

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 90-cv-00181-JLK

MERILYN COOK, *et al.*,

Plaintiffs,

v.

ROCKWELL INTERNATIONAL CORPORATION
and THE DOW CHEMICAL COMPANY,

Defendants.

**CLASS COUNSEL'S MOTION TO SET A FINAL DEADLINE
FOR CLAIMANT SUBMISSIONS AND AMENDMENT OF CLAIMS**

For the reasons set forth in the accompanying memorandum in support and related materials, Class Counsel respectfully request that the Court enter the proposed Order providing that:

- (1) All claimants must submit all required information, materials, and documentation to the Settlement and Claims Administrator on or before October 15, 2018 in order for their claims to be accepted, with the exception of the claims submitted on or before December 31, 2017 by The Farmers Reservoir and Irrigation Company ("FRICO") that are the subject of The Farmers Reservoir and Irrigation Company's Motion for: 1. Review of the Settlement and Claims Administrator's Denial of its Claims; 2. Request for Limited Discovery; and 3. Request for Hearing (ECF No. 2517). No information, materials, or documentation submitted after October 15, 2018 may be accepted by the Settlement and Claims Administrator with respect to the claims of any claimant other than FRICO. The Settlement and Claims Administrator shall deny any claims for which the Settlement and Claims Administrator has not received all required information, materials, and documentation by October 15, 2018. In other words, the Settlement and Claims Administrator shall deny all claims for which the

claimants have not submitted all required information, materials, and documentation by October 15, 2018; and

- (2) No claims may be amended after October 15, 2018, including to add any additional claimant(s).

Dated: September 13, 2018

Respectfully submitted,

/s/ Merrill G. Davidoff

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 13th day of September, 2018, he caused the foregoing submission to be served via the Court's ECF system on all participating counsel.

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**[PROPOSED] ORDER GRANTING CLASS COUNSEL’S MOTION TO SET A FINAL
DEADLINE FOR CLAIMANT SUBMISSIONS AND AMENDMENT OF CLAIMS**

This matter comes before the Court on Class Counsel’s Motion to Set a Final Deadline for Claimant Submissions and Amendment of Claims, made pursuant to Paragraph 5 of the Order Granting Plaintiffs’ and Class Counsel’s Unopposed Motion for Initial Distribution, ECF No. 2501, which provides that the Court retains jurisdiction over any further application or matter that may arise in connection with this Action.

NOW, THEREFORE, upon review of Class Counsel’s Motion for Motion to Set a Final Deadline for Claimant Submissions and Amendment of Claims, and the accompanying Memorandum in Support, it is ORDERED, ADJUDGED AND DECREED as follows:

1. All claimants must submit all required information, materials, and documentation to the Settlement and Claims Administrator on or before October 15, 2018 in order for their claims to be accepted, with the exception of the claims submitted on or before

December 31, 2017 by The Farmers Reservoir and Irrigation Company (“FRICO”) that are the subject of The Farmers Reservoir and Irrigation Company’s Motion for: 1. Review of the Settlement and Claims Administrator’s Denial of its Claims; 2. Request for Limited Discovery; and 3. Request for Hearing (ECF No. 2517). No information, materials, or documentation submitted after October 15, 2018 may be accepted by the Settlement and Claims Administrator with respect to the claims of any claimant other than FRICO. The Settlement and Claims Administrator shall deny any claims for which the Settlement and Claims Administrator has not received all required information, materials, and documentation by October 15, 2018. In other words, the Settlement and Claims Administrator shall deny all claims for which the claimants have not submitted all required information, materials, and documentation by October 15, 2018.

2. No claims may be amended or revised in any way after October 15, 2018, including to add any additional claimant(s).

3. This Court retains jurisdiction over any further application or matter that may arise in connection with this Action.

IT IS SO ORDERED.

BY THE COURT:

John L. Kane, Senior District Judge
United States District Court