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BARON & BUDD, P.C.
ATTORNEYS AND COUNSELORS
3102 OAK LAWN AVE., #1100
DALLAS, TEXAS 75219-4281
(214) 521-3605

SETTLEMENT STATEMENT

IN RE: Town of Medfield

Settlement: 25 12915 - 24 16798 1

3M Company - Initial Payment		204,931.52
Less Common Benefit Assessment (8%) & Attorneys' Fee (17%)*		51,232.88
Common Benefit Assessment - Court Ordered	16,394.52	
Cossich, Sumich, Parsiola & Taylor, LLC	13,935.34	
Sandman Law, LLC	6,967.67	
Baron & Budd, P.C.	13,935.35	
Less Partial Litigation Expenses		
Filing and Service Fees	1,709.20	
Misc. Postage Copies, etc.	17.65	
Sub Total Expenses		1,726.85
Balance Due Claimant		151,971.79

* Attorneys' Fees are equal to the Original Contract Fee % less the Common Benefit Assessment - Court Ordered %

Client has received from Attorneys the Balance Due Claimant shown above. Client hereby approves of the distribution of funds as hereinabove set forth, the services of the Attorneys, and the amount and breakdown of attorneys' fee. Client further authorizes Attorneys to disburse the proceeds in accordance with the above itemization.

A copy of Rule 1.8 of the Louisiana Rules of Professional Conduct is attached. It allows attorneys to advance courts costs and litigation expenses prior to settlement but requires that a copy of the rule be provided at the time of the approval of any settlement statement.

DocuSigned by:
KRISTINE TRIERWEILER
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May-09-2025

Town of Medfield **Date**

Aqueous Film-Forming Foam (AFFF) Products Liability Litigation (MDL 2873)
Public Water System Settlements

April 18, 2025

Joint Message from the Special Master & Claims Administrator

The Claims Administrator and Special Master are honored to serve in our Court-appointed capacities and understand the significant impact that these claims represent for Public Water Systems ("PWS") nationwide. Our collective teams have dedicated significant time and resources to ensure the accurate adjudication of the settlement process for all stakeholders and Class Members.

This letter provides an update on the current status of the claims process and fund disbursement related to the 3M and DuPont settlement program Action Funds. Future letters will provide updated Action Fund results and information related to both Special Needs and Supplemental Funds.

Claims Process Status Update

In our roles, the Claims Administrator performs claim review procedures and calculates Adjusted Base Scores ("ABS"), while the Special Master performs additional quality control procedures – including both claim audits and recalculations as deemed necessary. Our teams work hand-in-hand, and we have a shared belief that accuracy of Settlement Award calculations is paramount.

The Phase One Action Fund claims submission deadline for the 3M and DuPont settlements was July 26, 2024. The Claims Administrator received program registrations from over 5,200 Public Water Systems ("PWS"). There have been over 3,500 submissions from Phase One Claimants which account for over 16,000 Water Source claims. As of April 4, 2025, ABS have been published for 2,951 PWS and 16,205 Water Sources. Approximately 400 Water Source submissions remain under active review - most of which are "interconnected" across multiple PWS and require additional layers of review to mitigate potential duplicative compensation.

Although not all ABS have been finalized and published, each Water Source – including the 400 still under active review referenced above – has an ABS calculation that has contributed to a projected aggregate pool of nearly 50 billion ABS "points." That translates to a current *projected* **gross** value of **approximately $0.123 per ABS point for the 3M settlement and approximately $0.0117 per ABS point for the DuPont settlement**.

The calculated *projected* **net** value of each ABS point is **approximately $0.10 per ABS point for the 3M settlement and approximately $0.01 for the DuPont settlement**. The net value accounts for specified deductions outlined in the Settlement Agreement(s) as well as the Class Fees and Expenses approved by the Court (see MDL Docket #s 4959, 5011). The net value also includes net income accrued by the Qualified Settlement Fund account(s). These estimated

amounts do not account for any private attorney fee and cost agreements that may exist between a Class Member and their retained legal counsel (if any). If a Class Member has outside legal counsel, their fees and expenses will be deducted from this projected net value by their legal counsel.

The calculated *projected* **net** value of each ABS point also accounts for an unallocated "holdback" of 10% (approximately $548,000,000) which is set aside to resolve potential claim submission errors. Any amount remaining in the holdback fund is expected to be re-allocated to Qualifying Class Members on a pro-rata basis as soon as the Claims Administrator and Special Master confirm that it is safe to release those funds.

A holdback is a common contingency utilized in complex settlements to mitigate program financial risks. As our analysis has progressed for both (a) the claims under active review and (b) available remedies for potential future risks such as Claimant phase misidentification (i.e. Phase One vs. Phase Two submissions), we have determined that a reduced holdback fund of 10% is an appropriate contingency that will allow for payment distributions to occur as quickly as possible.

Payment Timeline

The Special Master and Claims Administrator will begin making 3M Phase One Action Fund settlement payments in April 2025 and the total net award amount will be paid in installments through calendar year 2033 in conjunction with the payment schedule outlined in Exhibit K of the 3M Settlement Agreement (see MDL Docket #3620-10).

Phase One Action Fund payments related to the DuPont, Tyco, and BASF settlement programs are each expected to be paid primarily in one 2025 payment pursuant to Table 1 below.

Table 1

Payment Batch Description	Anticipated Payment Initiation Timeline
3M - Payment 1 (2024 Payment Part 1)	Q2 2025
3M - Payment 2 (2024 Payment Part 2 + 2025 Payment)	Q2/Q3 2025
DuPont - Payment 1	Q2/Q3 2025
Tyco - Payment 1	Q4 2025
BASF - Payment 1	Q4 2025

Table 2 outlines the full anticipated 3M settlement payment schedule. Column C outlines the anticipated value per ABS point of each payment batch for the 3M settlement program and Column E outlines the cumulative amount that would be paid to date as a result of each payment batch. For example, the first payment would be valued at $0.02 per ABS point and the second payment would be valued at $0.0456 per ABS point, so the cumulative (rolling) amount paid after two payments would be $0.0656 per ABS point.

Table 2 Anticipated 3M Settlement Payment Schedule					
A	B	C	D	E	F
Description	Timeline	Anticipated $ per ABS Point Payment Amount	Payment % of Net Settlement Award	Cumulative (Rolling) $ per ABS Point Paid	Cumulative (Rolling) % of Net Settlement Award Paid
3M - Payment 1	Q2 2025	$0.0200	20.0%	$0.0200	20.0%
3M - Payment 2	Q2 - Q3 2025	$0.0456	45.6%	$0.0656	65.6%
3M - Payment 3	Q2 2026	$0.0064	6.4%	$0.0720	72.0%
3M - Payment 4	Q2 2027	$0.0048	4.8%	$0.0768	76.8%
3M - Payment 5	Q2 2028	$0.0056	5.6%	$0.0824	82.4%
3M - Payment 6	Q2 2029	$0.0050	5.0%	$0.0874	87.4%
3M - Payment 7	Q2 2030	$0.0034	3.4%	$0.0908	90.8%
3M - Payment 8	Q2 2031	$0.0034	3.4%	$0.0942	94.2%
3M - Payment 9	Q2 2032	$0.0030	3.0%	$0.0972	97.2%
3M - Payment 10	Q2 2033	$0.0028	2.8%	$0.1000	100.0%
Totals		**$0.1000**	**100%**	**$0.1000**	**100.0%**

Table 3 provides a breakdown of anticipated 3M Action Fund settlement payment installments over the full payment term through calendar year 2033 for a *sample* Claimant with an approved total of 100,000 ABS points across all claimed Water Sources.

Table 3 Sample Claim – 3M Distribution Schedule Total ABS Points: 100,000					
A	B	C	D	E	F
Description	Timeline	Anticipated $ per ABS Point Payment Amount*	Anticipated Payment Amount	Cumulative (Rolling) $ per ABS Point Paid	Cumulative (Rolling) Settlement Payment Amount
3M - Payment 1	Q2 2025	$0.0200	$2,000.00	$0.0200	$2,000.00
3M - Payment 2	Q2 - Q3 2025	$0.0456	$4,560.00	$0.0656	$6,560.00
3M - Payment 3	Q2 2026	$0.0064	$640.00	$0.0720	$7,200.00
3M - Payment 4	Q2 2027	$0.0048	$480.00	$0.0768	$7,680.00
3M - Payment 5	Q2 2028	$0.0056	$560.00	$0.0824	$8,240.00
3M - Payment 6	Q2 2029	$0.0050	$500.00	$0.0874	$8,740.00
3M - Payment 7	Q2 2030	$0.0034	$340.00	$0.0908	$9,080.00
3M - Payment 8	Q2 2031	$0.0034	$340.00	$0.0942	$9,420.00
3M - Payment 9	Q2 2032	$0.0030	$300.00	$0.0972	$9,720.00
3M - Payment 10	Q2 2033	$0.0028	$280.00	$0.1000	$10,000.00
Totals		**$0.1000**	**$10,000.00**	**$0.1000**	**$10,000.00**

** Any holdback amount that is re-allocated to Qualifying Class Members would increase the net value of each ABS point.*