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13 Liaison Counsel for Plaintiffs

14 Honorable H. Russel Holland

15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE DISTRICT OF ALASKA

17 In re:)
18 The EXXON VALDEZ) Case No. 3:89-cv-095 (HRH)
19 _____) (Consolidated)
20 THIS DOCUMENT RELATES TO)
21 ALL CASES)
22 _____)

23 DECLARATION OF LYNN LINCOLN SARKO IN SUPPORT OF LEAD
24 COUNSEL'S THIRTEENTH PUNITIVE DAMAGES APPLICATION FOR AN
25 ORDER DISTRIBUTING EXXON QUALIFIED SETTLEMENT FUNDS TO
CLAIMANTS IN VARIOUS CATEGORIES AND THEIR ATTORNEYS

1 1. I am the Court-appointed Claims Administrator of the Exxon Qualified
2 Settlement Fund (hereinafter "EQSF") and the Alyeska Qualified Settlement Fund
3 (hereinafter "AQSF"). I make this declaration based on personal knowledge and am
4 competent to testify to the matters set forth herein.
5

6 2. The current application to distribute punitive damages covers claimants
7 scheduled to receive punitive damages principal and interest payments in any of the 51
8 claim categories that have multiple impairments on their claims.¹
9

10 3. Exhibit A to this declaration sets out the amounts of punitive damages principal
11 going to claimants in the various categories. There are **135** claims being paid, the total
12 amount of which is **\$871,539.15**.
13

14 4. Exhibit B to this declaration sets out the amounts of punitive damages interest
15 going to claimants in the various categories. There are **532** claims being paid, the total
16 amount of which is **\$7,291,210.33**.
17

18 5. The dollar figures provided in Exhibits A and B are gross dollar allocations on
19 claims prior to any deductions for attorneys' fees or costs. The total amount of gross
20

21 ¹ There are a total of over 1600 such claims, approximately 600 of which were covered by the
22 12th application. We anticipated when we filed the 12th application that it would take at least
23 three months for all of them to be processed, and continue to believe that is correct. This
24 application thus supplements the 12th application, with an additional group of claims that I expect
25 can be processed within a month of the Court's order approving this application. I anticipate
making a third application to complete the remaining additional claims with multiple
impairments in approximately one month.

1 payments under this Thirteenth Distribution Application is **\$8,162,749.48**.

2 6. If the Court approves the current request, I will begin authorizing payments to
3 be issued on behalf of or to the listed claimants as soon as possible after entry of the
4 Court's order approving the distribution application.

5
6 7. I certify under penalty of perjury of the laws of the State of Washington that the
7 foregoing is true and correct.

8 DATED this 15th day of July, 2010 at Seattle, Washington.

9
10 

11 Lynn Lincoln Sarko, Administrator
12 Exxon Qualified Settlement Fund
13 Alyeska Qualified Settlement Fund
14 Post Office Box 21945
15 Seattle, Washington 98111
16 (206) 623-1900

17 Certificate of Service

18 The undersigned certifies that on July 14, 2010, a true and correct copy of the foregoing
19 DECLARATION OF LYNN LINCOLN SARKO IN SUPPORT OF 13th PUNITIVE DAMAGES
20 APPLICATION FOR AN ORDER DISTRIBUTING EXXON QUALIFIED SETTLEMENT FUNDS
21 TO CLAIMANTS IN VARIOUS CLAIM CATEGORIES AND THEIR ATTORNEYS
22 was served on the following attorneys or parties of record by the court's ECF system:

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TO CLAIMANTS IN VARIOUS CLAIM CATEGORIES AND THEIR ATTORNEYS - 3