16TH JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. MARTIN STATE OF LOUISIANA

NO. 081835 DIVISION "A"

JOSEPH HARVEY GAUTREAUX, INDIVIDUALLY AND ON BEHALF OF OTHERS SIMILARLY SITUATED

VERSUS

LOUISIANA FARM BUREAU CASUALTY INSURANCE COMPANY

FILED:	
	DEPUTY CLERK

UNOPPOSED MOTION TO APPOINT SPECIAL MASTER AND CLAIMS ADMINISTRATOR

Plaintiffs, Joseph Harvey Gautreaux, Wilfred Meaux, Jr., Carolyn Susie Lagneaux and Yvette Beauchamp (collectively "Plaintiffs"), individually and on behalf of the Class (defined in the "Settlement Agreement"), and Defendant, Louisiana Farm Bureau Casualty Insurance Company ("Louisiana Farm Bureau" or "Defendant") have entered into a Settlement Agreement (the "Settlement Agreement") to resolve all claims asserted and all claims that could have been asserted in the Action, as defined in the Settlement Agreement. Plaintiffs, with no opposition of Louisiana Farm Bureau, and pursuant to the terms of the Settlement Agreement hereby move this Court to appoint Randi S. Ellis as Special Master and Eisner Advisory Group LLC ("EAG" or "EisnerAmper") as Claims Administrator.

Randi S. Ellis has extensive experience serving as Special Master, as demonstrated by her attached CV. See Exhibit 1 Randi Ellis CV. As set forth in her affidavit, Ms. Ellis will propose an equitable means of allocating the settlement fund among class members according to the merits of their individual claims, as determined from claims data to be and previously produced in discovery. See Exhibit 2 Affidavit of Randi S. Ellis. In fact, Ms. Ellis performed the role of Special Master in another settlement confected by Class Counsel against another defendant arising from that defendant's use of a third-party valuation tool for evaluating total losses. Accordingly, Plaintiffs request the Court enter an order appointing Randi S. Ellis to assist in the administration and

implementation of their settlement with Louisiana Farm Bureau as defined in the Settlement

Agreement and authorize her to perform the functions outlined in her attached affidavit. Id.

Similarly, EAG has significant claims administration experience, as demonstrated by the

attached "EisnerAmper Firm Information and Qualifications." See Exhibit 3 P&N CV. EAG also

has familiarity with the issues presented in the Settlement Agreement, having performed certain

analyses for Plaintiffs' expert Dr. Johnette Hassell in other similar cases dealing with the same

causes of action. EAG assisted Dr. Hassel in generating samples for her damage opinions in those

cases. Likewise, EAG performed the role of Claims Administrator in the same settlement in which

Ms. Ellis served as Special Master. Thus, EAG is uniquely situated to assist proposed Special

Master Randi S. Ellis in her task of creating and implementing an allocation model for settlement

awards. See Exhibit 2 Affidavit of Randi S. Ellis. Accordingly, Plaintiffs request the Court enter

an order appointing EAG as Claims Administrator.

Simultaneous to filing this Motion to Appoint, Plaintiffs have moved the Court for

Preliminary Approval of the Settlement Agreement. Plaintiffs are filing this Motion in anticipation

that this Court will grant preliminary approval of the Settlement Agreement. Approving the

Special Master and Claims Administrator will allow them to begin allocation and administrative

procedures immediately, and thus will expedite disbursement of settlement funds. As per the

Settlement Agreement, the Special Master and Claims Administrator will be paid from the

settlement fund per Orders of this Court.

CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court appoint Randi S.

Ellis as the Special Master and Eisner Advisory Group LLC as Claims Administrator to aid in the

execution of the settlement pursuant to the Settlement Agreement and enter an order in the form

submitted herewith.

Dated this 6th day of January, 2025.

Respectfully submitted,

John Randall Whaley La Bar Roll No. 25930

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6700 Jefferson Highway, Bld. 12, Suite A

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MURRAY LAW FIRM

Stephen B. Murray, Sr. (No. 9858) Stephen B. Murray, Jr. (No. 23877) Arthur M. Murray (No. 27694) Ruston Pritchard (No. 38379) 650 Poydras Street, Suite 2150 New Orleans, LA 70130 Telephone: (504) 525-8100

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LAW OFFICES OF KENNETH W. DEJEAN Kenneth W. DeJean La. Bar Roll No. 04817 Post Office Box 4325 Lafayette, LA 70502 Telephone: (337) 235-5294 kwdejean@kwdejean.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been forwarded to all counsel of record by E-mail on this Land day of Janay, 2025.

JOHN RANDALL WHALEY

16^{TH} JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. MARTIN STATE OF LOUISIANA

NO. 081835 DIVISION "A"

JOSEPH HARVEY GAUTREAUX, INDIVIDUALLY AND ON BEHALF OF OTHERS SIMILARLY SITUATED

VERSUS

LOUISIANA FARM BUREAU CASUALTY INSURANCE COMPANY

FILED:		
	DEPUTY CLERK	

ORDER APPOINTING RANDI S. ELLIS AS SPECIAL MASTER AND EISNER ADVISORY GROUP LLC AS CLAIMS ADMINISTRATOR

Plaintiffs, Joseph Harvey Gautreaux, Wilfred Meaux, Jr., Carolyn Susie Lagneaux and Yvette Beauchamp, (collectively "Plaintiffs") individually and on behalf of the Class (defined in the "Settlement Agreement") have entered into a Settlement Agreement (the "Settlement Agreement") with Defendant, Louisiana Farm Bureau Casualty Insurance Company ("Louisiana Farm Bureau" or "Defendant") to resolve all claims asserted and all claims that could have been asserted in the Action, as defined in the Settlement Agreement. Under the provisions of the Settlement Agreement, Plaintiffs have agreed to seek the approval of this Court to appoint a Special Master and Claims Administrator to perform certain functions related to the administration and implementation of the Settlement Agreement. Plaintiffs submit that Randi S. Ellis is well-qualified to perform these, and other functions discussed in the Unopposed Motion to Appoint Special Master and Claims Administrator, and supported by an Affidavit and CV from Randi S. Ellis attached thereto. Plaintiffs also submit that Eisner Advisory Group LLC ("EAG" or "EisnerAmper") has significant claims administration experience and is well-qualified to assist Randi S. Ellis, as supported by the "EisnerAmper Firm Information and Qualifications" document attached thereto.

Defendant, Louisiana Farm Bureau, does not oppose Plaintiffs' request. The Court hereby orders that the Unopposed Motion to Appoint Settlement Master is **GRANTED.** Randi S. Ellis is

hereby appointed as the Special Master and Eisner Advisory Group LLC is appointed as the Claims Administrator for the administration of the settlement reached between Plaintiffs and Louisiana Farm Bureau.

JUDGE ANTHONY THIBODEAUX DISTRICT JUDGE 16TH JUDICIAL DISTRICT COURT

Randi S. Ellis Randi S. Ellis, LLC 5757 Indian Circle Houston, Texas 77057

randi@randiellis.com

(225) 803-1413

Randi holds both a bachelor's degree in arts and sciences (1994) and a law degree (1997) from Louisiana State University. She completed the Harvard Law School Program on Negotiation. Before going into private practice, Randi clerked for the Honorable Christine Noland of the U.S. District Court for the Middle District of Louisiana and for the Honorable William Morvant of the Nineteenth Judicial District Court of Louisiana. She also served as an attorney for the Louisiana Legislature Civil Law Committee. Randi worked in private practice for over 12 years before opening her own firm in 2016.

Arbiter, Future Claims Representative, Mediation, Special Master and Trustee

- Appointed by many Courts and selected by the parties to serve as Special Master, Settlement Master, Arbitrator, Neutral, Facilitator, Guardian ad Litem, and Mediator in Multidistrict Litigation, federal, and state cases throughout the United States
- Appointed Future Claims Representative for In re: LTL Management LLC, Case Nos.: 21-30589 and 23-12825, In re: Red River Talc LLC, Case No. 24-90505, and In re: Kidde-Fenwal, Inc., Case No. 23-10638
- Appointed Trustee for the trusts created for the MDL Contingency Fee Fund and Common Benefit Fund for *In re: National Prescription Opiate Litigation, MDL No. 3004* (N.D. Oh. J.P.M.L)
- Served as Special Master in matters involving:
 - Allocating settlement funds to class and mass action claimants (including development and implementation of methodology)
 - o Report and Recommendations to the Court on various assignments
 - o Final and non-appealable rulings on matters agreed to by the parties
 - Case management from the beginning of the matter through the end or single issue for resolution
 - o Pretrial discovery, including resolution of privilege issues
 - Reviewing reasonableness of attorneys' fees and expenses (including resolution of Common Benefit Fund issues)
 - o Pharmaceutical drugs and devices, personal injury, physical, mental, or sexual abuse, and property damage class and mass actions
- Appointed to serve as attorney chair for medical malpractice cases by plaintiffs and defendants (presided over more than 250 cases)

Professional Licenses

Admitted to Bar: Louisiana, 1997; Texas, 2021

Harvard Law School Program on Negotiation

EXHIBIT

Randi S. Ellis's Future Claims Representative, Special Master, Mediation, and Settlement Allocation Assignments

Future Claims Representative

- In re: Red River Talc LLC, Case No. 24-90505, United States Bankruptcy Court, Southern District of Texas, Houston Division, Court-Appointed to serve as Future Talc Claims Representative to represent the interests of, appear and act on behalf of, and be a fiduciary to Future Talc Claimants to protect their rights and interests
- In re: Kidde-Fenwal, Inc., Case No. 23-10638, United States Bankruptcy Court, District of Delaware, Court-Appointed and agreed to by all parties to serve as Future Talc Claims Representative to represent the interests of, appear and act on behalf of, and be a fiduciary to future tort claimants
- In re: LTL Management LLC, Case Nos.: 21-30589 and 23-12825, United States Bankruptcy Court, District of New Jersey. Court-Appointed and agreed to by all parties to serve as Future Talc Claims Representative to represent the interests of, appear and act on behalf of, and be a fiduciary to Future Talc Claimants to protect their rights and interests

Multidistrict Litigation

- In re: Recalled Abbott Infant Formula Products Liability Litigation, MDL no. 3037 (N.D. Ill. J.P.M.L.) Court-Appointed Settlement Master for mediation and allocation concerning products liability claims alleging injuries related to ingestion of contaminated infant formula
- In re: Acetaminophen ASD-ADHD Products Liability Litigation, MDL no. 3043 (S.D. NY) Court-Appointed Special Master to oversee census data and collection of claims information concerning products liability claims alleging ASD and ADHD as to children born after mother ingested acetaminophen during pregnancy
- In re: Paraquat Products Liability Litigation, MDL No. 3004 (S.D. Ill J.P.M.L.) Court-Appointed Special Master to establish discovery protocols and schedule, maintain a database for claims in the MDL and state courts, propose methodology for selection of trial cases, and establish a framework for submission of common benefit time and expenses pertaining to litigation concerning injuries caused by exposure to the herbicide paraquat
- In re: 3M Combat Arms Earplug Products Liability Litigation, MDL no. 2885 (N.D. Fl. J.P.M.L.) Court-Appointed Special Master for mediating settlement concerning the use of Combat Arms Version 2 earplugs

- In re: National Prescription Opiate Litigation, MDL No. 2804 (N.D. Oh. J.P.M.L.) Court-Appointed arbiter to a Fee Panel to oversee a process for allocation and distribution of the MDL Contingency Fee Fund and the Common Benefit Fund consistent with the terms of the Settlement Agreements between certain parties for fees and expenses incurred in furtherance of the opioid litigation, and serve as Trustee to the Trust created for this Fund
- In re: Roundup Products Liability Litigation, MDL No. 2741 (N.D. Ca. J.P.M.L.) Special Master selected by the parties for allocation concerning products liability claims alleging Non-Hodgkin Lymphoma after exposure to glyphosate-based herbicides
- In re: Testosterone Replacement Therapy Litigation, MDL No. 2545 (N.D. Ill. J.P.M.L.) Court-Appointed Settlement Master for mediation and allocation concerning products liability claims alleging arterial cardiovascular injuries or injuries related to blood clots in the veins as a result of taking prescription testosterone replacement therapy drugs
- In re: Cook Medical, Inc., IVC Filters Marketing, Sales Practices and Products Liability Litigation, MDL No. 2570 (S.D. Id. J.P.M.L.) Special Master selected by the parties for allocation concerning products liability claims alleging injuries after IVC filter was placed in the inferior vena cava to catch blood clots
- In re: Sorin 3T Heater-Cooler System Products Liability Litigation, MDL 2816 (M.D. Pa. J.P.M.L.) Court-Appointed Settlement Master for allocation of personal injury claims alleging serious infections and deaths following invasive surgeries
- In re: Pradaxa (Dabigatran Etexilate) Products Liability Litigation, MDL No. 2385 (S.D. Ill. J.P.M.L.) Court-Appointed Special Master for mediation and allocation; allocated \$650 million settlement fund to claimants alleging injuries related to anticoagulant pharmaceutical use; mediated and allocated MDL Common Benefit Fees and Expenses; Mediator and allocated state court settlements for CT and CA
- In re: Coloplast Corp. Pelvic Support Systems Products Liability Litigation (Vaginal Mesh), MDL No. 2387 (S.D. W.Va. J.P.M.L.) Mediator concerning products liability claims arising out of vaginal mesh use; Court-Appointed Special Master to allocate aggregate settlement funds for claims against American Medical Services, Boston Scientific, CR Bard, Covidien, Ethicon, and Mentor
- In re: DePuy Orthopaedics Inc. ASR Hip Implant Products Liability Litigation, MDL 2197 (N.D. Oh. J.P.M.L.) Special Master selected by the parties for allocation concerning products liability claims alleging injuries after being implanted with ASR hip device
- In re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico, on April 20, 2010, MDL No. 2179 (E.D. La. J.P.M.L.) Court-Appointed Mediator for personal injury claims; appointed Court-Designated Neutral for resolution of various matters; developed

methodology for allocating \$2.3 billion settlement fund to thousands of Gulf of Mexico seafood harvesters who alleged economic damage as a result of the BP oil rig disaster

- In re: Yasmin and Yaz (Drosporenone) Marketing, Sales Practices and Products Litigation, MDL No. 2100 (S.D. Ill. J.P.M.L.) Court-Appointed Mediator and Special Master concerning products liability claims arising out of contraceptive use
- In re: Chinese-Manufactured Drywall Products Liability Litigation, MDL No. 2047 (E.D. La. J.P.M.L.) Court-Appointed Mediator; secured commitments from more than 600 defendants to global settlement; assisted Special Master with allocation responsibilities for \$1.1 billion in settlement for case in which homeowners alleged defendants were responsible for installation of defective drywall
- In re FEMA Trailer Formaldehyde Products Liability Litigation, MDL No. 1873 (E.D. La. J.P.M.L.) Deputy Special Master in federal Multidistrict Litigation case to allocate multiple settlement funds to several thousand claimants who alleged chemical exposure while occupying temporary housing after Hurricane Katrina
- In re Denture Products Liability Litigation, MDL No. 2051 (S.D. Fla. J.P.M.L.) selected by group of settling products liability plaintiffs to allocate aggregate settlement fund

Other Federal Court Litigation

- In re: Aearo Technologies LLC, et al., Case No. 22-02890 (S.D. In.) Court-Appointed Mediator for the Chapter 11 proceedings related to use of Combat Arms Version 2 earplugs and use of 3M respirators
- In re: Essure Birth Control Devise Products Liability Litigation, E.D. Pa. and Ca. state court, Special Master selected by the parties for allocation concerning side effects of coils causing women to experience complications after implantation the birth control device
- Mass Depakote Litigation, 12-cv-52, etc. (S.D. Ill.) Court-Appointed Mediator and Special Master for settlement and allocation of claims alleging birth defects arising out of pharmaceutical use
- Hale, et al. v. State Farm Mutual Automobile Insurance Company, et al., 3:12-cv-660 (S.D. Ill.) Court-Appointed Mediator in class action alleging violations of the Racketeer Influenced Corrupt Organizations Act ("RICO") and deprivation of an impartial forum
- Suchanek, et al. v. Strum Foods, Inc. et al., 3:11-cv-565 (S.D. Ill.) Court-Appointed Mediator to resolve and allocate attorney fee dispute in class action settlement alleging Page 4 of 7

consumer fraud and unjust enrichment

- Medtronic Infuse Litigation (multiple jurisdictions) Mediator for products liability claims arising out of bone graft product use; as well as Court-Appointed Special Master for allocation of aggregate settlement fund
- McClurg et al v. Mallinckrodt, Inc. et al., 4:12-cv-00361 (E.D. Mo.) Court-Appointed Mediator and Special Master for settlement and allocation for consolidated actions seeking damages for injuries allegedly sustained as a result of multiple decades of exposure to hazardous, toxic, and radioactive substances
- In re: Just For Men® Mass Tort Litigation, 3:16-cv-00638 (S.D. Ill.) Court-Appointed Mediator Facilitator and Special Master for settlement and allocation for mass action involving claimants alleging adverse reactions and personal injuries suffered from product use
- St. Jude Medical Spinal Cord Stimulator Products (multiple jurisdictions) Mediator and Allocation Neutral for claims arising out of the use of spinal cord stimulator systems
- In re: Swift Energy Company, et al., 13-05552 (E.D. La.) Mediator and Settlement Administrator for claims alleging property damage from oil release to oyster leases
- Avandia Deceptive Marketing Litigation (multiple jurisdictions) Mediator for products liability claims by certain attorneys general arising out of allegations of deceptive marketing of diabetes pharmaceutical
- Ian Pollard, et al. v. Remington Arms Co., et al., 4:13-00086 (W.D. Mo.) Mediator for products liability claims arising out of gun use
- Jeff Simmons, et al. v. Sabine River Authority of Louisiana, et al., 2:11-cv-00588 (W.D. La.) Special Master for allocation of class settlement funds to claimants who alleged that they had suffered flood damages due to the opening of a nearby dam
- John Burford, et al. v. Cargill, Inc., 05-0283 (W.D. La.) assisted Special Master to disburse nationwide class settlement funds to thousands of farmers in 47 states who used allegedly defective dairy feed product

State Court Litigation

• Risperdal and Invega Product Liability Cases (Pa. and Ca.) Mediator and Special Master for settlement and allocation of actions pending in state courts alleging personal injury arising out of pharmaceutical use

- Paul Thompson, et al. v. Williams Companies, Inc. and Bailey, et al v. Williams Olefins, LLC, et al., 72,701 (La. 18th J.D.C.) Mediator and Court Appointed Special Master for settlement and allocations for claims arising out of personal injuries from plant explosion
- Noretta Thomas, et al. v. A. Wilbert & Sons, L.L.C., et al., 55,127 (La. 18th J.D.C.) Special
 Master for allocation of class settlement funds to several thousands of residents of and
 visitors to trailer park in settlement with trailer park owner for ground water contamination
 claims; Court-Appointed Special Master to allocate attorneys' fees; Court-Appointed
 Special Master to allocate class settlement funds to several thousand landowners in
 settlement with chemical plant owner for chemical pollution claims
- Toussaint Battley, Sr., et al. v. Pointe Coupee Parish Police Jury, et al., 41,792 (La. 18th J.D.C.) Special Master for allocation of class settlement funds to property owners damaged by flood
- Carey C. Abbott, et al v. Waste Management, Inc., et al., 87,182 (La. 21st J.D.C.) Special Master for allocation of settlement funds to residents affected by environmental contamination
- Mark S. Creech, et al. v. Acadian Ambulance Service, Inc., 61,236 (La. 18th J.D.C.) Court-Appointed Special Master for allocation of settlement funds to insurance policyholders in class action requesting payment reimbursement
- Keisha Desselle, et al. v. Acadian Ambulance Service, Inc., 2010-5885 (La. 12th J.D.C.)
 Court-Appointed Special Master for allocation of settlement funds to insurance policyholders in class action requesting payment reimbursement
- Rita H. Holzenthal, et al. v. Sewerage & Water Board of New Orleans, 2001-16969 (La. C.D.C.) assisted Special Master to allocate settlement to persons allegedly affected by New Orleans Sewerage and Water Board project
- Kristen M. Rhodes v. BG Estate Servs., Inc., et al., 2001-18355 (La. C.D.C.) assisted Special Master to allocate class settlement funds to persons allegedly affected by mold exposure
- Arthur Schexnayder, Jr., et al. v. Entergy Louisiana, Inc., et al., 28,907 (La. 23rd J.D.C.) assisted Special Master to allocate of class settlement funds to property owners in more than 20 parishes against utility company for alleged trespass claims
- Ivan Guidry, et al. v. City of Denham Springs, 28,907 (La. 21st J.D.C.) assisted Court-Appointed Arbitrator to allocate settlement funds among claimants who were allegedly affected by wastewater contamination

• In re Honeywell, July 20, 2003, Chlorine Release, 511,626 (La. 19th J.D.C.) assisted Special Master to allocate class settlement funds to several thousand persons allegedly affected by two separate releases from chemical plant; assisted Special Master to allocate attorneys' fees

Mass Litigation for Abuse and Harm

- Jane Doe#1 & Jane Doe #2 v. MG Freesites, Ltd., et al. Case No.: 7:21-cv-00220 (N.D.A.L.) Mediator for class action arising out of claims related to child pornography
- Uvalde served as Special Master for allocations related to Robb Elementary School mass shooting wherein 19 children and 2 teachers suffered death, and many others suffered significant personal bodily injuries, physical impairment, and great physical and mental harm
- Kurn Hattin Homes for Children served as Special Master for settlement allocations for claims related to allegation of physical, emotional, and sexual abuse
- Jane Doe No. 1, et al. v. The Johns Hopkins Health System Corporation, d/b/a The Johns Hopkins Hospital, et al., 24-C-13-00141 (Md. Baltimore City Cir. Ct.) Mediator for claims arising out of physician misconduct

Additional case information and references are available.

16^{TR} JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. MARTIN STATE OF LOUISIANA

NO. 081835

DIVISION "A"

GAUTREAUX

VERSUS

LOUISIANA FARM BUREAU CASUALTY INSURANCE CO

AFFIDAVIT OF RANDI S. ELLIS

STATE OF LOUISIANA

to:

PARISH OF EAST BATON ROUGE

RANDI S. ELLIS, being duly sworn, deposes and says:

- 1. I am an attorney at law licensed to practice law in the State of Louisiana.
- 2. I was admitted to the Louisiana Bar in 1997. I am in good standing.
- I have a full-time neutral practice and I have been appointed by several Federal Courts in Multi-District Litigation, Class Actions, and Mass Torts.
- 4. Current and prior Special Master, Mediator, and Settlement Master appointments are attached hereto with my Curriculum Vitae.
 - 5. I have reviewed certain pleadings and preliminary data concerning this class action;
- 6. If appointed by this Court to serve as Special Master, I will endeavor to devise an allocation plan that is fair, reasonable, and appropriate for the circumstances of this case. At all times I will be mindful of the costs and time necessary to efficiently resolve all matters.
 - 7. For consideration in developing a settlement award allocation methodology, I plan

EXHIBIT

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Page 1 of 2

Collect and review data from the WorkCenter Total Loss (WCTL) product utilized by Louisiana Farm Bureau to determine values and consider relevant data regarding negative or other condition adjustments for each total loss vehicle (TLV):

Collect and review data from the National Automobile Dealers Association (NADA) online interface for each total loss vehicle including its Clean Retail Base value, mileage adjustments, and applicable options adjustments;

Compare WCTL values to NADA values to calculate a monetary damage amount for each TLV;

Create base awards for claims with potential penalties (independent of monetary damages);

Create an allocation model based on a points system and award certain points for base awards and additional points for monetary damages, thereafter, converting points to dollars for settlement awards based on a pro rata apportionment; and

If necessary, outline and oversee objection and appeal processes. As needed, create a reserve with certain funds set aside to account for potential errors and omissions.

8. I am familiar with the issues involved in this case captioned above and as a result of my knowledge, I can attest and affirm that there are no grounds for disqualification that would prevent me from serving as a Special Master. I will use the information and my experience in performing my duties as Special Master.

Sworn to and subscribed Before me, Notary Public,

This \ day of January 2025.

NOTARY PURITY

RANDI S. ELLIS

Brandon A. Lagarde
Notary Public
Parish of Ascension
State of Louisiana
My Commission is for Life
LA Bar Roll No. 29302



(Effective May 21, 2023, Postlethwaite & Netterville has joined EisnerAmper)

EisnerAmper Firm Information and Qualifications

January 06, 2025



EXHIBIT 3







Since 1949, Postlethwaite & Netterville ("P&N") has proudly served its clients around the country. On May 21, 2023 P&N announced its combination with EisnerAmper, one of the Top 20 largest accounting and business advisory firms in the United States. Our team is pleased to continue providing our same level of exceptional quality and client service with our new combined firm of 4,000 experienced individuals ready to serve you and with the trusted name, EisnerAmper.

EisnerAmper (the "Firm" or "the EisnerAmper Team" when we refer to our prior experience as P&N) provides traditional accounting and tax services as well as innovative technology and advisory assistance. EisnerAmper offers technical experience and diverse resources that are unique to the settlement administration space.

Experience

Since 1999, the EisnerAmper Team has successfully administered numerous class action, mass tort and mass arbitration settlements in state court and federal court (including multidistrict litigation). Our team has processed and reviewed claims and managed distributions for settlements involving billions of dollars in settlement funds.

Breadth, Depth and Flexibility of Resources

Our approach to settlement administration provides a dedicated core team that is able to draw upon numerous specialized resources across diverse service areas within our firm of over 4,000 employees as needs arise. We leverage the knowledge and experience of professionals holding the following designations, among others:

DESIGNATIONS	
Juris Doctor (JD)	Certified Fraud Examiner (CFE)
Project Management Professional (PMP)	Certified in Financial Forensics (CFF)
Certified Public Accountant (CPA)	Certified Information Systems Security Professional (CISSP)
Certified Internal Auditor (CIA)	Certified Security Engineer (CSE)
Certified Information Systems Auditor (CISA)	Certified Information Security Manager
Certified in Risk and Infor	mation Systems Control

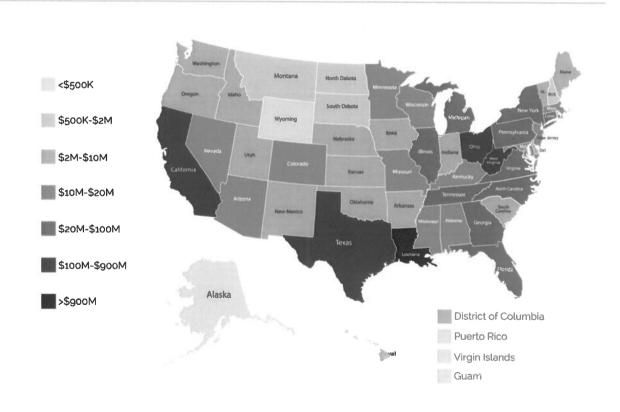


Capabilities and Experience Rooted in Quality and Objectivity

As an accounting and business advisory firm, objectivity, integrity and quality have been the cornerstones of our sustained success. These principles drive our work product, our decision-making, and our interactions with clients and team members. Our teams are well-versed in the development of and adherence to stringent quality assurance and quality control standards across a variety of disciplines.

The EisnerAmper Team has processed greater than \$14 billion¹ in claims, nationwide. Whether processing billions of dollars in complex claims for *In Re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico* or millions of class action claims across numerous settlement programs, EisnerAmper applies stringent quality assurance and quality control standards.

Claims Processed Nationwide²



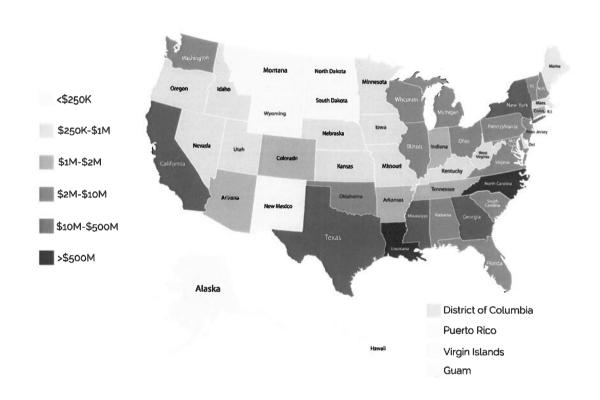
¹ Includes claims from *In re*: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico.

² Deepwater Horizon claims figures by state are not publicly available and not included in the map.



The EisnerAmper Team has disbursed billions in funds over the course of our administration projects. These distributions have occurred nationwide across mass tort, class action, mass arbitration, and disaster recovery projects, varying in size and scope. Whether working with over 100 law firms to allocate funds for thousands of claimants for *In Re: Testosterone Replacement Therapy Products Liability Litigation* or distributing \$467 million across 186,000+ awards for North Carolina – Housing Opportunities and Prevention of Eviction, we have done so with the highest level of quality.

Funds Disbursed Nationwide:





NOTABLE CLAIMS ADMINISTRATION EXPERIENCE

The cornerstones of EisnerAmper's success as a firm translate well to the administration of large settlement programs, and our quality of work is particularly apparent in matters involving complex claims. The EisnerAmper Team has significant experience in complex settlement matters, including:

IN RE: AQUEOUS FILM-FORMING FOAM PRODUCT LIABILITY LITIGATION (MDL 2873)

Nature of Work: EisnerAmper serves as the Claims Administrator for four settlements totaling over \$14 billion to resolve Public Water Systems' claims relating to PFAS contamination. EisnerAmper is performs intake, review, analysis, and approval of these complex claims. EisnerAmper is also responsible for allocating and distributing Settlement Funds fairly and equitably among all Qualifying Class Members pursuant to the Court-approved allocation procedures.

IN RE: OIL SPILL BY THE OIL RIG "DEEPWATER HORIZON" IN THE GULF OF MEXICO (MDL 2179)

Nature of Work: The EisnerAmper Team was approved by the United States District Court for the Eastern District of Louisiana to process business economic loss and seafood harvester claims within the Deepwater Horizon Economic and Property Damages Settlement. The EisnerAmper Team participated in determining over \$1 billion in eligible claims within the first six months of the program and approximately \$10 billion to date. The EisnerAmper Team committed a significant multi-city team of 400+ accounting and finance professionals to the ongoing effort, providing claim eligibility review, economic damages calculations, and claimant communications for over 100,000 businesses and seafood harvesters with representation from 2,000+ law and accounting firms.



IN RE: E.I. DU PONT DE NEMOURS AND COMPANY C8 PERSONAL INJURY LITIGATION (MDL 2433)

Nature of Work: The EisnerAmper Team developed a secure, customized, web-based database application that served as the framework for claim filing and document management efforts for approximately 3,700 personal injury claims. In cooperation with the Special Master, Daniel J. Balhoff, the EisnerAmper Team's also provided project management services to facilitate the logistics of the claims process life cycle. Our claims database technology also served as both the central repository for claims determinations and allocation reporting to the Plaintiff Steering Committee and Lien Resolution Administrator.

IN RE: PARAQUAT PRODUCTS LIABILITY LITIGATION (MDL 3004)

Nature of Work: On October 27, 2021, the Court appointed the EisnerAmper Team to serve as the administrator of the online platform for the exchange and management of the data submitted with respect to the Plaintiff Assessment Questionnaire ("PAQ"). The parties were directed to utilize the EisnerAmper Team's online portal, available at www.paraquatmdlportal.com, to fulfill Plaintiffs' discovery obligations. The EisnerAmper Team provides ongoing administration and maintenance of the portal and database(s), works with the parties to compile all necessary data, and develops customized reporting available directly through the portal as well as ad hoc reports as requested by the Special Master, the parties, and the Court.

IN RE: CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION (MDL 1917)

Nature of Work: In cooperation with our project partner, The Notice Company, Inc., the EisnerAmper Team performs claims administration services for indirect purchaser class action settlements in this multidistrict litigation totaling over \$547,750,000 to date. The scope of the EisnerAmper Team's services includes (1) custom website and database application development and maintenance, (2) claim data acquisition and management, (3) claims processing and validation, (4) claims deficiency and audit processing, (5) quality control and fraud, waste, and abuse monitoring, (6) custom reporting, (7) call center support and claimant communications, (8) claim allocation determination and distribution, and (9) project management services.



IN RE: TESTOSTERONE REPLACEMENT THERAPY PRODUCTS LIABILITY LITIGATION (MDL 2545)

Nature of Work: The EisnerAmper Team provides claims administration services related to custom technology development, project management, and attorney communications support. In coordination with the Court-appointed Special Master, Randi S. Ellis, the EisnerAmper Team has developed secure, customized, web-based technology applications that are the framework for claim filing and document management efforts for over 130 participating law firms. Our claims platform also serves as both the central repository for personal injury claims adjudication and allocation functions of the Special Master.

IN RE: FEMA TRAILER FORMALDEHYDE PRODUCTS LIABILITY LITIGATION (MDL 1873)

Nature of Work: The EisnerAmper Team provided full-scale notice and claims administration services for this multi-settlement MDL involving over \$45,000,000 in settlement funds. The scope of the EisnerAmper Team's services includes (1) notice administration, (2) custom website and database application development and maintenance, (3) claim data acquisition and management, (4) claims processing and deficiency curing, (5) call center support and claimant communications, (6) claim allocation determination and distribution, and (7) quality control and project management services.

IN RE: ROUNDUP PRODUCTS LIABILITY LITIGATION (MDL 2741)

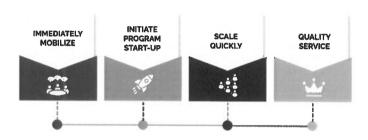
Nature of Work: On October 18, 2021, the Court appointed the EisnerAmper Team as the Fund Administrator for the Roundup Common Benefit Trust Account with authority to conduct any and all activities necessary to administer the Fund, in accordance with the Motion to Establish Roundup Common Benefit Trust Account and to Appoint Fund Administrator, filed September, 2, 2021.



OTHER SIGNIFICANT ADMINISTRATION PROGRAMS

Providing quality service has been a cornerstone of our firm since its foundation. The EisnerAmper Team has helped courts, governmental agencies, municipalities, non-profit organizations, and businesses administer large programs. EisnerAmper's success in delivering large programs is rooted in our proven ability to immediately mobilize, initiate program start-up, scale quickly, and provide quality service.

The EisnerAmper Team has provided management and oversight of large programs by carefully navigating federal and state regulatory requirements, program compliance requirements, vendor management, and resource availability, while working



to fulfill the mission of the program. The EisnerAmper Team has worked on numerous large programs, including recovery efforts to many of the largest declared disasters in recent history and at least two unprecedented disasters – the BP Oil Spill Recovery and the COVID-19 Pandemic Recovery and many others, including:

- IIJA Infrastructure Investment and Jobs Act (2021 current)
- ARPA American Rescue Plan Act Programs (2021 current) Emergency Rental,
 Homeowners Assistance, Capital Projects Fund, State & Local Fiscal Recovery
- Hurricanes Ida (2021), Laura (2020), Florence (2018), Harvey (2017), Irma (2017), Matthew (2016), Isaac (2012), Gustav (2008), Rita (2005), and Katrina (2005)
- Coronavirus Aid, Relief, and. Economic Security Act (2020- 2021)
- State of Louisiana, HUD Community Development Block Grant (2017 current)
- Louisiana Main Street Recovery COVID-19 Small Business Program (2020)
- Historic Louisiana Floods (2016)
- Deepwater Horizon "BP" Oil Spill (2010)
- Numerous class action, mass tort, and mass arbitration settlements and legal notice programs

Our innovative approach to managing programs includes creating large program management plans from the ground up and software customization that integrates applicant/claimant communication and serves as a central repository of documentation, eligibility review, applicant outreach and education, duplication of benefit review, eligibility quality control, grant award determination, appeals, anti-fraud, waste, and abuse, change management and communications, payment information, and data analytics and reporting.



Representative Large Program Experience

Louisiana Office of Community Development – Restore Louisiana Homeowner Assistance Program

The Department of Housing and Urban Development (HUD) allocated funding to assist in Louisiana's long-term recovery from the severe flooding that occurred throughout much of the state in March and August of 2016.

The EisnerAmper Team is responsible for performing a quality control review of all award calculations and payments requests, as well as



requesting funds from Louisiana's Office of Community Development (OCD) and subsequently disbursing those funds to applicants. Prior to issuance of payments, the EisnerAmper Team utilizes the HUD-established award calculation formula and supporting documentation to review and confirm calculated awards and payment requests. Since it is a HUD-funded Program, it is vital all funds are accounted for and disbursed appropriately. The EisnerAmper Team has successfully completed a reconciliation of OCD Disbursed Funds to Program Disbursements, as well as OCD and Escrow bank reconciliations, for every month by the OCD determined deadline. Program funds received from OCD for all solutions total over \$667M, with escrow totaling over \$4M. Total checks disbursed are over 42,000.

Louisiana Department of Treasury - Louisiana Main Street Recovery Program (MSRP)



The EisnerAmper Team was engaged with the Louisiana Department of Treasury to serve as the program administrator for the Louisiana Main Street Recovery Program (MSRP), through which approximately \$262 million was distributed to Louisiana small businesses for eligible expenses related to the COVID-19 pandemic. The program was administered by

the Louisiana Department of Treasury, John M. Schroeder, State Treasurer. The EisnerAmper Team



established a recovery office for the Program and began public outreach in July 2020.

The EisnerAmper Team's scope of work on the Main Street Recovery Program included software customization that integrated applicant communications and served as a central repository of

documentation, eligibility review, applicant outreach and education, duplication of benefit review,



eligibility quality control, grant award determination, appeals, anti-fraud, waste, and abuse, change management and communications, and data analytics and reporting.

Within 5 months, the Program had processed over 34,000 applications and awarded/paid \$262 million to small businesses affected by COVID-19. Reporting metrics were critical the program's success, exceeding the goals of the program, and provided transparency to the public.

Emergency Rental Assistance Programs (ERAP)

The EisnerAmper Team has served five Emergency Rental Programs across the country. Representative program summaries are included below.

Fulton County, GA



The EisnerAmper Team is currently engaged with Fulton County, GA to serve as the program administrator for the Emergency Rental Assistance Program (ERAP), through which approximately \$18 million has been distributed to Fulton County residents for rental assistance to households impacted by the COVID-19 pandemic. As of August, 2021, the Program has adjudicated over 1,250 applications and have more than 1,100 more in process.



Key Program Insights:

- Expanded existing program infrastructure by onboarding approximately 90 team members to augment eligibility processes
- ✓ Utilize best practices and program experience to work alongside client to determine program goals, develop strategies and processes to achieve results, and execute and monitor outcomes
- ✓ Provide comprehensive Program Management services that expand and contract quickly as client needs evolve
- ✓ Deliver data driven strategies, enabled by KPI determination, implementation, and reporting



Louisiana Housing Corporation

The EisnerAmper Team is currently engaged as a subcontractor with CSRS Inc. to provide professional consulting services to the Louisiana



Housing Corporation to manage the state-wide Emergency Rental Assistance Program. The EisnerAmper Team is leading the design and execution of the financial management function of the program, including disbursing funds to applicants, bank reconciliations, and reporting. The EisnerAmper Team's implementation of strategic distribution of funds is focused on quality, transparency, and efficiency. Additionally, the EisnerAmper Team is supporting the design and implementation of the applicant management system, anti-fraud waste and abuse, compliance monitoring, policy and the call center facility.

The financial management function is responsible for the management and accounting of applicant funds and applicant disbursements. The EisnerAmper Team is developing policies, procedures and guidelines that are aligned with the grant agreements, state and local requirements, and the Uniform Guidance. The financial management team provides critical feedback by identifying areas of risk that have led to process change and quality control. The team provides a limited quality review that assists the Program in ensuring applicants are awarded correctly according to policies and applicable regulations.

Fort Bend County Rental, Mortgage, and Utility Assistance Program

The EisnerAmper Team is currently engaged with MPACT Strategic Consulting, LLC to assist in providing professional consulting services for COVID-19 emergency management and grant management services to Fort Bend County, Texas. As a subcontractor, the EisnerAmper Team assists in performing QA/QC reviews of payments to vendors from the CARES Act funding through the Fort Bend County Rental, Mortgage and Utility Assistance Program (RMU Program). Fort Bend County approved \$19.5 million in funding from the CARES Act to support residents in paying their rent or mortgage from June 2020 through December 2020. An additional \$2 million was allocated by the county for utility assistance for residents. Further, approximately \$27 million was allocated to Fort Bend County for rental and utility assistance through the Emergency Rental Assistance Program, which is expected to continue through December 31, 2021.

As part of the QA/QC review, the EisnerAmper Team is responsible for reviewing invoice transmittals prior to payment for compliance with program regulations. In addition, the EisnerAmper Team developed and assists with a process to help identify and mitigate the



occurrence of duplicate payments and overpayments. To date, the EisnerAmper team has performed QA/QC reviews for more than 50,000 invoice transmittals pending payment.

North Carolina – Housing Opportunities and Prevention of Eviction



The EisnerAmper Financial Management and Disbursements Team is currently engaged with the North Carolina Office of Recovery and Resilience to serve as the funds disbursement

manager for the Housing Opportunities and Prevention Eviction Program - Emergency Rental Assistance Program (ERAP). To date, approximately **\$467 million has been distributed through 186,000+ awards** to applicants for rental assistance to households impacted by the COVID-19 pandemic.

Quality Standards

As a top 20 U.S. accounting and business advisory firm out of over 40,000 firms across the country, EisnerAmper offers a deep bench of experienced accountants, financial analysts, project managers, grant managers, disaster recovery specialists, consultants, and other team members, including Certified Public Accountants (CPA), Juris Doctors (JD), Certified Internal Auditors (CIA), Certified Fraud Examiners (CFE), Project Management Professionals (PMP), AICPA Advanced Single Audit Certificate, and other credentialed personnel who have earned advanced training and ongoing education and adhere to the highest levels of confidentiality and professional standards.

Additionally, the Firm's quality controls contain the highest professional standards and meet the requirements of the practice sections of the AICPA Division for Firms, including:

- Ethical and technical standards of the relevant professional associations and quality centers, state boards of accountancy, U.S. Government agencies and other regulatory agencies;
- Human resource provisions that establish criteria for hiring quality personnel and providing continuing education for the development of competencies of all of our employees; and
- Internal monitoring aimed at the quality of engagement performance with respect to ongoing adherence to professional standards.



INFORMATION SECURITY PROCESSES AND QUALIFICATIONS

Confidentiality is a hallmark of our profession, and it is of the utmost importance to our client relationships. At EisnerAmper, we are committed to keeping client data secure, which is why we have designed engagement tools and policies to help ensure information security and privacy.

EisnerAmper employs professionals that maintain numerous information technology and data security certifications as well as a Service Organization Control (SOC) services team that has substantial experience in performing SOC engagements for service organizations in a variety of industries. Our SOC services team includes personnel with specialized internal control training and backgrounds. Our professionals have completed the AICPA's SOC School and hold relevant industry certifications. Our professionals help ensure that service organizations receive the highest level of assurance over the effectiveness of their internal controls.

EisnerAmper Team Experience & Qualifications

EisnerAmper professionals maintain the following certifications related to information technology, data security, internal controls, and compliance:

CISA (Certified Information Systems Auditor)	CIA (Certified Internal Auditor)
CISSP (Certified Info Systems Security Professional)	CITP (Certified Information Technology Professional)
CIPP/US (Certified Information Privacy Professional/United States)	CRISC (Certified in Risk & Information Systems Control)
CIPM (Certified Information Privacy Manager)	Certified HITRUST Practitioner
JNCIS (Juniper Networks Cert. Internet Specialist)	VCP5 (VMware Certified Professional v5)
RSA/CSE (Certified Security Engineer)	VCP6 (VMware Certified Professional v6)
Checkpoint Certified Security Admin	MCITP (Microsoft Certified IT Professional)
MCITP & MCSE - Messaging	MCSE (Microsoft Certified System Engineer)
CCSP (Cisco Certified Security Professional)	CCVP (Cisco Certified Voice Professional)



CCNA (Cisco Certified Network Associate)	CCNP (Cisco Certified Network Professional)
JNCIA (Juniper Networks Certified Associate)	CCDA (Cisco Certified Design Associate)
MCNE (Master Certified Novell Engineer)	BCFP (Brocade Fiber Channel Professional)
BCSD (Brocade Certified SAN Designer)	EnCE (Encase Certified Forensic Examiner)
DOSD (Dell On Site Diagnostics)	AccessData Certified Forensic Examiner

Our security processes follow industry accepted standards such as NIST, HITRUST, CIS Controls; any required elements from regulatory bodies/legislation such as AICPA, HIPAA, HITECH, FFIEC, CUNA, various state requirements; and vendor best practices (i.e. Microsoft, Cisco, VMWare, etc.) We apply the same requirements delivered through our client engagements to our internal processes. Our work product for client engagements have been reviewed, tested, and ultimately accepted by regulatory bodies and government entities such as OCR, FFIEC, and CUNA.

The EisnerAmper Team served as an expert in an Office for Civil Rights (OCR) investigation for a HIPAA breach at a large, national covered entity. OCR recognized the EisnerAmper Team as "HIPAA Experts" in their final report.

General Security Protocols

Eisner Advisory Group LLC, EisnerAmper LLP and all applicable subsidiaries maintain their network environment with a managed data center provider with locations exclusively in the U.S. The environment is protected at the perimeter with next-generation firewalls, DMZ, and 24/7 Intrusion Detection & Prevention services. On the interior, activities are monitored with Web Application Firewalls, inbound/outbound Internet and Email filtering, Data Loss Prevention, and Endpoint Detection & Response systems on every endpoint and server. System patching and vulnerability remediation are fully automated. All internal data is encrypted using TLS 1.3 in transit, and AES256 or higher at rest. EisnerAmper employees receive mandatory Information Security and Social Engineering training on an annual basis.

Two-Factor Authentication

Our proprietary claims management database application utilizes two-factor authentication provided by Duo Security (https://duo.com) for all system users. As described by Duo, "two-factor authentication adds a second layer of security to your online accounts. Verifying your identity using a second factor (like your mobile phone or other mobile device) prevents anyone but you from logging in, even if they know your password."





Mass Data Transmission Through Secure Web Portal

In our efforts to use technology to make our client relationships more effective and efficient, EisnerAmper can establish a secure web portal for data transfer on an as-needed basis. Simply put, a secure web portal is a password protected area on our servers that allows users to securely transfer and retrieve information. When transferring a large volume of documents, using a secure web portal is a more efficient practice than traditional methods.

Limited Access to Information

EisnerAmper makes every reasonable effort to limit access to the minimum necessary to accomplish the intended purpose of the use, disclosure, or request of information resources.

Employee Security Protocols Training and Testing

All firm employees are required to complete annual security awareness training. This is a web-based interactive training using common traps, live demonstration videos, short tests and the new scenario-based Danger Zone exercises. The training specializes in making sure employees understand the importance of protecting information like PII and mechanisms of spam, phishing, spear phishing, malware, ransomware and social engineering, and are able to apply this knowledge in their day-to-day jobs.



QUALITY CONTROL

Our claims administration teams include professionals trained and certified in, among others, the following areas: project management (PMP), accounting (CPA), internal controls and risk (CIA), information systems controls (CISA), fraud examination (CFE), information systems security (CISSP), and legal analysis (JD).

Our project initiation phase includes an identification of critical focus areas and implementation of a plan that covers the following key components of quality control in the context of claims administration service delivery.

Resource Consistency & Training: Because we maintain a large, diverse professional workforce, our team is scalable without the need for temporary employees for every major project. This organic scalability is important in terms of retained process knowledge as well as consistency of execution and deliverables.

Data Validation: EisnerAmper implements proactive data validation measures into our online claims platform to minimize claim deficiencies, duplication, and anomalies that require dedication of resources and expenses throughout the claims process.

Segregation of Duties: Segregation of duties is important for risk mitigation and internal control – particularly in the accounting function for large fund projects. The diversity and scalability of our workforce would allow each high-risk component of the claims life cycle to be performed by a team member that specializes in the relevant professional area (rather than a single project manager or assigned resource).

Technology & Software Analysis Tools: EisnerAmper utilizes various software tools to assist in the execution of quality control procedures and identification of suspicious activity. Our systems include "fuzzy" matching logic which allows us to detect and address duplicate claim submissions. We also maintain service subscriptions for technology programs that allow us to research potential fraudulent claim submissions and enables us to report our findings to the parties and Court as appropriate.

Internal Controls: For high-risk projects and data sets, our team is able to utilize our Certified Internal Audit (CIA) and other control and risk advisory professionals to design data management and processing protocols that ensure proper internal controls are established.



EXHIBIT A: ABOUT EISNERAMPER

EisnerAmper, one of the largest business consulting firms in the world, is comprised of EisnerAmper LLP, a licensed independent CPA firm that provides client attest services founded in 1963; and Eisner Advisory Group LLC, an alternative practice structure that provides business advisory and non-attest services in accordance with all applicable laws, regulations, standards, and codes of conduct. Settlement administration services will be provided by EAG Gulf Coast LLC, a subsidiary of Eisner Advisory Group, which includes the recent combination with Postlethwaite & Netterville, APAC.

Our clients are in all business sectors and leverage a complete menu of service offerings, including advisory, accounting, tax, and outsourcing.

Our professionals are passionate about helping clients grow and offering them tailored services every step of the way to help them reach their goals. Our firm structure allows us to provide the flexibility and personalized approach of a small firm, together with the wide variety of resources, leading-edge technology and integrated expertise of a multinational firm.





For six consecutive years, the Firm has received the **Best of Accounting** award from ClearlyRated for excellence in client service. The Best of Accounting designation is the only award program that recognizes service excellence for accounting firms based on ratings provided exclusively by clients.



Our History

P&N was founded in 1949 by Alexander Postlethwaite. Through its 74 years of service to Louisiana, P&N's clients grew and our firm and the professional services we offer expanded. P&N was the largest Louisiana-based accounting and business consulting firm and one of the top firms in the Gulf Coast region. P&N was the only firm in Louisiana to be consistently named one of the top 70 firms in the United States. On May 21, 2023, P&N joined EisnerAmper.





Class & Mass Action Settlement Administration

Our Approach

EisnerAmper provides pre-settlement consulting and post-settlement administration services in connection with lawsuits pending in state and federal courts nationwide. Since 1999, EisnerAmper professionals have processed more than \$14 billion dollars in settlement claims. Our innovative team successfully administers a wide variety of settlements, and our industry-leading technology enables us to develop customizable administration solutions for class and mass action litigations.

EisnerAmper
professionals have
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settlement claims.

Sample Case Experience*



Environmental/Toxic Torts

- In re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico (MDL 2179)
- Aqueous Film-Forming Foam (AFFF) Product Liability Litigation (MDL 2873) - Public Water System Settlement
- In re: FEMA Trailer Formaldehyde Products Liability Litigation (MDL 1873)
- Sanchez et al v. Texas Brine, LLC et al.
- Burmaster et al. v. Plaquemines Parish Government, et al.
- Cajuns for Clean Water, LLC et al. v. Cecilia Water Corporation, et al.
- Cooper, et al. v. Louisiana Department of Public Works
- Maturin v. Bayou Teche Water Works
- Chevron Richmond Refinery Fire Settlement
- · Chapman et al. v. voestalpine Texas LLC, et al.



Consumer

- Jones et al. v. Monsanto Co.
- Hadley, et al. v. Kellogg Sales Co.
- McMorrow, et al. v. Mondelez International, Inc
- Krommenhock, et al. v. Post Foods, LLC
- Hanson v. Welch Foods Inc.
- Siddle et al. v. The Duracell Co. et al.
- Copley, et al. v. Bactolac Pharmaceutical, Inc.
- Hughes et al. v. AutoZone Parts Inc. et al.
- Winters v. Two Towns Ciderhouse, Inc.
- · Burford et al. v. Cargill, Incorporated
- Fabricant v. AmeriSave Mortgage Corp. (TCPA)
- Makaron v. Enagic USA, Inc. (TCPA)
- Prescod et al. v. Celsius Holdings, Inc.
- · Gilmore v. Monsanto Co.



Antitrust

- In re: Cathode Ray Tube (CRT) Antitrust Litigation (MDL 1917)⁴
- In re: Interior Molded Doors Antitrust Litigation (Indirect)



Mass Torts

- In re: E.I. du Pont de Nemours and Company 68- Personal Injury Litigation (MDL 2433)¹
- In re: Testosterone Replacement Therapy Products Liability Litigation (MDL 2545)¹
- In re: Paraquat Products Liability Litigation (MDL 3004)¹
- In re: Paragard Products Liability Litigation (MDL 2974)
- In re: Roundup Products Liability Litigation (MDL 2741)²
- Proton-Pump Inhibitor Products Liability Litigation (MDL 2789)
- Essure Product Liability Settlement³
- Porter Ranch (JCCP 4861)



Data Breach/Privacy

- · Miracle-Pond, et al. v. Shutterfly
- Baldwin et al. v. National Western Life Insurance Co.
- Jackson-Battle, et al. v. Navicent Health, Inc.
- Bailey, et al. v. Grays Harbor County Public Hospital No. 2
- In re: Forefront Data Breach Litigation
- Easter et al. v. Sound Generations
- Rivera, et al. v. Google LLC
- Acalev v. Vimeo, Inc.



Mass Arbitration

- T-Mobile
- Uber
- Postmates
- Instacart
- Intuit



Other Notable Cases

- Brown, et al. v. State of New Jersey DOC (Civil Rights)
- Slade v. Progressive (Insurance)

*Work performed as Postlethwaite & Netterville, APAC (P&N)

¹Services provided in cooperation with the Court-Appointed Special Master

²Appointed As Common Benefit Trustee

³Inventory Settlement

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