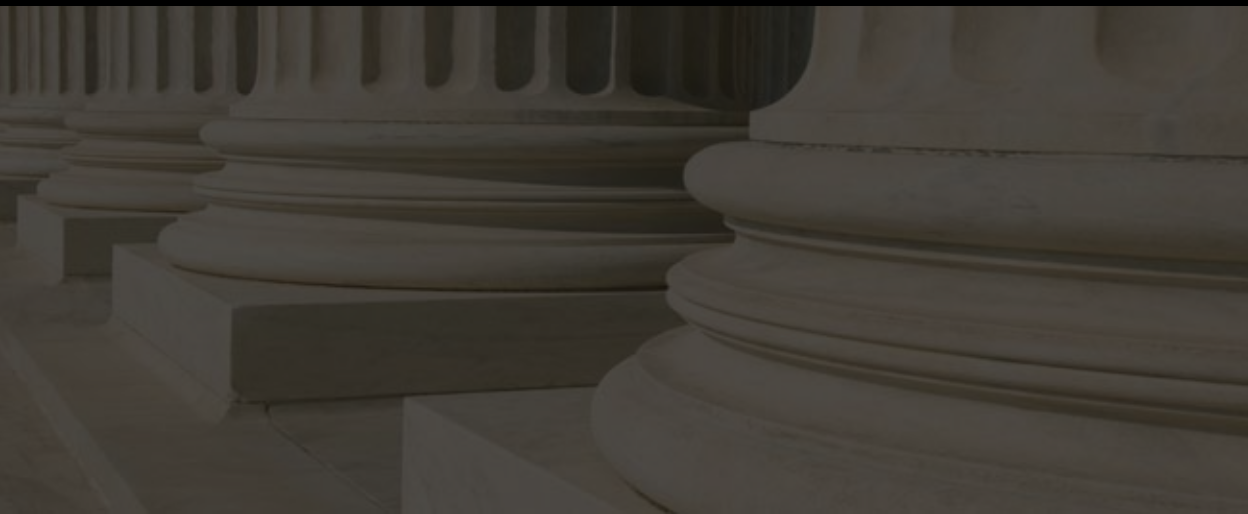




Perry Dampf Dispute Solutions
and Postlethwaite & Netterville

Working Together to Provide

SPECIAL MASTER AND DISBURSEMENT MANAGEMENT SERVICES



Perry Dampf Dispute Solutions (PDDS) and Postlethwaite & Netterville (P&N) have teamed up to offer a unique service designed to maximize the efficiency and quality provided to all parties involved in complex litigation. By joining the experience and skills of a Special Master and a Disbursement Manager, we aim to make the process as seamless and timely as possible for all concerned parties.

Start-to-Finish	3
Special Master Team.....	4
Special Master Services	5
Disbursement Management Team	6
Disbursement Management Services.....	7

Special Master

The purpose of the Special Master is to assist the Court and counsel with complex litigation, including facilitating the completion of discovery, resolving disputes, and overseeing the settlement fund.

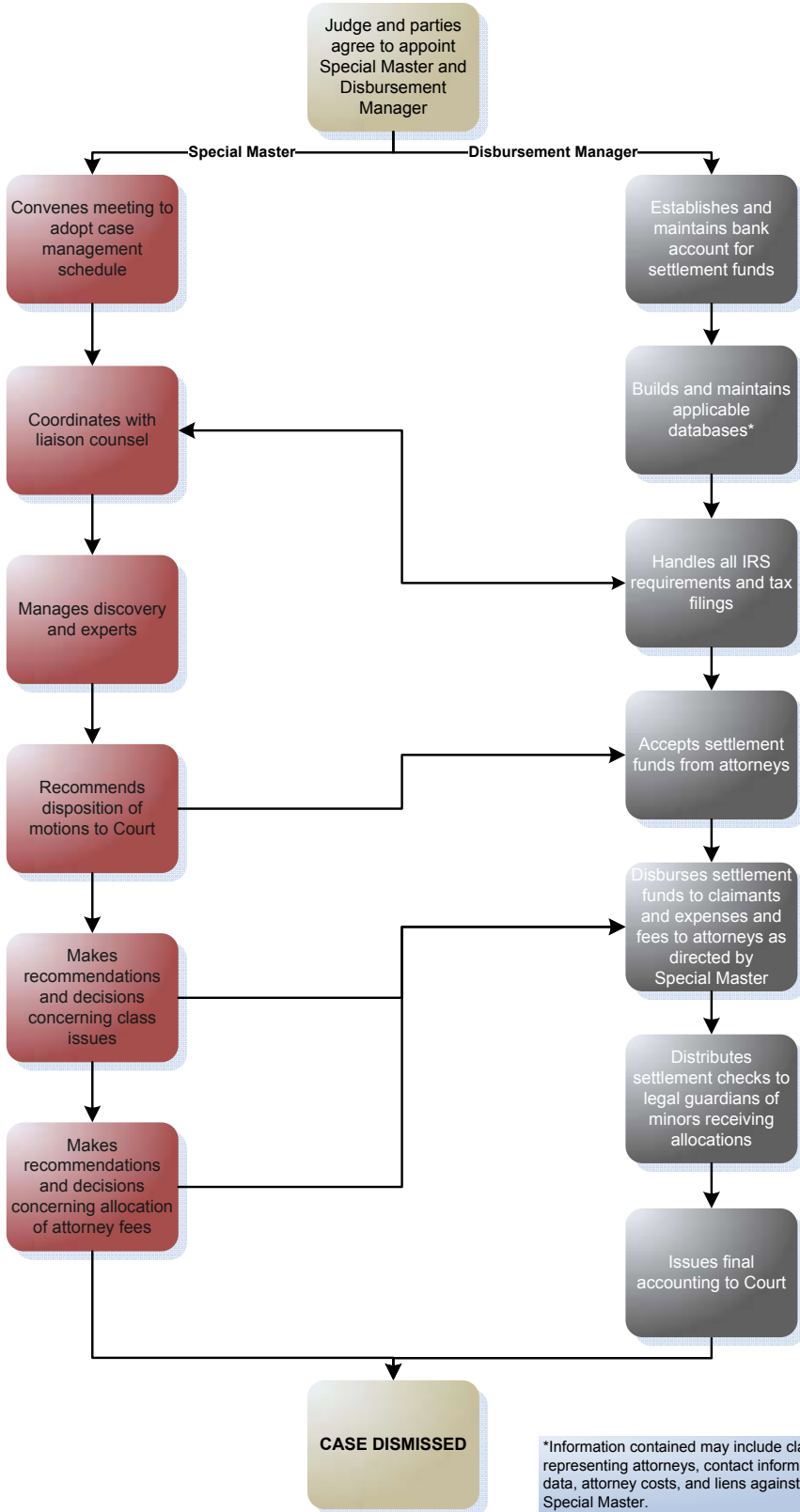
Disbursement Management

The Disbursement Manager manages and disburses the settlement. Responsibilities include notifying class members, administering the claim, providing call center support services, obtaining required signed releases, and disbursing the fund.

Start-to-Finish

Many firms offer either Special Master or Disbursement Management services, but our team provides a solution for the litigation process from discovery to disbursement and every step in between.





*Information contained may include claimants, representing attorneys, contact information, settlement data, attorney costs, and liens against allocations for Special Master.



JOHN W. PERRY, JR.

John is a partner in the Baton Rouge office of Perry, Atkinson, Balhoff, Mengis & Burns and a founding principal of Perry Dampf Dispute Solutions. He has been conducting mediations for over 10 years and is one of the most active mediators and arbitrators in the South. His mediation practice has included thousands of successfully completed mediations for legal and commercial clients. John is recognized as a leading authority on the process and application of alternative dispute resolution. His experience as a mediator has covered a wide array of multi-party, complex legal, and commercial issues. John also served as Judge Pro Tempore of the 19th Judicial

Court by appointment from the Louisiana Supreme Court. John has 28 years of litigation and mediation experience in personal injury, insurance, professional, commercial, and products liability cases. He is a Fellow in both the American College of Trial Lawyers and the American College of Civil Trial Mediators.

Perry Dampf Dispute Solutions • 721 Government Street, Suite 102 • Baton Rouge, Louisiana 70802 • (225) 389-9899 • perry@pabmb.com



ROBERT S. DAMPF

Robert is a partner in the Lake Charles office of Stockwell, Sievert, Vicillio, Clements & Shaddock. He is also a principal of Perry Dampf Dispute Solutions. He has been recognized as a premier mediator and an authority on alternative dispute resolution for the past 19 years. In that time, Robert has conducted thousands of mediations throughout the Gulf South. In addition to his active mediation schedule, he is also a frequent author and lecturer on the mediation and arbitration processes. As a certified instructor, Robert works with clients providing in-house staff with accredited training.

Perry Dampf Dispute Solutions • 721 Government Street, Suite 102 • Baton Rouge, Louisiana 70802 • (225) 389-9899 • rsdampf@ssvcs.com



DANIEL J. BALHOFF

Dan is a partner in the Baton Rouge office of Perry, Atkinson, Balhoff, Mengis & Burns. He holds chemical engineering and law degrees from LSU. While in law school, he served as the managing editor of the Louisiana Law Review. He later clerked for the Honorable Frank J. Polozola of the U.S. District Court for the Middle District of Louisiana, and for the Honorable Daniel A. Manion of the U.S. Court of Appeals for the Seventh Circuit. He has authored several articles concerning insurance and constitutional issues. Dan has over 19 years of practice in federal and state trial and appellate litigation, including complex litigation, mass torts, and class actions.

Perry Dampf Dispute Solutions • 721 Government Street, Suite 102 • Baton Rouge, Louisiana 70802 • (225) 389-9899 • balhoff@pabmb.com



MICHAEL E. PONDER

Mike retired from the 19th Judicial District Court after being elected and serving as a judge for 14 years. He then served as the East Baton Rouge Parish Attorney, who is the legal advisor to the Mayor-President and Metropolitan Council. He became a full-time member of Perry Dampf Dispute Solutions in 2005 and was appointed by the First Circuit Court of Appeal as Program Director for its mediation program. Mike has over 33 years of experience in personal injury (plaintiff and defense), insurance, professional, and products liability law. He has received advanced mediation and arbitration training from the Alternative Dispute Resolution Administration, specifically in Stipulation Analysis and Claim File Preparation and Analysis. In addition, Mike was a member of Arbitration Forums from 1993-1995.

Perry Dampf Dispute Solutions • 721 Government Street, Suite 102 • Baton Rouge, Louisiana 70802 • (225) 389-9899 • judgeponder@gmail.com

SPECIAL MASTER SERVICES

A Special Master is appointed by the Court to supervise the administration and execution of complex lawsuits. The Special Master acts as a resource, assisting the Court and all involved parties in the management of the case. By using the experience and resources of a third-party Special Master, the Court significantly reduces its burden, potentially resulting in cost savings and faster resolutions.

PDDS has extensive alternative dispute resolution experience, having successfully resolved thousands of cases as mediator or arbitrator. With over 110 years of combined legal experience, PDDS has a unique depth of knowledge in facilitating communications and agreements among opposing parties.

PDDS provides a variety of Special Master services throughout the litigation process including, but not limited to, the following:

- Acts as a liaison between the Court and the parties
- Maintains records throughout the process
- Manages the discovery process, including scheduling, resolving disputes, and communicating with the Court and parties
- Oversees testing protocols and computer modeling
- Creates and manages a method for allocation
- Generates claim forms
- Determines the amount of claimant awards
- Supervises the funding process
- Monitors settlement compliance, ensuring that the settlement agreement is implemented properly

YEAR	CASE
2002	EDC Spill in Lake Charles
2003	Mobile Home Sales Tax Refund
2003	PCS Nitrogen (Geismar Release)
2003	Victor Bussie v. All American Life Insurance
2006	Vulcan April 2001 Settlement
2006	Clean Harbors Plaquemine
2007	Allied Signal Southworks
2008	Allied Signal Cedarcrest
2008	A&B Bolt & Supply
2008	Honeywell International
2008	Noretta Thomas (Myrtle Grove)



WILLIAM E. BALHOFF

William E. Balhoff, CPA, CFE is a Director in the Postlethwaite & Netterville Accounting and Assurance Services Group. He serves as a member of the Firm Executive Committee, Chair of the Audit Committee, and Director-in-Charge of P&N Consulting.

Bill is a nationally recognized professional, having served in leadership roles on numerous professional committees. He served on the Special Committee on State Regulation regarding the effects of Sarbanes-Oxley Act. During the Spring of 2002, Bill testified before the U.S. Senate Banking Subcommittee chaired by Senator Sarbanes regarding Enron matters and the impact on non-Big Four firms. He serves as a member of the AICPA Council and served as a member of the AICPA Board of Directors. Bill also recently served as Chair of the AICPA's PCPS Executive Committee. Bill was recently named to CPA Magazine's List of Top 100 Most Influential People in the Accounting Profession.

Postlethwaite & Netterville • 8550 United Plaza, Suite 1001 • Baton Rouge, Louisiana 70809 • (225) 922-4600 • bbalhoff@pncpa.com



RALPH J. STEPHENS

Ralph J. Stephens, CPA/ABV, JD is a Director in the Tax practice at Postlethwaite & Netterville. Ralph's areas of concentration include income and estate planning, succession planning, business consulting, and litigation support. He is one of the few Certified Public Accountants in Louisiana who have attained the Accredited in Business Valuation designation. In addition to valuation services to business owners, Ralph regularly consults with companies on merger and acquisition valuations and financial reporting.

Ralph works extensively with litigation settlement funds and related issues. He has been recognized as a qualified expert witness and has provided testimony on various accounting and valuation issues in numerous state and federal courts.

Postlethwaite & Netterville • 8550 United Plaza, Suite 1001 • Baton Rouge, Louisiana 70809 • (225) 922-4600 • rstephens@pncpa.com



WAYNE J. HENDERSON

Wayne J. Henderson is a Manager in the management consulting practice at Postlethwaite & Netterville. Wayne joined the firm in 1997. Prior to joining the firm, he was Vice-President and Real Estate Manager in the trust department of a large Louisiana bank.

Wayne has served as Manager of 15 class action/mass tort settlements as Court-Appointed Disbursing Agent (CADA) disbursing over \$160 million in the past five years.

Wayne works extensively with litigation settlement funds and related issues. He served as the Manager for Postlethwaite & Netterville as CADA for a \$9 million dollar class action suit (19th JDC), Manager for the Escrow Agent in a \$140 million dollar legal action (19th JDC), and Manager for claims/disbursements for a state agency in a class action settlement.

Postlethwaite & Netterville • 8550 United Plaza, Suite 1001 • Baton Rouge, Louisiana 70809 • (225) 922-4600 • whenderson@pncpa.com

DISBURSEMENT MANAGEMENT SERVICES

P&N has considerable experience in providing litigation services to the legal community. Our team of qualified, credentialed professionals includes Certified Internal Auditors (CIA), Accredited Business Valuations (ABV), Certified Valuation Analysts (CVA), Certified Information Systems Security Professionals (CISSP), Certified Information Systems Auditors (CISA), Juris Doctors (JD), Certified Public Accountants (CPA), Certified Valuation Analysts (CVA), and Certified Fraud Examiners (CFE).

With the resources of the largest accounting and business advisory firm in Louisiana, P&N has experience in organization, implementation, and operation of settlement activities. Our team can provide:

- A plan to ensure proper determination of entitlement amounts
- A system to provide relevant data on a timely basis
- Safeguards for security of data
- Efficient operations at reasonable costs
- Process reviews
- Claim process design and management
- Client communication protocols
- Award distribution
- Document fulfillment

YEAR	CASE	# CLAIMS PAID
1999	Georgia Gulf- mass tort	1,750
2001	Vietnamese Fishermen License Refund*	600
2001	DSI Chippewa Street Spill	3,650
2003	DSI I-110 Spill	3,754
2003	Mobile Home Sales Tax Refund	3,692
2004	Zen-Noh Grain Release	1,340
2003	PCS Nitrogen (Geismar Release)*	2,300
2003-07	LA Norm-site clean up	TBD
2006	Reddy Ice*	11,000
2006-07	Aldana-site clean up	TBD
2006-07	Allemania (Oldham)*	2,000
2007	Allied Signal Southworks*	6,000
2007-08	Brusly Barge*	TBD
2007-08	Vulcan April 2001 Settlement*	2,000
2008	Allied Signal Cedarcrest	TBD
	TOTALS	38,086

*Also served as Claims Administrator

Settlements for the above cases total over \$175 Million

**SPECIAL MASTER &
DISBURSEMENT MANAGEMENT SERVICES**

PERRY  **DAMPF**
DISPUTE SOLUTIONS

721 Government Street, Suite 102
Baton Rouge, Louisiana 70802
(225) 389-9899
www.perrydampf.com

P&N Postlethwaite
& Netterville

8550 United Plaza, Suite 1001
Baton Rouge, Louisiana 70809
(225) 922-4600
www.pncpa.com