

DONALD W. ABSHIRE, ET AL.

19TH JUDICIAL DISTRICT COURT

-versus-

CIV. ACTION NO. 377713, SEC. 26

THE STATE OF LOUISIANA, ET AL.

**EAST BATON ROUGE PARISH
STATE OF LOUISIANA**

CONSOLIDATED WITH

ARTHUR A. LEWIS, ET AL.

19TH JUDICIAL DISTRICT COURT

-versus-

CIV. ACTION NO. 412265, SEC. 26

THE STATE OF LOUISIANA, ET AL.

**EAST BATON ROUGE PARISH
STATE OF LOUISIANA**

**UNOPPOSED MOTION FOR DISTRIBUTION OF NET SETTLEMENT FUND
WITH INCORPORATED MEMORANDUM IN SUPPORT**

NOW INTO COURT, through undersigned counsel (“Class Counsel”), comes the Plaintiff Class¹ (“Plaintiffs or the “Class”) who moves this Court for an order directing distribution of the Net Settlement Fund in this case.

This Motion is based upon the Declaration of Amy Fringer of Rust Consulting, the Court-approved Claims Administrator for this case (“Rust Decl.”) (Ex. A hereto), the Declaration of Co-Lead Counsel David Raphael filed herewith (“Raphael Decl.”) (Ex. B hereto), the

¹The Plaintiff Class is defined in the Court’s Order granting class certification dated September 14, 2016 as follows:

All persons or entities in the United States who filed suit against the State of Louisiana and/or its Department of Insurance or Office of Financial Institutions for damages caused by the State’s conduct in connection with the failure of Public Investors Life Insurance Company, Inc., and whose claim was consolidated into Civil Action No. 377,713 or No. 412,265 (captioned *Donald W. Abshire, et al., vs. The State of Louisiana, et al.*);

All persons or entities in the United States who filed suit against the State of Louisiana and/or its Department of Insurance or Office of Financial Institutions for damages caused by the State’s conduct in connection with the failure of Public Investors, Inc., and whose claim was consolidated into Civil Action No. 377,713 or No. 412,265 (captioned *Donald W. Abshire, et al., vs. The State of Louisiana, et al.*);

All persons or entities in the United States who filed suit against the State of Louisiana and/or its Department of Insurance or Office of Financial Institutions for damages caused by the State’s conduct in connection with the failure of Midwest Life Insurance Company, and whose claim was consolidated into Civil Action No. 377,713 or No. 412,265 (captioned *Donald W. Abshire, et al., vs. The State of Louisiana, et al.*);

Excluded from the Class are any persons or entities to the extent their claims in Civil Action No. 377,713 or No. 412,265 have been resolved by a final, unappealable judgment, including those claims dismissed as a result of the rulings of the United States District Court, Western District of Louisiana, No. 06-1368.

Declaration of Shelli McVay (“McVay Decl.”) (Ex. C hereto), and the Memorandum of Points and Authorities set forth below.

This Motion will be available today for review by Class members and any other Claimants at the website of Class Counsel, Smith Segura Raphael & Leger, LLP:
<http://www.ssrlp.com/abshire-class-action-information.html>.

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION AND BACKGROUND

Plaintiffs respectfully submit this memorandum in support of their motion to distribute the Net Settlement Fund from their Settlement with Defendants.² The Settlement was filed on December 21, 2018 with the Motion by All Parties for Preliminary Approval of Settlement Agreement and Issuance of Other Related Orders; it was preliminarily approved by the Court in its Order Preliminarily Approving Movants’ Motion By All Parties For Preliminary Approval of Settlement Agreement and Issuance of Other Related Orders dated December 27, 2018 (“Preliminary Approval Order”); and was finally approved by the Court in its Order Approving Settlement and Plan of Allocation of Settlement Proceeds, Dismissing All Claims, and For Related Relief dated April 29, 2019 (“Final Approval Order”). Class Counsel took all actions in accordance with the Preliminary Approval Order and Final Approval Order, including making pertinent settlement and claims related information publicly available on a website maintained by Class Counsel (<http://www.ssrlp.com/abshire-class-action-information.html>).

As the Court will recall, the Settlements, to which no objections were lodged (see Motion by All Parties for Final Approval of Settlement with Incorporated Memorandum of Law filed herein on March 21, 2019), provided for payments totaling \$5.81 million into a settlement fund for the Class (the “Settlement Fund”) comprised of the following separate settlement payments:

1. \$3,300,000.00 from the State of Louisiana;
2. \$1,400,000.00 from Lexington Insurance Company and National Union Fire Insurance Company of Pittsburgh, Pa.;
3. \$600,000.00 from Admiral Insurance Company;

² The Defendants are the State of Louisiana by and through its Department of Insurance, Office of Risk Management, and Office of Financial Institutions, Admiral Insurance Company, Westchester Fire Insurance Company, Lexington Insurance Company, National Union Fire Insurance Company of Pittsburgh, Pa., and American Excess Insurance Association and each of its members (“AEIA”). All claims against the Defendants were dismissed with prejudice by this Court’s final approval Order dated April 29, 2019.

4. \$360,000.00 from Westchester Fire Insurance Company; and
5. \$150,000.00 from AEIA.

All settlement amounts were deposited by Rust Consulting (“Rust”), the Court-approved Claims Administrator, into interest-bearing accounts as required by the Preliminary Approval Order.

II. RELIEF REQUESTED

In accordance with the Final Approval Order and the Claim Administration Plan,³ Plaintiffs, by Class Counsel, respectfully move for an order:

- (i) approving the decisions of Rust regarding Accepted Claims and Rejected Claims;
- (ii) approving the distribution of the Net Settlement Fund⁴ to Class members and any other Claimants with Accepted Claims in the proportion reflected in Exhibit 3 to the Rust Declaration, filed herewith;
- (iii) approving payment to Rust and to Class Counsel of fees and expenses associated with the administration of the Settlement; and
- (iv) finally and forever barring further claims against the Settlement Fund.

III. ARGUMENT

The Court should direct distribution of the Net Settlement Fund in proportion to the percentage allocation shown in Exhibit 3 to the Rust Declaration (Ex. A hereto). As detailed in the Rust Declaration, Rust, assisted by AsherMeyers, LLC and Class Counsel, has calculated each Claimant’s proportionate share of the Net Settlement Fund after processing all Accepted Claims and Rejected Claims.

Claim Forms were sent to Class members on March 8, 2019. Rust Decl. ¶3.a.

Thereafter, extensive efforts were made to contact and assist Class members who did not submit Claim Forms. McVay Decl. (Ex. C hereto). A total of 437 Claimants will receive a share of the

³ The Claim Administration Plan, attached as an Exhibit to the Motion for Approval of Claim Administration Plan, was filed on April 29, 2019 and approved by Order of the same date.

⁴ The “Net Settlement Fund” (defined in the Claim Administration Plan) is the amount set forth in the Settlement Agreement approved by the Court, plus interest, minus the attorneys’ fees, expenses, and the service awards that the Court previously approved in its April 29, 2019 Order granting the Application of Plaintiffs’ Co-Lead Class Counsel for Award of Limited Attorney’s Fees, and for Approval of Certain Out-of-Pocket Costs and Expenses and Incentive Awards for Class Representatives (the “April 2019 Expense Reimbursement Order”), and minus any other expenses the Court orders be paid from the Settlement.

Net Settlement Fund. Rust Decl. ¶5. Where two or more Claimants submitted valid claims as heirs/successors of a deceased original claimant, the claim was divided equally among those successor Claimants. Rust Decl. ¶5.

There were a total of 60 Rejected Claims. Rust Decl. ¶3.h.

As shown at Rust Decl. ¶ 4, claims by the following individuals were rejected because the claim was made by or on behalf of someone who was not a Class member (i.e., a person or entity who was not a party plaintiff in this matter prior to the class certification order):

Arlene Jones Anna Normand Kent Normand

As shown at Rust Decl. ¶4, claims by the following individuals were rejected because they were determined to be duplicative of other approved claims:

Resa Ann Frederic Burke	Marsden Aymond	Nicholas J. Bordelon
Jennifer Johnston	Ernest Bell	Elizabeth (Betty) Lemoine
Gregory Marcus Roberts	Margaretta Thornton	Tena McNeal
Donald Kennair, III	Debbie Dubose McElhannon	Robert A. Corley, III
Gayle A. Simoneaux	Conrhone Wallace	Janet G. Kimball
Wayne E. Jackson	William Lee Rose, Sr.	Patricia Rogers
Rogerlyn Wanda Jackson	Stephanie A. Savoie Hopkins	Rickey Johnson
Wyatt Kennair	Carol G. Frederic	Alice Haynes Westmoreland
Russell Andrew Falgout	Cher Ja Dina Wallace	Catherine Gentry
Cathy Stack	Carlos Torres Wallace	Linda G. Amberg
Dorothy Malbrough	Lucille Wilson Wallace	Melissa McMillian
Sonya Buccola	Rosemary Morris Bryant	Ryan Lofton
Simonne Savioe Golden	Crystal Park Tuey	Kevin Hunter Clay
Sidney A Savoie	Carmen Deon Park	Kathleen C. Utecht
Regina Oliver	Joyce Bonner	Kenneth L. Parker
Crystal A. Strickland	Teresa Ball	Conrad Wallace
Barbara Peyton	Derek Ball	Jennifer A. Golden
Robert K. Faul	LJ Cheek	Charlene Wilson
Ingrid Taraza Jefferson-Butler		

As shown at Rust Decl. ¶4, claims by the following individuals were rejected in part, but approved at an amount less than the amount requested on the Claimant's Claim Form:

Ernest L. Edwards, Jr. Adell Wallace

From April 29, 2019 to the date of this filing, Class Counsel has incurred a total of \$86,762.01 in additional expenses, which amounts have been paid from the Settlement Fund as authorized by Class Counsel pursuant to the April 2019 Expense Reimbursement Order.

Raphael Decl. ¶4 (Ex. B hereto). Class Counsel seeks authorization for Rust to pay to Class Counsel and Rust out of the Settlement Fund, the \$29,017.16 in additional expenses itemized in ¶5 of the Raphael Declaration.

Rust estimates that it will incur an additional \$38,296.50 in fees and expenses to complete the distribution of the Net Settlement Fund, and to address accounting and tax issues associated with distribution of the fund. Raphael Decl. ¶8, Rust Decl. ¶8.

More than twenty calendar days have elapsed from the December 23, 2019 mailing of claim rejection notices referred to in Rust Declaration ¶3.h.; and, as can be seen by reference to the certificate of the Clerk of Court appearing at the foot of this motion, no claimant has filed a request for review or appeal of a determination by the Claims Administrator. Accordingly, there were no timely appeals of claim rejections as contemplated in Section VI of the Claim Administration Plan.

Defendants have been notified of this Motion prior to its filing and take no position with respect to it.

DATED: January 23, 2020

Respectfully submitted:

SMITH SEGURA RAPHAEL & LEGER, LLP



David C. Raphael, Jr. (Bar # 22853)

David P. Smith (Bar #12159)

221 Ansley Blvd.

Alexandria, LA 71303

Tel: 318-445-4480

Co-Lead Class Counsel

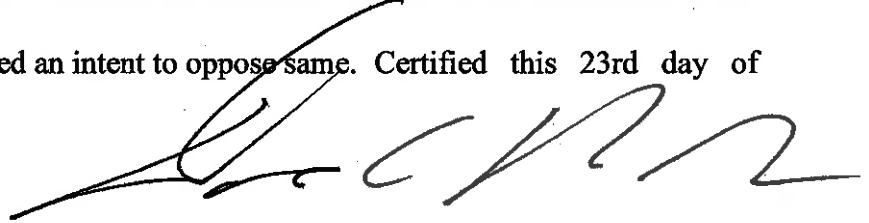
ODOM & DESROCHES, LLC

John Gregory Odom (Bar #1109)
Stuart E. Des Roches (Bar #21902)
Christopher T. Stow-Serge (Bar #34779)
Suite 2020, Poydras Center
650 Poydras Street
New Orleans, LA 70806
Tel: 504-522-0077

Co-Lead Class Counsel

CERTIFICATE PURSUANT TO RULE 9.8(f)

I hereby certify that counsel for Plaintiffs has informed counsel for all defendants of the filing of this motion, and none indicated an intent to oppose same. Certified this 23rd day of January, 2020.



David C. Raphael, Jr.

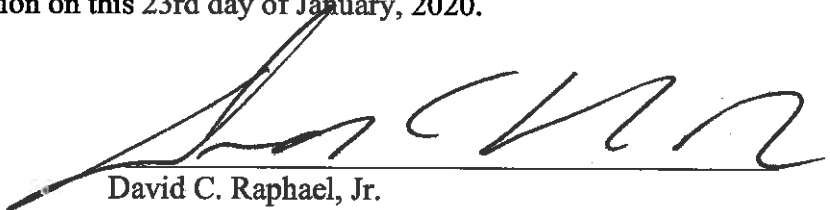
CERTIFICATE OF THE CLERK OF COURT

I HEREBY CERTIFY that no notice seeking review or appeal of determinations by the Claims Administrator in this matter has been filed in this office from December 23, 2019 through ____ o'clock __.m. on this _____ day of January, 2020.

Clerk of Court
19TH Judicial District Court

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing has been served on all counsel of record via-mail transmission on this 23rd day of January, 2020.



David C. Raphael, Jr.

DONALD W. ABSHIRE, ET AL
VS
THE STATE OF LOUISIANA, ET AL

19TH JUDICIAL DISTRICT COURT
CIV. ACTION NO. 377, 713, SEC. 26
EAST BATON ROUGE PARISH
STATE OF LOUISIANA

CONSOLIDATED WITH

ARTHUR A. LEWIS, ET AL
VS
THE STATE OF LOUISIANA, ET AL

19TH JUDICIAL DISTRICT COURT
CIV. ACTION NO. 412, 265, SEC. 26
EAST BATON ROUGE PARISH
STATE OF LOUISIANA

**DECLARATION OF AMY FRINGER IN SUPPORT OF
PLAINTIFFS' MOTION FOR DISTRIBUTION OF NET SETTLEMENT FUND**

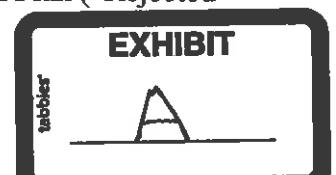
I, Amy Fringer, declare as follows:

1. I am a Senior Project Manager at Rust Consulting ("Rust"). Rust serves as the Court-approved Claims Administrator pursuant to Paragraph 4 of this Court's order dated September 6, 2018. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. I submit this declaration in order to provide the Court and the parties with information about the administration of the Settlement Fund.

3. As Claims Administrator, Rust performed the following tasks in accordance with the Court-Approved Claim Administration Plan dated April 29, 2019 (the "Administration Plan"):

- a. Printing and mailing 1,403 Claim Forms to potential Class members on March 8, 2019 (the Claim Forms were substantially in the form approved by this Court by Order dated December 27, 2018);
- b. Accepting and maintaining documents received from Claimants, including Claim Forms and other documents relating to the value of claims and/or the right of successors to submit claims on behalf of deceased Class members;
- c. Assisting Class members in their submission of Claim Forms;
- d. Answering questions from Claimants and communicating with claimants, including Claimants who chose to submit their own data and/or documents;
- e. Coordination with the accounting firm of AsherMeyers, LLC and Class Counsel on a variety of issues in connection with the claim administration process, including issues relating to the valuation of claims and the sufficiency of documentation;
- f. Printing and mailing 265 notices to Claimants on or about August 12, 2019 regarding additional documentation or information needed to evaluate their claim, as contemplated in Section IV of the Administration Plan ("Rejected



Claims”);

- g. Evaluating each Claimant’s claim for acceptance or rejection;
- h. Printing and mailing 60 notices of rejection/modification on December 23, 2019 to Claimants whose claims were denied or approved for an amount less than the amounts claimed on the Claim Form, as contemplated in Section V of the Administration Plan;
- i. Calculating each Claimant’s pro rata share of the Net Settlement Fund;
- j. Otherwise managing the claims administration process in accordance with the Administration Plan.

4. Of the 60 Rejected Claims referred to in Paragraph 3(h) above, three (3) were based upon a determination, after consultation with Class Counsel, that the Claimant was not a Class member, i.e., the Claim was made by or on behalf of a person or entity what did not file suit against the State of Louisiana and/or its Department of Insurance or Office of Financial Institutions in this matter, and another 55 of were rejections of claims that were duplicative of other approved claims. A list of these claims showing the reason for denial, including for duplicate claim rejections, the name of Claimant whose corresponding claim was approved, is attached as Exhibit 1. The remaining two (2) of the Rejected Claims involved the approval, after consultation with AsherMeyers, LLC and Class Counsel, of a claim in an amount less than the amount shown on the Claimant’s Claim Form. A list of these claims showing the claimed amount, the approved amount, and the reasons for the modifications, is attached as Exhibit 2.

5. Based on Rust’s administration of the Settlement as required by the Administration Plan, Rust has determined that 437 Claimants are eligible for participation in the Net Settlement Fund (“Accepted Claims”). Where two or more Claimants submitted valid claims as heirs/successors to a deceased original claimant, the claim was divided equally among those successor Claimants. A list of each Claimant’s name, the value of their Accepted Claim, and their pro rata percentage of the Net Settlement Fund that each is entitled to receive is attached hereto as Exhibit 3.

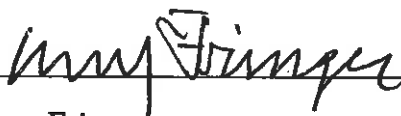
6. The Net Settlement Fund will be distributed by multiplying the Net Settlement Fund by the percentage shares appearing in Exhibit 3 and causing checks to be sent to Claimants with Accepted Claims.

7. As of this Date, Rust has incurred a total of \$10,911.28 in unpaid professional fees and expenses for the administration of this Settlement. To date, Rust has not been paid or reimbursed for these invoices. These are attached to the Raphael Declaration as Exhibit 4.

8. In addition, based upon previous cases containing a similar number of claimants, Rust estimates that it will incur an additional \$38,296.50 in professional fees and expenses to distribute the remaining Class Settlement Fund to Authorized Claimants and complete the administration of this Settlement.

9. Unless otherwise ordered by the Court, one (1) year after final distribution of the Net Settlement Find, Rust will destroy the paper copies and supporting documentation of the claims, and three (3) years after the final distribution, Rust will destroy the electronic copies of the claims and all supporting documents.

I declare under penalty of perjury under the laws of the United States and the State of Louisiana that the foregoing statements are true and correct. This declaration was executed on January 21st, 2020 in Minneapolis, Minnesota.



Amy Fringer

Exhibit 1

Claimant ID	Name	Reason for Denial	Name of Claimant Whose Claim was Approved, if applicable
4343	RESA ANN FREDERIC BURKE	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Frank Fredric
14533	JENNIFER JOHNSTON	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by the original claimant.	Ronald F. Falgout
7603	GREGORY MARCUS ROBERTS	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by the approved heirs of original claimant.	Larry Edward Lofton and Jan Roberts
6545	DONALD KENNAIR, III	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Barbara Kennair
10948	GAYLE A SIMONEAUX	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by the approved heirs of original claimant.	Beatrice Simoneaux
5838	WAYNE E. JACKSON	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Marilyn Jackson
5852	ROGERLYN WANDA JACKSON	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Marilyn Jackson
6521	WYATT KENNAIR	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Barbara Kennair
3735	RUSSELL ANDREW FALGOUT	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Nolan Falgout
11396	CATHY STACK	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	George Stack
7788	DOROTHY MALBROUGH	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by the approved heirs of original claimant.	Theresa Facine & Alvin Malbrough
10351	SONYA BUCCOLA	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Ted Savoie
14410	SIMONNE SAVOIE GOLDEN	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Ted Savoie
10306	SIDNEY A SAVOIE	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Ted Savoie
9256	REGINA OLIVER	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Timothy Oliver
11624	CRYSTAL A. STRICKLAND	The claim was made on behalf of other persons alleged to be original claimants and are duplicative of claims made by those original claimants.	Kathy & Jeffery Strickland
4084	BARBARA PEYTON	The claim was made on behalf of other persons alleged to be original claimants and are duplicative of claims made by those original claimants.	Dorothy O Flick
3865	ROBERT K. FAUL	The claim was made on behalf of other persons alleged to be original claimants and are duplicative of claims made by those original claimants.	Joseph & Eula Faul
581	MARSDEN AYMOND	The claim was made on behalf of other persons alleged to be original claimants and are duplicative of claims made by those original claimants.	Mildred Aymond
949	ERNEST BELL	The claim was made on behalf of other persons alleged to be original claimants and are duplicative of claims made by those original claimants.	Geraldine Bell

Exhibit 1

Claimant ID	Name	Reason for Denial	Name of Claimant Whose Claim was Approved, if applicable
12058	MARGARETTA THORNTON	The claim was made on behalf of other persons alleged to be original claimants and are duplicative of claims made by those original claimants.	Russell Thornton, Jr.
9782	DEBBIE DUBOSE MCELHANNON	The claim was made on behalf of other persons alleged to be original claimants and are duplicative of claims made by those original claimants.	Judy Richard
12522	CONRHONE WALLACE	The claim was made on behalf of other persons alleged to be original claimants and are duplicative of claims made by those original claimants.	Adell Wallace
10085	WILLIAM LEE ROSE SR.	The claim was made on behalf of other persons alleged to be original claimants and are duplicative of claims made by those original claimants.	Diane Rose
10320	STEPHANIE A SAVOIE HOPKINS	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Ted Savoie
4350	CAROL G. FREDERIC	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Frank Fredric
12591	CHER JA DINA WALLACE	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Odell Wallace
14649	CARLOS TORRES WALLACE	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Odell Wallace
12546	LUCILLE WILSON WALLACE	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Dillon Wallace
1656	ROSEMARY MORRIS BRYANT	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Cordis Bryant
2608	CRYSTAL PARK TUEY	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by the approved heirs of original claimant.	Gwendoyne Cother is original claimant and Billy Cothern is her heir.
2615	CARMEN DEON PARK	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by the approved heirs of original claimant.	Gwendoyne Cother is original claimant and Billy Cothern is her heir.
1250	JOYCE BONNER	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by the approved heirs of original claimant.	Dorothy Bonner was the original claimant and her son James Bonner's claim is approved
673	TERESA BALL	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	David Ball
680	DEREK BALL	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	David Ball
13543	LJ CHEEK	Claimant filed on behalf of Verdie F Ponthier who is not an original claimant and Flulgence Ponthier	Flulence Pontier is original claimant and LJ Cheek is heir.
13642	NICHOLAS J BORDELON	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by the original claimant.	Germain Chatelain
7276	ELIZABETH (BETTY) LEMOINE	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Bert J. Lemoine
604	TENA MCNEAL	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Mildred Aymond
2578	ROBERT A. CORLEY, III	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Rachel Corley

Exhibit 1

Claimant ID	Name	Reason for Denial	Name of Claimant Whose Claim was Approved, if applicable
13772	JANET G KIMBALL	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Norris Kimball
10047	PATRICIA ROGERS	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Glenn Rogers
6231	RICKEY JOHNSON	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Valerie Johnson
12843	ALICE M HAYNES WESTMORELAND	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Bruce Westmorland
14526	CATHERINE GENTRY	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	G.W. Gentry
253	LINDA G AMBERG	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Larry Amberg
10887	MELISSA MCMILLIAN	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Beatrice Simoneaux
15103	RYAN E LOFTON	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by the approved heirs of original claimant.	Larry Edward Lofton and Jan Roberts are approved heirs.
2325	KEVIN HUNTER CLAY	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	James Clay Jr.
12270	KATHLEEN C UTECHT	Claimant filed on behalf of self and Thomas Utecht who is not an original claimant.	Kathleen Utecht is original claimant and her claim is approved.
5302	KENNETH L PARKER	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by that original claimant.	Lillian Parker
12515	CONRAD WALLACE	The claim was made on behalf of other persons alleged to be original claimants and are duplicative of claims made by those original claimants.	Adell Wallace
14847	JENNIFER A GOLDEN	The claim was made on behalf of another person alleged to be an original claimant and are duplicative of claims made by the approved heirs of original claimant.	John Covington is the original claimant and Yvlonda Joy Livingston is his heir and that claim was approved.
6057	INGRID TARAZA JEFFERSON - BUTLER	The claim was made on behalf of other persons alleged to be original claimants and are duplicative of claims made by those original claimants.	Joseph Jefferson
13130	CHARLENE WILSON	Claimant filed on behalf of Martha Wilson who is not an original claimant and Daniel Wilson.	Daniel Wilson is original claimant and Charlene Wilson is heir.
15189	ARLENE J JONES	Individual was not original claimant.	N/A
14045	ANNA NORMAND	Individual was not original claimant.	N/A
15356	KENT NORMAND	Individual was not original claimant.	N/A

Exhibit 2

Claimant ID	Name	Original Claimant	Original Valuation from Exhibit A	Approved Amount	Reason for Modification
3483	ERNEST L EDWARDS JR	WANDA BETH EDWARDS	\$170,909.00	\$117,231.08	Original claimant had 3 notes and 3 annuities however there were two valuations listed on Exhibit A. Upon Counsel review, they determined the correct valuation for all policies combined is \$117,231.
12508	ADELL WALLACE	Conrad Wallace and Conthone Wallace	\$368.30	\$10,290.00	Adell Wallace owned 3 instruments. Cash value on 50370 (insured was Conrad Wallace) and 50360 (insured was Conthone Wallace) was each \$4,000. Cash value on 6898 was \$2,044. Total claim for Adell Wallace is \$10,290.



ClaimantID	Name	Value of Accepted Claim	Pro Rata Percentage of Net Settlement Fund
12508	ADELL WALLACE		
8518	ALETA JOYCE LUMPKIN MOSS		
15233	ALFRED CALISTE ROUGEOU		
14267	ALICE G LOFTON		
7801	ALVIN P MALBROUGH		
14960	ANCHOR TRUST		
15035	ANGELA C SMITH		
3391	ANGELA EDEN SKIPPER		
8532	ANN T. MOYE		
2530	ANTHONY EDWARD CORLEY		
15080	ARTHUR A LEWIS JR		
8693	ASHLEY E. MURPHY		
9928	AVERIL HUGHES ROBINSON		
1670	BARBARA C BURROUGHS		
9294	BARBARA G PATE		
1045	BARBARA O BESSON		
6538	BARBARA S KENNAIR		
13437	BARNEY PREJEAN		
10870	BEATRICE B SIMONEAUX		
3773	BEATRICE PEREZ FALGOUT		
14328	BECKY S HOLLIER		
7269	BERT J. LEMOINE		
2493	BETH GIRLINGHOUSE		
901	BETTY ANN BECK		
14472	BEVERLY D ROSE		
2585	BILLY C. COTHERN		
9676	BLANCHE REYNOLDS		
5012	BOBBIE JEAN MURPHY		
8501	BOBBY D MOSS		
5555	BOBBY E. HOLMES		
10290	BOBBY L. SASSER		
5050	BRANDON COUVILLION		
7115	BRENDA ANN LE BOEUF THOMPSON		
8259	BRENDA MILAM		
765	BRIGHT MORNING STAR BAPTIST CHURCH		
12867	BRUCE D. WESTMORELAND		
12850	BRUCE KADE WESTMORELAND		
14670	BRYAN J JACOB		
6750	CAMILLE FERRY LACROIX		
6590	CARL DWAYNE KILPATRICK		
7207	CARL L. LEMAIRE		
14342	CAROL J SMITH		
3902	CAROL L MANNO		
15158	CAROL SMITH LAURENCE		
12904	CAROLYN C WHEAT		
14380	CAROLYN O PLAUCHE		
6279	CATHERINE E WINSLOW		
9447	CATHERINE F. PINCKLEY		
15073	CECILE MUROV		
13147	CHARLENE WILSON		
4282	CHARLES B FOSTER III		
13864	CHARLES D. LEWIS		
2738	CHARLES E DASPIT		
6804	CHARLES R LALONDE		
14663	CHARLIE H MYERS JR		
4916	CHRIS G. GUILLORY		
14762	CHRISTINE L KELLER		
12614	CHRISTOLA WALTON		
2264	CHURCH OF GOD IN CHRIST		
1267	CILTON J. BORDELON		
5449	CLAUDINE HICKMAN ABBOTT		
12836	CODY L WESTMORELAND		
4817	CONNIE G CLICK		
13093	CONSTANCE W KLINGMAN		
1663	CORDIS CHARLES BRYANT		
5203	COREY GEORGE HARRIS		
14397	CRAIG P ORTEGO		
13918	CRAIG P. ORTEGO		
13734	CRYSTAL JEANSONNE		
13673	CYNTHIA G LEET		
13666	CYNTHIA GALLAND GATES		
13895	DANIEL LEE MADDOX		
14748	DARROW A ADAMS		
5661	DAVID KYLE COLEMAN		
6378	DAVID L KELLY JR		

ClaimantID	Name	Value of Accepted Claim	Pro Rata Percentage of Net Settlement Fund
1342	DAVID MARK BORNE		
666	DAVID N. BALL		
11334	DEANNA JOAN BENNETT SPURGEON		
3254	DEBBIE DUCOTE THOMPSON		
93	DEBORAH G DADBEH		
2448	DEBORAH R COLEMAN		
4619	DEBRA GAUTHIER SCALLAN ORTEGO		
9607	DEBRA TESSON POWELL		
11129	DELORES A. SMITH		
15547	DELORES LACOMBE		
5876	DENNIS P JAKE JACOBS		
13680	DENNIS P LEMOINE		
14236	DEWON J GAUTHIER		
13963	DIANA DAUZAT RACHAL		
4732	DIANE GLASER		
12140	DIANE L. TRAHAN		
14939	DIANNE L MCRAE COFFMAN		
8150	DIANNE W. MECALIS		
12539	DILLON D. WALLACE		
15578	DON B HOLMES JR		
9744	DON BARNES REYNOLDS		
1755	DONALD BYARS AND TERRY G BYARS		
3834	DONALD F. FARRELLY		
13970	DONALD L. RACHAL		
3247	DONNA DUCOTE HARRUFF		
14571	DONNA GAIL SCHIRO		
14779	DONNA L RACCA		
7979	DONNA REED MCGAUNN		
9751	DONNA REYNOLDS WHITED		
10825	DONNA WILLIAMSON		
6392	DOREEN L. KELLY-SPEYRER		
1274	DORIS BORDELON		
5470	DORIS G. HILL		
3841	DORIS L. FARRELLY		
11716	DORIS M SWEET		
13789	DOUGLAS JAMES LACOUR		
5562	DUANNA L. HOLMES		
4695	DUNCAN SHANON GILCREASE		
9669	DWAYNE A RABALAIS		
7283	EDDIE P LEMOINE JR		
14182	EDITH C NEVILS		
5982	EDNA L. JAMESON		
11655	ELEANOR RAY STROTHER		
7863	ELIZABETH ANN MASSIE		
7733	ELIZABETH POWELL LYONS		
15219	ELLEN COVINGTON		
6675	ELLIS L. LACOMBE		
468	ELOISE ARNOLD		
13055	ELVIE M MAIN		
13369	ELVIE ZERANGUE JR.		
11136	EMMETTE R SMITH JR		
3193	ERIC S. DUCK		
3483	ERNEST L EDWARDS JR		
15127	ESTATE OF CHARLES W TURNER		
14441	ESTATE OF HAZEL S FALGOUT		
4701	ESTATE OF JOHN AND MARY GILCREASE		
14465	ESTATE OF NOLAN P FALGOUT		
2134	ESTHER HAYES		
3896	EULA M. FAUL		
4879	EULALIE GUILLORY		
9348	EULALIE PERKINS		
4442	EVA LOIS GAMBLE		
4435	EVA LUCILLE LAW GAMBLE		
505	EVELYN F ATWELL		
4121	EVELYN F ATWELL		
14274	EVELYN G GUILLORY		
741	FAUSTINA BALTHAZAR		
5005	FAYE BEATRICE MAGEL		
13727	FAYE F. HINEMAN		
8310	FERMAN JOHN MILLETTE III		
13291	FLOYD GLENN STOKES		
4855	FRANK E COOK		
12744	FRANK L WELSH JR		
4336	FRANK P. FREDERIC		
7122	FREIDA MARIE LE BOEUF WHITNEY		

ClaimantID	Name	Value of Accepted Claim	Pro Rata Percentage of Net Settlement Fund
14519	G. W. GENTRY		
3353	GAIL DUNBAR		
8952	GARY A. NEIE		
13758	GARY SHIVERS		
11228	GAY MARIE SMITH		
11389	GEORGE DAVIS STACK		
13826	GEORGE P LEMOINE JR		
14908	GEORGIA R AYMOND DEVILLE		
932	GERALDINE BELL		
14403	GERALDINE O GAUTHIER		
13574	GERMAIN CHATELAIN		
161	GESELE ADAMS		
13246	GINNY W HATHORN		
6798	GLADYS LALONDE		
451	GLEN ARNOLD		
3117	GLENN D. DOWDEN		
10030	GLENN J. ROGERS		
13925	GLENN M ORTEGO		
14250	GLENN MICHEAL GUILLORY		
10443	GREGORY SCHIRO		
15172	GREGORY SHIVERS		
4329	GUS EDWARD FRANCIS JR.		
1458	GUSTAVE BOURGEOIS		
3124	GWEN L LANDEN		
9768	HAROLD RICHARD		
11679	HELEN B. SULLIVAN		
14854	HELEN MAE RODGERS		
7658	HERMAN A LOUQUE		
4480	HERMAN D. GAMBLE JR.		
5814	HOWARD W. JACKSON JR.		
9515	INELL M POTTER		
14885	IRMA L AYMOND MARKS		
11693	IVA D. SULLIVAN JR.		
4725	JACOB ROBERT GLASER		
14489	JACQUELINE A POUSSON		
13512	JACQUES CHARRIER		
2332	JAMES BASIL CLAY JR.		
5913	JAMES CURTIS JACOB		
475	JAMES D. ASHWORTH		
12348	JAMES D. VERCHER		
6132	JAMES E BALL		
4749	JAMES EDWARD GREEN		
14588	JAMES KEVIN SCHIRO		
1229	JAMES L BONNER JR.		
10092	JAMES LEE ROUGEOU		
14755	JAMES M JACKSON		
12997	JAMES MICHAEL WHITLER		
4923	JAMES NED GUILLORY JR.		
9041	JAMES NICKLYN		
5388	JAMES P. HAYES		
14793	JAMES R GOUDEAU		
5999	JAMES R. JAMESON III		
10238	JAMES RUTHERFORD		
14335	JAMES S BASSETT		
13581	JANELL CHEEK		
15516	JANICE LOFTON ROBERTS		
9454	JANSSSEN MARK PINCKLEY		
7078	JASON P LE BOEUF		
14915	JEANNE CARY BERGERON		
11648	JEFFREY STRICKLAND		
8815	JENNIFER F MYERS		
9577	JENNIFER M KRANZMAN		
62	JESSIE C ADAMS JR		
7436	JIMMIE NELLE A. RABALAIS LEWIS		
5395	JIMMIE SUE HAYES		
14724	JOCELYN P FOSTER		
14212	JOEL W PETRUS		
1212	JOELLA B BOLTON		
11570	JOHN HOWARD STOTT		
1038	JOHN KER BERNARD		
2974	JOHN L DENISON		
8723	JOHN LONNIE MYER		
14540	JOHN M CHEVALIER		
12454	JOHN R. WAGNER		
13598	JOHN W. CHEEK		

ClaimantID	Name	Value of Accepted Claim	Pro Rata Percentage of Net Settlement Fund
10221	JOHN WYNN RUSSELL		
14168	JOSEPH D DAVIS JR		
3889	JOSEPH E FAUL		
8167	JOSEPH MECALIS		
6033	JOSEPH O. JEFFERSON		
14786	JOSEPH W GOUDEAU III		
14946	JOY E MCRAE FONDREN		
13635	JOY LACOUR FISHER		
13697	JOYCE GREMILLION		
14434	JUDITH B WENDEL		
9799	JUDY RICHARD		
14120	JULIA BALL MORRIS		
4510	KAREN L GAUPP-WOZNAK		
14021	KAROLIN Y. JOHNSON		
5067	KARYN R COUVILLION		
15134	KATHLEEN BERGERON LEVINGSTON		
12256	KATHLEEN C UTECHT		
14175	KATHRYN N WATT		
4404	KATHY ANN FRYE SHIRLEY		
3131	KATHY D. MEDICUS		
11631	KATHY STRICKLAND		
8396	KAY FINNELLE MOFFETT		
4626	KEDGY J LARSON		
4053	KELLY ELIZABETH FITZPATRICK WIGGINS		
13109	KENNETH A WILLIAMS		
8679	KENNETH D. MURPHY		
14243	KENNETH P GAUTHIER		
7092	KENNETH ROBERT LE BOEUF		
15059	KENT N VAUGHN		
2776	KEVIN N DAVIDSON		
14809	KIMBERLEY D DIFFEY		
3209	KIMBERLY J. DUCK		
15066	KOREY J VAUGHN		
13659	KRISTY G ST ROMAIN		
13604	L. J. CHEEK		
246	LARRY AMBERG		
15523	LARRY E LOFTON		
10634	LARRY K. SHAW		
710	LAURA K AMMERMAN		
13956	LAVERNE LEWIS PARMLEY		
1182	LAWRENCE BLANCHARD		
14892	LAWRENCE C AYMOND JR		
14137	LESA WAGNER		
5258	LESLIE B HART		
13567	LESTER A SAUCIER JR		
5319	LILLIAN PARKER		
13987	LINDA LACOUR SHEA		
4466	LINDA MARIE GAMBLE		
8303	LINDA MILLETTE		
8686	LINDA SUSAN MURPHY		
13536	LJ CHEEK		
4312	LORRAINE FRANCIS		
5593	LORRIE A. HOOD		
7870	LOUIS DAVID MASSIE		
9157	LOUIS G. NORMAND		
3063	LOUIS R. DIGILORMO		
5081	LOYCE RUTH HALE LESLEY		
512	LUCY L AUZENNE		
14922	LYLE E. BERGERON		
10160	LYNDA S ROWLAND		
7467	LYNN A.(M) LINDNER ALMLOFF		
12874	LYNN C TANNER		
13086	MADISON JACK WILLIAMS JR		
13949	MARCELLA ORTEGO		
12386	MARCIA K VIGIL		
2240	MARGIE FAY CHILDERS		
10740	MARGO LYNN SHERIDAN MCBETH		
5845	MARILYN R. JACKSON		
8242	MARION E. MIDDLEBROOKS		
5616	MARK HUDSON		
13819	MARK JOHN LACOUR		
13833	MARK L. LEMOINE		
9355	MARK PERKINS		
3148	MARTHA DOWDEN MOORE PHILLIPS		
7849	MARTHA FAYE MARTINEZ		

ClaimantID	Name	Value of Accepted Claim	Pro Rata Percentage of Net Settlement Fund
5210	MARVELYN HARRIS		
3803	MARY (BETTY) ELIZABETH SCHULLY FALGOUT		
11952	MARY D THOMPSON		
6446	MARY ELLA KELLY		
15509	MARY LAVESPERE		
6026	MARY LOU JANTZ		
4046	MARY S FITZPATRICK		
9898	MELANIE PONSON		
14502	MELBA DUCOTE-DUTTON		
8471	MELBA MORRIS		
10856	MENTORIA CROSS TRUST		
7948	MERTON ELGIN MCFADDEN JR.		
14311	MICHAEL K BASSETT		
11860	MICHAEL K. TATE		
10214	MICHELLE RUSSELL HARKNESS		
15561	MILDRED AYMOND		
14823	MILDRED G. CHEVALIER		
11587	MILTON RONALD STOTT		
5548	MIMELL HOLMES		
6620	MINNIE KINSEY		
7986	MISTY DAVIS		
11617	NANCY BETH STRICKLAND		
14991	NANCY L FOSTER		
8839	NANCY SUE MYERS		
6729	NARCELLE D LACOMBE		
14298	NELDA LAVESPERE		
1625	NOLAN BRUCE		
3742	NOLAN P. FALGOUT III		
6347	NORA J JOSEPH		
3230	NORMAN DUCOTE		
13710	NORMAN G. HAYMON		
13765	NORRIS J KIMBALL		
14656	ODELLA ADAMS WALLACE		
2202	ODOM V. CHEVALLIER JR.		
5456	ORA LEE HICKMAN DAVIDSON		
14083	PATRICIA CHEVALLIER RODNEY		
9836	PATRICIA DALE RIDDICK DEWITT		
4664	PATRICIA GEORGE WALKER		
109	PATRICIA V DEAN		
15264	PATSY T CATO		
13888	PAUL D. LEWIS		
8914	PAUL HARRY NARCISSE		
11266	PAUL HARVEY SUMMERVILLE		
9201	PAUL JOHNSON		
4756	PAULA H. GREEN		
9096	PAULA NOLEN		
11488	PERRY WAYNE STEVENS		
1397	PETER J. BORNE		
8754	PHILIP GRALEND MYER		
15097	PHILLIP L HICKMAN		
14564	PHILLIP M SCHIRO		
5784	PIERRE VALMONT BLANCHARD, IV		
14953	PRISCILLA L MCRAE HANDORF		
15554	RACHEL C GAGLIANO		
8129	RALPH DILLON MCRAE JR.		
9973	RALPH ROBINSON		
1281	RANDY J. BORDELON		
7511	RATNAMANI LINGAMALLU		
314	REBECCA ANDERSON		
13802	REBECCA D FRISBY		
14304	REBECCA SCHMIDT READ		
154	REGINA S LOWE		
8761	RENARD MYER		
13840	RENEE GALLAND LEMOINE		
10436	RICHARD A. SCHENCK SR.		
8174	RICHARD KEVIN WATTS		
1496	RICHARD L BOUSMAN		
14632	RICKY LYNN GUILLORY		
9089	RITA NICHOLS		
11280	ROBERT B. SPARKS JR.		
12881	ROBERT V. WESTMORELAND		
15332	ROGER BLAKE YOUNG		
3810	RONALD F. FALGOUT, SR.		
8235	ROSA LEE MIDDLEBROOKS		
9812	ROSALIE H RICHARDSON		

ClaimantID	Name	Value of Accepted Claim	Pro Rata Percentage of Net Settlement Fund
9102	ROY NOLEN		
15288	RUBY JONES		
12201	RUSSELL TURRENTINE		
12218	RUSSELL W TURRENTINE		
15462	RUSSELLH THORNTON JR		
2196	RUTH CHEVALLIER		
13628	SABIA DESSELLE		
10481	SARA M. SCHMIDT HAYES		
14144	SARA M. SCHMIDT HAYES		
14861	SARA PAUL LINDELL		
15141	SARAH B MCDUFFIE		
1571	SARAH D BROUILLETTE		
14984	SARAH ELIZABETH CHEVALIER HOLLFIELD		
6507	SERIAL D. KENERSON		
6484	SHAMON KENERSON HIGGINBOTHAM		
10283	SHERRILL L SASSER		
123	SHRYE L JACKSON		
14687	SRECKA TALIANCICH		
4534	STEPHANIE ANNE GAUPP JOHNSON		
3360	STEVE G. DUNBAR		
6927	STEVEN A LAVESPERE		
2110	SUE C HAYES		
15240	SURYAMANI L RICCIARDI		
2363	SUSAN ALICE CLAY		
5760	SUSAN C IVY		
2516	SUSAN L. COMBS		
13901	SUSAN MARTINEZ MAYEUX		
9485	SUSAN P ANDRADE		
4497	SUZANNE CHERAMIE		
7382	SYLVIA G. LEMOINE		
147	TAMICA A JONES MADISON		
14427	TED J. SAVOIE		
2950	TERRY GOODRICH (DEMOSS)		
7771	THERESA COLWART		
1533	THOMAS A. BROCATO		
4039	THOMAS JAMES FITZPATRICK		
4060	THOMAS P FLICK		
9119	THOMAS R NORMAN		
13505	THOMAS W AYMOND		
9249	TIMOTHY OLIVER		
12478	TODD G. WAGNER		
14205	TOMMY B HAGGART		
1199	TRAVIS BOLTON		
6880	TRAVIS JAMES LARTIGUE		
4886	TROY GAUTHIER		
6224	VALERIE JOHNSON		
6491	VANETTA J. KENERSON		
13611	VERNA M. CHEEK		
5746	VICKI J. IVY CARR		
5647	VIKI MARISSA COLEMAN ALLEN		
7108	WANDA MARIE LE BOEUF STERKINS		
12119	WANDA TRAHAN AND ARNOLD TRAHAN		
14199	WARREN D HAGGART JR		
11372	WAYNE J ST. PIERRE		
13413	WILLIAM BRYAN NETHERY JR		
10511	WILLIAM J. SCHMIDT		
14106	WILLIE AYMOND HACKMEISTER		
857	WILLIE DOROTHY BATES		
1564	WOODRUFF A. BROUILLETTE		
2660	YVLONDA JOY COVINGTON LIVINGSTON		
13994	YVONNE LEWIS WELBORN		
13741	JEAN EVELYN BURNETT JOHNSON		

DONALD W. ABSHIRE, ET AL

19TH JUDICIAL DISTRICT COURT

VS

CIV. ACTION NO. 377,713, SEC. 26

THE STATE OF LOUISIANA, ET AL

**EAST BATON ROUGE PARISH
STATE OF LOUISIANA**

CONSOLIDATED WITH

ARTHUR A. LEWIS, ET AL

19TH JUDICIAL DISTRICT COURT

VS

CIV. ACTION NO. 412, 265, SEC. 26

THE STATE OF LOUISIANA, ET AL

**EAST BATON ROUGE PARISH
STATE OF LOUISIANA**

**DECLARATION OF DAVID RAPHAEL IN SUPPORT OF
PLAINTIFFS' MOTION FOR DISTRIBUTION OF NET SETTLEMENT FUND**

I, David C. Raphael, Jr., declare as follows:

1. I am a partner at Smith Segura Raphael and Leger, LLP and, together with counsel from Odom & Des Roches, LLC, was appointed Co-Lead Counsel for the Class of plaintiffs by this Court on September 6, 2018 ("Class Counsel"). I submit this declaration on behalf of Class Counsel in support of Plaintiffs' Motion for Distribution of Net Settlement Fund ("Distribution Motion").

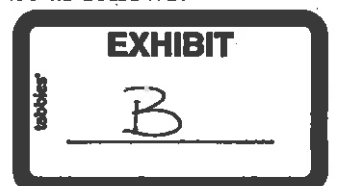
2. I make this declaration to identify expenses incurred in connection with the administration of the settlement.

A. Past Expenses

3. Pursuant to this Court's April 29, 2019 Order granting the Application of Plaintiffs' Co-Lead Class Counsel for Award of Attorney's Fees and for Approval of Certain Out-of-Pocket Costs and Expenses and Incentive Awards for Class Representatives (the "Fee and Expense Order"), \$100,000 of the Settlement Fund was made available, on Class Counsel's approval and without further order of the Court, to cover administration expenses incurred after March 21, 2019.

4. Attached hereto as Exhibit 1 is an accounting of expense payments from the Settlement Fund authorized by Class Counsel after the Fee and Expense Order. The total amount of such expense payments was \$86,762.01.

5. Class Counsel has incurred a total of \$29,017.16 in additional unreimbursed expenses in connection with the administration of the settlement. Those expenses are as follows:



- a. Payable to the Court-approved claims administrator Rust Consulting, \$10,911.28 (see Exhibit 2 hereto);
- b. Payable to Odom & Des Roches, LLC, \$16,635.55 (see Exhibit 3 hereto);
- c. Payable to Smith Segura Raphael & Leger, LLP, \$1,470.33 (see Exhibit 4 hereto);

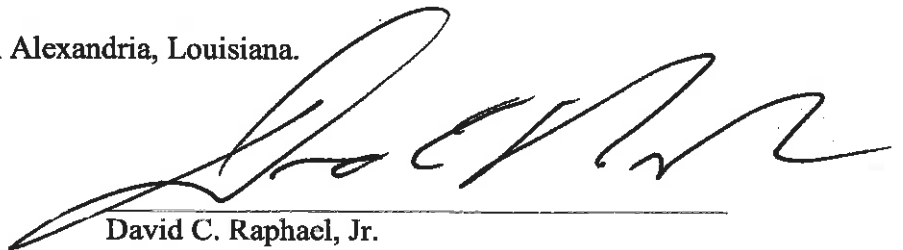
6. Rust's efforts this far in administering the settlement are described in the Declaration of Amy Fringer in Support of Direct Purchaser Plaintiffs' Motion for Distribution of Net Settlement Fund.

7. The accounting firm of AsherMeyers, LLC rendered assistance to Rust in connection with the administration of the Settlement. Specifically, AsherMeyers worked with Rust to analyze the claim documentation submitted by Claimants who claimed amounts that differed from AsherMeyers' preliminary valuation of the instruments.

B. Future Expenses

8. In connection with its administration of the Settlement in this action, claims administrator Rust has estimated that it will require an additional \$38,296.50 in fees and expenses to complete the distribution of the Net Settlement Fund and to address accounting and tax issues associated with distribution of the fund. See Declaration of Amy Fringer, ¶ 8.

I declare under penalty of perjury under the laws of the United States and the State of Louisiana that the foregoing statements are true and correct. This declaration was executed on January 23, 2020 in Alexandria, Louisiana.



David C. Raphael, Jr.

SMITH SEGURA RAPHAEL & LEGER, LLP
A LAW FIRM INCLUDING A LIMITED LIABILITY COMPANY

DAVID P. SMITH, LLC*
SUSAN C. SEGURA
DAVID C. RAPHAEL, JR.
ERIN R. LEGER

POST OFFICE BOX 12008
ALEXANDRIA, LOUISIANA 71315

221 ANSLEY BOULEVARD
ALEXANDRIA, LOUISIANA 71303-3000
TELEPHONE: 318-445-4480
FACSIMILE: 318-487-1741

*Also Admitted in Tennessee

Re: Abshire v. State of Louisiana

Expense reimbursement, as of 10/30/2019, in connection with expenses authorized by Class Counsel after the Fee and Expense Order.

TOTAL EXPENSE REIMBURSEMENT REQUEST:

\$86,762.01

broken down for distribution is as follows



PICO Litigation In re Abshire v State of Louisiana

SMITH SEGURA & RAPHAEL, LLP

Expense Report

Period of March 2019 thru October 30th 2019

Description		Amount
Telephone/Teleconference/Facsimile/Long Distance	\$	804.23
Photocopies - *Including photocopies for depository	\$	735.00
Photocopies - Outside	\$	-
Postage/Express Mail /Messengers	\$	71.68
Outside Database/Document Management	\$	-
Travel/Hotel/Meals	\$	1,710.47
Claims Administration/Professional Services/Expert Services	\$	47,995.78
Witness Fees/Court Cost/Filing Fees	\$	306.63
Total Expenses	\$	51,623.79

*SSR created a depository for all documents obtained through investigations and discovery and for client information and instruments. The depository was maintained over the course of the case at SSR's office and storage facility.

PICO Litigation In re Abshire v State of Louisiana

Odom & Des Roches, LLC

Expense Report

Period of March 2019 thru October 30, 2019

Description	Amount
Telephone/Teleconference/Facsimile/Long Distance	\$ -
Photocopies - Including photocopies for depository	\$ -
Photocopies - Outside	\$ -
Postage/Express Mail /Messengers	\$ -
Outside Database/Document Management	\$ -
Travel/Hotel/Meals	\$ -
Claims Administration/Professional Services/Expert Services	\$ 35,138.22
Witness Fees/Court Cost/Filing Fees	\$ -
Total Expenses	\$ 35,138.22



DATE: 1/7/20
INVOICE #: 19-2235
MATTER #: 615000

STATEMENT OF ACCOUNT
Abshire v State of Louisiana
December 2019 Claims Administration Services

Total Invoice \$ 6,665.54

INVOICE HISTORY:

Date	Invoice #	Amount	Payments	Balance
10/01/18	14538		(979.45)	(979.45)
11/13/19	19-1902	6,359.67	(3,179.84)	3,179.83
12/06/19	19-2020	4,090.72	(2,045.36)	2,045.36

PAST DUE BALANCE \$ 4,245.74

Total Due \$ 10,911.28

WIRE INFORMATION

ACCOUNT #: 8093434387
ABA/ROUTING # WIRE or ACH: 111014325
BANK: BANK OF TEXAS, DALLAS, TX 75225
BANK CONTACT: MAYRA LANDEROS 214.987.8817
REFERENCE: INVOICE NUMBER

PAYMENT TERMS: NET DUE UPON RECEIPT

PAYMENT MAILING ADDRESS

PO BOX 142589
DRAWER #9051
IRVING, TX 75014-2589



PICO Litigation In re Abshire v State of Louisiana

Odom & Des Roches, LLC

Expense Report

Period of November 2019 thru Current

Description		Amount
Telephone/Teleconference/Facsimile/Long Distance	\$	-
Photocopies - Including photocopies for depository	\$	-
Photocopies - Outside	\$	-
Postage/Express Mail /Messengers	\$	-
Outside Database/Document Management	\$	-
Travel/Hotel/Meals	\$	-
Claims Administration/Professional Services	\$	16,635.55
Witness Fees/Court Cost/Filing Fees	\$	-
Total Expenses	\$	16,635.55



PICO Litigation In re Abshire v State of Louisiana

SMITH SEGURA & RAPHAEL, LLP

Expense Report
Period of October 31st thru January 2020

Description		Amount
Telephone/Teleconference/Facsimile/Long Distance	\$	14.83
Photocopies - *Including photocopies for depository	\$	-
Photocopies - Outside	\$	-
Postage/Express Mail /Messengers	\$	148.78
Outside Database/Document Management	\$	-
Travel/Hotel/Meals	\$	-
Claims Administration/Professional Services	\$	1,164.72
Witness Fees/Court Cost/Filing Fees	\$	142.00
Total Expenses	\$	1,470.33

*SSR created a depository for all documents obtained through investigations and discovery and for client information and instruments. The depository was maintained over the course of the case at SSR's office and storage facility.



DONALD W. ABSHIRE, ET AL

19TH JUDICIAL DISTRICT COURT

VS

CIV. ACTION NO. 377, 713, SEC. 26

THE STATE OF LOUISIANA, ET AL

**EAST BATON ROUGE PARISH
STATE OF LOUISIANA**

CONSOLIDATED WITH

ARTHUR A. LEWIS, ET AL

19TH JUDICIAL DISTRICT COURT

VS

CIV. ACTION NO. 412, 265, SEC. 26

THE STATE OF LOUISIANA, ET AL

**EAST BATON ROUGE PARISH
STATE OF LOUISIANA**

**DECLARATION OF SHELLI MCVAY IN SUPPORT OF
PLAINTIFFS' MOTION FOR DISTRIBUTION OF NET SETTLEMENT FUND**


I, Shelli McVay, declare as follows:

1. I am the accounting and administrative assistant at Smith Segura Raphael and Leger, LLP, one of the firms serving as Class Counsel in this case.

2. I submit this declaration to detail the process and hours involved in connection with contacting and communicating with class members. In the six-month period from March to August 2019, I personally spent hundreds of hours meeting with, calling, emailing, faxing and/or contacting through various forms of social media, class members who had not yet submitted claim forms or needed help understanding the process. During this time period, I had one-on-one meetings with 46 claimants and/or heirs, phone conferences with approximately 85-100 claimants, and email correspondence with 33 claimants.

3. Beginning in early May of 2019, I made a list of class members with larger claim amounts that had yet to file claims. I retrieved and reviewed file information on each of these class members and performed additional internet searches for contact information for the original claimants and/or any heirs that I could identify. During this time period, I successfully contacted dozens of potential claimants and alerted them of the need to submit a claim form to the claims administrator in order to secure their pro rata share of the Net Settlement Fund.

I declare under penalty of perjury under the laws of the United States and the State of Louisiana that the foregoing statements are true and correct. This declaration was executed on January 23, 2020 in Alexandria, Louisiana.


Shelli McVay

