

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 (1) claimants
7 scheduled to receive their portion of the Final Distribution (as defined in connection with
8 the Sixteenth Application) in any of the 51 claim categories that have multiple
9 impairments on their claims (this is the second of several successive applications
10 covering claimants with multiple impairments to their claim);¹ and (2) claimants who
11 have who had some impediment to distribution of their claims in a prior application, and
12 for whom the impediment is now resolved.
13

14 3. Examples of claimants who are covered in this application because their claim
15 has recently been resolved include those deceased claimants for whom a personal
16 representative had not been identified in the past, claimants who submitted updated
17 address information and those claimants whose IRS levies have now been released. The
18 number of recently resolved impaired claims is composed of approximately 63 claimants,
19 with 258 claims to process. Assuming no additional lien, levy or assignment is received
20 between now and when payments are issued, the entire amount will be paid to these
21
22

23
24
25 ¹ Because there were over 1720 claims with multiple liens, approximately one third of
them were included in the 20th application; approximately one third are included in this

Davis Wright Tremaine LLP
LAW OFFICES
Suite 800 • 701 West 8th Avenue
Anchorage, Alaska 99501
(907) 257-5300 • Fax: (907) 257-5399

1 claimants, by either direct deposit or check.nts in the various categories. There are 258
2 claims being paid, the total amount of which is \$1,192,690.96.

3 4. Exhibit A to this declaration sets out the gross amounts of Combined
4 Compensatory Damages (the Supplemental, Compensatory Damages and Compensatory
5 Interest allocations are consolidated on Exhibit A) payments allocated to claimants.
6 There are 165 claims being paid, the total amount of which is \$13,014.41.
7

8 5. Exhibit B to this declaration sets out the gross amounts of Punitive Damages
9 Principal allocated to claimants. There are 99 claims being paid, the total amount of
10 which is \$389,389.58.
11

12 6. Exhibit C to this declaration sets out the gross amounts of Punitive Damages
13 Interest allocated to claimants. There are 110 claims being paid, the total amount of
14 which is \$635,123.44.
15

16 7. Exhibit D to this declaration sets out the gross amounts of the Final
17 Distribution allocated to claimants. There are 452 claims being paid, the total amount of
18 which is \$2,343,000.98
19

20 8. The dollar figures provided in Exhibits A, B, C and D are gross dollar
21 allocations on claims prior to any deductions for attorneys' fees or costs. The total
22 amount of gross payments under this Twenty-First Distribution Application is
23 \$3,380,528.41.
24

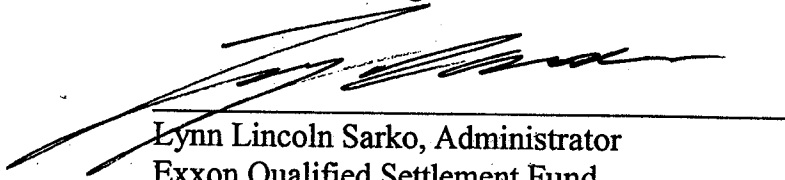
25 application; and the balance will be covered in the 22nd application.

Davis Wright Tremaine LLP
LAW OFFICES
Suite 800 · 701 West 8th Avenue
Anchorage, Alaska 99501
(907) 257-5300 · Fax: (907) 257-5399

1 9. If the Court approves the current request, I will begin authorizing payments to
2 be issued on behalf of or to the listed claimants after completion of the distribution of
3 payments on the 20th Application, which was approved by the Court on June 29, 2011 at
4 Docket No. 9717.

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

8 DATED this 13th day of July 2011 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 15th 2011, a true and correct copy of the foregoing
19 DECLARATION OF LYNN LINCOLN SARKO IN SUPPORT OF 21st 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:

23 Douglas J. Serdahely
24 PATTON BOGGS LLP
25 E-mail: dserdahely@pattonboggs.com

Lloyd B. Miller
SONOSKY, CHAMBERS, SACHSE,
MILLER & MUNSON
E-mail: lloyd@sonosky.net

By: s/ David W. Oesting

DECLARATION OF LYNN LINCOLN SARKO IN SUPPORT OF 21st PUNITIVE DAMAGES
APPLICATION FOR AN ORDER DISTRIBUTING EXXON QUALIFIED SETTLEMENT FUNDS
TO CLAIMANTS IN VARIOUS CLAIM CATEGORIES AND THEIR ATTORNEYS - 4
In re the Exxon Valdez, Case No. 3:89-cv-095-HRH

Davis Wright Tremaine LLP
LAW OFFICES
Suite 800 • 701 West 8th Avenue
Anchorage, Alaska 99501
(907) 257-5300 • Fax: (907) 257-5399