

1 the United States Supreme Court.

2 The current application to distribute punitive damages covers (1) claimants
3 scheduled to receive their portion of the Final Distribution (as defined in connection with
4 the Sixteenth Application) in any of the 51 claim categories that have multiple
5 impairments on their claims;¹ and (2) claimants who have who had some impediment to
6 distribution of their claims in a prior application, and for whom the impediment is now
7 resolved. See Declaration of Lynn L. Sarko, filed herewith.
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10 Examples of claimants who are covered in this application because an impediment
11 to payment of their claim has recently been resolved include those deceased claimants for
12 whom a personal representative had not been identified in the past, claimants who
13 submitted updated address information and those claimants whose IRS levies have now
14 been released. The number of recently resolved impaired claims is composed of
15 approximately 63 claimants, with 258 claims to process. Assuming no additional lien,
16 levy or assignment is received between now and when payments are issued, the entire
17 amount will be paid to these claimants, by either direct deposit or check.nts in the various
18 categories. There are 258 claims being paid, the total amount of which is \$1,192,690.96.
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21 4. Exhibit A to the Sarko Declaration sets out the gross amounts of Combined
22 Compensatory Damages (the Supplemental, Compensatory Damages and Compensatory
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24 ¹ Because there were over 1720 claims with multiple liens, approximately one third of them were
25 included in the 20th application; approximately one third are included in this application; and the

1 Interest allocations are consolidated on Exhibit A) payments allocated to claimants.
2 There are 165 claims being paid, the total amount of which is \$13,014.41.

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4 5. Exhibit B to the Sarko Declaration sets out the gross amounts of Punitive
5 Damages Principal allocated to claimants. There are 99 claims being paid, the total
6 amount of which is \$389,389.58.

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8 6. Exhibit C to the Sarko Declaration sets out the gross amounts of Punitive
9 Damages Interest allocated to claimants. There are 110 claims being paid, the total
10 amount of which is \$635,123.44.

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12 7. Exhibit D to the Sarko Declaration sets out the gross amounts of the Final
13 Distribution allocated to claimants. There are 452 claims being paid, the total amount of
14 which is \$2,343,000.98

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16 8. The dollar figures provided in Exhibits A, B, C and D are gross dollar
17 allocations on claims prior to any deductions for attorneys' fees or costs. The total
18 amount of gross payments under this Twenty-First Distribution Application is
19 \$3,380,528.41.

20 A proposed order is attached authorizing the proposed distributions discussed in
21 this application.

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balance will be covered in the 22nd application.

LEAD COUNSEL'S TWENTY-FIRST APPLICATION FOR AN ORDER DISTRIBUTING EXXON
QUALIFIED SETTLEMENT PUNITIVE DAMAGE FUNDS TO MULTIPLE CLAIM CATEGORIES
AND THEIR ATTORNEYS - 3

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

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Respectfully submitted this 15th day of July 2011.

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Certificate of Service

The undersigned certifies that on July 15th, 2011, a true and correct copy of the foregoing LEAD COUNSEL'S TWENTY-FIRST 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 TWENTY-FIRST APPLICATION FOR AN ORDER DISTRIBUTING EXXON QUALIFIED SETTLEMENT PUNITIVE DAMAGE FUNDS TO MULTIPLE CLAIM CATEGORIES AND THEIR ATTORNEYS - 4