final determinations being made on their claim(s) by the CSSP. For individuals/entities that had claims settled with the Court-appointed Neutrals after the CSSP had made a final determination and for which all due process rights had already expired, the Court-appointed Neutrals' settlement value was not appended. The process of discerning the eligible and ineligible Court-appointed Neutral settlements was performed in accordance with the Court's Order and Reasons at Footnote 6 [Rec. Doc 22252]. Exhibit A contains a list of the CSSP Claimant IDs and, as available, Claim IDs that were not appended with Court-appointed Neutrals' settlement values because the claims were no longer under the purview of the CSSP at the time of the settlement.

10. In addition, parties that settled with the Court-appointed Neutrals regarding Opt-Out and excluded party claims or reserved claim types pursuant to the terms of the DHEPDS Agreement are not eligible as these individuals and entities were not DHEPDS Class Members and their payments did not come from the CSSP or relate to a CSSP-filed claim.

11. Reserve Claim Cutoff and Valuation. The Old Class Claims Administrator identified 887 claims at the time of allocation that did not have final

outcomes with the CSSP, the U.S. District Court for the Eastern District of Louisiana, or the U.S. Court of Appeals for the Fifth Circuit (collectively, the “Reserve Claims”). A list of the Reserve Claims identified by Claimant ID Number and Claim Number is appended as Exhibit B. To determine the appropriate value for the Reserve Claims, the Old Class Claims Administrator considered the following:

- (a) If the CSSP completed valuing the Reserve Claim, but the claimant or BP still had available due process rights, the yet-to-be-final determined value was utilized, subject to the \$150,000 maximum award for any Old Class claimant;
- (b) If the DHEPDS claim was pending in one of the various available appellate processes, the proposal value submitted by the claimant on appeal was utilized, subject to the \$150,000 maximum award for any Old Class claimant;
- (c) If a determined value or a claimant proposal value was not available because the claim was denied in processing and/or because inadequate information existed because the Reserve Claim was still under review, the Old Class Claims Administrator determined the average payable value for the underlying claim type and applied that value to ensure an adequate reserve is available.

(d) Based on this process, the Old Class Claims Administrator determined that a reasonable, maximum valuation for these claims was \$22,500,000.00, and to ensure no issues related to an undervaluation of either the Reserve Claims or any other items identified after the first installment of payments in the Old Class distribution, the Old Class Claims Administrator retained an additional 10% for a total Reserve Fund of \$24,750,000.00.

12. Handling of Clawbacks and Refunds to the CSSP. To the extent a claimant was subject to a clawback pursuant to an Order of the Court, that claimant's award(s) will not be deemed a payment by the CSSP and will not be eligible for inclusion in the calculation of Old Class awards. To the extent a claimant refunded a CSSP payment or portion of a payment voluntarily, such amount will not be considered part of his/her/its distribution for purposes of calculating an Old Class award, but it will not affect eligibility with regard to any other DHEPDS payments retained by the claimant.

13. Refunded Appeals Filing Fees and 6% Payment Amounts. In instances where an appeal filing fee or a 6% Payment was returned by the CSSP to an individual or entity, this was not included in the DHEPDS award paid by the CSSP, if any, and will not be considered in the calculation of Old Class awards. A total of 3,091 6% Payments were paid through the CSSP.

14. Prevailing CSSP Appeal Increases/Decreases. Prevailing party increases and decreases included in the Post-Appeal Eligibility Notice will be considered in the calculation of Old Class awards.

15. Parties Excluded After Initial CSSP Payment. For parties paid, but later excluded on a subsequent claim, or connected to a valid Opt-Out request, these claimants were not DHEPDS Class Members and thus cannot participate in this extension of the DHEPDS Agreement. A list of affected claimants is appended as Exhibit C.

16. Parties That Opted Out of the HESI/Transocean Settlements. Two parties opted out of the HESI/Transocean Settlements that would otherwise have been entitled to payments made under the Old Class Distribution Model. Given their Opt-Out status, they are no longer eligible to participate. The prior DHEPDS Claimant IDs for these two parties are noted in Exhibit D.

17. Payments Compromised to be Paid Over Time. For claimants who have compromised with BP to accept payments of their claim over time, the full value of their claims to be paid by the CSSP, regardless of the distribution total issued to date, will be used for the valuation of Old Class awards.

18. True-Up Payments. To the extent a true-up payment was issued to a DHEPDS Claimant, that amount will be counted toward his/her/its total CSSP payments and will be utilized to establish the eligible Old Class distribution award value.

19. Eligible Old Class Members with an Associated Third-Party Claim Record. The third-party claimants of record shall be paid without further follow up if the third-party claim relates to the filing or processing of the original DHEPDS claim. For other third-party claims that could be satisfied at this point, such as tax liens, child support liens, judgments, etc., the third-party claimant and the Old Class Member, or his/her/its attorney if individually represented, will be contacted for confirmation of the current third-party claim value during the pendency of the Motion for Approval of Distribution of the Assigned Claims Portion of the Halliburton Energy Services, Inc. and Transocean Ltd. Settlement Agreements and any appeal period following entry of an order approving distribution. For third-party claims that were previously paid in full based on the prior filing by the third-party claimant, the Old Class Member or his/her/its attorney will be paid directly, as appropriate.

20. Eligible Old Class Members with Claims Previously Identified as Related to a Bankruptcy Proceeding. The appropriate US Trustees have been contacted and, during the pendency of the Motion for Approval of Distribution of the Assigned Claims Portion of the Halliburton Energy Services, Inc. and Transocean Ltd. Settlement Agreements and any appeal period following entry of an order approving distribution, updates will be made to the claimant bankruptcy records based on responses by the US Trustees. In the event the award is disclaimed

by the Trustee, such amount shall be paid directly to the Old Class claimant or his/her attorney, as applicable.

QUALITY ASSURANCE, FRAUD PREVENTION AND REGULATORY COMPLIANCE

21. Fraud Prevention Measures. GCG, prior to distribution, will have reviewed the Database against its “watch list” of known potential fraudulent filers that GCG has developed throughout its over thirty years of experience as a claims administrator. GCG works closely with the FBI to update that watch list with the latest information available.

22. OFAC Review. In accordance with the regulations of the Office of Foreign Asset Control regulations and guidelines, known as OFAC, GCG will perform searches on payments to identify potential payees whose names may appear on the federal government’s restricted persons list or who reside in countries to which payments are prohibited. GCG regularly monitors changes to OFAC regulations and guidelines in connection with its distributions.

DISPOSITION OF CLAIMS

23. Eligible Claims/Claimants. A total of 201,777³ eligible claims for 154,674 unique claimants were identified pursuant to the compilation procedures described in Sections 8-18.

³ As a result of generally including Neutrals’ -settled claims as eligible for participation in the Old Class distribution, the total claim count described in this Declaration naturally exceeds the reported DHEPDS count of eligible claims because withdrawn DHEPDS claims were not counted as eligible in the DHEPDS statistics.

24. Ineligible Claims/Claimants. There are 2,214 claims that fell into one of the exception categories in Sections 9 and 11-16. This does not include the 887 Reserve Claims that remain pending at this time. Additionally, there were 205,601⁴ claims that never qualified for a payment from the CSSP and were therefore also deemed ineligible as there was no basis upon which to calculate a *pro rata* distribution.

**ESTABLISHMENT OF THE NET SETTLEMENT FUND AND
ESTIMATED INITIAL DISTRIBUTION *PRO RATA***

25. Fees and disbursements. The Court has previously approved payments for administrative fees and expenses totaling \$7,182,501.97 to date. Of that, \$6,623,799.36 has been allocated to the New Class and \$558,702.61 to the Old Class, \$495,637.26 of which related to notice fees and expenses and \$63,065.35 of which related to claims administration. It is anticipated that the administrative fees and expenses to complete the Old Class distribution will be \$1,773,400, assuming:

- (a) Only one primary distribution will occur;
- (b) Payments will be made for Reserve Claims as they are finalized in conjunction with monthly check reissue runs;
- (c) The administrative fees and expenses reserve takes into account estimated federal taxes on interest earned and tax preparation through 2020; and

⁴ Duplicate or otherwise inactive claimant records from the CSSP were not transferred to the Database and therefore are not included in this total.

(d) Escheatment is conducted in two rounds within one calendar year at the close of the Assigned Claims Settlements Program.

Should it be determined that adequate funds are remaining from the Reserve Fund after all eligible claims have received distribution, the Court will be petitioned for an additional distribution order at that time, which will include estimated administrative fees and expenses necessary to conduct the additional distribution. During the pendency of the distribution phase, the Old Class Claims Administrator has advised he will continue to submit invoices for Court approval on a quarterly basis as fees and expenses are accrued.

26. Reserve Fund. Based on these assumptions, the Old Class Claims Administrator determined that a reasonable valuation for the Reserve Fund is \$24,750,000.00 after taking into account the Reserve Claims and a limited additional reserve for any items that are identified post-distribution as requiring an adjustment to an award value.

27. Settlement Funds Allocated to the Old Class. The Allocation Neutral allocated the Old Class \$337,666,750.00 of the comingled HESI and Transocean Settlement Agreements proceeds (the “Old Class Settlements’ Proceeds”) [Rec. Doc. 15653], which totaled \$1,239,750,000.00 prior to earning interest, less any taxes due and administrative costs and fees.

28. Inclusion of the Residuary Funds from the Insurance Proceeds Recovery Fund in the HESI-Transocean Assigned Claims Comingled Distribution.

As the Court has granted Co-Lead Counsel's motion [Rec. Doc. 24881] to include the remaining balance of the Insurance Proceeds Recovery Fund established by Section 5.14 of the DHEPDS Agreement [Rec. Doc 6276-1] in the amount of \$32,702,270.24, plus any accrued interest, for distribution along with the Old Class Net Settlement Fund [Rec. Doc. 24887], this will be added to the Old Class Settlements' Proceeds for a total of \$370,369,020.24 in aggregate proceeds from all sources (the "Old Class Aggregated Funds") prior to the addition of interest earned and payment of administrative costs and expenses and hold back of the Reserve Fund.

29. Estimated Comingled Net Settlement Fund. After the addition of interest earned and estimated to be earned on the Old Class Aggregated Funds and the residuary balance of the Insurance Proceeds Recovery Fund, as well as deduction of: (1) Old Class invoices approved by the Court in the amount of \$558,702.61 that have previously been paid, (2) the estimated future administrative costs and expenses in the amount of \$1,753,400.00⁵, (3) tax preparation costs and taxes paid by the HESI and Transocean Settlements' Funds to date, (4) payment of estimated

⁵ It is notable that through careful planning and execution of the most efficient and simplified process possible, the Old Class Claims Administrator will complete the notification phase, claims data transfer, claims data analysis, adjustments pursuant to the Old Class Distribution Model, and the distribution to the Old Class at a cost of just over one-third of the interest earned on the Old Class Proceeds, thus making 100% of the Old Class Proceeds plus nearly two-thirds of the interest earned available for distribution to the Old Class.

future tax preparation costs in the amount of \$20,000.00⁶, and (5) the \$24,750,000.00 Reserve Fund, the Net Settlement Fund value is \$349,900,217.46 for the Old Class. This amount will be subject to adjustment once actual interest earned is added to the Old Class Aggregated Funds. Then, the full share of the Old Class allocated funds from the HESI and Transocean escrow accounts will be transferred to the HESI-Transocean Assigned Claims Comingled Distribution account pursuant to the Order entered by the Court authorizing this action [Rec. Doc. 24887].

30. Estimated Pro Rata. A minimum payment value of \$100 was approved by the Court in the Old Class Distribution Model as part of the Court's Order and Reasons [Rec. Doc. 22252]. Therefore, all Old Class Members who received a payment awarded by the CSSP in any amount will receive a minimum Old Class payment of \$100.00. Additionally, pursuant to the Old Class Distribution Model, payments will be limited to a maximum of \$150,000.00. These determinations are subject to the adjustments described in the processing procedures highlighted in Sections 8-19. A total of 35,481 eligible claimants are anticipated to receive the minimum payment of \$100.00⁷, and 138 are expected to receive the maximum

⁶ It was confirmed with the tax preparer that no additional tax payments will be required given the expense offset for future costs related to the upcoming distribution.

⁷ When estimating the *pro rata*, DHEPDS claimants with an aggregate payment for all paid claims of \$4,776.93 or less are anticipated to receive the minimum payout of \$100. This will adjust slightly once actual interest for October and November 2018 are included.

payment of \$150,000.00⁸, with all other eligible claimants receiving a *pro rata* share of the remaining funds based on the claimant's prior aggregate CSSP award payments. Based on the estimated Comingled Net Settlement Fund value of \$349,900,217.46, the estimated *pro rata* is 2.2233425%.

DISTRIBUTION TAX REPORTING

31. IRS Forms W-9 Required. Attorneys receiving a payment in any claim category with aggregate payments exceeding \$600 and Old Class members receiving a distribution of \$600 or more in the aggregate across any of the reportable claim categories listed below must receive an IRS Form 1099-MISC:

- (a) Individual Economic Loss;
- (b) Individual Periodic Vendor/Festival Vendor;
- (c) Business Economic Loss;
- (d) Start-Up Business Economic Loss;
- (e) Failed Business Economic Loss;
- (f) Seafood Compensation (all categories except Oyster Leaseholders);
- (g) Subsistence; and
- (h) VoO Charter Payments.

In order to facilitate accurate tax reporting, an IRS Form W-9 that matches the name and social security number or name and employer identification number issued by

⁸ When estimating the *pro rata*, DHEPDS claimants with an aggregate payment for all paid claims of \$6,731,771.35 or more are anticipated to receive the maximum payout of \$150,000. This will adjust slightly once actual interest for October and November 2018 are included.

the IRS must be on file with the Old Class Claims Administrator prior to payment being issued, or the claimant's award may be subject to backup withholding.

32. IRS Backup Withholding. For individuals and entities that have previously been identified by the IRS as having provided inaccurate information to the CSSP and to whom an IRS "B" Notice was issued by the CSSP pursuant to the request of the IRS, backup withholding of 24% may be paid to the IRS on the claimant's behalf. In his sole discretion, the Old Class Claims Administrator may opt to withhold the 24% backup for eligible claimants for whom the IRS has confirmed the information provided to the CSSP is inaccurate and who have not responded to the HESI/Transocean Settlements Program notices requesting an updated W-9; alternately, the Old Class Claims Administrator may opt to hold the payments and allow the claimant to respond within 30 days of the occurrence of the initial distribution.

33. Issuance of Forms 1099-MISC. IRS Forms 1099-MISC will be issued as per the IRS deadline of January 31 of the year following the distribution. Each law firm that receives payment(s) on behalf of its client(s) and each claimant that has received at least \$600 in the aggregate among reportable claim categories noted above will receive an IRS Form 1099-MISC.

PROPOSED DISTRIBUTION ORDER

34. The Settlement Administrator respectfully requests the Old Class Claims Administrator petition the Court for an Order approving the following to allow GCG and other vendors to take the actions specified, under the direction and supervision of the Old Class Claims Administrator:

- (a) Creation of a new, commingled Qualified Settlement Fund in the name of “HESI-Transocean Assigned Claims Combined Settlements Fund” with a distinct employer identification number;
- (b) Establishing a distribution account with Huntington Bank such that funds will be secured by United States Government-backed Treasury instruments in the name of the HESI-Transocean Assigned Claims Combined Settlements Fund for the purpose of conducting the Old Class distribution;
- (c) Funding the HESI-Transocean Assigned Claims Combined Settlements Fund with 27.2366808% of the proceeds from the HESI and Transocean Settlement Funds currently held in escrow by UBS (the “Escrow Agent”), plus a proportional share of the interest earned as of September 30, 2018, to create the comingled fund for distribution by transferring these funds from the Escrow Agent to Huntington Bank via wire transfer on or after October 1, 2018, at such time as the Court’s Order approving the Motion for Approval of

Distribution of the Assigned Claims Portion of the Halliburton Energy Services, Inc. and Transocean Ltd. Settlement Agreements is final;

- (d) Establishing the administrative expense and cost reserve of \$1,753,400.00 to be held back from the initial distribution;
- (e) Establishing the tax return preparation reserve of \$20,000.00 to be held back from the initial distribution;
- (f) Establishing the Reserve Fund holdback of \$24,750,000;
- (g) Making any final updates to the estimated *pro rata* included in Section 30 based on the final value of funds available or changes to eligible claims pursuant to the methodology stated herein without further approval of the Court as long as the adjustment to the *pro rata* is 0.5% or less;⁹
- (h) Approving the Old Class Claims Administrator's claim determinations made pursuant to the methodology established based upon the Court's Order and Reasons (Rec. Doc. 22252), which included approval of the Old Class Distribution Model as discussed in Sections 8-20 above;
- (i) Issuing payments via wire or check in the same manner as previously paid by the CSSP to eligible Old Class members, with the exception of claims included on the Reserve Claims list, upon an Order of the Court approving distribution being final; however, reserving unto the Old Class Claims

⁹ An adjustment up to 0.5% will have a net effect of \$750 or less, even at the maximum payment of \$150,000.

Administrator the authority to hold back payments for (1) individuals/entities with missing, incomplete, or inaccurate IRS Forms W-9 or, in the Old Class Old Class Claims Administrator's discretion, to withhold 24% of the payment for forwarding to the IRS as backup withholding, (2) unresolved liens/third party claims, or (3) unresolved issues surrounding the rights of a trustee in bankruptcy to the award or part of the award;

- (j) Reissuing checks on a monthly basis along with first time payments for eligible Reserve Claims that have been resolved in the month prior; initial payments will be made consistent with the methodology stated herein and the *pro rata* applied to all distributions in the initial Old Class distribution;
- (k) Issuing IRS Forms 1099-MISC to attorneys and paid Old Class Members with reportable distributions and filing the same information with the IRS annually until distribution is complete;
- (l) Retaining the Court's jurisdiction over the HESI-Transocean Assigned Claims Combined Settlements Fund and the Reserve Fund; should the Old Class Claims Administrator determine a residual distribution is necessary, the Old Class Claims Administrator shall file a motion with the Court for approval; and
- (m) Requiring the Old Class Claims Administrator to close the HESI-Transocean Assigned Claims Combined Settlements Fund account one calendar year

after issuance of the final eligible Reserve Claim check, further ordering accelerated escheatment of any residual funds to the states by the Old Class Claims Administrator at that time, unless a residual distribution order is pending with or entered by the Court prior to closure of the account.

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

Executed in Franklin, Wisconsin, on October 30, 2018.



Michelle M. La Count

Exhibit A

Exhibit A – Claims settled with the Court Appointed Neutrals that had full and final determinations by the DHEPDS Court Supervised Settlement Program prior to settlement

Claimant ID Number	Claim Number
100000593	25467
100002059	199198
100003972	167589
100005698	70948
100005781	36839
100005841	77505
100007463	15225
100008163	116150
100008163	116155
100008193	136814
100009634	93974
100010229	286870
100012285	84444
100014908	263272
100017451	220643
100021165	135538
100021441	50679
100021441	Not Provided
100021801	129023
100026818	24303
100027219	139189
100027518	125544
100027518	Not Provided
100027579	125765
100029726	253894
100030821	130577
100030908	226763
100031885	38139
100032089	34962
100033253	7475
100033563	42054
100033854	32679
100035366	40170
100035555	23106
100038588	49462
100038896	16030
100038896	50104
100039845	190812
100040269	135641
100040953	47411
100041013	82344

Exhibit A con't

Claimant ID Number	Claim Number
100041024	21679
100041254	253890
100041533	256467
100041590	237839
100041590	Not Provided
100041867	253865
100052457	317121
100054252	251726
100082244	217215
100085230	245587
100086651	112521
100092886	116616
100093803	200136
100093804	197467
100096582	418283
100096952	88907
100099518	130722
100105713	55408
100105713	Not Provided
100109187	171041
100109187	Not Provided
100110849	167248
100114206	275044
100114948	298348
100115085	167071
100116854	72936
100116905	157909
100119600	358188
100119600	Not Provided
100120617	299924
100120617	Not Provided
100125081	283649
100125081	Not Provided
100125271	91010
100125271	219682
100125271	Not Provided
100125272	219794
100125272	219807
100125272	Not Provided
100129536	86441
100129668	138163
100130870	88870
100134072	132233
100136851	94337
100136851	94504
100136851	94525

Exhibit A con't

Claimant ID Number	Claim Number
100136851	161505
100136851	208512
100136851	208586
100136851	208661
100136851	208807
100136851	Not Provided
100139597	137358
100143075	117977
100145099	209873
100152924	272099
100154652	113835
100154652	Not Provided
100155653	155786
100155653	239328
100155653	Not Provided
100158187	132367
100160115	132845
100160119	134860
100161669	281420
100163121	238979
100166320	127172
100167291	128860
100167291	Not Provided
100168104	159435
100168104	Not Provided
100168149	129860
100172742	139012
100178673	177004
100178673	Not Provided
100179651	222134
100181826	154368
100181826	Not Provided
100195970	169884
100199369	253175
100199898	251669
100200817	244913
100201100	176203
100202472	185312
100205111	240014
100205114	217640
100205220	182080
100205220	Not Provided
100206399	211020
100207486	252359
100207870	236410
100209131	361947

Exhibit A con't

Claimant ID Number	Claim Number
100210312	239689
100220517	200588
100220517	Not Provided
100223850	204227
100223850	Not Provided
100224342	204771
100232563	215044
100232563	Not Provided
100235789	219873
100235789	Not Provided
100237395	289789
100238568	224209
100238568	Not Provided
100245210	269837
100247219	360320
100251473	242638
100252028	374490
100255339	249121
100256729	251233
100256729	Not Provided
100256793	274349
100256793	Not Provided
100258579	253861
100263644	264713
100275689	371052
100283889	297346
100289163	305874
100289398	306149
100289398	Not Provided
100290022	307755
100290022	307758
100290022	307780
100290022	307798
100290022	307801
100290022	307805
100290022	307811
100290022	307828
100290022	307832
100290022	307833
100290022	307835
100290022	307840
100290022	307842
100290022	307845
100290022	307847
100290022	307848
100290022	307849

Exhibit A con't

Claimant ID Number	Claim Number
100290022	307850
100290022	307852
100290022	307856
100290022	307858
100290022	307859
100290022	307860
100290022	307876
100290022	307879
100290022	307882
100290022	307885
100290022	307890
100290022	307892
100290022	307896
100290022	307899
100290022	307905
100290022	307908
100290022	307911
100290022	307915
100290022	307928
100290022	307932
100290022	307936
100290022	307937
100290022	307938
100290022	307939
100290022	307942
100290022	307943
100290022	307946
100290022	307949
100290022	307952
100290022	307957
100290022	307962
100290022	307963
100290022	307964
100290022	307965
100290022	307966
100290022	307974
100290022	307975
100290022	307976
100290022	307977
100290022	307978
100290022	307979
100290022	307981
100290022	307994
100290022	307997
100290022	307999
100290022	308002

Exhibit A con't

Claimant ID Number	Claim Number
100290022	308005
100290022	308009
100290022	308014
100290022	308025
100290022	308027
100290022	308028
100290022	308030
100290022	311938
100290022	312064
100290022	312066
100290022	Not Provided
100297164	332982
100297490	324360
100324395	371932
100324395	Not Provided
100338177	394578
100338177	Not Provided

Exhibit B

Exhibit B – Reserve Claims List

Claimant ID Number	Claim Number
100000513	7425
100000660	21302
100000813	61632
100001004	37018
100001094	172819
100001389	189968
100001594	31351
100002063	261815
100002093	388564
100002223	16766
100002438	170901
100002448	28826
100003533	1054
100003668	107411
100003735	37892
100004776	72789
100005130	77599
100005301	123090
100005726	125096
100006076	19360
100006386	82730
100007394	76034
100008241	171173
100008244	161888
100008822	291105
100008832	1694
100010990	161025
100010990	161029
100010990	161031
100012504	2080
100012907	54349
100012991	72624
100014075	52121
100015495	365972
100015942	47156
100016632	8661
100017145	59042
100017178	44888
100017457	56257
100017458	47658
100017582	335491
100017595	183164
100017609	317452
100017956	358156

Claimant ID Number	Claim Number
100017956	358160
100017956	425143
100018408	412750
100020057	113206
100021409	3922
100021728	302490
100022655	186904
100023739	17031
100024319	312111
100024710	4709
100024892	405311
100025646	108498
100025875	53816
100025880	386889
100025887	419042
100026270	317389
100026410	46166
100026410	57564
100027195	382573
100028150	316656
100028192	387015
100028232	313477
100028398	381288
100028494	308229
100028948	316898
100029109	334834
100030245	376345
100030813	183544
100031188	162178
100031266	90371
100031516	89611
100033471	109734
100033512	7546
100033935	7903
100034986	8743
100035448	334368
100035483	117484
100035960	393277
100036033	179009
100036447	14270
100037150	264719
100037150	439622
100037150	439623
100037150	439624
100037150	439625
100037150	439673

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Claimant ID Number	Claim Number
100037150	439674
100037150	439675
100037150	439676
100037150	439677
100037150	439678
100037333	9891
100038208	419017
100041182	264466
100043289	135475
100043605	33423
100044509	129195
100045520	14398
100046353	20892
100047779	15885
100048053	15902
100049831	74874
100050481	185091
100051197	131688
100051387	82606
100051573	402947
100052418	276889
100054321	20434
100055132	176985
100055916	22058
100057108	23170
100057283	39510
100058919	61823
100059769	25618
100061532	31364
100062202	159399
100062229	376272
100062351	61324
100062351	207661
100062351	207662
100062351	207664
100062351	285522
100062524	27871
100062796	241645
100064164	236189
100064910	46107
100065193	29856
100065410	30083
100065964	173871
100066254	209338
100066589	51646
100067850	64476

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Claimant ID Number	Claim Number
100068924	425724
100068977	201877
100069205	32179
100069457	432096
100069667	33468
100070220	38523
100070390	72646
100074999	397508
100080852	382356
100081155	34212
100081155	191251
100081155	191262
100081155	191269
100081155	191277
100081417	34687
100081659	37423
100082577	38228
100082976	37866
100083657	49892
100084529	377276
100085525	58378
100088951	49145
100089393	53954
100089736	42177
100090895	202148
100090931	323428
100091053	232719
100091053	232721
100091053	232725
100091053	437954
100092283	274384
100094082	44999
100094162	45215
100094497	46103
100094579	169886
100097103	47845
100097416	48124
100097416	429685
100098072	261859
100098483	49112
100099307	57948
100100036	50908
100100680	52576
100100680	442130
100101570	52507
100103743	254772

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Claimant ID Number	Claim Number
100104439	396646
100104931	54811
100104936	54652
100105064	440141
100105444	55267
100105592	56606
100105769	111069
100105769	224524
100105769	224528
100106589	394029
100106951	56492
100106951	56495
100106951	56496
100110028	60048
100111142	92074
100112403	274704
100114866	64365
100115255	64891
100115255	217181
100116150	66008
100116389	87392
100118258	314578
100118552	229610
100118552	229615
100118552	229616
100118552	229618
100119450	153667
100119595	442811
100119843	188899
100120122	165681
100123057	79969
100124146	81189
100124146	81791
100124184	81080
100124959	398688
100125532	89326
100125674	91830
100126024	100928
100126191	101577
100126742	83855
100127361	215312
100128364	85519
100129696	389648
100133935	217243
100134924	93428
100135429	99465

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Claimant ID Number	Claim Number
100135429	99477
100135622	119190
100135774	288139
100135807	101063
100135837	97293
100136199	93478
100136275	93693
100136794	439137
100137423	94897
100137852	95419
100137950	95523
100139051	158796
100139132	98913
100139132	209175
100140583	98247
100140651	313264
100141377	424183
100141377	424184
100141377	424185
100141377	424186
100141377	424187
100141850	334069
100144723	102552
100145392	103049
100145621	104389
100145913	103637
100145913	422638
100145913	422639
100145913	422643
100145913	422646
100145913	422650
100145913	422655
100145913	422656
100147262	106467
100147506	106426
100148628	125655
100148762	107393
100148871	257791
100149765	114184
100150453	113838
100150590	179415
100151500	110407
100152299	116579
100152345	116569
100152637	111658
100155124	114277

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Claimant ID Number	Claim Number
100155293	115237
100155611	114748
100155863	114992
100155863	298082
100155863	298084
100155863	424827
100156164	116955
100156517	387142
100156677	115715
100157225	118558
100157477	271184
100157891	260255
100158112	188042
100158112	347590
100158551	119913
100158551	244722
100158551	244724
100158551	244727
100158551	244730
100158551	244731
100158551	244733
100158551	244736
100158551	244737
100158551	244740
100158551	244741
100158551	244743
100158551	244746
100158551	244748
100158551	244749
100158551	244752
100158551	424388
100158551	424389
100158551	424390
100158551	424391
100158551	424392
100158551	424393
100158551	424395
100159046	119787
100160651	132926
100160714	120132
100160729	120135
100160778	122573
100160820	120287
100161139	120725
100162593	122602
100163022	131587

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Claimant ID Number	Claim Number
100163022	424546
100164130	124605
100164525	153000
100165232	126178
100165780	126515
100165906	177941
100166533	164379
100166581	127507
100167035	153628
100167108	372267
100167589	418762
100167589	419355
100168733	152347
100169452	131557
100169928	135083
100169928	135093
100169971	132473
100170128	269148
100171030	135163
100172004	137338
100172421	165866
100173641	148543
100173955	162093
100176936	345868
100177365	151298
100178051	153520
100178765	151437
100178843	151493
100179569	156978
100179931	152505
100180179	276807
100180353	156412
100182390	155126
100182991	155441
100184426	157298
100184833	404052
100185019	284031
100185019	284032
100185019	284033
100185019	284034
100185315	157989
100185390	158062
100185449	158575
100186305	159254
100186362	443083
100187576	218115

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Claimant ID Number	Claim Number
100188324	166951
100188691	239923
100188866	214006
100188945	205740
100189329	198541
100189536	165800
100190627	170255
100191715	169354
100191796	269578
100192823	166438
100193730	167353
100193730	320131
100195328	169154
100195340	181256
100195524	177858
100195673	169617
100196090	170366
100196422	170441
100196873	171054
100196917	171095
100197066	171289
100197323	178804
100197950	172395
100198026	172534
100198060	172542
100198790	173297
100199351	242941
100199592	174251
100200020	174825
100201953	177358
100202453	178183
100203356	438410
100204031	181677
100204031	181678
100204615	181250
100206176	322114
100206201	183328
100206362	194324
100206719	425630
100207091	185342
100207628	390374
100208363	186141
100208411	204814
100208655	190449
100209074	187164
100209551	187694

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Claimant ID Number	Claim Number
100209920	418425
100210429	203213
100210868	189428
100211718	190605
100211895	190864
100212052	191082
100212911	192249
100213095	192253
100213166	322309
100213166	322331
100213166	322332
100213166	322333
100213166	322334
100213166	322335
100213166	322336
100213908	193018
100213908	439434
100213908	439435
100213908	439436
100214639	193893
100214656	193973
100215057	318532
100215257	195927
100216298	195970
100216423	226479
100216581	196468
100217018	196818
100217035	219342
100217235	204113
100217946	198519
100218085	197915
100218632	212998
100219339	203451
100220221	200327
100220931	201103
100222322	203102
100224371	205449
100224760	205186
100225009	217638
100225486	219692
100225486	219721
100225492	206487
100226289	207000
100226808	207730
100226828	207655
100227197	208202

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Claimant ID Number	Claim Number
100227272	400098
100227272	400105
100227272	400111
100227272	400117
100227272	400139
100227272	400144
100227611	209978
100228672	210517
100229051	355339
100229751	211490
100230793	213842
100230809	216178
100231113	213108
100231975	214183
100233618	217070
100233717	221339
100234143	217528
100234712	218378
100234754	218416
100234828	218548
100236079	220802
100237030	221350
100237661	222279
100237700	404495
100238025	386535
100238059	223246
100238083	226734
100238084	226753
100238693	279208
100238696	372996
100238803	251351
100239841	225901
100240467	443081
100241241	227804
100241867	229683
100241914	228757
100243018	230445
100243047	254194
100243288	230854
100243447	296792
100243579	231118
100243875	256003
100244079	241427
100244444	232252
100245152	233330
100245558	233759

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Claimant ID Number	Claim Number
100245927	234426
100246277	235823
100246646	235438
100246928	235837
100246947	299004
100247222	238320
100248137	237803
100248744	238785
100248748	238834
100248832	239273
100248905	238994
100249188	239309
100249258	239409
100249740	240135
100250111	241046
100250478	241213
100250680	241435
100250950	241846
100251090	246629
100251119	242101
100251401	242512
100251453	242594
100251490	242670
100251666	243025
100252090	243662
100252813	244631
100253053	245331
100253053	364699
100253122	245113
100253621	246053
100254213	256993
100254304	250997
100254609	247827
100254998	248556
100255177	248836
100255229	250347
100255459	249332
100255630	258980
100255655	249609
100255752	249747
100256187	273348
100256434	256029
100257058	251781
100257128	252412
100257196	252392
100257196	439780

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Claimant ID Number	Claim Number
100257200	252416
100257200	439781
100257210	252450
100257210	439782
100257233	252518
100257233	439783
100257235	252635
100257235	439784
100257238	252669
100257238	439785
100257253	255158
100257253	439787
100257445	253388
100257462	252675
100257462	439788
100257469	252660
100257469	439789
100257818	252741
100257818	439790
100258941	254342
100259071	281974
100260500	417868
100260530	315647
100260597	386360
100261260	258485
100261403	258787
100261435	273082
100261598	386338
100261619	259261
100261758	259679
100261892	263871
100261922	260216
100261939	260253
100262053	260534
100262092	260619
100262121	260735
100262194	261063
100262308	261540
100262347	261718
100262523	262234
100262673	262683
100262795	263558
100263032	272120
100263273	263787
100263321	263799
100263384	265000

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Claimant ID Number	Claim Number
100263754	268859
100264025	264955
100264048	265004
100264865	268176
100264865	269405
100264865	269406
100264865	320843
100265563	267677
100265655	267785
100266126	268614
100266263	268903
100266704	269479
100267689	271155
100268006	271960
100268006	439792
100268018	271985
100268018	439793
100268247	271895
100270111	275198
100270854	276399
100271718	277947
100271726	278286
100273979	289851
100274262	282639
100274308	321470
100274564	283731
100276106	286447
100276935	287596
100278753	312660
100279526	290697
100279933	291252
100280397	368056
100281276	293134
100281299	293156
100281817	294023
100282449	312426
100282515	295106
100283067	295882
100283535	296544
100283991	443089
100284842	298651
100285293	299313
100285293	442950
100285548	299778
100285582	299821
100285582	299822

Claimant ID Number	Claim Number
100285739	300021
100286111	419644
100286132	442892
100286412	304872
100286781	301558
100286781	301559
100286882	442182
100287006	301985
100287246	443092
100287696	303967
100287699	303127
100287882	303392
100288441	304475
100288552	304756
100288552	356352
100288552	356361
100288552	356365
100288552	356372
100288728	305353
100289220	305824
100289791	306769
100290015	307283
100290261	308075
100290959	317823
100290959	317836
100290959	317843
100290959	317844
100291211	310441
100291479	311323
100291552	365168
100292174	312744
100292782	315473
100292926	314270
100294499	317094
100295153	318147
100295238	360771
100295328	360780
100295330	360783
100295394	318810
100295851	319862
100295869	319977
100296061	320460
100297067	323460
100297067	437940
100297067	437941
100297067	437942

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Claimant ID Number	Claim Number
100297071	438986
100297071	438987
100297071	438988
100297075	438999
100297075	439000
100297075	439001
100297077	439006
100297077	439007
100297077	439008
100297080	439038
100297080	439039
100297080	439040
100298024	439045
100298024	439046
100298024	439047
100298282	439052
100298282	439053
100298282	439054
100298392	334214
100299181	334144
100299695	334763
100299837	441152
100300903	342652
100301329	397196
100301594	342687
100302265	386487
100302267	386825
100302463	347116
100302962	343738
100303726	344482
100303892	344590
100305558	346790
100306755	347826
100308214	349899
100311251	352541
100311611	352861
100311611	352862
100311611	352865
100311734	353055
100312422	353774
100312440	360325
100312530	370558
100312996	410350
100313533	354664
100313574	354974
100314042	357148

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Claimant ID Number	Claim Number
100314191	357980
100314239	355467
100315756	359478
100315902	357660
100316106	362636
100316963	359522
100317267	359911
100317267	359916
100317585	380278
100317640	417411
100318379	364472
100318689	362094
100318689	362097
100318689	362109
100318754	376778
100319411	390270
100320353	364610
100320413	371512
100320571	398228
100320907	399622
100320908	397972
100320931	365796
100321001	366337
100321039	366028
100321191	366226
100321513	366863
100322342	368301
100322357	368324
100322740	423458
100322740	423459
100322740	423460
100322740	423461
100322740	423464
100322995	369383
100323050	251680
100323176	370615
100323192	370773
100323733	400245
100323733	400262
100323733	400268
100323733	400273
100323978	371167
100324160	371520
100324302	371773
100324892	377395
100324898	377093

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Claimant ID Number	Claim Number
100324924	377151
100324968	375648
100325633	374504
100325677	379415
100325736	374088
100326520	379186
100326569	375458
100327209	402418
100327608	387803
100327751	390307
100328272	378514
100328272	378554
100328272	378561
100328272	378625
100328287	378624
100328431	378799
100328431	379992
100328779	379411
100328940	379739
100329490	380685
100329889	381213
100329935	381405
100330006	381590
100330111	443101
100330392	382390
100330399	382407
100330580	386066
100330580	386078
100330580	386090
100330580	386117
100330908	387410
100331361	383878
100331683	384206
100331982	417755
100332044	392797
100332556	390168
100332989	386396
100333597	387199
100333648	387757
100333675	387266
100333854	387638
100335108	389686
100335363	417794
100335534	390485
100335709	442905
100336040	391154

Claimant ID Number	Claim Number
100336159	391291
100336211	391456
100336931	392462
100337908	394311
100337908	394316
100337908	394328
100337908	394342
100337908	394350
100337908	394356
100337908	394368
100337908	394376
100337908	394390
100337908	394397
100338078	394486
100338623	395225
100338809	395523
100339236	396180
100340370	399993
100340672	404068
100340994	404482
100341114	410467
100343352	403160
100343628	403391
100343933	403772
100345577	409539
100348102	407813
100348532	408180
100348761	408407
100349978	410099
100350222	415308
100350697	411300
100351502	412645
100353876	417253
100354107	418880
100354107	419474
100354107	419559
100354107	419603
100354107	419604
100354107	419734
100354236	418786
100354236	418795
100354883	430424
100354884	438191
100355386	425609
100355902	430887
100355902	439794

Exhibit B con't

Exhibit B con't

Claimant ID Number	Claim Number
100356347	439574
100356431	354238
100356431	442887
100356431	442889
100356472	272574
100356533	442631
100356536	442687
100356536	442688
100356536	442689
100356536	442690
100356536	442841
100356583	442859
100356602	309241
100356602	309242
100356637	92366

Exhibit C

Exhibit C – Excluded or identified as a valid opt-out from the DHEPDS Class after a DHEPDS payment had been made

Claimant ID Number	Claim Number
100043000	71736
100059927	71753
100060418	71764
100063459	71789
100087797	69778
100088370	70351
100095141	72486
100103392	72188
100103396	72190
100176960	174553
100176960	174555
100294949	317752
100298372	332367

Exhibit D

Exhibit D – Opt-out parties from the HESI and Transocean Settlements

Claimant ID Number	Claim Number
100119805	78335
100312638	405853