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April 21, 2023

REQUEST FOR CLAIM VERIFICATION

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

Dear Clients,

Please accept this letter as an update to the ongoing ITC litigation and request for claim verification. Thank you again for previously providing your signed verification page to continue in the settlement negotiation process. **As we continue in this process, we now ask that you carefully read this letter and contact our office to ensure verification of your claim details arising from this matter.**

1. Case Update:

By way of general update, we have begun taking the depositions of defense experts retained by counsel for ITC and NSK. We are also beginning the process of presenting the experts retained by my law firm and the plaintiff leadership committee, who we anticipate will testify on our behalf if this matter proceeds to trial. We are presently set to commence trial of selected bellwether plaintiffs in November 2023. We are also continuing settlement negotiations with the next in-person settlement conference scheduled to resume in July 2023.

As we continue in settlement negotiations, it is urgent that you call our office and speak with a member of our team to verify that we have all information and supporting documents pertaining to your claims arising from this matter.

2. Claim Details Verification:

According to our records, the only claims we show you are submitting for this case are for **BODILY INJURIES AND PROPERTY DAMAGE ONLY**. This means that our office has obtained information demonstrating that you received medical treatment for acute bodily injuries suffered as a result of the ITC fire, as well as information pertaining to property damage suffered

as a result of the fire. Further, we show no records or information has been submitted to support a claim for lost wages.

Please see below for next steps that you should take to verify your claim:

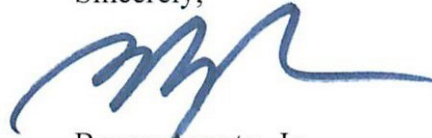
1. Call or email our office to verify your claim at:
 - a. Tel: (713) 226-5108; or
 - b. Email: itclawsuit@awtxlaw.com.
 - c. If you represent any other individual's claim (e.g., a deceased family member, children under the age of 18, other dependents), please make sure to confirm the details of their claims when you call our office.
2. BODILY INJURY VERIFICATION:
 - a. Confirm that we have a record for each doctor you saw that treated you for injuries related to the ITC fire.
 - b. Confirm that the billing amounts for each of the doctors you saw for injuries related to the ITC fire are accurate.
 - c. If you believe you suffered Lost Wages as a result of the ITC fire, please provide our office with necessary information and supporting documentation for those claims as soon as possible.
3. PROPERTY DAMAGE VERIFICATION:
 - a. Confirm that we have accurately listed:
 - i. The nature and extent of the property damage involved; and
 - ii. Your calculation for the value of the property damage you suffered due to the fire and how this calculation is derived.
 - b. Confirm that we have all documents supporting your property damage claim, including for example:
 - i. Receipts or invoices pertaining to the property damage;
 - ii. Photographs or other recordings demonstrating the property damage; and
 - iii. Any other records that you feel are relevant to supporting your lost wage claim.
 - c. **PLEASE NOTE: It is extremely unlikely that you will be compensated for any property damage claims without documentation supporting your loss. Please make sure to provide us with these critical documents that will be essential to supporting any property damage claim you may have.**

Once you have confirmed your claim with our office and confirmed that all supporting documents have been submitted to us, no other action will be needed from you at this time. We will continue to keep you updated on an ongoing basis as we have throughout this litigation of any updates pertaining to the settlement negotiations, as well as ongoing discovery and preparation for bellwether trials set to commence in November 2023.

As always, if your address, phone number, or e-mail address changes, please provide us with your updated contact information so we can keep you informed about your case. Thank you again for your time and assistance as we work to finalize the details of your claim and we look forward to hearing from you. For reference, our contact information is below:

ITC Telephone Number: 713-226-5108
ITC Email Address: itclawsuit@awtxlaw.com

Sincerely,

A handwritten signature in blue ink, appearing to read 'BAJ', with a long horizontal flourish extending to the right.

Benny Agosto, Jr.

BAJ/JDS
CC: Referring attorneys