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**PERRINE DUPONT SETTLEMENT CLAIMS OFFICE
ATTN: EDGAR C. GENTLE, CLAIMS ADMINISTRATOR
C/O SPELTER VOLUNTEER FIRE DEPARTMENT OFFICE**

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August 27, 2018

VIA HAND DELIVERY

The Honorable Thomas A. Bedell
Circuit Judge of Harrison County
301 West Main Street, Room 321
Clarksburg, West Virginia 26301

Re: Perrine, et al. v. DuPont, et al.; Civil Action No. 04-C-296-2 (Circuit Court of Harrison County, West Virginia) - Ninth Proposed Settlement Administration Budget (for September 1, 2018 through August 31, 2019) (the "Budget"); Our File Nos. 4609-1 {R} and 4609-1 {NN}

Dear Judge Bedell:

Your Claims Administrator submits the proposed Settlement Administration Budget for the Perrine DuPont Medical Monitoring Fund (the "Medical Monitoring Fund") for the period of September 1, 2018 through August 31, 2019 in Attachment A. Pursuant to this Court's January 3, 2018 Order, the Perrine DuPont Property Remediation Fund was terminated at February 28, 2018, and your Claims Administrator is operating under a separate Remediation Program Final Surplus Dividend and Budget, funded through the Remediation Fund Sinking Fund held by the Medical Monitoring Fund.

Please note that no additional DuPont monetary contribution is requested.

This budget follows an initial draft provided to the Parties on August 20, telephone discussions on August 21, a second draft on August 22, and telephone discussions on August 23, in an effort to generate a collaborative budget.

It should be noted that, historically, for the last 7 years, the Medical Monitoring Program (post-implementation) budgets have exceeded actual expenditures:

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<u>Year</u>	<u>Budget Amount</u>	<u>Actual Expenses</u>	<u>Percent of Budget Expended</u>
2011	\$492,297	\$57,230	11.63%
2012	\$2,630,479	\$796,723	30.29%
2013	\$792,480	\$365,935	46.18%
2014	\$1,007,349	\$485,223	48.17%
2015	\$379,720	\$232,714	61.29%
2016	\$408,101	\$311,719	76.38%
2017	<u>\$567,062</u>	<u>\$296,960</u>	<u>52.37%</u>
Total	<u>\$6,277,488</u>	<u>\$2,546,504</u>	<u>40.57%</u>

We will continue to manage the Medical Monitoring Program frugally, with the goal being for actual expenditures to continue to come in below the Budget. However, the requested DuPont replenishment amount is necessary to ensure that there are adequate reserves to continue to carry out the Medical Monitoring Program without interruption.

Now that the last step of the Remediation Program, being the final dividend, is complete, except for Claimant follow-up with dividend checks, we are closing the Spelter Claims Office by the end of the year, with our key Perrine Medical Monitoring employee, Ms. Christy Mullins of Bridgeport, West Virginia, agreeing to relocate to our Birmingham, Alabama main office. Our Spelter Claims Office telephone number and mail will be forwarded to Birmingham to make this transition as seamless as possible.

Now that the number of Medical Monitoring participants has leveled in the 500 range, instead of the originally anticipated possible 4,000, and with the size of the Perrine DuPont Medical Monitoring Qualified Settlement Fund (the "QSF") being smaller, we will explore the following additional cost cutting measures with the Finance Committee during the budget period:

1. Scanning claimant paper files onto electronic media, and seeking Court authority to shred the originals. This will eliminate file storage costs.
2. Possibly not having full formal outside audits of the QSF each year but a compilation one year and an audit the next.
3. Taking the Medical Monitoring Program medical provider management and claimant notice functions in house like we do with the Mingo County, West Virginia Medical Monitoring Program.

We continue the Settlement's commitment to carry out DuPont's request to be mindful of Settlement Medical Monitoring Fund administrative expenses, and we are pleased to report that: (i) after years of budgeting for the Medical Monitoring Fund, budget-to-actual expenditures have always

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resulted in Medical Monitoring Fund actual expenses coming in at less than budgeted expenses; for the life of the Medical Monitoring Fund (Post-Implementation Date) through December 31, 2017, actual expenditures have been \$3,730,984 (or 59.43%) less than budgeted expenditures; (ii) the proposed Budget includes a \$250,400 decrease in the collective cost of the expense categories of your Claims Administrator, the Guardian Ad Litem, and the Finance Committee, with these expenses categories having been reduced by approximately \$520,600 for the Eighth Administration Budget; and (iii) your Claims Administrator, with the help of Don Brandt with CTIA, was able to develop a more efficient and cost-effective Medical Monitoring Program, resulting in a Medical Monitoring Program Third Party Administrator budget reduction from \$512,000 to \$267,500 for the sixth and seventh budget, with such Third Party Administrator expenses projected to be approximately \$110,000 for the Ninth Administration Budget.

The Medical Monitoring Program is provided on a per unit of service method, with the Program paying for each unit of service that is provided only, and with the cost/unit being negotiated by CTIA. In our experience, this historically results in cheaper medical service than under alternative methods. A further cost-cutting measure may be to handle this function in-house, as done in the Mingo County, West Virginia, Medical Monitoring Program.

Please also note that due to CTIA's efficacy in negotiating lower provider rates and laboratory fees, the ratio of service fees to total cost seems unusually high when compared to a typical medical plan. The average claim payment in the Medical Monitoring Program is approximately 1/3 of what one would find in a typical medical plan (\$51 average claim for the Medical Monitoring Program versus \$160 for a typical medical plan). The cost to process a \$51 claim and a \$160 claim are essentially the same, causing the ratio of CTIA's service fees compared to total claim costs to appear high. As seen in prior years, the average service fee per claim was only \$12.60 (a very competitive rate).

Thus, absent CTIA, the medical services per Medical Monitoring Claimant would cost \$160 per claim, while with CTIA, and including the cost of CTIA they equal \$63.60 per claim (\$51 + \$12.60 per claimant). Thus, while the ratio of CTIA's expenses to overhead is increased as Medical Provider prices are decreased by CTIA, the Program realizes a net savings, to the benefit of the Program and DuPont. In addition, CTIA is essentially performing the services of a physician's office, as they are scheduling claimant patient medical appointments and handling claimant patient billing matters. By doing so, CTIA is reducing the amount the Medical Monitoring Program would be required to pay the physician's office by performing these matters in place of the physician's office.

As mentioned in prior years during the Budget approval process, the percentage of administrative expenses as compared to Medical Provider expenses will increase when Medical Monitoring Program turnout is low, as in round one at 50%, as some of the Medical Monitoring Program administrative expenses are fixed costs, thereby resulting in an increase in the percent of Medical Monitoring Program Fund administrative expenses. In addition, with the winding-up of the Remediation Fund, the Medical Monitoring Fund is now the primary contributor to the previous

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sharing of common overhead expenses.

Furthermore, rather than looking at this proposed Budget in isolation, it is beneficial to look at the Medical Monitoring Settlement Program expenses incurred since inception through our projected Budget period. The attached pie diagram titled Perrine Dupont Medical Monitoring Settlement Program Post-Implementation Date Actual and Projected Expenses (November 1, 2011 through August 31, 2018) in Exhibit B to the Budget details the ratio of Medical Monitoring Fund administrative expenses as compared to the Medical Monitoring Fund medical provisioning expenses from inception through August 31, 2018.

As you can see from the attached pie diagram, we believe the Medical Monitoring Fund medical provisioning expenses through August 31, 2018 are reasonable for the life of the Medical Monitoring Settlement Program Post-Implementation Date expenses at 67.59% (21.59% Providers and 46.00% CTIA), with your Claims Administrator fees and expenses constituting 24.89% of such expenditures, and 7.52% of such expenditures being for Guardian Ad Litem fees, Finance Committee/Shared Common administrative expenses for both Settlement Funds, and other Medical Monitoring Program expenses.

Your Honor, we have enclosed in Attachment B a proposed Order for your consideration that would approve the enclosed, proposed Ninth Administration Budget for the Medical Monitoring Fund for the period of September 1, 2018 through August 31, 2019 in Attachment A.

Thank you for the Court's consideration.

Yours very truly,

Edgar C. Gentle, III

ECGIII/mg
Enclosures

cc: (with enclosures)(by e-mail)(confidential)
Niall A. Paul, Esq.
Clifford F. Kinney, Jr., Esq.
DuPont Representatives on the Settlement Finance Committee

Virginia Buchanan, Esq.
Plaintiff Class Representative on the Finance Committee

Meredith McCarthy, Esq.,
Guardian Ad Litem for Children

Clerk of Court of Harrison County,
West Virginia, for filing (via hand delivery)

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cc: (continued)

Terry D. Turner, Jr., Esq.

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McDavid Flowers, Esq.

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Ms. Jennifer Newby, C.P.A.

Ms. Christy Mullins

Ms. Tracy R. Collingsworth

ATTACHMENT A

PERRINE DUPONT SETTLEMENT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
SEPTEMBER 1, 2018 THROUGH AUGUST 31, 2019

	MEDICAL MONITORING SETTLEMENT FUND *, **	
September 2018	\$39,349.80	
October 2018	\$39,829.65	
November 2018	\$29,594.25	
December 2018	\$21,737.10	
January 2019	\$21,906.15	
February 2019	\$21,606.90	
March 2019	\$23,116.80	
April 2019	\$24,651.90	
May 2019	\$23,693.25	
June 2019	\$34,359.15	
July 2019	\$39,370.80	
August 2019	\$36,226.05	
TOTALS	<u>\$355,441.80</u>	#
<p>* The total amount needed in the Medical Monitoring Fund Account for this budget period is \$355,441.80.</p> <p>** This draft of the Budget estimates that only \$2,883 will be spent on CT scans considered diagnostically medically necessary for Medical Monitoring claimants.</p> <p># The total amount includes \$1,858 in projected CTI Administrators expenses toward a Central Repository for Scientific Research Concerning Test Results, with these projected expenses only being used for the purpose of collecting and maintaining the test results, and NOT to do research, which may be performed by an independent researcher. This issue was resolved by the Court on August 24, 2011, with test results to be stored for consenting claimants.</p>		

PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
SEPTEMBER 2018

Expense Category	MEDICAL MONITORING SETTLEMENT FUND EXPENSES *			
A. <u>Claims Administrator Fees Based on Detail in Appendix A</u>				
Claims Administrator Legal Fees (Claims Office and General Case Administration Services, and Tax and Accounting Support)	\$ 11,000.00			
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$ 5,000.00			
Total Claims Administrator Fees and Expenses	\$ 16,000.00			
B. <u>Medical Monitoring Program Expenses</u>				
Third Party Administrator Fees and Expenses	\$ 8,242.00			
Medical Provider Medical Monitoring Expenses	\$ 9,664.00			
Medical Panel Fees (8 hours per month @ \$350/hr)	\$ -			
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$ -			
Total Medical Monitoring Program Expenses	\$ 17,906.00			
C. <u>Overhead Expenses</u>				
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$ 500.00			
Audit and Income Tax Return	\$ -			
Web Hosting	\$ 10.00			
Claims Office Rent	\$ 1,100.00			
Office Cleaning	\$ -			
Copy Machine Rental	\$ 220.00			
Office Insurance	\$ 90.00			
Photocopies	\$ 500.00			
Telecopies	\$ 50.00			
Postage	\$ 125.00			
Federal Express	\$ 100.00			
Office Supplies	\$ 25.00			
Office Equipment	\$ -			
Telephone Service	\$ 300.00			
Lexis Legal Research	\$ 250.00			
Airfare	\$ 200.00			
Rental Vehicle	\$ 100.00			
Total Overhead Expenses	\$ 3,570.00			
D. <u>FASB 5 Contingency Reserve (5% of above accounts)</u>	\$ 1,873.80			
TOTAL of A, B, C, and D	\$ 39,349.80			
* Funded by additional contributions by DuPont.				

PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
OCTOBER 2018

<u>Expense Category</u>	<u>MEDICAL MONITORING SETTLEMENT FUND EXPENSES *</u>
A. Claims Administrator Fees Based on Detail in Appendix A	
Claims Administrator Legal Fees (Claims Office and General Case Administration Services, and Tax and Accounting Support)	\$ 11,000.00
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$ 5,000.00
Total Claims Administrator Fees and Expenses	\$ 16,000.00
B. Medical Monitoring Program Expenses	
Third Party Administrator Fees and Expenses	\$ 5,815.00
Medical Provider Medical Monitoring Expenses	\$ 12,548.00
Medical Panel Fees (8 hours per month @ \$350/hr)	\$ -
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$ -
Total Medical Monitoring Program Expenses	\$ 18,363.00
C. Overhead Expenses	
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$ 500.00
Audit and Income Tax Return	\$ -
Web Hosting	\$ 10.00
Claims Office Rent	\$ 1,100.00
Office Cleaning	\$ -
Copy Machine Rental	\$ 220.00
Office Insurance	\$ 90.00
Photocopies	\$ 500.00
Telecopies	\$ 50.00
Postage	\$ 125.00
Federal Express	\$ 100.00
Office Supplies	\$ 25.00
Office Equipment	\$ -
Telephone Service	\$ 300.00
Lexis Legal Research	\$ 250.00
Airfare	\$ 200.00
Rental Vehicle	\$ 100.00
Total Overhead Expenses	\$ 3,570.00
D. FASB 5 Contingency Reserve (5% of above accounts)	\$ 1,896.65
TOTAL of A, B, C, and D	\$ 39,829.65
* Funded by additional contributions by DuPont.	

PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
NOVEMBER 2018

<u>Expense Category</u>	<u>MEDICAL MONITORING SETTLEMENT FUND EXPENSES *</u>
A. <u>Claims Administrator Fees Based on Detail in Appendix A</u>	
Claims Administrator Legal Fees (Claims Office and General Case Administration Services, and Tax and Accounting Support)	\$ 11,000.00
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$ 5,000.00
Total Claims Administrator Fees and Expenses	\$ 16,000.00
B. <u>Medical Monitoring Program Expenses</u>	
Third Party Administrator Fees and Expenses	\$ 1,851.00
Medical Provider Medical Monitoring Expenses	\$ 6,764.00
Medical Panel Fees (8 hours per month @ \$350/hr)	\$ -
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$ -
Total Medical Monitoring Program Expenses	\$ 8,615.00
C. <u>Overhead Expenses</u>	
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$ 500.00
Audit and Income Tax Return	\$ -
Web Hosting	\$ 10.00
Claims Office Rent	\$ 1,100.00
Office Cleaning	\$ -
Copy Machine Rental	\$ 220.00
Office Insurance	\$ 90.00
Photocopies	\$ 500.00
Telecopies	\$ 50.00
Postage	\$ 125.00
Federal Express	\$ 100.00
Office Supplies	\$ 25.00
Office Equipment	\$ -
Telephone Service	\$ 300.00
Lexis Legal Research	\$ 250.00
Airfare	\$ 200.00
Rental Vehicle	\$ 100.00
Total Overhead Expenses	\$ 3,570.00
D. <u>FASB 5 Contingency Reserve (5% of above accounts)</u>	\$ 1,409.25
TOTAL of A, B, C, and D	\$ 29,594.25
* Funded by additional contributions by DuPont.	

PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
DECEMBER 2018

<u>Expense Category</u>	<u>MEDICAL MONITORING SETTLEMENT FUND EXPENSES *</u>
A. <u>Claims Administrator Fees Based on Detail in Appendix A</u>	
Claims Administrator Legal Fees (General Case Administration Services, and Tax and Accounting Support)	\$ 8,000.00
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$ 5,000.00
Total Claims Administrator Fees and Expenses	\$ 13,000.00
B. <u>Medical Monitoring Program Expenses</u>	
Third Party Administrator Fees and Expenses	\$ -
Medical Provider Medical Monitoring Expenses	\$ 6,132.00
Medical Panel Fees (8 hours per month @ \$350/hr)	\$ -
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$ -
Total Medical Monitoring Program Expenses	\$ 6,132.00
C. <u>Overhead Expenses</u>	
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$ 500.00
Audit and Income Tax Return	\$ -
Web Hosting	\$ 10.00
Claims Office Rent	\$ -
Office Cleaning	\$ -
Copy Machine Rental	\$ -
Office Insurance	\$ -
Photocopies	\$ -
Telecopies	\$ 50.00
Postage	\$ 35.00
Federal Express	\$ 100.00
Office Supplies	\$ 25.00
Office Equipment	\$ -
Telephone Service	\$ 300.00
Lexis Legal Research	\$ 250.00
Airfare	\$ 200.00
Rental Vehicle	\$ 100.00
Total Overhead Expenses	\$ 1,570.00
D. <u>FASB 5 Contingency Reserve (5% of above accounts)</u>	\$ 1,035.10
TOTAL of A, B, C, and D	\$ 21,737.10
* Funded by additional contributions by DuPont.	

PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
JANUARY 2019

<u>Expense Category</u>	<u>MEDICAL MONITORING SETTLEMENT FUND EXPENSES *</u>
A. <u>Claims Administrator Fees Based on Detail in Appendix A</u>	
Claims Administrator Legal Fees (General Case Administration Services, and Tax and Accounting Support)	\$ 8,000.00
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$ 5,000.00
Total Claims Administrator Fees and Expenses	\$ 13,000.00
B. <u>Medical Monitoring Program Expenses</u>	
Third Party Administrator Fees and Expenses	\$ 542.00
Medical Provider Medical Monitoring Expenses	\$ 5,751.00
Medical Panel Fees (8 hours per month @ \$350/hr)	\$ -
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$ -
Total Medical Monitoring Program Expenses	\$ 6,293.00
C. <u>Overhead Expenses</u>	
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$ 500.00
Audit and Income Tax Return	\$ -
Web Hosting	\$ 10.00
Claims Office Rent	\$ -
Office Cleaning	\$ -
Copy Machine Rental	\$ -
Office Insurance	\$ -
Photocopies	\$ -
Telecopies	\$ 50.00
Postage	\$ 35.00
Federal Express	\$ 100.00
Office Supplies	\$ 25.00
Office Equipment	\$ -
Telephone Service	\$ 300.00
Lexis Legal Research	\$ 250.00
Airfare	\$ 200.00
Rental Vehicle	\$ 100.00
Total Overhead Expenses	\$ 1,570.00
D. <u>FASB 5 Contingency Reserve (5% of above accounts)</u>	\$ 1,043.15
TOTAL of A, B, C, and D	\$ 21,906.15
* Funded by additional contributions by DuPont.	

PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
FEBRUARY 2019

<u>Expense Category</u>	<u>MEDICAL MONITORING SETTLEMENT FUND EXPENSES *</u>
A. <u>Claims Administrator Fees Based on Detail in Appendix A</u>	
Claims Administrator Legal Fees (General Case Administration Services, and Tax and Accounting Support)	\$ 8,000.00
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$ 5,000.00
Total Claims Administrator Fees and Expenses	\$ 13,000.00
B. <u>Medical Monitoring Program Expenses</u>	
Third Party Administrator Fees and Expenses	\$ -
Medical Provider Medical Monitoring Expenses	\$ 6,008.00
Medical Panel Fees (8 hours per month @ \$350/hr)	\$ -
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$ -
Total Medical Monitoring Program Expenses	\$ 6,008.00
C. <u>Overhead Expenses</u>	
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$ 500.00
Audit and Income Tax Return	\$ -
Web Hosting	\$ 10.00
Claims Office Rent	\$ -
Office Cleaning	\$ -
Copy Machine Rental	\$ -
Office Insurance	\$ -
Photocopies	\$ -
Telecopies	\$ 50.00
Postage	\$ 35.00
Federal Express	\$ 100.00
Office Supplies	\$ 25.00
Office Equipment	\$ -
Telephone Service	\$ 300.00
Lexis Legal Research	\$ 250.00
Airfare	\$ 200.00
Rental Vehicle	\$ 100.00
Total Overhead Expenses	\$ 1,570.00
D. <u>FASB 5 Contingency Reserve (5% of above accounts)</u>	\$ 1,028.90
TOTAL of A, B, C, and D	\$ 21,606.90
* Funded by additional contributions by DuPont.	

PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
MARCH 2019

<u>Expense Category</u>	<u>MEDICAL MONITORING SETTLEMENT FUND EXPENSES *</u>
A. Claims Administrator Fees Based on Detail in Appendix A	
Claims Administrator Legal Fees (General Case Administration Services, and Tax and Accounting Support)	\$ 8,000.00
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$ 5,000.00
Total Claims Administrator Fees and Expenses	\$ 13,000.00
B. Medical Monitoring Program Expenses	
Third Party Administrator Fees and Expenses	\$ -
Medical Provider Medical Monitoring Expenses	\$ 7,446.00
Medical Panel Fees (8 hours per month @ \$350/hr)	\$ -
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$ -
Total Medical Monitoring Program Expenses	\$ 7,446.00
C. Overhead Expenses	
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$ 500.00
Audit and Income Tax Return	\$ -
Web Hosting	\$ 10.00
Claims Office Rent	\$ -
Office Cleaning	\$ -
Copy Machine Rental	\$ -
Office Insurance	\$ -
Photocopies	\$ -
Telecopies	\$ 50.00
Postage	\$ 35.00
Federal Express	\$ 100.00
Office Supplies	\$ 25.00
Office Equipment	\$ -
Telephone Service	\$ 300.00
Lexis Legal Research	\$ 250.00
Airfare	\$ 200.00
Rental Vehicle	\$ 100.00
Total Overhead Expenses	\$ 1,570.00
D. FASB 5 Contingency Reserve (5% of above accounts)	
TOTAL of A, B, C, and D	\$ 1,100.80
	\$ 23,116.80
* Funded by additional contributions by DuPont.	

PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
APRIL 2019

<u>Expense Category</u>	<u>MEDICAL MONITORING SETTLEMENT FUND EXPENSES *</u>
A. Claims Administrator Fees Based on Detail in Appendix A	
Claims Administrator Legal Fees (General Case Administration Services, and Tax and Accounting Support)	\$ 8,000.00
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$ 5,000.00
Total Claims Administrator Fees and Expenses	\$ 13,000.00
B. Medical Monitoring Program Expenses	
Third Party Administrator Fees and Expenses	\$ 3,546.00
Medical Provider Medical Monitoring Expenses	\$ 5,362.00
Medical Panel Fees (8 hours per month @ \$350/hr)	\$ -
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$ -
Total Medical Monitoring Program Expenses	\$ 8,908.00
C. Overhead Expenses	
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$ 500.00
Audit and Income Tax Return	\$ -
Web Hosting	\$ 10.00
Claims Office Rent	\$ -
Office Cleaning	\$ -
Copy Machine Rental	\$ -
Office Insurance	\$ -
Photocopies	\$ -
Telecopies	\$ 50.00
Postage	\$ 35.00
Federal Express	\$ 100.00
Office Supplies	\$ 25.00
Office Equipment	\$ -
Telephone Service	\$ 300.00
Lexis Legal Research	\$ 250.00
Airfare	\$ 200.00
Rental Vehicle	\$ 100.00
Total Overhead Expenses	\$ 1,570.00
D. FASB 5 Contingency Reserve (5% of above accounts)	\$ 1,173.90
TOTAL of A, B, C, and D	\$ 24,651.90
* Funded by additional contributions by DuPont.	

**PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9**

MAY 2019

Expense Category	MEDICAL MONITORING SETTLEMENT FUND EXPENSES *
A. Claims Administrator Fees Based on Detail in Appendix A	
Claims Administrator Legal Fees (General Case Administration Services, and Tax and Accounting Support)	\$ 8,000.00
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$ 5,000.00
Total Claims Administrator Fees and Expenses	\$ 13,000.00
B. Medical Monitoring Program Expenses	
Third Party Administrator Fees and Expenses	\$ 125.00
Medical Provider Medical Monitoring Expenses	\$ 7,870.00
Medical Panel Fees (8 hours per month @ \$350/hr)	\$ -
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$ -
Total Medical Monitoring Program Expenses	\$ 7,995.00
C. Overhead Expenses	
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$ 500.00
Audit and Income Tax Return	\$ -
Web Hosting	\$ 10.00
Claims Office Rent	\$ -
Office Cleaning	\$ -
Copy Machine Rental	\$ -
Office Insurance	\$ -
Photocopies	\$ -
Telecopies	\$ 50.00
Postage	\$ 35.00
Federal Express	\$ 100.00
Office Supplies	\$ 25.00
Office Equipment	\$ -
Telephone Service	\$ 300.00
Lexis Legal Research	\$ 250.00
Airfare	\$ 200.00
Rental Vehicle	\$ 100.00
Total Overhead Expenses	\$ 1,570.00
D. FASB 5 Contingency Reserve (5% of above accounts)	
TOTAL of A, B, C, and D	\$ 1,128.25
	\$ 23,693.25
* Funded by additional contributions by DuPont.	

PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
JUNE 2019

<u>Expense Category</u>	<u>MEDICAL MONITORING SETTLEMENT FUND EXPENSES *</u>
A. <u>Claims Administrator Fees Based on Detail in Appendix A</u>	
Claims Administrator Legal Fees (General Case Administration Services, and Tax and Accounting Support)	\$ 8,000.00
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$ 5,000.00
Total Claims Administrator Fees and Expenses	\$ 13,000.00
B. <u>Medical Monitoring Program Expenses</u>	
Third Party Administrator Fees and Expenses	\$ 296.00
Medical Provider Medical Monitoring Expenses	\$ 5,357.00
Medical Panel Fees (8 hours per month @ \$350/hr)	\$ -
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$ -
Total Medical Monitoring Program Expenses	\$ 5,653.00
C. <u>Overhead Expenses</u>	
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$ 500.00
Audit and Income Tax Return	\$ 12,500.00
Web Hosting	\$ 10.00
Claims Office Rent	\$ -
Office Cleaning	\$ -
Copy Machine Rental	\$ -
Office Insurance	\$ -
Photocopies	\$ -
Telecopies	\$ -
Postage	\$ 50.00
Federal Express	\$ 35.00
Office Supplies	\$ 100.00
Office Equipment	\$ 25.00
Telephone Service	\$ -
Lexis Legal Research	\$ 300.00
Airfare	\$ 250.00
Rental Vehicle	\$ 200.00
Total Overhead Expenses	\$ 100.00
	\$ 14,070.00
D. <u>FASB 5 Contingency Reserve (5% of above accounts)</u>	
TOTAL of A, B, C, and D	\$ 1,636.15
	\$ 34,359.15
* Funded by additional contributions by DuPont.	

PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
JULY 2019

<u>Expense Category</u>		MEDICAL MONITORING SETTLEMENT FUND EXPENSES *
A. <u>Claims Administrator Fees Based on Detail in Appendix A</u>		
Claims Administrator Legal Fees (General Case Administration Services, and Tax and Accounting Support)	\$	8,000.00
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$	5,000.00
Total Claims Administrator Fees and Expenses	\$	13,000.00
B. <u>Medical Monitoring Program Expenses</u>		
Third Party Administrator Fees and Expenses	\$	29.00
Medical Provider Medical Monitoring Expenses	\$	10,397.00
Medical Panel Fees (8 hours per month @ \$350/hr)	\$	-
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$	-
Total Medical Monitoring Program Expenses	\$	10,426.00
C. <u>Overhead Expenses</u>		
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$	500.00
Audit and Income Tax Return	\$	12,500.00
Web Hosting	\$	10.00
Claims Office Rent	\$	-
Office Cleaning	\$	-
Copy Machine Rental	\$	-
Office Insurance	\$	-
Photocopies	\$	-
Telecopies	\$	50.00
Postage	\$	35.00
Federal Express	\$	100.00
Office Supplies	\$	25.00
Office Equipment	\$	-
Telephone Service	\$	300.00
Lexis Legal Research	\$	250.00
Airfare	\$	200.00
Rental Vehicle	\$	100.00
Total Overhead Expenses	\$	14,070.00
D. <u>FASB 5 Contingency Reserve (5% of above accounts)</u>	\$	1,874.80
TOTAL of A, B, C, and D	\$	39,370.80
* Funded by additional contributions by DuPont.		

PERRINE-DUPONT MEDICAL MONITORING SETTLEMENT FUND
ADMINISTRATION BUDGET NO. 9
AUGUST 2019

<u>Expense Category</u>	<u>MEDICAL MONITORING SETTLEMENT FUND EXPENSES *</u>
A. Claims Administrator Fees Based on Detail in Appendix A	
Claims Administrator Legal Fees (General Case Administration Services, and Tax and Accounting Support)	\$ 8,000.00
Claims Administrator Legal Fees for Medical Monitoring Provisioning	\$ 5,000.00
Total Claims Administrator Fees and Expenses	\$ 13,000.00
B. Medical Monitoring Program Expenses	
Third Party Administrator Fees and Expenses	\$ -
Medical Provider Medical Monitoring Expenses	\$ 19,931.00
Medical Panel Fees (8 hours per month @ \$350/hr)	\$ -
Guardian Ad Litem Fees (4 hours per month @ \$250/hr)	\$ -
Total Medical Monitoring Program Expenses	\$ 19,931.00
C. Overhead Expenses	
Finance Committee Fees (2 hours each per month @ \$250/hr)	\$ 500.00
Audit and Income Tax Return	\$ -
Web Hosting	\$ 10.00
Claims Office Rent	\$ -
Office Cleaning	\$ -
Copy Machine Rental	\$ -
Office Insurance	\$ -
Photocopies	\$ -
Telecopies	\$ 50.00
Postage	\$ 35.00
Federal Express	\$ 100.00
Office Supplies	\$ 25.00
Office Equipment	\$ -
Telephone Service	\$ 300.00
Lexis Legal Research	\$ 250.00
Airfare	\$ 200.00
Rental Vehicle	\$ 100.00
Total Overhead Expenses	\$ 1,570.00
D. FASB 5 Contingency Reserve (5% of above accounts)	
TOTAL of A, B, C, and D	\$ 36,226.05
* Funded by additional contributions by DuPont.	

SCHEDULE OF APPENDIX AND EXHIBITS

Appendix A: Suggested Fees Appendix

Exhibit A: Third Party Administrator and Medical Provider Medical Monitoring Fees and Expenses, and Medical Monitoring Program Medical Providers and Third Party Administration Budget Based on 2,238 Active Claimants and Developed by the Third Party Administrator

Exhibit B: Medical Monitoring Program Actual and Projected Expenses (November 1, 2011 through August 31, 2018)

APPENDIX A

APPENDIX A

SUGGESTED MONTHLY FEES APPENDIX

A. Claims Office and General Case Administration Services

	September 2018 thru August 2019
Legal Assistant/Receptionist at Office @ \$50/hr	x 4 hours = \$ 200
Associate Attorney @ \$150/hr	x 1/2 hour = \$75
Partners @ \$200/hr	x 1/2 hour = \$ 100
Claims Administrator @ \$250/hr	x 1/2 hour = \$ 125
TOTAL	<u>\$ 500</u>

B. Tax and Accounting Support

	September 2018 thru August 2019
\$ 150 (blended) /hr	x 70 hours = <u>\$10,500</u>

C. **Medical Monitoring Monthly Provisioning**

	September 2018 thru August 2019
Legal Assistant/Receptionist at Office @ \$50/hr	x 40 hours = \$ 2,000
Associate Attorney @ \$150/hr	x 5 hours = \$ 750
Partners @ \$200/hr	x 5 hours = \$ 1,000
Claims Administrator @ \$250/hr	x 5 hours = \$ 1,250
TOTAL	<u>\$ 5,000</u>

EXHIBIT A

THIRD PARTY ADMINISTRATOR AND MEDICAL PROVIDER MEDICAL MONITORING FEES AND EXPENSES

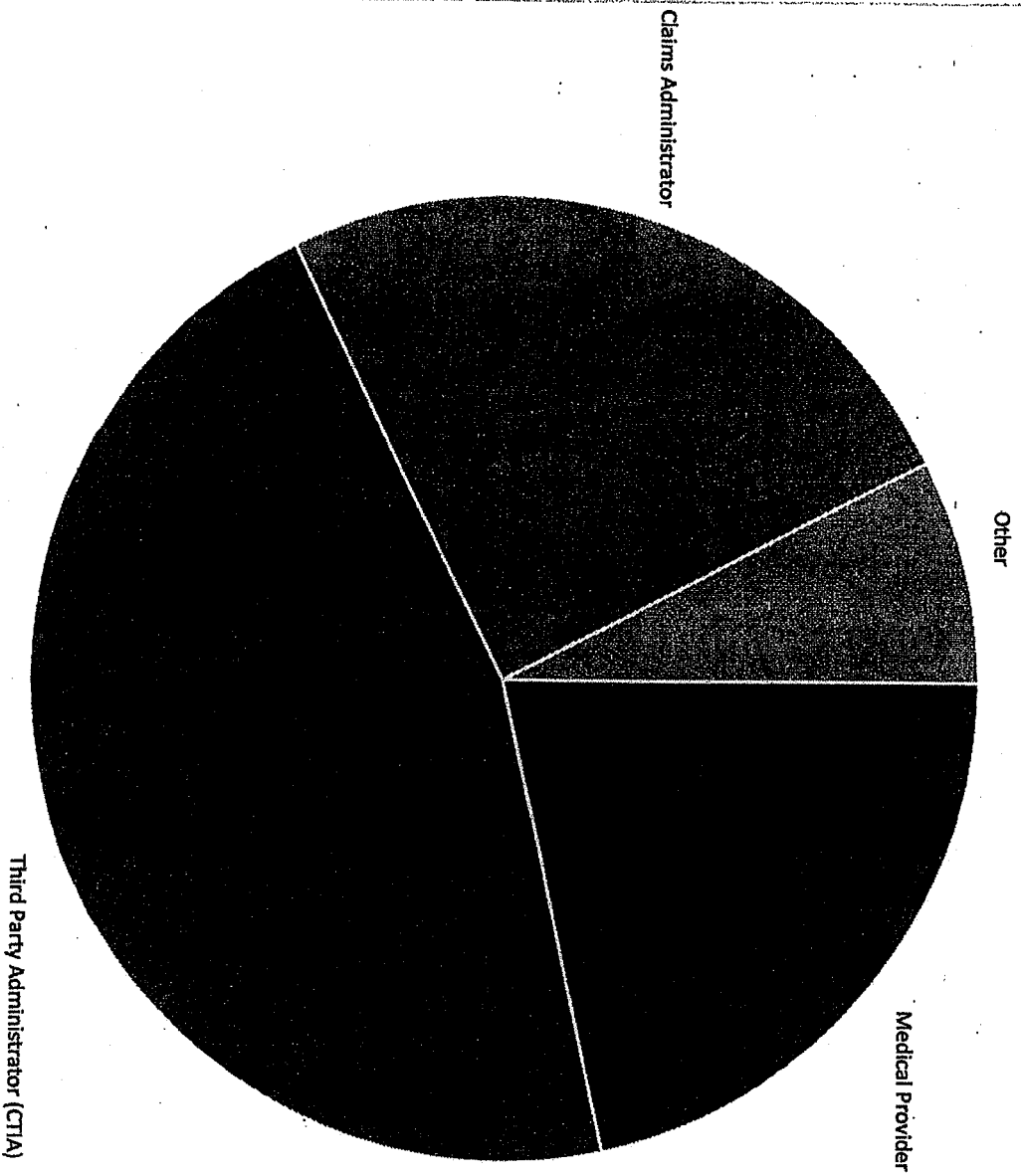
The Third Party Administrator (the "TPA") and the Medical Provider Medical Monitoring fees and expenses are based on the projections of the Claims Administrator and the Third Party Administrator contained in this Exhibit, taking into account actual experience and estimating that there will be 2,238 active participants in the Medical Monitoring Program this budget period. The Medical Provider Medical Monitoring fees and expenses for the budget period are projected by the Third Party Administrator at \$13,369 for the 2,238 Medical Monitoring claimants that for this non-testing budget period, and we are estimating that of the 75% of Medical Monitoring claimants that may be eligible to have a CT scan, only 10% of those CT scans may be considered diagnostically medically necessary. Our estimate for the projected number of CT scans is predicated on experience and Section 3© of the Memorandum of Understanding (the "MOU") that no routine CT scans shall be performed as part of the medical monitoring program, although the Defendant shall provide CT scans that are diagnostically necessary as determined by a competent physician as relevant to possible exposure to the heavy metal contamination at issue in the litigation. In accordance with Section 3 of the MOU between the Parties, the Defendant shall provide a medical monitoring program for all enrolled Plaintiffs on a pay-as-you-go basis, paying a sum certain each calendar year that reasonably secures such medical monitoring expenses for each such calendar year and, if the sum certain is not sufficient for payment of anticipated medical monitoring expenses, the Defendant shall make an additional payment to reasonably secure such medical monitoring expenses for the calendar year. It is estimated that the additional Third Party Administrator and Medical Provider fees and expenses for each additional Medical Monitoring Claimant over the 2,238 active participants this budget year would equal approximately \$62 per claimant.

Medical Provider Medical Monitoring Expenses: The Medical Provider Medical Monitoring Expenses include estimated CT scan and consultation expenses totalling \$2,883.

Third Party Administrator Fees and Expenses: Please note that included within Third Party Administrator Fees and Expenses are \$1,858 in expenses during the Budget period toward the cost of a Central Repository for Scientific Research Concerning Test Results (which includes the downloading and capturing of test data and maintaining such data on CTIA's server during the program) and would only be for the purpose of collecting and maintaining the test results, and not to do research, which may be performed by an independent researcher.

EXHIBIT B

Perrine DuPont Medical Monitoring Settlement Program Post Implementation Date
Actual and Projected Expenses (November 1, 2011 through August 31, 2018)



- Medical Provider = \$638,727 (21.59%)
- Third Party Administrator (CTIA) = \$1,361,211 (46.00%)
- Claims Administrator = \$736,615 (24.89%)
- Other = \$222,549 (7.52%)

ATTACHMENT B

IN THE CIRCUIT COURT OF HARRISON COUNTY, WEST VIRGINIA

LENORA PERRINE, et al., individuals
residing in West Virginia, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

Case No. 04-C-296-2
Thomas A. Bedell, Circuit Judge

E.I. DU PONT DE NEMOURS AND COMPANY, et al.,

Defendants.

FINAL ORDER APPROVING THE
NINTH ADMINISTRATION BUDGET FOR THE SETTLEMENT

Presently pending before the Court is the Ninth Budget for the Settlement Medical Monitoring Program (for the twelve months beginning September 1, 2018 and ending August 31, 2019) (the "Ninth Settlement Administration Budget" or the "Budget"), submitted to the Court and The Finance Committee, on August 27, 2018 with no objections being received.

The Court notes that the Settlement Medical Monitoring Fund Budget is to be funded by the Medical Monitoring Fund Account created by a Court-ordered DuPont contribution on October 31, 2011, and by additional contributions from DuPont, if necessary. According to the Claims Administrator's August 27, 2018 Report to the Court, no additional DuPont funding of the Medical Monitoring Fund Account is required at this, as the Account balance at August 17, 2018 was approximately \$360,000, and projected Medical Monitoring expenses of \$355,000 for the Budget period.

After a careful review of the Ninth Settlement Administration Budget, and in consideration of the applicable law, the Court **ORDERS** that the same is hereby **APPROVED** and shall be used in the administration of the Settlement.

Lastly, pursuant to Rule 54(b) of the West Virginia Rules of Civil Procedure, the Court directs entry of this Order as a Final Order as to the claims and issues above upon an express determination that there is no just reason for delay and upon an express direction for the entry of judgment.

IT IS SO ORDERED.

The Clerk of this Court shall provide certified copies of this Order to the following:

Niall A. Paul, Esq.
Clifford F. Kinney, Jr., Esq.
Spilman, Thomas & Battle, PLLC
P. O. Box 273
Charleston, WV 25321
DuPont's Finance Committee Representatives

Virginia Buchanan, Esq.
Levin, Papantonio, Thomas, Mitchell,
Rafferty & Proctor, P.A.
P.O. Box 12308
Pensacola, FL 32591
Plaintiffs' Finance Committee Representative

Meredith McCarthy, Esq.
Guardian Ad Litem for Children
901 W. Main St.
Bridgeport, WV 26330

Edgar C. Gentle, III, Esq.
Gentle, Turner, Sexton & Harbison, LLC
55 B Street
P.O. Box 257
Spelter, WV 26438
Special Master and Claims Administrator

Order Prepared By:

Edgar C. Gentle, III, Claims Administrator
Gentle Turner, Sexton & Harbison, LLC
P.O. Box 257
Spelter, WV 26438

Michael A. Jacks, Esq.
W. Va. Bar No. 1044
Jacks Legal Group, P.L.L.C.
3467 University Avenue, Suite 200
Morgantown, WV 26505

ENTER: _____

Thomas A. Bedell, Circuit Judge