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***Lead Trial Counsel***

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

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

18 KEITH ANDREWS, an individual, et al.,  
19 Plaintiffs,  
20 v.  
21 PLAINS ALL AMERICAN PIPELINE,  
22 L.P., a Delaware limited partnership, et al.,  
23 Defendants.

Case No. 2:15-cv-04113-PSG-JEMx

**REQUEST TO RENOTE STATUS  
CONFERENCE REGARDING  
SETTLEMENT DISTRIBUTION TO  
FISHER AND PROPERTY CLASSES**

Judge: Hon. Philip S. Gutierrez

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1 Class Counsel hereby request a four-week continuance of the status conference  
2 currently scheduled for July 18, 2024, to August 15, 2024, or at the Court’s convenience  
3 thereafter, to allow Class Counsel and the Settlement Administrator additional time to  
4 resolve the remaining objections to the Notices of Rejection of Claims, before  
5 presenting them to the Court for resolution.

6 **Status Conference**

7 In its April 3, 2024, Order (Dkt. 984), this Court established deadlines and  
8 procedures for distributing the remaining Verified Claims, and allowing payment of  
9 “late claims,” i.e., pending claims that remained outstanding or deficient at the end of  
10 the claim period in October 2023, that were completed as of April 2024. The Court’s  
11 Order also established a procedure for notifying those whose claims were rejected,  
12 including a process for lodging objections to rejections.

13 Since that time, the Settlement Administrator has issued payments to the  
14 remaining Verified Fisher and Property Claimants and issued Notices of Rejection to 39  
15 Fisher and 226 Property Claimants. As of July 3, 2024, the Settlement Administrator  
16 has received just 27 objections to these rejections in total, six from Fisher Claimants and  
17 21 from Property Claimants. A few additional complaints have been lodged by those  
18 who received settlement awards but were dissatisfied with the amounts.

19 The Court’s April 2024 Order directs the Settlement Administrator to present any  
20 remaining unresolved objections to the Court in advance of the next status conference,  
21 currently set for July 18, 2024. Class Counsel believes additional time is needed to  
22 better attempt to resolve these objections and complaints, to minimize the need for  
23 Court intervention in resolving them.

24 Class Counsel therefore requests that the status conference currently set for July  
25 18, 2024, be renoted for August 15, 2024, or thereafter at the Court’s convenience, to  
26 approve a plan for distribution of the remainder of the Net Settlement Funds and resolve  
27 any remaining objections to Rejected Claims, two weeks in advance of the hearing date.

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2 Dated: July 9, 2024

Respectfully submitted,

3 KELLER ROHRBACK L.L.P.

4 By: /s/ Juli E. Farris

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*Lead Trial Counsel*

**CERTIFICATE OF SERVICE**

I, Juli E. Farris, hereby certify that on July 9, 2024, I electronically filed the foregoing 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/ Juli E. Farris

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

KEITH ANDREWS, an individual, et al.,

Plaintiffs,

v.

PLAINS ALL AMERICAN PIPELINE,  
L.P., a Delaware limited partnership, et al.,

Defendants.

Case No. 2:15-cv-04113-PSG-JEMx

**[PROPOSED] ORDER GRANTING  
COUNSELS' REQUEST TO RENOTE  
STATUS CONFERENCE  
REGARDING SETTLEMENT  
DISTRIBUTION TO FISHER AND  
PROPERTY CLASSES**

Judge: Hon. Philip S. Gutierrez

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Upon presentation of Class Counsels' Request to Renote Status Conference Regarding Settlement Distribution to Fisher and Property Classes, it is hereby ORDERED.

The Status Conference currently set for July 18, 2024, shall be renoted for \_\_\_\_\_, 2024,

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Philip S. Gutierrez