

# Exhibit A

## To Motion For

## Final Approval

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

George M. Hearn Jr., on behalf of himself and all  
others similarly situated,

Plaintiffs,

vs.

South Carolina Public Service Authority d/b/a  
Santee Cooper,

Defendant.

Civil Action No. 2017-CP-26-5256

**AFFIDAVIT OF JESSIE MONTAGUE**

1. My name is Jessie Montague, and I am over the age of eighteen (18) years. I make this declaration under the penalty of perjury, free and voluntarily, under no coercion, threat, or intimidation, and without promise of benefit or reward, based on my own personal knowledge. If called to testify, I could and would testify consistent with the matters stated herein.

2. I am a Project Manager for RG/2 Claims Administration LLC (“RG/2 Claims”), the independent third-party settlement administrator retained as Settlement Administrator to handle various settlement administration activities in the above-referenced matter.

3. RG/2 Claims is a full service class action settlement administrator offering notice, claims processing, allocation, distribution, tax reporting, and class action settlement consulting services. RG/2 Claims’ experience includes the provision of notice and administration services for settlements arising from antitrust, consumer fraud, civil rights, employment, negligent disclosure, and securities fraud allegations. Since 2000, RG/2 Claims has administered and distributed in excess of \$1.8 billion in class action settlement proceeds.

4. I have been actively involved and responsible for handling the administration of the settlement of the above-referenced matter.

5. RG/2 Claims was retained to, among other tasks, a) prepare, print, mail and email

Notices to all Class Members; b) create and maintain the Settlement website; c) prepare and publish the Publication Notice; d) prepare weekly activity reports; e) handle inquiries from and correspondence to Settlement Class Members; f) re-mail Notices; g) skip-trace undeliverable addresses; h) calculate and issue Settlement payments to valid Claimants; and i) conduct such other tasks as the Parties mutually agree or the Court orders RG/2 Claims to perform.

6. On August 4, 2021, RG/2 Claims made available to the public a settlement website at [www.peedeeplantclassaction.com](http://www.peedeeplantclassaction.com). This website includes the following:

- a. The “Homepage” contains a brief summary of the Settlement and advises potential Class Members of their rights under the Settlement. A copy of the Homepage is attached hereto as **Exhibit A**.
- b. The “Notices and Forms” page contains pdf copies of the Notice of Proposed Class Action Settlement (Detailed Notice), Notice of Proposed Class Action Settlement (Summary Notice), and Request for Exclusion Form.
- c. The “Court Documents” page contains pdf copies of the Summons and Complaint, Motion for Preliminary Approval of the Class Action Settlement, Settlement Agreement and Release, and the Order Granting Preliminary Approval.
- d. The “Contact Information ” page contains the contact information of the Settlement Administrator and Class Counsel.

7. RG/2 Claims also arranged for a toll-free phone number at 1-800-283-0976 to be available for Class Members to review frequently asked questions about the Settlement, request a Notice be mailed to them, speak to a live operator or leave a voicemail message requesting a returned call. As of September 8, 2021, we have received 520 calls to the Interactive Voice Response system and 236 calls requiring live operator support.

8. RG/2 Claims also arranged for the Summary Class Notice or the Publication Notice to be published in the *Charleston Post & Courier*, *Greenville News*, *Sun News (Myrtle Beach, SC)*, *Aiken Standard*, *Beaufort Gazette/Bluffton Island Packet*, *the State (Columbia)*, and *the Rock Hill Herald*. The publication ran on Thursday, August 5, 2021. A sample of the published Notice is attached hereto as **Exhibit B**.

9. On or about July 1, 2021, RG/2 Claims received the Settlement Class List from

Defendant's Counsel containing the names, known contact information, account numbers, person IDs and current or former Customer status for all residential and business retail customers who were identified as Settlement Class Members. In addition, on or about July 26, 2021, RG/2 Claims received an electronic file from Defense Counsel containing names and known contact information for Class Member identified by RG/2 Claims as having incomplete account and contact information on the original Settlement Class List. Review of the data received revealed there were 374,178 individual rows of data provided, with 325,785 unique person IDs. In total 322,806 Settlement Class Notices were issued to Settlement Class Members.

10. Prior to mailing the Notices, and in order to locate the most recent addresses, RG/2 Claims processed the Settlement Class List names and addresses received from Defense Counsel through the United States Postal Service's ("USPS") National Change of Address database ("NCOA") and updated the data with any corrected information from NCOA.

11. On August 5, 2021, RG/2 Claims caused to be mailed by First-Class mail the Summary Class Notice ("Notice"). The Notice was sent by first-class mail to 173,212 Class Members for whom an email addresses was not provided in the Settlement Class List. A true and correct copy of the Notice is attached hereto as **Exhibit C**.

12. On August 5, 2021, RG/2 Claims caused to be sent by email, the Summary Class Notice to 149,594 Class Members for whom email addresses were provided in the Settlement Class List. For any email Notice for which a bounce code was received indicating that the message was undeliverable, two additional attempts were made to deliver the Notice by email. After three attempts to contact the Class Members by email, RG/2 Claims sent Notice to Class Members at their physical mailing address. RG/2 Claims mailed an additional 17,551 Notices by first-class mail as a result of undeliverable or bounced email Notice.

13. As of September 9, 2021, 23,008 Notices were returned by the USPS as undeliverable. Of the returned Notices, 1,029 Notices included a forwarding address provided by the USPS, and a new Notice was promptly mailed to the Class Member. For the remaining 21,979 Notices, RG/2 Claims performed extensive skip-trace procedures using Accurint, and was able to locate updated addresses for 14,535 Class Members. A total of 7,444 Notices remain undeliverable by mail, thus approximately 2.3% of the Notices sent have been deemed unsuccessfully delivered.

14. The Notice informed Class Members of their right to request exclusion from the Settlement, provided the request is received or postmarked on or before September 20, 2021. As of September 9, 2021, RG/2 Claims has received three (3) requests for exclusion from the Settlement. Following the exclusion deadline, the names of all excluded Class Members will be provided to the Court as directed by the settlement.


15. The Notice also informed Class Members of their right to object to the Settlement provided the request is received or postmarked on or before September 20, 2021. To date, RG/2 Claims has not received or been advised of any objections to the Settlement.

16. I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of September, 2021.

  
JESSIE MONTAGUE

STATE OF PA }  
} ss:  
COUNTY OF Philadelphia

On the 10 day of September, 2021, before me, the undersigned personally appeared JESSIE MONTAGUE, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

  
Notary Public

Commonwealth of Pennsylvania - Notary Seal  
SOFIA A LOWENBERG - Notary Public  
Philadelphia County  
My Commission Expires Jul 16, 2022  
Commission Number 1332836

# EXHIBIT A

## **George M. Hearn Jr., et al. v. South Carolina Public Service Authority d/b/a Santee Cooper, Civil Action No. 2017-CP-26-5256**

**If you were a direct residential or business retail customer of the South Carolina Public Service Authority (“Santee Cooper”) at any time between November 1, 2009 and February 28, 2021, a class action lawsuit may affect your rights.** In the lawsuit the Plaintiff alleges that direct residential and business retail customers of Santee Cooper paid increased and improper utility rates in connection with the cancelled construction of coal-fired generation facilities at the Pee Dee Energy Campus (the “Pee Dee Project”). Santee Cooper denies any wrongdoing but has agreed to settle. The Class Action Settlement resolves all claims in the lawsuit.

**Who is Included?** All direct residential and business retail customers who received power and energy from Santee Cooper and who had Accounts with Santee Cooper at any time between November 1, 2009 and February 28, 2021 are part of the Settlement Class and included in the lawsuit. If you think you are a Settlement Class member and you did not receive the court authorized Notice call 1-800-283-0976 or email **info@rg2claims.com** (mailto:info@rg2claims.com).

**What Does the Settlement Provide?** Pursuant to the proposed Settlement, in exchange for dismissal of this action and release of claims known and unknown against Santee Cooper, Santee Cooper will pay twelve million five hundred thousand dollars (\$12,500,000.00) in cash (the “Settlement Benefit”). Distributions from the Settlement Benefit will be made to Class Members after deducting (1) attorneys’ fees and litigation expenses approved by the Court; (2) certain administrative and tax expenses; and (3) an incentive award to the Representative

Plaintiff approved by the Court. All Class Members are entitled to receive a minimum payment or billing credit of \$5.00, and the remaining Settlement Benefit will be allocated in proportion to the amount the Class Member is estimated to have paid toward the Pee Dee Project. Distributions will be made by check to former customers and to current customers who will receive \$200 or more, and distributions will be made by bill credit to current customers who will receive less than \$200. The Settlement is subject to Court approval. The Court will hold a hearing regarding final approval on October 7, 2021. Distributions will be made only if and after the Court approves the Settlement.

**What Are Your Options?** You have the following options:

- **Stay in the class:** You may qualify for a billing credit or payment if the settlement is approved. You do not have to take any action to receive this benefit.
- **Exclude yourself:** You may exclude yourself or “opt out” of the Class by **September 20, 2021**. If you opt out, you will not receive a billing credit or payment, and your right to bring your own lawsuit related to the same subject matter will not be affected by the Settlement. The Request for Exclusion Form is available under the Notice and Forms tab for your convenience.
- **Go to a hearing:** If you do not opt out, you may ask to speak in Court about the fairness of the settlement.
- **Object:** If you do not opt out, you may submit a written objection, informing the Court if you do not like the Settlement and explaining why, your objection must be submitted by **September 20, 2021**.

To understand your options and how your rights will be affected, as well as the deadlines for action on your part, please read all of the Notice of Proposed Class Action Settlement (pdf/Hearn\_Long\_Form\_Notice.pdf).



**Final Hearing and Judgment.** A hearing in this case will be held on October 7, 2021, at 2:00 p.m., at the Dorchester County Courthouse in St. George, SC, or via videoconferencing means that comply with South Carolina Courts' Standing Order regarding COVID-19, to consider whether to approve the Settlement. You may appear at the hearing, but you do not have to. Please continue to check this website for updates regarding this case and the Final Hearing and Judgment.

**IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THE PROPOSED SETTLEMENT.** These rights and options — **and the deadlines to exercise them** — are explained further in the Notice of Proposed Class Action Settlement (pdf/Hearn\_Long\_Form\_Notice.pdf) and the Settlement Agreement (pdf/Executed\_Settlement\_Agreement.pdf).

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# EXHIBIT B





FILE/BRAD NETTLES/STAFF

Citadel cadets participate in a honorary parade to celebrate the 50th anniversary of Charles Foster, who was the first African American cadet to graduate from The Citadel.

## Citadel planning to bring back public cadet parades

BY THOMAS NOVELLY  
tnovelly@postandcourier.com

The Citadel is bringing back its tradition of allowing the public to come and watch cadet parades at Charleston's historic military college after pausing last year due to the pandemic.

But even as cases of the new delta variant of COVID-19 begin to spike, the school still plans to continue without other precautions in place this upcoming school year.

Kim Keelor, a spokeswoman for The Citadel, said currently there are no requirements for masks or social distancing planned for the outside parades.

Circumstances could change as many South Carolina colleges begin to make preparations for incoming freshman, she said.

"Everyone loves a parade. Dress parades have been pulling together proud parents, alumni and visitors from around the country to the perimeter of Summerall Field on The Citadel since 1922," The Citadel Commandant of Cadets, Col. Tom Gordon, said in a media statement.

"We look forward to showcasing the discipline, profession-

*"We look forward to showcasing the discipline, professionalism and Esprit de Corps that defines The Citadel when the South Carolina Corps of Cadets resumes the parade schedule in September."*

**Col. Tom Gordon,**  
The Citadel Commandant of Cadets

alism and Esprit de Corps that defines The Citadel when the South Carolina Corps of Cadets resumes the parade schedule in September."

The tradition of parading military troops in the United States began at Valley Forge in the late 18th century during the Revolutionary War.

According to The Citadel's archivist, parades were written into the regulations in 1845, and mentioned as being held on Friday afternoons in 1849. The tradition for the Corps of Cadets dates back around 180 years.

In addition to being a public display of tradition, The Citadel's parades are an opportunity for leaders to "inspect the Corps, render honors, preserve tradition and foster a sense of unity among cadets," the school said in a statement.

Parades, and many of the longstanding traditions at The Citadel, were put on hold last year as South Carolina was slammed with the COVID-19 virus.

Students finished off the end of the school year remotely and the campus was used to quarantine Marine Corps recruits getting ready for boot camp at Parris Island.

The Citadel will likely not host the Marines on campus again if another COVID spike happens, as the school will need the barracks for incoming freshman for in-person classes starting this month.

The Friday afternoon parade schedule can be found on The Citadel's website here.

Reach **Thomas Novelly** at 843-937-5713. Follow him @TomNovelly on Twitter.



FILE/GRACE BEAHM ALFORD/STAFF

Floodwater from the Little Pee Dee River flows close to the top of a bridge on Highway 76 near Nichols in Marion County on Sept. 18, 2018, hours before two women drowned there in an Horry County jail van.

## Horry settles with estates of women who drowned in van

BY RICHARD CAINES  
rcaines@postandcourier.com

MYRTLE BEACH — The estates of two women who died after drowning in the back of an Horry County Sheriff's transport van that was engulfed by Marion County floodwaters after Hurricane Florence in 2018 have reached a settlement with Horry County.

The details of the settlement were not immediately known. Nicolette Green of Myrtle Beach and Wendy Newton of Shallotte, N.C., were being taken on Sept. 18, 2018, to hospitals for emergency mental health treatment.

Court records said that while on the way to Darlington, two deputies, Stephen Flood and Joshua Bishop, drove through a flooded road near the Pee

Dee River on S.C. 76.

The deputies climbed out of the van while Newton and Green could not escape. The firings of Flood and Bishop were announced several weeks after both women drowned.

In 2019, Flood and Bishop were each charged with two counts of involuntary manslaughter, punishable by up to five years in prison.

Flood, who drove the van, also faces two counts of reckless homicide, an offense that carries up to 10 years behind bars.

Their criminal cases are still pending in Marion County.

The county released a statement on Aug. 3: "Horry County and the Estates of Wendy Haywood Newton ('Ms. Newton') and Nicolette Tanyja Eugenia Green ('Ms. Green') have reached an agreement to resolve

all claims asserted against Horry County regarding the deaths of Ms. Newton and Ms. Green that occurred on September 18, 2018 in the aftermath of Hurricane Florence," the statement read.

"Horry County regrets and acknowledges these tragic deaths, and changes have been implemented to better protect the safety of mental health patients in Horry County. These changes will help ensure that mental health patients are transported in a more safe and responsible manner. Horry County extends its sincere condolences to the families of Ms. Newton and Ms. Green. As part of the resolution of all pending claims involving Horry County, Horry County's sincere hope is that the families of Ms. Newton and Ms. Green will experience some sense of closure to their grief."

## Nursing home to workers: Get vaccine or lose your job

BY BERNARD CONDON and MATT SEDENSKY  
Associated Press

NEW YORK — The U.S. nursing home industry's resistance to forcing workers to get vaccinated against COVID-19 for fear that too many of them might quit began to crack this week when its biggest player announced its employees must get the shot to keep their jobs.

The new requirement at Genesis Healthcare, which has 70,000 employees at nearly 400 nursing homes and senior communities, is the clearest sign yet that owners may be willing to risk an exodus at already dangerously understaffed facilities to quickly vaccinate the 40 percent of workers still resisting shots and fend off the surging delta variant.

Some experts are calling for mandatory vaccinations at nursing homes, warning that unprotected staff members are endangering residents. Even residents who have been inoculated are vulnerable because many are elderly and frail, with weak immune systems.

More than 1,250 nursing

home residents across the U.S. were infected with COVID-19 in the week ending July 25, double the number from the week earlier, and 202 died, according to federal data.

"It's so easy now to say, 'Well, Genesis is doing it. Now we'll do it,'" said Brian Lee, who leads Families for Better Care, an advocacy group for long-term care residents. "This is a big domino to fall."

Lawrence Gostin, a professor of health law at Georgetown University, said he likewise foresees a "snowball effect." He said resisting vaccination mandates at this point is "unconscionable."

Some local governments are taking the decision out of the industry's hands, with Massachusetts and Denver announcing mandatory vaccinations at nursing homes this week.

The question has become more urgent as the highly contagious delta variant drives up new COVID-19 cases in the U.S. to about 90,000 a day on average — the most since mid-February — and has led to several outbreaks in nurs-

ing homes and sent hospitalizations surging in states like Florida and Louisiana to the highest levels since the pandemic began.

Despite the terrible toll taken by the disease at nursing homes, many of the nation's 15,000 such institutions have rejected mandatory vaccinations or fear large numbers of workers will leave in protest. Nearly a quarter of nursing homes are already short of nurses or nurse's aides.

But Associated Press interviews this past week with managers at 10 mostly smaller nursing home operations across the nation that are requiring vaccines found that the threat of workers quitting en masse over the shots may be overblown.

After Canterbury Court in Atlanta announced a mandate in January, CEO Debi McNeil was so fearful of a "mass walkout" that she brought in medical experts to talk to workers, met with holdouts one-on-one and invited staff to gather in the community room for meetings that occasionally got heated.

## Sturgis bike rally revs back bigger, despite virus variant

BY STEPHEN GROVES  
Associated Press

SIoux FALLS, S.D. — Crowds of bikers are rumbling their way towards South Dakota's Black Hills, raising fears that COVID-19 infections will be unleashed among the 700,000 people expected to show up at the Sturgis Motorcycle Rally.

The rally, which starts Friday, has become a haven for those eager to escape coronavirus precautions. Last year, the rally hardly slowed down, with roughly 460,000 people attending. Masks were mostly ditched as bikers crowded into bars, tat-

too parlors and rock shows, offering a lesson in how massive gatherings could spread waves of the virus across the country.

This year — the 81st iteration of the rally — is expected to be even bigger, drawing people from around the U.S. and beyond, despite concerns about the virus' highly contagious delta variant.

"It's great to see a party of hundreds of thousands of people," said Zoltán Vári, a rally-goer who was settling into his campsite Tuesday after making the trek from Hungary.

He was eager to return to riding a Harley-Davidson through the Black Hills after missing last year.

Vári evaded U.S. tourism travel restrictions on Europe by spending two weeks in Costa Rica before making his way to South Dakota. He hopes 1 million people will show up. Typical attendance is around a half a million.

The city of Sturgis, usually a sleepy community of under 7,000, tried to tamp things down last year, canceling most city-sponsored events and promotion, but hordes of bikers showed up anyway.

"The rally is a behemoth, and you cannot stop it," said Carol Fellner, a local who worried that this year's event would cause a fresh outbreak of cases.

### LEGAL NOTICE

#### If you were a residential or business retail customer of Santee Cooper at any time between November 1, 2009 and February 28, 2021, a class action settlement may affect your rights.

A settlement of a class action lawsuit affects you if, for any time between November 1, 2009 to February 28, 2021, you were a residential or business retail customer of the South Carolina Public Service Authority ("Santee Cooper") and had an Account with Santee Cooper. The settlement provides a Settlement Benefit to Class Members, which includes attorneys' fees and costs of the litigation, administration and related costs, and the Representative Plaintiff's incentive award. The Horry County, South Carolina, Court of Common Pleas authorized this notice. The Court will have a hearing to consider whether to approve the settlement, so that the Settlement Benefit may be provided.

#### Who Is Affected?

All residential or business retail customers of Santee Cooper who had Accounts with, and received power and energy from, Santee Cooper at some time between November 1, 2009 and February 28, 2021.

#### What Is This About?

The lawsuit claimed that Santee Cooper charged increased and improper utility rates to its residential and business retail customers in connection with the permitting and construction of coal-fired generation facilities at the Pee Dee Energy Campus (the "Pee Dee Project") that were not completed. The Settlement is not an admission of wrongdoing or an indication that any law was violated.

The Settlement Administrator has mailed or emailed a Summary Class Notice to all Settlement Class members for whom it has current addresses. If you think you are a Settlement Class member and you did not receive the Notice, or for a fuller description of the Settlement, call 1-800-283-0976 or visit [www.peedeplantclassaction.com](http://www.peedeplantclassaction.com) to request more information.

#### What Can You Receive from the Settlement?

Santee Cooper will pay twelve million five hundred thousand dollars (\$12,500,000.00) in settlement of all claims. The Settlement Benefit, less attorneys' fees and expenses, the Representative Plaintiff's incentive award, and certain administrative and other costs and expenses specified in the Settlement Agreement, will be divided among all Class Members and distributed by check or billing credit to Class Members who do not exclude themselves from the Class. Class Members will receive a minimum of \$5.00. Distributions above the minimum payment will depend on the amount of energy used and the estimated amount paid toward the Pee Dee Project.

#### How Do You Get a Benefit?

If you are a Class Member, you do not need to do anything to receive a check or billing credit.

#### What Are Your Options?

If you don't want a check or billing credit of \$5.00 or more, or you don't want to be legally bound by the settlement, you must exclude yourself by September 20, 2021. If you exclude yourself, you won't get a check or billing credit from this Settlement. If you stay in the Class, you may object to the settlement by September 20, 2021.

#### Final Hearing and Judgment.

A hearing in this case will be held on October 7, 2021, at 2:00 p.m., at the Dorchester County Courthouse in St. George, SC, or via videoconferencing means that comply with South Carolina Courts' Standing Order regarding COVID-19, to consider whether to approve the Settlement. You may appear at the hearing, but you do not have to. For more details, call or write to the Settlement Administrator at [info@rg2claims.com](mailto:info@rg2claims.com) or visit [www.peedeplantclassaction.com](http://www.peedeplantclassaction.com).

Hearn v. South Carolina Public Service Authority d/b/a Santee Cooper, Case No. 2017-CP-26-5256  
If you have questions, call 1-800-283-0976 or write to [info@rg2claims.com](mailto:info@rg2claims.com)  
[WWW.PEEDEPLANTCLASSACTION.COM](http://WWW.PEEDEPLANTCLASSACTION.COM)



# EXHIBIT C

**If you were a residential or business retail customer of Santee Cooper at any time between November 1, 2009 and February 28, 2021, a class action lawsuit may affect your rights.**

*A court authorized this notice. This is not a solicitation.*

A proposed Settlement of a lawsuit against the South Carolina Public Service Authority (“Santee Cooper”) may affect your rights. In the lawsuit the Plaintiff alleges that residential and business retail customers of Santee Cooper paid increased and improper utility rates in connection with the permitting and construction of coal-fired generation facilities at the Pee Dee Energy Campus (the “Pee Dee Project”) that were not completed. Santee Cooper denies any wrongdoing but has agreed to settle. The Class Action Settlement resolves all claims in the lawsuit.

**This Notice advises you of your rights with respect to the proposed settlement, including the process for receiving payment, your right to exclude yourself from the settlement, and your right to object to the settlement. The Horry County, South Carolina, Court of Common Pleas authorized this Notice.**

**Who is Included?** On July 1, 2021, the Court preliminarily certified the following Settlement Class:

All residential and business retail customers who received power and energy from Santee Cooper and who had Accounts with Santee Cooper between November 1, 2009 to February 28, 2021.

This Notice is being sent to you because you are believed to be a member of this Class. Based on Santee Cooper’s records, you were a residential or business retail customer and paid costs for the Pee Dee Project as part of your Santee Cooper electric bills during the stated time period.

**What Does the Settlement Provide?** Pursuant to the proposed Settlement, in exchange for dismissal of this action and release of claims known and unknown against Santee Cooper, Santee Cooper will pay twelve million five hundred thousand dollars (\$12,500,000.00) in cash (the “Settlement Benefit”).

Distributions from the Settlement Benefit will be made to Class Members after deducting attorneys’ fees and litigation expenses approved by the Court, an incentive award to the Representative Plaintiff approved by the Court, and certain administrative and other costs and expenses as specified in the Settlement Agreement. All Class Members are entitled to receive a minimum payment or billing credit of \$5.00, and the remaining Settlement Benefit will be allocated in proportion to the amount the Class Member is estimated to have paid toward the Pee Dee Project. Distributions will be made by check to all former customers and to current customers who will receive \$200 or more, and distributions will be made by bill credit to current customers who will receive less than \$200.

**How Do You Get Benefits from the Settlement?** Class Members entitled to receive a benefit do not need to do anything to receive benefits from the Settlement.

**What Are My Other Options?** If you do not want to be a part of the Settlement, you must exclude yourself (“opt out”) by September 20, 2021. If you opt out, you will not receive any payments or

**QUESTIONS? CALL 1-800-283-0976 OR VISIT [WWW.PEEDEEPLANTCLASSACTION.COM](http://WWW.PEEDEEPLANTCLASSACTION.COM)**

bill credits from the Settlement, you may not file an objection to the Settlement, you will not be bound by any judgment in this lawsuit, whether favorable or unfavorable, and you may attempt to pursue any claims you have against Santee Cooper at your own risk and expense by filing your own lawsuit. If you stay in the Class, you have the right to object to the fairness of any aspect of the proposed Settlement by September 20, 2021. For instructions on opting out or objecting to the Settlement, view the detailed written notice available at [www.peedeeplantclassaction.com](http://www.peedeeplantclassaction.com) or call 1-800-283-0976.

**Final Hearing and Judgment of the Court.** The Court will hold a hearing to consider the fairness and adequacy of this proposed Settlement and to consider Class Counsel's Motion for Attorneys' Fees and Expenses on October 7, 2021 at 2:00 p.m. at the Dorchester County Courthouse, 5200 E. Jim Bilton Boulevard, St. George, SC 29477 or via Webex or other video conferencing means and in compliance with any Standing Order regarding COVID-19. At this hearing, the Court will determine whether the Settlement Class was properly certified and whether the Settlement is fair, adequate, and reasonable and should be finally approved, with judgment entered accordingly. You or your own lawyer, if you have one, are welcome to attend the hearing at your own expense, but your attendance is not necessary.

Class Counsel intend to file a motion for attorneys' fees to be paid from the Settlement Benefit in an amount not to exceed thirty-three and one-third (33.33)% of the Settlement Benefit, plus reimbursement of reasonable litigation expenses incurred and advanced by Class Counsel in this action. Class Counsel's Motion for Attorneys' Fees and Expenses must be approved by the Court. Class Counsel will also seek approval of an incentive award to the Representative Plaintiff in the amount of ten thousand dollars (\$10,000.00) to recognize the Representative Plaintiff's time, energy, and commitment during the litigation.

The descriptions in this Notice are only summaries. If you have any questions or would like more information, including the detailed notice, please contact the Settlement Administrator by phone at 1-800-283-0976, by e-mail at [info@rg2claims.com](mailto:info@rg2claims.com), via mail at Pee Dee Plant Class Action, c/o RG/2 Claims Administration, P.O. Box 59479, Philadelphia, PA 19102-9479 or visit [www.peedeeplantclassaction.com](http://www.peedeeplantclassaction.com). You may also consult with your own attorney.

Please do not call the Judge, Clerk, or Court about this Notice or lawsuit. They will not be able to give you advice or answer your questions.