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14 *Class Counsel*

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 GREY FOX, LLC, et al.
18 Plaintiffs,
19 v.
20 PLAINS ALL AMERICAN
21 PIPELINE, L.P., et al.,
22 Defendants.

Case No. 2:16-cv-03157-PSG-JEM

**PLAINTIFFS' SECOND
SUPPLEMENTAL MEMORANDUM
IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, MOTION
FOR FEES, EXPENSES, AND
SERVICES AWARDS, AND
MOTION TO APPROVE THE PLAN
OF ALLOCATION**

Date: September 13, 2024
Time: 1:30 pm
Judge: Hon. Philip S. Gutierrez
Courtroom: 6A

1 Per counsel for Sable’s request, the Parties have met and conferred in
2 advance of the Fairness Hearing and have agreed to modify the [Proposed] Final
3 Judgment to reflect the Settlement’s requirement regarding the recordation of the
4 easements on the Class Properties, per Section VI.G. of the Settlement Agreement.
5 Dkt. 303-1, Ex. 1, p. 54-56. Attached hereto as Exhibit 1 is a redlined copy of the
6 [Amended Proposed] Final Judgment and a clean version will be uploaded through
7 the District’s [Proposed] Order portal.

8
9 Dated: September 13, 2024

Respectfully submitted,

10
11 By: /s/Robert J. Nelson

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CERTIFICATE OF SERVICE

I, Wilson Dunlavey, hereby certify that on September 13, 2024, I caused to be electronically filed the Plaintiffs’ Supplemental Memorandum of Points and Authorities in Support of Motion for Final Approval of Class Action Settlement, Motion for Fees, Expenses, and Services Awards, and Motion to Approve of Plan of Allocation with the Clerk of the United States District Court for the Central District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Wilson M. Dunlavey

EXHIBIT 1

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13 *Class Counsel*
14 *(additional counsel listed at signature)*

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

18 GREY FOX, LLC, et al.

19 Plaintiffs,

20 v.

21 PLAINS ALL AMERICAN
22 PIPELINE, L.P., et al.,

23 Defendants.
24

Case No. 2:16-cv-03157-PSG-JEM

**[AMENDED PROPOSED] FINAL
JUDGMENT**

Date: September 13, 2024

Time: 1:30 p.m.

Judge: Hon. Philip S. Gutierrez

Courtroom: 6A

1 The Court, having entered on [DATE] a Final Approval Order approving the
2 Settlement between plaintiffs Grey Fox, LLC, MAZ Properties, Inc., Bean Blossom,
3 LLC, Winter Hawk, LLC, Mark Tautrim, Trustee of the Mark Tautrim Revocable
4 Trust, and Denise McNutt, individually and in their representative capacities (“Class
5 Representatives”), and Defendant Pacific Pipeline Company (“PPC”) and Sable
6 Offshore Corp., as successor by merger of Sable Offshore Holdings LLC and Flame
7 Acquisition Corp. (“Sable,” and collectively with PPC, “Settling Parties”), it is
8 hereby ORDERED, ADJUDGED, and DECREED that:

9 1. Judgment is hereby entered in this case as to the Settlement in
10 accordance with the Court’s [DATE] Final Approval Order as to all claims against
11 Defendant in this Action.

12 2. The Settlement and all of its terms, shall have full force and effect. *See*
13 #Dkt. 303-1, Ex. 1.

14 3. This Order approves the Settlement in all respects, including Section IV.
15 B (“Final Order and Judgment”).

16 4. The Parties shall take all actions required of them in the Final Approval
17 Order and the Settlement Agreement.

18 5. The Court directs that the recorder’s office of Santa Barbara County,
19 California, San Luis Obispo County, California, or Kern County, California, as
20 appropriate, shall record this Final Order and Judgment, and the Easement Notice(s)
21 (Dkt. 303-1, Ex. 1, Ex. 1-B (Page ID 10250-10255)) against each Settlement Class
22 Members’ name or against such Settlement Class Members’ interest in their
23 Property so as to give constructive and record notice to all subsequent parties
24 acquiring an interest in such Settlement Class Members’ interest in the Property of
25 the existence and terms of the Easement Notice. If for any reason the Final Order
26 and Judgment cannot be recorded as provided above, the Court orders that the
27 Settlement Administrator shall take such action as is necessary or required to have
28 the existence and terms of the Easement Notice recorded in such land records.

1 ~~5.6.~~ The above-captioned action is DISMISSED in its entirety with
2 prejudice.

3 ~~6.7.~~ Except as otherwise provided in orders separately entered by this Court
4 on the application for attorneys' fees and expenses and the application for service
5 awards submitted by Class Counsel, the Parties will bear their own expenses and
6 attorneys' fees.

7 ~~7.8.~~ Without affecting the finality of this Order and the accompanying
8 Judgment, the Court reserves jurisdiction over the implementation of the Settlement,
9 including enforcement and administration of the Settlement Agreement, including
10 any releases in connection therewith, and any other matters related or ancillary to
11 the Settlement.

12 ~~8.9.~~ This document constitutes a final judgment pursuant to Federal Rule of
13 Civil Procedure 54 and a separate document for purposes of Federal Rule of Civil
14 Procedure 58(a).

15
16 DATED: _____

17
18 _____
19 Hon. Philip S. Gutierrez