

**If you attended school as a student or worked as staff at Magnolia Elementary School in El Cajon, California for one or more school years between January 1, 1963 and through April 14, 2020, you may qualify for benefits from a class action settlement.**

*This Notice may affect your rights, so please read it carefully.*

- A settlement has been reached in a class action lawsuit about claims of exposure to toxic contamination from waste materials stored below ground at the Former Ametek Facility (located at 790 Greenfield Avenue, El Cajon, California). Generally, you are included in the Settlement if you attended school as a student or worked as staff at Magnolia Elementary School in Cajon, California for one or more school years between January 1, 1963 through April 14, 2020.
- Defendants Ametek, Inc., Senior Operations LLC, and Thomas Deeney (“Defendants”) deny any and all alleged liability, wrongdoing, violations, and/or damages allegedly caused with respect to any and all claims asserted or that could have been asserted in this lawsuit. The Court has not decided who is right, but both the Plaintiffs and the Defendants have agreed to a settlement to end the lawsuit and avoid further related costs and burdens.
- The claims process created by the settlement provides for medical consultation benefits from a \$1,000,000.00 settlement fund, and \$500,000.00 to help establish the Remediation/Mitigation Fund for sampling/mitigation/remediation of the plume, consistent with the Settlement Agreement. Complete details on eligibility and claim form submission requirements are included in this notice.
- Your legal rights are affected whether you act or do not act. Read this Notice carefully.
- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the settlement. If it does, and after any appeals are resolved, a settlement fund will be established and medical consultation benefits will be available to those who qualify and file a valid and timely Claim Form.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:</b>	
<b>SUBMIT A CLAIM FORM</b>	Submit a Claim Form seeking medical consultation benefits.
<b>EXCLUDE YOURSELF</b>	Request to be excluded and get no benefits from the settlement. This is the only option that allows you to start or continue a lawsuit against the Defendant about the claims this settlement resolves.
<b>OBJECT</b>	Write to the Court about why you do not like the settlement.
<b>GO TO A HEARING</b>	Ask to speak in Court about the fairness of the settlement.
<b>DO NOTHING</b>	Get no benefits. Give up your rights to sue the Defendant for the claims the settlement resolves.

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**QUESTIONS? CALL 844-814-8803 OR VISIT [WWW.ELCAJONCASESETTLEMENT.COM](http://WWW.ELCAJONCASESETTLEMENT.COM)**

## BASIC INFORMATION

### 1. Why is this Notice being provided?

A Court authorized this Notice because you have a right to know about a proposed class action settlement and about all of your options before the Court decides whether to give “final approval” to the settlement. This Notice explains the lawsuit, the settlement, your legal rights, what benefits are available, who may be eligible for those benefits, and how to get them.

Chief Judge Larry A. Burns of the United States District Court for the Southern District of California, is overseeing this lawsuit. The settlement resolves the litigation known as *Danielle Trujillo, et al. v. Ametek, Inc. et al.*, Case No. 3:15-cv-01394-GPC-AGS (S.D. Ca.) (“the *Trujillo Action*”).

The persons who sued are called “Plaintiffs,” and the persons or companies being sued, Ametek, Inc., Thomas Deeney, and Senior Operations LLC, are called the “Defendants.”

### 2. What is this lawsuit about?

Plaintiffs allege that between 1963 and 1983, manufacturing process materials were placed in an in-ground tank at the aerospace manufacturing facility (the “Former Ametek Facility”) located at 790 Greenfield Avenue, El Cajon, California 92021 (the “Site”). Ametek owned and operated the Former Ametek Facility at the Site from 1968 through 1988. Deeney has been a corporate officer with Ametek since approximately 1996, and has dealt with issues concerning the Former Ametek Facility and the Site on Ametek’s behalf at times, including since approximately 2006. The Site is now owned and operated by Senior.

Plaintiffs claim that past use of the in-ground tank, which was removed decades ago, has and continues to result in contamination of groundwater resulting in a subsurface “plume” of certain chemicals that may be detectable in soil vapor and indoor air, on and below Magnolia Elementary School, located adjacent to the Site at 650 Greenfield Dr., El Cajon, CA 92021, (“MES”). As a result, Plaintiffs claim they have been exposed to toxic contamination and have suffered damages. Plaintiffs brought the *Trujillo Action* on behalf of themselves and other teachers and students who attended or worked at MES, who are similarly situated.

Defendants deny any and all alleged liability, wrongdoing, violations, and/or damages any of them allegedly caused with respect to any and all claims asserted or that could have been asserted in the *Trujillo Action*.

The Court has not decided who is right, but both the Plaintiffs and Defendants have agreed to a settlement to end the lawsuit and avoid further related costs and burdens.

### 3. Why is there a settlement?

The Court did not decide in favor of Plaintiffs or Defendants. Instead, both sides agreed to settle this case to avoid the cost and risk of litigation. The settlement does not mean that any law was broken or that any of the Defendants did anything wrong. Each of the Defendants deny all legal claims in this case. Plaintiffs and their lawyers think the settlement is best for the Settlement Class.

### 4. Why is the settlement a proposed class action settlement?

Proposed class action settlements typically get reviewed by a court twice: once for preliminary approval and once for final approval. As part of approving a class action settlement, courts certify a settlement class. That class is a Settlement Class (a.k.a., a class certified only for settlement). Here, the Court has given the proposed settlement preliminary approval, and has certified a Settlement

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Class. But the Court cannot decide whether to finally approve the proposed settlement until the Final Fairness Hearing (described in Section 23 below), when it will resolve any issues for all Class Members, except for those Members who exclude themselves from the settlement through the process described in Section 17 below.

## WHO IS IN THE SETTLEMENT

To see if you will be affected by the settlement or if you can receive medical consultation benefits from it, you first have to determine if you are a Class Member.

### 5. How do I know if I am part of the settlement?

The settlement includes every person who: (1) Attended Magnolia Elementary School as a student for one or more school years between January 1, 1963 through April 14, 2020; or (2) Worked as staff at Magnolia Elementary School for one or more school years between January 1, 1963 through April 14, 2020.

### 6. Are there other lawsuits relating to alleged groundwater contamination?

Yes, in addition to the *Trujillo* Action, Ametek and Senior are also defendants in three other cases relating to the alleged groundwater contamination. The other cases are *Greenfield MHP Associates, L.P., et al. v. Ametek, Inc., et al.*, No. 3:15-cv-01525-GPC-AGS (the “*Greenfield* Action”); *Cox, et al. v. Ametek, Inc., et al.*, 3:17-cv-00597-GPC-AGS (the “*Cox I* Action”); and *Cox, et al. v. Ametek, Inc., et al.*, No.3:17-cv-01211-GPC-AGS (the “*Cox II* Action”). These four related cases are collectively called the “Groundwater Actions.” The Settlement of the *Trujillo* Action must receive Final Approval of the Court, and is part of the resolution of all of the Groundwater Actions.

### 7. Is anyone excluded from the settlement?

Yes, the Settlement Class does not include any individual who has independently settled or resolved any claims related to exposure to contaminants emanating from the Former Ametek Facility with any Defendant in the *Trujillo* Action, and specifically including any person who has settled or resolved claims directly with Ametek, Inc., Senior Operations LLC, or any of Defendants’ present, former and future parents, subsidiaries, divisions, affiliates, stockholders, benefit plans, officers, directors, employees, joint ventures, members, domestic and foreign corporations, attorneys, insurers, agents and any of their legal representatives, and the predecessors, heirs, executors, administrators, successors and assigns of the same.

### 8. What if I am not sure whether I am included in the settlement?

If you are not sure whether you are a member of the Settlement Class, or have any other questions about the settlement, visit the settlement website at [www.ElCajonCaseSettlement.com](http://www.ElCajonCaseSettlement.com) or call the toll free number, 844-814-8803. You may also write with questions to El Cajon Claims Administrator, PO Box 3266, Portland, OR, 97208-3266 or send an e-mail to [info@ElCajonCaseSettlement.com](mailto:info@ElCajonCaseSettlement.com).

## THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

### 9. How much money is available for medical consultation under the settlement?

If approved by the Court and not subject to a successful appeal, a Settlement Fund of \$1,000,000.00 will be established as the Medical Consultation Fund to pay for medical consultation for Plaintiffs and Class Members, as well as fees and costs consistent with the Settlement Agreement. A separate

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\$500,000.00 payment will be made to help establish the Remediation/Mitigation Fund for sampling/mitigation/remediation of the plume, consistent with the Settlement Agreement.

## 10. What are the benefits of the Settlement?

Once a Class Member submits a valid Claim Form and the Class Member's status has been verified, the verified Class Member will be eligible to receive their class benefit as follows:

(1) Each verified Class Member shall be eligible for one (1) medical consultation with a doctor selected by Class Counsel to receive any or all of the following procedures, pursuant to the advice of the selected physician and based on the verified Class Member's own discretion for the same, intended to screen for medical conditions including those potentially associated with exposure to Trichloroethylene ("TCE") in very high concentrations (far exceeding any of the indoor air concentrations of TCE ever detected in any residence or building at the MHPs), including kidney cancer, liver cancer, and hematolymphatic cancer:

- history and physical examination by board-certified physician
- blood chemistry, blood count and microscopy urinalysis
- CT scan of kidney (in a follow-up appointment, if determined necessary)
- liver ultrasound or MRI (in a follow-up appointment, if determined necessary)

(2) The costs of the diagnostic medical consultation outlined above will be billed by the physician to the Claims Administrator, and will be paid by the Claims Administrator from the Medical Consultation Fund portion of the Settlement Fund.

(3) Any medical consultation available to verified Class Members shall be completed on or before the date which falls four (4) years after the date of Final Approval. Medical consultation visits shall be available to verified Class Members during the four year eligibility period, or until the Medical Consultation Fund is exhausted, whichever occurs first.

## HOW TO GET BENEFITS FROM THE SETTLEMENT

### 11. What do I need to do to get medical consultation?

To make a claim against the Settlement Fund and to receive any medical consultation benefits from the settlement, Class Members are required to submit a Claim Form. You must follow the instructions on the Claim Form. You should read the Claim Form instructions carefully and provide all the information that is requested.

All Claim Forms, must be mailed by first-class United States Mail, postage prepaid, to the Claims Administrator postmarked no later than **September 23, 2022**:

El Cajon Claims Administrator  
PO Box 3266  
Portland, OR 97208-3266

If you change your address and want to receive a Claim Form at your new address, you should notify the Claims Administrator of your new address by sending written notice of your change of address to the Claims Administrator at the address above.

If you did not receive a Claim Form by mail, or if you need a Claim Form, you can get one in any of the following ways: (1) by downloading a Claim Form at the website; (2) by requesting a Claim Form be mailed to you by calling the Claims Administrator's toll-free number at 844-814-8803 or (3) by requesting a Claim Form be mailed to you by writing to the Claims Administrator at the address provided above.

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## 12. What is the deadline for submitting a Claim Form?

Claims must be postmarked no later than **September 23, 2022**.

## 13. How will my Claim be validated?

Class Counsel will, in its sole discretion, confirm the validity of each Claim Form and confirm that it provides the required information.

## 14. What am I giving up to receive medical consultation?

If the settlement becomes final, Class Members who submit a claim or do nothing at all will be releasing the Defendants from all of the Released Claims described and identified in Section 30 of the Settlement Agreement. This means you will no longer be able to sue the Defendant regarding any of the claims described in the Settlement Agreement (see Question No. 16 below).

The Settlement Agreement is available at [www.ElCajonCaseSettlement.com](http://www.ElCajonCaseSettlement.com). The Settlement Agreement provides more detail regarding the release and describes the released claims with specific descriptions in necessary, accurate, legal terminology, so read it carefully. You can talk to the law firms representing the Settlement Class listed in the section “The Lawyers Representing You” for free or you can, at your own expense, talk to your own lawyer if you have any questions about the released claims or what they mean.

## EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to participate in this proposed settlement and you want to keep the right to sue the Defendants about the legal issues in this case, then you must take steps to get out of the settlement. This is sometimes called “opting out” of the Settlement Class.

## 15. If I exclude myself, can I get anything from this settlement?

No, if you exclude yourself, you may not apply for any benefits under the settlement and you cannot object to the proposed settlement. If you ask to be excluded, however, you may sue or be part of a different lawsuit against the Defendants in the future. You will not be bound by anything that happens in this class action settlement.

## 16. If I do not exclude myself, can I sue later?

Unless you exclude yourself, you give up the right to sue the Defendants for all of the claims that the settlement resolves. You must exclude yourself from this Settlement Class to start or continue your own lawsuit relating to the claims in this case. The full release is stated in Section 30 of the Settlement Agreement. The Settlement Agreement can be found at [www.ElCajonCaseSettlement.com](http://www.ElCajonCaseSettlement.com).

## 17. How do I get out of the settlement?

To exclude yourself from the settlement and Settlement Class, you must send the Claims Administrator a written and signed statement, entitled “Request for Exclusion.” The Request for Exclusion must:

(1) Certify in accordance with 28 U.S.C. § 1746, under penalty of perjury, that the filer has been legally authorized to exclude the Class Member from the Settlement and provide an affidavit or other proof of the Class Member’s standing;

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(2) Provide the filer's name, address, telephone and facsimile number, and email address (if available);

(3) Include the Class Member's name, address, telephone number, and e-mail address (if available); and

(4) Be postmarked by the deadline.

You must mail your completed Request for Exclusion, postmarked by **July 25, 2020** to:

El Cajon Claims Administrator  
PO Box 3266  
Portland, OR 97208-3266

A copy of your completed Request for Exclusion should also be sent to:

<b>Court</b>	<b>CLASS COUNSEL</b>	<b>Counsel for Defendants</b>
Clerk of the Court United States District Court Southern District of California 333 West Broadway San Diego, CA 92101	Scott Summy Baron & Budd 3102 Oak Lawn Ave Suite 1100 Dallas, TX 75219-3605	<b>Counsel for Ametek:</b> Edward C. Walton, Sean Sullivan Procopio, Cory, Hargreaves & Savitch, LLP 525 B Street, Suite 2200 San Diego, CA 92101  <b>Counsel for Senior:</b> Kimberly Arouh Buchanan Ingersoll & Rooney LLP 600 West Broadway, Suite 1100 San Diego, CA 92101  <b>Counsel for Mr. Deeney:</b> Michael Pietrykowski Gordon & Rees Scully Mansukhani LLP 111 Broadway, Suite 1700 Oakland, CA 94607

**If you do not want to be a part of the settlement, but do not send in a Request for Exclusion, you will remain a Class Member and lose any opportunity to exclude yourself from the settlement, and your rights will be determined in this lawsuit by the Settlement Agreement, if it receives final judicial approval.**

You cannot ask to be excluded/opt-out on the phone, by email, or at the website.

## **THE LAWYERS REPRESENTING YOU**

### **18. Do I have a lawyer in the case?**

The Court designated Scott Summy and the law firm of Baron & Budd as Class Counsel for the Plaintiffs and members of the Settlement Class. You will not be charged for Class Counsel. If you want to be represented by your own lawyer in this case, you may hire one at your own expense.

### **19. Why is Class Counsel recommending the settlement?**

Class Counsel reached this settlement after weighing the risks and benefits to the Settlement Class of this settlement compared with those of continuing the litigation. The factors that Class Counsel considered included the uncertainty and delay associated with continued litigation, a trial and numerous appeals, and the uncertainty of particular legal issues that have been, or are yet to be, determined by the Court. Class Counsel balanced these and other substantial risks in determining that the settlement is fair, reasonable, and adequate in light of all circumstances and in the best interests of members of the Settlement Class.

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## 20. How will the Lawyers be paid?

If the settlement is approved by the Court, Class Counsel will ask the Court for an award of attorneys' fees in an amount not to exceed 25% of the gross amount awarded to the Settlement Class plus costs and expenses and incentive awards of up to \$5,000.00 per Plaintiff. Any award of attorneys' fees, expenses, costs or incentive awards, ordered by the Court will be paid from the Settlement Fund according to the terms and limitations of the Settlement Agreement.

## OBJECTING TO THE SETTLEMENT

## 21. How do I tell the Court if I do not like the settlement?

If you do not exclude yourself from the Settlement Class, you may, if you wish, object to the Settlement or an award of fees or expenses to Class Counsel.

To do so, you or your own attorney must provide a written and signed statement, entitled "Objection".

(1) All Objections must:

- a. Certify in accordance with 28 U.S.C. § 1746, under penalty of perjury, that the filer has been legally authorized to object on behalf of the Class Member and provide an affidavit or other proof of the Class Member's standing;
- b. Provide the name, address, telephone and facsimile number, and email address (if available) of the filer and the Class Member;
- c. Provide the name, address, telephone and facsimile number, and email address (if available) of any counsel representing the Class Member;
- d. State all objections asserted by the Class Member and the specific reason(s) for each objection, and include all legal support and evidence the Class Member wishes to bring to the Court's attention;
- e. Indicate if the Class Member wishes to appear at the Final Fairness Hearing; and
- f. Identify all witnesses the Class Member may call to testify.

(2) Class Members may object either on their own or through any attorney hired at their own expense. If a Class Member is represented by counsel, the attorney must: file a notice of appearance with the Clerk of Court no later than **July 25, 2020**, and serve all Parties in accordance with Fed. R. Civ. P. 5 within the same time period.

(3) Any Class Member who fully complies with the provisions of the Objection requirements listed here in Question 21 may, in the Court's discretion, appear at the Final Fairness Hearing to object to the Settlement or the award of fees and costs to Class Counsel. Any Class Member who fails to comply with the provisions listed in Question 21 will waive and forfeit any and all rights and objections the Class Member may have asserted in this action, and will be bound by all the terms of the Agreement and by all proceedings, orders and judgments with respect to the Settlement.

Your Objection must be filed with the Clerk of the Court and served on Class Counsel and Defendants' counsel by first-class United States Mail, postmarked no later than **July 25, 2020**. The copies to be filed with the Court and served on Class Counsel and Defendants' counsel must be mailed to the following addresses:

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Court	CLASS COUNSEL	Counsel for Defendants
Clerk of the Court United States District Court Southern District of California 333 West Broadway San Diego, CA 92101	Scott Summy Baron & Budd 3102 Oak Lawn Ave Suite 1100 Dallas, TX 75219-3605	<b>Counsel for Ametek:</b> Edward C. Walton, Sean Sullivan Procopio, Cory, Hargreaves & Savitch, LLP 525 B Street, Suite 2200 San Diego, CA 92101  <b>Counsel for Senior:</b> Kimberly Arouh Buchanan Ingersoll & Rooney LLP 600 West Broadway, Suite 1100 San Diego, CA 92101  <b>Counsel for Mr. Deeney:</b> Michael Pietrykowski Gordon & Rees Scully Mansukhani LLP 111 Broadway, Suite 1700 Oakland, CA 94607

**If you do not comply with these procedures and the deadline for objections, you will lose any opportunity to have your objection considered at the Fairness Hearing or otherwise to contest the approval of the settlement or to appeal from any order or judgment entered by the Court in connection with the settlement.**

**22. What is the difference between objecting and asking to be excluded?**

Objecting is simply telling the Court that you do not like something about the settlement. You can object only if you stay in the Settlement Class. Excluding yourself (opting-out) is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you cannot object to the settlement and you will not be eligible to apply for any benefits under the settlement because the case no longer affects you.

**THE COURT'S FAIRNESS HEARING**

**23. When and where will the Court decide whether to approve the settlement?**

On **August 24, 2020, at 11:30 a.m.**, the Court will hold a public hearing in the United States District Court for the Southern District of California, located at the U.S. Courthouse, 333 West Broadway, San Diego, CA 92101, to 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. The Court also will consider Counsel's application for an award of attorneys' fees and expense reimbursement and any opposition thereto. This hearing may be continued or rescheduled by the Court without further notice to the Settlement Class so you should check the website for updates. If there are objections, the Court will consider them at that time. After the hearing, the Court will decide whether to approve the settlement. It is unknown how long these decisions will take.

**24. Do I have to come to the hearing?**

No, Class Counsel will answer any questions the Court has. However, you are welcome to attend the hearing at your own expense. If you send in a written objection, you do not have to come to the Fairness Hearing to talk about it. If you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend the Fairness Hearing, but it is not necessary.

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## **IF YOU DO NOTHING**

### **25. What happens if I do nothing at all?**

If you are a Class Member and do nothing, you will not get benefits from the settlement. And, unless you exclude yourself, you will be bound by the judgment entered by the Court. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit or proceeding against the Defendants about the statements and claims at issue in this case.

## **GETTING MORE INFORMATION**

### **26. How do I get more information?**

This Notice summarizes the proposed settlement. More details are in the Settlement Agreement. You can view a copy of the Settlement Agreement and read a list of Frequently Asked Questions and Answers at [www.ElCajonCaseSettlement.com](http://www.ElCajonCaseSettlement.com). You may also write with questions to El Cajon Claims Administrator, PO Box 3266, Portland, OR 97208-3266 or send an e-mail to [info@ElCajonCaseSettlement.com](mailto:info@ElCajonCaseSettlement.com). You can get a Claim Form at the website, or have a Claim Form mailed to you. If you wish to communicate directly with Class Counsel, you may contact them at the address listed above in paragraph 21, or by e-mail at [ElCajonCaseSettlement@baronbudd.com](mailto:ElCajonCaseSettlement@baronbudd.com). You may also seek advice and guidance from your own private attorney at your own expense.

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