

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
IN RE: PARADISE MEMORIAL PARK LITIGATION, LEAD CASE NO. 130375**

**NOTICE TO ALL CLAIMANTS
THIS NOTICE MAY AFFECT YOUR RIGHTS - PLEASE READ IT CAREFULLY**

THE COURT APPROVED THE SETTLEMENT WITH THE CEMETERY ON SEPTEMBER 28, 1998 AND
THE SETTLEMENT WITH THE MORTUARIES AND FUNERAL HOMES ON APRIL 2, 1999

THE COURT IS NOW CONSIDERING THE FOLLOWING CLAIMS DISTRIBUTION PLAN:

The claims portion of the settlement funds will be distributed to each claimant based on the following point system. Each claimant will qualify for points based upon the type of impropriety suffered by the family and the relationship of the claimant to the decedent.

THE CLAIM CATEGORIES FOR ALLOCATION OF POINTS ARE:

1. <u>Types of improprieties.</u>		2. <u>Relationship between claimant and decedent.</u>	
Single Graves Reused or Unauthorized Disinterment	6 Points	Spouse/children	5 Points
Multiple Graves Reused/reopened or Unauthorized Disinterment	5 Points	Parents/siblings	4 Points
New Single Grave in a Used Grave	3 Points	Grandparents/grandchildren/contracting Party	3 Points
New Double/multiple/extra Depth Grave in a Used Grave	2 Points	Other Relatives Residing in The Decedent's Household at The Time of The Decedent's Death	2 Points
Missing Headstone/different Grave Location	1 Point	Exceptional Circumstances	1 Point
Maintenance/cemetery Degradation	.5 Points		

The Court is also considering applying the mortuary settlement to all claimants, regardless of whether or not a particular decedent's remains were handled by a settling mortuary. The Court would also add any later judgments or settlements received from the few non-settling mortuaries to the total sum disbursed to the class.

Persons dissatisfied with the determination of their claim will have a right to participate in either a binding or nonbinding (with right of review by the court) arbitration process. The cost of arbitrations will be paid from the settlement and by persons who unsuccessfully pursue a review by the court of a non-binding arbitration decision.

**YOU MAY MAKE SUGGESTIONS OR OTHERWISE COMMENT UPON THIS PROPOSED
DISTRIBUTION PLAN IN WRITING TO:**

Class Plaintiffs' Liaison Counsel

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COMMENTS MUST BE POSTMARKED ON OR BEFORE JULY 16, 1999. THE COURT WILL READ AND CONSIDER ALL SUGGESTIONS, CONSULT WITH COUNSEL, AND THEREAFTER ISSUE ITS FURTHER ORDER. IT IS EXPECTED THAT CLAIM FORMS WILL BE MAILED OUT IN MID-AUGUST.

DO NOT WRITE TO OR CONTACT THE COURT