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## MEMORANDUM

To: BP Clients/Claimants

Date: August 29, 2018

As a client and a BP-DWH/DHECC claimant, we wanted to let you know that we are now entering the Halliburton Transocean Punitive Damages Settlement phase. The total amount of money in this settlement phase is a \$1.24 billion pool, which is to be shared by several hundred thousand claims rolled into this phase. The amount of money in the pool is extremely small compared to the \$2.3 billion paid for seafood and approximately \$15+ billion paid for all other claims in the BP-DWH/DHECC settlement program.

The Halliburton Transocean Punitive Damages Settlement program administrators are still in the process of determining who may be entitled to some claim dollars and into which category a claimant may fall. It is a work in progress and very fluid at this time since this is a **NEW** settlement program.

We want to give you a **HEADS-UP** that within the next week to 10 days, you may receive some correspondence via US mail informing you that your claim may be either eligible or ineligible or pending or FWA (fraud, waste, abuse). In some cases, correspondence may even give a "base compensation" amount. If your letter happens to mention an amount, **please do not think this is the amount you will receive.** It is merely an amount the program will use as a base to apply a yet to be developed formula to determine a dollar amount award.

We have been working with the Halliburton Transocean Punitive Damages Settlement Program representatives in making sure all their numbers are correct, but as this memorandum goes out, we are not aware of the formula or the distribution model that will be used.

Currently, we are reviewing the base compensation amounts our clients have received and if necessary, we will file any appeals. Some of our clients are being listed as "ineligible" or "denied/FWA". **We are going to appeal all "ineligible, denied/FWA" awards if there is a legitimate basis to do so.** You therefore do not have to do anything for claims you retained us to handle and we have handled in the BP-DWH/DHECC program. Based on what we have been told, none of our clients need W-9 forms for the claims we are handling, as they were all provided and filed previously.

WAITZ & DOWNER



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