

THE PENSACOLA JAIL EXPLOSION SETTLEMENT  
ATTN: ED GENTLE, CLAIMS ADMINISTRATOR  
SUITE 100  
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BIRMINGHAM, ALABAMA 35244  
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[Pensacolasettlement@gtandslaw.com](mailto:Pensacolasettlement@gtandslaw.com)

February 1, 2021

MEMORANDUM

VIA EMAIL  
CONFIDENTIAL

**TO:** Adrian R. Bridges, Esq., Plaintiff's Counsel  
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Christopher P. Janes, Esq., Plaintiff's Counsel  
Eric D. Stevenson, Esq., Plaintiff's Counsel  
J. Christopher Klotz, Esq., Plaintiff's Counsel  
Scott C. Barnes, Esq., Plaintiff's Attorney  
James Biggart, Esq., Plaintiffs' Attorney  
Vanessa Brice, Esq., Plaintiffs' Attorney  
Robert Scott Cox, Esq., Plaintiffs' Attorney  
Kim Evers, Esq., Plaintiff's Attorney  
Jake Evers, Esq., Plaintiff's Attorney  
Jon Gann, Esq., Plaintiffs' Attorney  
Rachael Raymon Gilmer, Esq., Plaintiff's Attorney  
Kevin Hausfeld, Esq., Plaintiffs' Attorney  
Talley Kaleko, Esq., Plaintiff's Attorney  
Camille Martin, Esq., Plaintiffs' Attorney  
Gerald McKenzie, Esq., Plaintiffs' Attorney  
Jonothan Rotstein, Esq., Plaintiffs' Attorney  
Scott Stone, Esq., Plaintiffs' Attorney  
Keith Weidner, Esq., Plaintiffs' Attorney  
Joseph Zarzaur, Esq., Plaintiffs' Attorney  
Robert N. Heath, Jr., Esq., Pro Se Plaintiffs' Liaison

**FROM:** Edgar C. Gentle, III, Esq.

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

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Dear Plaintiffs' Counsel and Robert:

The purpose of this memorandum is to provide you with an update on the payment of claims since our last update of November 19, 2020.

**1. Claims Payment Timing.**

We have a total of 520 claims. Of those, we have paid 6, with 514 remaining to be paid.

We have completed two (2) batches of payments, and we anticipate paying a third batch in the next two weeks. Thereafter, all Grave Claimants will be paid.

Future batches will be larger and more frequent, though many of the Claimants will not receive a net payment, as explained below. Our goal is to complete rolling batches of payments approximately bi-weekly, **as we resolve liens.**

## **2. Lien Compilation, Resolution and Payment.**

We have 355 Claimants who are Medicaid beneficiaries, which is almost 3 times higher than what the Claimants disclosed on their Benefits Questionnaires. Hence, we need to conduct our own due diligence due to the unreliability of Claimant-provided information. This has very materially slowed down the lien clearance and Claimant payment process.

As we continue to work to resolve liens and compile payment batches, we will continue to contact you from time to time to help us facilitate the resolution of your clients' liens. We are attempting to favorably resolve Medicaid liens and other liens (such as restitution and child support).

Many of these liens are large, and will exceed the Claimant payment for a large portion of the claims, with the Claimant not getting a payment.

We are updating the data we have received concerning Court costs and incarceration-related expenses, child support, and restitution. We sent deficiency notices to Counsel for Claimants who did not fully complete their lien questionnaires when they signed up for the Settlement. Based upon the completed information, we have updated the Claimant lien database. We continue to work through the deficiencies, and we will be in contact with the Claimants and/or attorneys regarding the same.

We have recently started receiving correspondence from Florida Medicaid. It will take a few weeks to receive all \$0 lien letters and even longer if the potential lien amount is greater than \$0. As a Claimant is cleared for liens (i.e., Medicare, Medicaid, Restitution, DHR, and private liens), we will send correspondence to the attorney, if the Claimant is represented, requesting any additional information that we need to place the Claimant in line for payment. Once we receive any remaining documentation, we then submit the claim in a batch to the Defendants for review and for payment.

## **3. Legal Fees and Expenses.**

As you recall, except for the Grave Claims, 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 your fee.

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

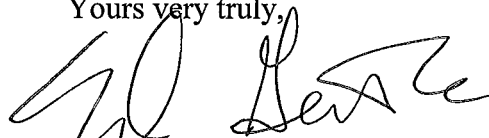
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By copy of this Memo to Tom, we are keeping the Defendants informed. We are also posting it on the Settlement website.

Yours very truly,

A handwritten signature in black ink, appearing to read "Edgar C. Gentle, III". The signature is written in a cursive style with a large initial "E" and "G".

Edgar C. Gentle, III

ECGIII/jcs

cc: (via e-mail)(confidential)  
Thomas B. Alleman, Esq., Defense Counsel Liaison  
R. Stephen Coonrod, Esq., Counsel for Florida League of Cities and Workers' Comp  
Christopher D. White, Esq., Counsel for Florida League of Cities and Workers' Comp

Katherine A. Benson, Esq.  
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Ms. Kathleen Clements