

TWENTY-SECOND JUDICIAL DISTRICT COURT
PARISH OF WASHINGTON
STATE OF LOUISIANA

NO. 73,341
ALL CASES

IN RE CHEMICAL RELEASE

DIVISION "C"

CLASS NOTICE PLAN

NOW INTO COURT comes the Plaintiff Class herein, who, in agreement with the Defendant Reliance Insurance Company (In Liquidation) ("Reliance"), which is now Reliance in liquidation pursuant to Order of the Pennsylvania Commonwealth Court, respectfully submit to the Court for consideration and approval the following plan for dissemination of the Class Settlement Notice relating to the September 2014 Louisiana Settlement Agreement and General Release between these parties, including two notice forms, identified as the Short Form Notice and Long Form Notice, attached to this Class Notice Plan as Exhibits II(A) and II(B), respectively.

Requirements

1. Dissemination of the Class Settlement Notice shall be the responsibility of the PLC and the Class Settlement Notice Administrator ("CSN Administrator") appointed by this Court. The PLC in its Motion for Preliminary Approval has recommended Bourgeois Bennett, LLC for this purpose. Reliance does not object to this recommendation. The qualifications and expertise of Bourgeois Bennett as a CSN Administrator are a matter of record and are known to this Court, based not only upon the appointment of Bourgeois Bennett to serve in this capacity in connection with previous class settlements in this litigation, but also upon Bourgeois Bennett's

successful implementation of this same notice protocol in connection with these previous class settlements.

2. The Long Form Notice and Short Form Notice of the settlement shall be disseminated as follows: (i) Long Form Notice — by first class mail to the last known address of all Class Members who timely filed Proof of Claim forms in the most recent class settlement in this litigation; (ii) Long Form Notice — by first class mail to the last known address of all named plaintiffs in all filed actions herein, and/or their counsel; (iii) Long Form Notice — by first class mail to all known attorneys retained as counsel of record in this matter as of the most recent class settlement in this litigation, and who have in the past represented, or presently represent, any Class Member individually in matters pertaining to the Louisiana Litigation, with instructions that said counsel are to disseminate a copy of the notice to their respective clients who have not received notice pursuant to (i) or (ii) above; (iv) Short Form Notice — by publication; (v) Short Form Notice — by posting a copy of the Short Form Notice at the courthouses of the Twenty-Second Judicial District Court, Washington Parish, Louisiana; Marion County, Mississippi; Pike County, Mississippi; and Walthall County, Mississippi; (vi) Short Form Notice — by posting a copy of the Short Form Notice at the town or city halls for Franklinton, Louisiana; Bogalusa, Louisiana; Columbia, Mississippi; McComb, Mississippi; and Tylertown, Mississippi; and (vii) Short Form Notice — by posting a copy of the Short Form Notice at such other public places, as may be further ordered by the Court.

Proposed Implementation of the Notice Plan

3. The Parties propose that the Long Form Notice, substantially in the form of Exhibit II(B) attached hereto, be sent by first-class United States mail, postage prepaid as prescribed in subparagraphs (i), (ii) and (iii) of paragraph 2 above.

4. Prior to dissemination of the Long Form Notice, the CSN Administrator shall process the names and addresses of Class Members through the National Change of Address database, Equifax, or similar consumer locator service, to provide current addresses for Class Members. If Long Form Notices addressed to Class Members are returned, the CSN Administrator shall process the names of Class Members whose Long Form Notices were returned through CDB Infotek, or a similar federal, state and local public record locator service, to provide updated addresses for Class Members. If an updated address is located, the CSN Administrator shall re-mail the Long Form Notice to the Class Member with the new address. All Class Member address updates shall be reported to the PLC and the Court-Appointed Disbursing Agent.

5. The Short Form Notice, substantially in the form of Exhibit II(A) attached hereto, shall be used for the principal purpose of encouraging Class Members to seek additional information. The Short Form Notice is designed to be sufficiently simple and comprehensive for Class Members, prior to the Fairness Hearing, to (i) understand that there is a pending settlement; (ii) obtain a copy of the Long Form Notice; (iii) protect their rights regarding the settlement; (iv) participate, if desired, at the Fairness Hearing; and (v) protect their rights and participate, if desired, regarding the Louisiana Special Master's Report and Recommendation and/or individual allocation amounts, if any.

6. The mailings of the Long Form Notice shall commence on or before the final date for the commencement of class notice as ordered by this Court, which date shall be at least 45 days before the date on which the Fairness Hearing is scheduled to commence. Publication of the Short Form Notice likewise shall be accomplished no less than 45 days before the date of the Fairness Hearing.

7. The Parties further propose that the Short Form Notice be published in several newspapers serving the Bogalusa, Louisiana and surrounding areas. The Short Form Notice shall be published twice (once in a daily edition and once in a Sunday edition) in *The Times Picayune* (distributed to the greater New Orleans metropolitan area), and twice (in two daily editions) in *The Bogalusa Daily News* (distributed to most of Washington Parish, Louisiana), *The Franklinton Era Leader* (official journal for Washington Parish, Louisiana), *The McComb Enterprise Journal* (official journal for Pike County, Mississippi), *The Tylertown Times and Shopper* (official journal for Walthall County, Mississippi), *The Columbia Progress* (official journal for Marion County, Mississippi), and *The Chainlink Chronicle* (official newspaper for the Washington Correctional Institute, Angie, Louisiana, provided that publication is accepted by the publisher). The Short Form Notice shall also be published once in a daily edition of *The Advocate* (distributed to the Baton Rouge area). The CSN Administrator shall place the orders for publication of the Short Form Notice and personally review proofs thereof prior to publication to assure that the advertisements are suitable to serve the purposes herein stated.

8. The CSN Administrator shall also draft a press release approved by the Parties, which the CSN Administrator shall submit to different media outlets in the Washington Parish area for publication.

9. The CSN Administrator shall then monitor the publication of the press release through the use of a clipping service, which shall forward the publications from radio, television, and newspapers to each of the parties to this Join Notice Plan.

10. The PLC shall post a copy of the Short Form Notice at (i) the courthouses of the Twenty-Second Judicial District Court, Washington Parish, Louisiana; Marion County, Mississippi; Pike County, Mississippi; and Walthall County, Mississippi; (ii) the town or city halls for Franklinton, Louisiana; Bogalusa, Louisiana; Columbia, Mississippi; McComb, Mississippi; and Tylertown, Mississippi; and (iii) such other public places as may be further ordered by the Louisiana Court.

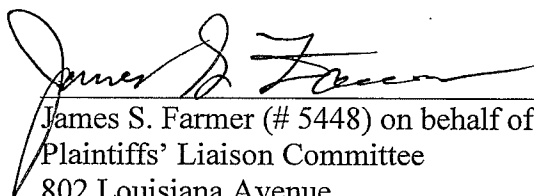
11. In order to accommodate inquiries concerning these notices, whether mailed or published, the Parties propose that a staff of personnel be supervised by the Louisiana Special Master to be trained to (i) respond to telephone inquiries; (ii) arrange for Long Form Notices to be sent to those requesting them; and (iii) obtain and log all necessary information from the callers. This information should include full names and present addresses; social security numbers; dates of birth; and, in the discretion of the Louisiana Special Master, any other relevant information, but making no representation that any callers may be excused from failure to file a timely Proof of Claim.

12. This notification plan is designed to: (i) provide best practicable notice under the circumstances of this settlement and the terms of the 2014 Settlement Agreement and General Release Between Reliance Insurance Company (in Liquidation) and the Louisiana Plaintiff Class Members; (ii) effectively reach both those Class Members for whom accurate addresses are known and those Class Members whose addresses have changed or are not currently known; and

(iii) satisfy all applicable due process and other relevant standards for the provision of settlement notification to Class Members.

Dated: November 14, 2014

Respectfully submitted,



James S. Farmer (# 5448) on behalf of the
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