

1 This is the nineteenth of several applications for authority to distribute portions of
2 the money plaintiffs received from Exxon as partial payments on the punitive damages
3 judgment entered by the United States Supreme Court.
4

5 The current application (All Plaintiffs' Lead Counsel's Nineteenth Punitive
6 Damages Application) to distribute EQSF funds covers claimants scheduled to receive
7 their portion of the Final Distribution (as defined in connection with the Sixteenth
8 Application). The current application to distribute damages covers claimants scheduled
9 to receive final distribution payments in two categories: (1) claimants in any of the 51
10 claim categories that have a single payment which must be to a lienholder other than
11 those who were covered in either the Seventeenth¹ or Eighteenth² Applications; and (2)
12 claimants who have had some impediment to distribution of Combined Compensatory
13 Damages, Punitive Damages Principal and/or Punitive Damages Interest in a prior
14 application, and for whom the impediment is now resolved. For claimants listed in this
15 application, this will be their final payment from the EQSF. *See* Declaration of Lynn
16 Lincoln Sarko In Support Of Lead Counsel's Nineteenth Punitive Damages Application
17 For An Order Distributing Exxon Qualified Settlement Funds To Claimants In Various
18 Categories And Their Attorneys, filed herewith.
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24 ¹ Clerk's Docket No. 9690.

25 ² Clerk's Docket No. 9702.

1 Examples of claimants who are covered in this application because their claim has
2 recently been resolved include those deceased claimants for whom a personal
3 representative had not been identified in the past, claimants who submitted updated
4 address information and those claimants whose IRS levies have now been released. The
5 number of recently resolved impaired claims is composed of approximately 133
6 claimants, with 541 claims to process. Assuming no additional lien, levy or assignment
7 is received between now and when payments are issued, the entire amount will be paid to
8 these claimants, by either direct deposit or a check.
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11 Exhibit A to the Sarko Declaration sets out the gross amounts of Combined
12 Compensatory Damages (the Supplemental, Compensatory Damages and Compensatory
13 Interest allocations are consolidated on Exhibit A) payments allocated to claimants.
14 There are 675 claims being paid, the total amount of which is \$68,604.65.
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16 Exhibit B to the Sarko Declaration sets out the gross amounts of Punitive
17 Damages Principal allocated to claimants. There are 261 claims being paid, the total
18 amount of which is \$656,622.63.
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20 Exhibit C to the Sarko Declaration sets out the gross amounts of Punitive
21 Damages Interest allocated to claimants. There are 272 claims being paid, the total
22 amount of which is \$842,640.35.
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1 Exhibit D to the Sarko Declaration sets out the gross amounts of the Final
2 Distribution allocated to claimants. There are 1559 claims being paid, the total amount of
3 which is \$9,910,412.97.
4

5 There are no contested claims being paid under the 19th Application. For the 2767
6 claims covered by this Nineteenth Application, distributions to or on behalf of the
7 claimants will be made as set out in Exhibits A-D to this declaration, and if the Court
8 approves this distribution, a gross distribution of \$11,478,260.60 will be made.
9

10 The dollar figures provided in Exhibits A – D. are gross dollar allocations on claims
11 prior to any deductions for attorneys’ fees or costs.

12 A proposed order is attached authorizing the proposed distributions discussed in
13 this application.
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15 Respectfully submitted this 3rd day of May, 2011.
16

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Certificate of Service

The undersigned certifies that on May 3, 2011, a true and correct copy of the foregoing LEAD COUNSEL'S NINETEENTH APPLICATION FOR AN ORDER DISTRIBUTING EXXON QUALIFIED SETTLEMENT PUNITIVE DAMAGE FUNDS TO MULTIPLE CLAIM CATEGORIES AND THEIR ATTORNEYS was served on the following attorneys or parties of record by the court's ECF system:

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LEAD COUNSEL'S NINETEENTH APPLICATION FOR AN ORDER DISTRIBUTING EXXON QUALIFIED SETTLEMENT PUNITIVE DAMAGE FUNDS TO MULTIPLE CLAIM CATEGORIES AND THEIR ATTORNEYS - 5

In re the Exxon Valdez, Case No. 3:89-cv-095-HRH
DWT 17028652v1 0027510-000015