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May 26, 2021

**RE: *Intercontinental Terminals Company and NSK Litigation – Update***

Dear Clients,

I hope this letter finds you and your family well. We are looking forward to the end of the COVID-19 pandemic and returning to more normal activities. We are writing to update you on the status of the ongoing Intercontinental Terminals Company and NSK litigation as of May 26, 2021.

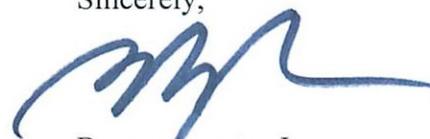
As many of you may have seen, Harris County recently settled its claims regarding various environmental regulatory violations against ITC in Deer Park Facility fire. While this is a good indication regarding liability in our case, our office and the other Co-Lead plaintiff lawyers designated by the Court continue efforts to coordinate depositions in the coming months regarding ITC's failures that led to the catastrophic fire and subsequent injuries you suffered. We are also commencing discovery against NSK, the entity responsible for manufacturing component parts to an industrial pump that may have contributed to the cause of the subject fire.

In the meantime, we continue efforts to finalize your damages model in preparation to begin settlement negotiations this fall. To this end, we have recently sent profile forms to all clients who did not return the Plaintiff's Fact Sheet that was previously sent to you. If you did not recently receive a request to complete the profile form, then no action or information is needed from you at this time. **If you did receive a request to complete the profile form, please review and return the completed form to our office as soon as possible as it contains information vital for settlement of your claims.**

We appreciate everyone's cooperation and patience. As always, if your address, phone number, or e-mail address changed, 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](mailto:itclawsuit@awtxlaw.com).

Sincerely,



Benny Agosto, Jr.

BAJ/ohc