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Liaison Counsel for Plaintiffs

Honorable H. Russel Holland

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

In re:)
) Case No. 3:89-cv-095 (HRH)
The EXXON VALDEZ) (Consolidated)

_____)
THIS DOCUMENT RELATES TO)
ALL CASES)
_____)

DECLARATION OF LYNN LINCOLN SARKO IN SUPPORT OF LEAD
COUNSEL'S NINETEENTH PUNITIVE DAMAGES APPLICATION FOR AN
ORDER DISTRIBUTING EXXON QUALIFIED SETTLEMENT FUNDS TO
CLAIMANTS IN VARIOUS CATEGORIES AND THEIR ATTORNEYS

Davis Wright Tremaine LLP
LAW OFFICES
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1 1. I am the Court-appointed Claims Administrator of the Exxon Qualified
2 Settlement Fund (hereinafter "EQSF") and the Alyeska Qualified Settlement Fund
3 (hereinafter "AQSF"). I make this declaration based on personal knowledge and am
4 competent to testify to the matters set forth herein.
5

6 2. The current application (All Plaintiffs' Lead Counsel's Nineteenth Punitive
7 Damages Application) to distribute EQSF funds covers two categories of claimants
8 scheduled to receive their portion of the Final Distribution (as defined in connection with
9 the Sixteenth Application): (1) claimants in any of the 51 claim categories who have a
10 single payment that must be made to a lienholder other than those who were covered in
11 either the Seventeenth¹ or Eighteenth² Applications; and (2) claimants who have had
12 some impediment to distribution of their claims in a prior application, and for whom the
13 impediment is now resolved.
14

15 3. Examples of claimants who are covered in this application who have an
16 impediment that has recently been resolved include those deceased claimants for whom a
17 personal representative had not been identified in the past and claimants who submitted
18 updated address information. The number of recently resolved impaired claims is
19 composed of approximately 133 claimants with 541 claims to process. Assuming no
20 additional lien, levy or assignment is received between now and when payments are
21
22
23

24 _____
25 ¹ Clerk's Docket No. 9690.

² Clerk's Docket No. 9702.

1 issued, the entire amount will be paid to these claimants, by either direct deposit or check.

2 4. Exhibit A to this declaration sets out the gross amounts of Combined
3 Compensatory Damages (the Supplemental, Compensatory Damages and Compensatory
4 Interest allocations are consolidated on Exhibit A) payments allocated to claimants.

5 There are 675 claims being paid, the total amount of which is \$68,604.65.

6
7 5. Exhibit B to this declaration sets out the gross amounts of Punitive Damages
8 Principal allocated to claimants. There are 261 claims being paid, the total amount of
9 which is \$656,622.63.

10
11 6. Exhibit C to this declaration sets out the gross amounts of Punitive Damages
12 Interest allocated to claimants. There are 272 claims being paid, the total amount of
13 which is \$842,640.35.

14
15 7. Exhibit D to this declaration sets out the gross amounts of the Final
16 Distribution allocated to claimants. There are 1559 claims being paid, the total amount of
17 which is \$9,910,412.97.

18 8. There are no contested claims being paid under the 19th Application.

19
20 9. For the 2767 claims covered by this Nineteenth Application, distributions to or
21 on behalf of the claimants will be made as set out in Exhibits A-D to this declaration, and
22 if the Court approves this distribution, a gross distribution of \$11,478,260.60 will be
23 made.

24
25 10. The dollar figures provided in Exhibits A – D. are gross dollar allocations on

DECLARATION OF LYNN LINCOLN SARKO IN SUPPORT OF 19th PUNITIVE DAMAGES
APPLICATION FOR AN ORDER DISTRIBUTING EXXON QUALIFIED SETTLEMENT FUNDS
TO CLAIMANTS IN VARIOUS CLAIM CATEGORIES AND THEIR ATTORNEYS - 3

In re the Exxon Valdez, Case No. 3:89-cv-095-HRH

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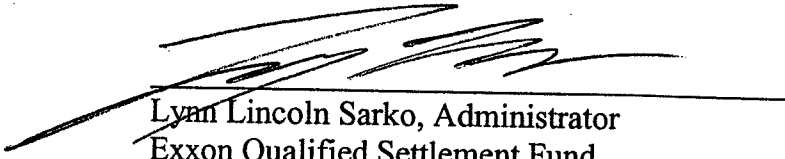
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claims prior to any deductions for attorneys' fees or costs.

11. If the court approves the current request, I will begin authorizing payments to be issued on behalf of or to the listed claimants as soon as possible after entry of the Court's order approving the distribution application.

12. I certify under penalty of perjury of the laws of the State of Washington that the foregoing is true and correct.

DATED this 3 day of May, 2011 at Seattle, Washington.



Lynn Lincoln Sarko, Administrator
Exxon Qualified Settlement Fund
Alyeska Qualified Settlement Fund
Post Office Box 21945
Seattle, Washington 98111
(206) 623-1900

Certificate of Service

The undersigned certifies that on May 3rd, 2011, a true and correct copy of the foregoing DECLARATION OF LYNN LINCOLN SARKO IN SUPPORT OF 19th PUNITIVE DAMAGES APPLICATION FOR AN ORDER DISTRIBUTING EXXON QUALIFIED SETTLEMENT FUNDS TO CLAIMANTS IN VARIOUS 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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