

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

**NO. 73341  
ALL CASES**

**IN RE CHEMICAL RELEASE  
AT BOGALUSA**

**Division "C"**

**JOINT MOTION FOR PRELIMINARY APPROVAL  
OF PROPOSED CLASS SETTLEMENT BETWEEN PLAINTIFF  
CLASS AND RELIANCE INSURANCE COMPANY**

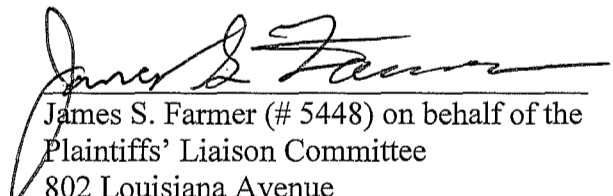
\*\*\*\*\*


NOW INTO COURT, through their undersigned, respective counsel or representatives, come the Plaintiff Class herein and the Defendant Insurer in Liquidation, Reliance Insurance Company [hereafter "Reliance"], who respectfully move the Court to:

- (a) grant preliminary approval of a proposed class settlement agreement between the parties,
- (b) approve a Notice Plan attached hereto (inclusive of both a Long Form Notice for mail-out purposes and a Short Form Notice for posting/publication purposes),
- (c) reconfirm the appointment of Bourgeois Bennett, LLP as both the Notice Administrator and Disbursing Agent for this proposed settlement, and
- (d) set dates for both a Fairness Hearing to proceed with final approval of the class settlement, and deadlines by which to send notice to class members under the Notice Plan and by which objections to the proposed settlement must be made by or on behalf of class members.

Dated: Nov. 13, 2014

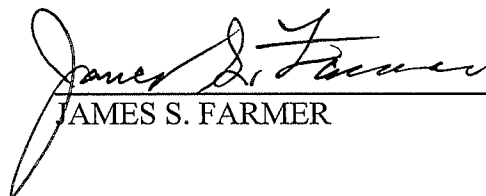
Respectfully submitted,

  
James S. Farmer (# 5448) on behalf of the  
Plaintiffs' Liaison Committee  
802 Louisiana Avenue  
Bogalusa, Louisiana 70427  
Telephone: (504) 732-1760

  
S. Emy Poulad  
Vice President, Associate General Counsel  
for Reliance Insurance Company (In  
Liquidation)  
75 Broad Street  
New York, New York 10004  
Telephone: (212) 858-3614

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Joint Motion for Preliminary Approval of Proposed Class Settlement Between Plaintiff Class and Reliance Insurance Company has been furnished to all liaison counsel of record by placing a copy of same in the U.S. mail, postage prepaid and properly addressed, this 14<sup>th</sup> day of November, 2014.

  
\_\_\_\_\_  
JAMES S. FARMER