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2 **UNITED STATES DISTRICT COURT**  
3 **CENTRAL DISTRICT OF CALIFORNIA**

4 GREY FOX, LLC, *et al.*,  
5 Plaintiffs,

6 v.

7 PLAINS ALL AMERICAN PIPELINE,  
8 L.P. *et al.*,  
9 Defendants.

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

**DECLARATION OF GINA  
INTREPIDO-BOWDEN REGARDING  
REQUESTS FOR EXCLUSION**

Honorable Philip Gutierrez

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11 I, Gina Intrepido-Bowden, declare as follows:

12 1. I am a Vice President at JND Legal Administration (“JND”). This Affidavit  
13 is based on my personal knowledge, as well as upon information provided to me by  
14 experienced JND employees and, if called upon to do so, I could and would testify  
15 competently thereto.

16 2. I previously submitted the Declaration of Gina Intrepido-Bowden re:  
17 Settlement Notice Program (“Intrepido-Bowden Decl.”) filed April 9, 2024, ECF No. 303-  
18 2, the Declaration of Gina Intrepido-Bowden Regarding Settlement Notice Program  
19 Implementation (“Notice Decl.”) filed July 5, 2024, ECF No. 365, the Supplemental  
20 Declaration of Gina Intrepido-Bowden Regarding Class Notice Implementation  
21 (“Supplemental Decl.”) filed August 9, 2024, ECF No. 371-6, the Declaration of Gina  
22 Intrepido-Bowden Regarding Compliance with the Class Action Fairness Act, 28 USC §  
23 1715 (“CAFA Decl.”) filed August 28, 2024, ECF No. 376, the Affidavit of Gina Intrepido-  
24 Bowen Regarding Objections and Requests for Exclusion, filed September 3, 2024, ECF  
25 No. 378, and the Declaration Of Gina Intrepido-Bowden Regarding Objections And  
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1 Requests For Exclusion, filed September 12, 2024 ECF No. 379<sup>1</sup>. JND is serving as the  
2 Settlement Administrator in the above-captioned litigation for the purposes of  
3 administering the Settlement Agreement, filed April 9, 2024, ECF No. 303-1, Ex. 1  
4 (“Settlement Agreement”), preliminarily approved by the Court in its Order Granting  
5 Preliminary Approval of Proposed Settlement, filed May 1, 2024, ECF No. 325  
6 (“Preliminary Approval Order”).

7 3. This Declaration is being filed to provide an additional update to the Court  
8 regarding requests for exclusion per Paragraph 19 of the Preliminary Approval Order.

9 **REQUESTS FOR EXCLUSION**

10 4. JND previously indicated that the parties had agreed that APNs 131-010-026,  
11 131-010-066, and 131-030-018 had withdrawn their request for exclusion. *See* Dkt. 379 ¶  
12 7. Since September 12, 2024, however, the owner of these parcels has indicated in writing  
13 that these parcels did not wish to withdraw their requests for exclusion after all.  
14 Accordingly, there are a total of 10 valid requests for exclusion.

15 5. JND has conferred with Class Counsel and Counsel for the Settling Parties,  
16 and all parties are in agreement regarding the final list of valid and invalid requests for  
17 exclusion. A list of the final, valid exclusions is attached hereto as **Exhibit A**. Lists of the  
18 invalid and withdrawn exclusion requests are attached hereto as **Exhibit B**. These are the  
19 final complete and accurate lists.  
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27 <sup>1</sup> All capitalized terms not defined herein have the meanings given to them in the Intrepido-  
28 Bowden Decl. and Notice Decl., unless otherwise indicated.  
DECLARATION OF GINA INTREPIDO-  
BOWDEN REGARDING REQUESTS FOR EXCLUSION 2 2:16-CV-03157-PSG-JEM

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**CONCLUSION**

JND is continuing to implement the Settlement pursuant to the Settlement Agreement and the Preliminary Approval order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 16, 2024 in Stone Harbor, New Jersey.



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GINA INTREPIDO-BOWDEN

# **EXHIBIT A**

**LAS FLORES PIPELINE SYSTEM SETTLEMENT**  
**(USDC CENTRAL DISTRICT OF CALIFORNIA, CASE NO. 16-cv-03157 PSG (JEM))**

**TIMELY AND VALID EXCLUSIONS**

|     | <u>APN NUMBER</u> | <u>NAME</u>                             | <u>CITY/STATE</u> | <u>POSTMARK DATE</u>                     | <u>SIGNATURE TYPE</u> | <u>LAW FIRM SUBMITTING</u> |
|-----|-------------------|---|-------------------|--|-----------------------|----------------------------|
| 1.  | 131-010-026       | 77 Broad Street LLC                     | Orange, CA        | July 10, 2024                            | Wet                   | N/A                        |
| 2.  | 131-010-066       | 77 Broad Street LLC                     | Orange, CA        | July 10, 2024                            | Wet                   | N/A                        |
| 3.  | 131-030-018       | 77 Broad Street LLC                     | Orange, CA        | July 10, 2024                            | Wet                   | N/A                        |
| 4.  | 081-150-002       | The Land Trust for Santa Barbara County | Santa Barbara, CA | July 12, 2024                            | Wet                   | N/A                        |
| 5.  | 081-150-028       | The Land Trust for Santa Barbara County | Santa Barbara, CA | July 12, 2024                            | Wet                   | N/A                        |
| 6.  | 131-200-013       | Jack & Shannon Selvidge                 | Santa Maria, CA   | May 29, 2024 [CURED August 13, 2024]     | Wet                   | John Kenneth Dorwin        |
| 7.  | 131-200-002       | Barak & Alyssa Moffitt Revocable Trust  | Santa Maria, CA   | July 12, 2024 [CURED September 11, 2024] | Wet                   | John Kenneth Dorwin        |
| 8.  | 131-200-003       | Barak & Alyssa Moffitt and Lanny Zamora | Santa Maria, CA   | July 12, 2024 [CURED September 11, 2024] | Wet                   | John Kenneth Dorwin        |
| 9.  | 131-200-001       | Timothy Bennett                         | Santa Maria, CA   | July 12, 2024 [CURED September 12, 2024] | Wet                   | N/A                        |
| 10. | 099-400-017       | ZACA Preserve, LLC                      | Los Olivos, CA    | July 10, 2024                            | Wet                   | N/A                        |

# **EXHIBIT B**

**LAS FLORES PIPELINE SYSTEM SETTLEMENT**  
**(USDC CENTRAL DISTRICT OF CALIFORNIA, CASE NO. 16-CV-03157 PSG (JEM))**

**INVALID EXCLUSIONS**

|    | <u>APN NUMBER</u> | <u>NAME</u>         | <u>CITY/STATE</u> | <u>POSTMARK DATE</u> | <u>SIGNATURE TYPE</u> | <u>LAW FIRM SUBMITTING</u> | <u>REASON DEFECTIVE</u> |
|----|-------------------|---------------------|-------------------|----------------------|-----------------------|----------------------------|-------------------------|
| 1. | 131-010-024       | 77 Broad Street LLC | Orange, CA        | July 10, 2024        | Wet                   | N/A                        | Non-Class Property      |
| 2. | 131-010-028       | 77 Broad Street LLC | Orange, CA        | July 10, 2024        | Wet                   | N/A                        | Non-Class Property      |

**WITHDRAWN EXCLUSIONS**

|    | <u>APN NUMBER</u> | <u>NAME</u>                | <u>CITY/STATE</u> | <u>POSTMARK DATE</u>                         | <u>SIGNATURE TYPE</u> | <u>LAW FIRM SUBMITTING</u>    |
|----|-------------------|----------------------------|-------------------|--|-----------------------|-------------------------------|
| 1. | 083-430-033       | TAK LLC                    | Casper, WY        | July 15, 2024 [Withdrawn August 7, 2024]     | Wet                   | N/A                           |
| 2. | 131-030-003       | Big River Real Estate, LLC | Coto De Caza, CA  | July 11, 2024 [Withdrawn September 12, 2024] | Wet                   | Beaudoin & Krause-Leemon, LLP |
| 3. | 131-030-019       | Big River Real Estate, LLC | Coto De Caza, CA  | July 11, 2024 [Withdrawn September 12, 2024] | Wet                   | Beaudoin & Krause-Leemon, LLP |
| 4. | 131-030-021       | Big River Real Estate, LLC | Coto De Caza, CA  | July 11, 2024 [Withdrawn September 12, 2024] | Wet                   | Beaudoin & Krause-Leemon, LLP |
| 5. | 131-030-039       | Big River Real Estate, LLC | Coto De Caza, CA  | July 11, 2024 [Withdrawn September 12, 2024] | Wet                   | Beaudoin & Krause-Leemon, LLP |