

THE PENSACOLA JAIL EXPLOSION SETTLEMENT
ATTN: ED GENTLE, CLAIMS ADMINISTRATOR
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February 22, 2022

MEMORANDUM

VIA EMAIL
CONFIDENTIAL

TO: Adrian R. Bridges, Esq., Plaintiff's Counsel
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Jonothan Rotstein, Esq., Plaintiffs' Attorney
Scott Stone, Esq., Plaintiffs' Attorney
Keith Weidner, Esq., Plaintiffs' Attorney
Joseph Zarzaur, Esq., Plaintiffs' Attorney
Thomas B. Alleman, Esq., Defense Counsel Liaison

FROM: Edgar C. Gentle, III, Esq.

RE: Pensacola Jail Explosion Settlement -Update; Our File No. 6338-1 {NNNN}

Dear Plaintiffs' Counsel and Tom:

The purpose of this memorandum is to provide you with an update on the payment of claims.

1. Claims Payment Timing.

We have a total of 520 claims. Of those, we have paid 265, with 255 remaining to be paid. Of those 255 remaining to be paid, we have to 20 to be paid shortly in the upcoming Batch 13. All Grave Claimants are paid. We have completed 12 batches of payments, and we anticipate paying a 13th batch shortly.

Many of the payments are being held up at this time because there are insufficient funds available to resolve a Claimant's outstanding liens, so that the Claimant is "under water."

As you recall, except for the Grave Claimants, the computation of the amount to be received by each Claimant was net of fees, with a fee percentage of 33.3% being assumed and factored in as each claim is paid. Thus, as each Non-Grave Claimant represented by a lawyer is paid, his or her recovery will be "grossed up" to reflect the legal fee to be paid to the attorney.

2. Requested Defendants' Release of the Holdback to Facilitate Efficient Settlement Administration

We have asked the Defendants to provide permission for the release of the holdback.

As you will recall, the holdback amount is \$645,000, less the money that is to be paid to the 3 Opt-Outs who now desire to be a part of the Class totaling \$42,340.50. As this point, we have asked that Defendants agree that the holdback be released so that we can pay the Claimants.

Without the release of the holdback, there is no money for many of the Claimants. As stated above, lien resolution is difficult for a number of Claimants because they are "under water."

Once the holdback is released, we will have to revisit the prior Claimant payouts and lien amount resolutions. For the liens that have already been settled due to limited Claimant funds, we will have to revisit the lienholder when we receive the holdback amount for the Claimant. Moreover, for those Claimants who have not been paid, if the holdback was released now, we would be able to resolve liens and pay the remaining Claimants just once, rather than twice. The sooner we can wrap the payments up, the sooner we can close the books, wrap up the QSF with the Court, and file the final tax returns.

Releasing the holdback NOW ameliorates the above problems.

We are awaiting further response from Defense Counsel on this request.

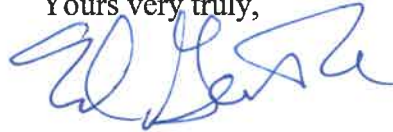
Thank you for the pleasure of working with you in this Settlement.

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We are posting this update on the Settlement website.

Yours very truly,



Edgar C. Gentle, III

ECGIII/jcs

cc: (via e-mail)(confidential)

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