

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 to distribute punitive damages covers (1) claimants
7 scheduled to receive their portion of the Final Distribution (as defined in connection with
8 the Sixteenth Application) in any of the 51 claim categories that have multiple
9 impairments on their claims;¹ and (2) claimants who have who had some impediment to
10 distribution of their claims in a prior application, and for whom the impediment is now
11 resolved.
12

13 3. Examples of claimants who are covered in this application because their claim
14 has recently been resolved include those deceased claimants for whom a personal
15 representative had not been identified in the past, claimants who submitted updated
16 address information and those claimants whose IRS levies have now been released. The
17 number of recently resolved impaired claims is composed of approximately 55 claimants,
18 with 227 claims to process. Assuming no additional lien, levy or assignment is received
19 between now and when payments are issued, the entire amount will be paid to these
20
21
22

23 ¹ Because there are at least 660 multi-impaired claimants with over 1720 claims to
24 process, and it may take at least three months for all of them to be processed, this
25 application includes only about one third of the claimants in this category. A series of
applications will be made covering additional claims with multiple impairments.

1 claimants, by either direct deposit or check.nts in the various categories. There are 227
2 claims being paid, the total amount of which is \$466,442.40.

3 4. Exhibit A to this declaration sets out the gross amounts of Combined
4 Compensatory Damages (the Supplemental, Compensatory Damages and Compensatory
5 Interest allocations are consolidated on Exhibit A) payments allocated to claimants.
6 There are 195 claims being paid, the total amount of which is \$17,717.22.
7

8 5. Exhibit B to this declaration sets out the gross amounts of Punitive Damages
9 Principal allocated to claimants. There are 81 claims being paid, the total amount of
10 which is \$139,514.88.
11

12 6. Exhibit C to this declaration sets out the gross amounts of Punitive Damages
13 Interest allocated to claimants. There are 91 claims being paid, the total amount of which
14 is \$294,587.46.
15

16 7. Exhibit D to this declaration sets out the gross amounts of the Final
17 Distribution allocated to claimants. There are 417 claims being paid, the total amount of
18 which is \$1,456,727.95.
19

20 8. There are no contested claims being paid under the 20th Application.

21 9. The dollar figures provided in Exhibits A, B, C and D are gross dollar
22 allocations on claims prior to any deductions for attorneys' fees or costs. The total
23 amount of gross payments under this Twentieth Distribution Application is
24 \$1,908,547.51.
25

DECLARATION OF LYNN LINCOLN SARKO IN SUPPORT OF 20th 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

1 10. If the Court approves the current request, I will begin authorizing payments to
2 be issued on behalf of or to the listed claimants after completion of the distribution of
3 payments on the 19th application.
4

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

7 DATED this 6th day of June 2011 at Seattle, Washington.

8 

9
10 Lynn Lincoln Sarko, Administrator
11 Exxon Qualified Settlement Fund
12 Alyeska Qualified Settlement Fund
13 Post Office Box 21945
14 Seattle, Washington 98111
15 (206) 623-1900

16 Certificate of Service

17 The undersigned certifies that on June 8th 2011, a true and correct copy of the foregoing
18 DECLARATION OF LYNN LINCOLN SARKO IN SUPPORT OF 20th PUNITIVE DAMAGES
19 APPLICATION FOR AN ORDER DISTRIBUTING EXXON QUALIFIED SETTLEMENT FUNDS
20 TO CLAIMANTS IN VARIOUS CLAIM CATEGORIES AND THEIR ATTORNEYS
21 was served on the following attorneys or parties of record by the court's ECF system:

22 Douglas J. Serdahely
23 PATTON BOGGS LLP
24 E-mail: dserdahely@pattonboggs.com

Lloyd B. Miller
SONOSKY, CHAMBERS, SACHSE,
MILLER & MUNSON
E-mail: lloyd@sonosky.net

25 By: s/ David W. Oesting

DECLARATION OF LYNN LINCOLN SARKO IN SUPPORT OF 20th PUNITIVE DAMAGES
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