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April 1, 2021

RE: *Intercontinental Terminals Company Litigation – Update*

Dear Clients,

I hope this letter finds you and your family well. We continue to work diligently to expedite the ITC litigation process. We are writing to update you on the status of the ongoing Intercontinental Terminals Company Litigation as of April 1, 2021.

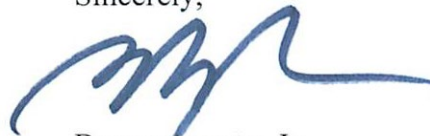
In late December of 2020, NSK, Ltd. // NSK Automation was identified by ITC's Root Cause Analysis report as potentially bearing responsibility for causing the subject fire. This new Defendant was served and is now included in the ITC litigation. In the meantime, the two-year Statute of Limitation for the ITC incident has passed. All our clients' claims have been preserved with a Tolling Agreement among all parties which allows us to work moving forward without a lawsuit.

As of today, we are on schedule and continue to move forward in preparing and presenting the case to the court. In the coming months and as a requirement of the Tolling Agreement, the ITC department will be reaching out to you to complete a profile form for your ITC claim.

We appreciate everyone's cooperation and patience as we continue to aim toward a mediation date. As always, if your address, phone number, or e-mail address change, please provide us with your updated contact information so that we can keep you informed about your case.

Please do not hesitate to call me or my legal assistants, Tina Gonzales or Edith Juarez, with any questions or concerns you may have. You also can e-mail our firm at itclawsuit@awtxlaw.com.

Sincerely,



Benny Agosto, Jr.

BAJ/edj