

Notice of Class Action Settlement

If you owned or lived in a residential property in Southeast Portland in the area shown on the map below in 2016, a class action lawsuit may affect your rights.

A court authorized this notice. This is not a solicitation from a lawyer.

La información proporcionada en este aviso está disponible en español en www.StructuralsSettlement.com.

- Residents of Southeast Portland—the “Plaintiffs”—sued Precision Castparts Corp. and PCC Structurals, Inc. (“PCC”), alleging that metals allegedly emitted from PCC facilities as particulate matter contaminated the air in their neighborhood and their properties. Plaintiffs and PCC have reached a Class Action Settlement (or “Settlement”). Your legal rights are affected whether you act or not. Please read this notice carefully.
- The Settlement guarantees PCC will install certain enhanced pollution controls at its facilities and it creates a \$12.5 million Settlement Fund. After Court-approved costs and fees, the remainder of the fund will be used for payments to people covered by the Settlement, called “Class Members.”
- You may be a Class Member covered by the Settlement if you were a resident or owner of any residential properties included in the class area shown on the map on page 2 below on February 17, 2016.
- As a Class Member, you will benefit from the enhanced pollution controls provided by the Settlement, and you may also be entitled to compensation from the Settlement. The terms of the Class Action Settlement are described below.

Your Legal Rights and Options in this Settlement

File a Claim for Payment by April 9, 2022	Filing a claim will allow you to receive money under the Settlement if you’re eligible.
Do Nothing	By doing nothing, you will not obtain any payment from the Settlement, but you will give up legal rights to sue PCC.
Ask to be excluded from the Settlement by April 9, 2022	Get out of this lawsuit. Get no monetary benefits from it. Keep your rights.
Object to the Settlement by April 9, 2022	If you do not wish to be excluded from the Class but you object to the terms of the Class Action Settlement, you may write to the Court about why you don’t like the Settlement.

Questions? Read on and visit www.StructuralsSettlement.com.

What This Notice Contains

GENERAL INFORMATION.....	2
1. Why did I receive this notice?	2
2. What is this lawsuit about?	3
3. What is a class action and who is involved?.....	3
4. Why is this lawsuit a class action?.....	3
THE CLAIMS IN THE LAWSUIT.....	3
5. What does the lawsuit complain about?.....	3
6. How does PCC respond to the allegations?.....	3
7. Has the Court decided who is right?.....	3
WHO IS IN THE CLASS.....	3
8. Am I a part of the Class?.....	3
9. What if I’m not sure if I’m part of the Class?.....	3
THE SETTLEMENT BENEFITS	3
10. What does the Settlement provide?.....	3
11. What payments can I get from the Settlement?.....	4
HOW TO GET A PAYMENT – SUBMITTING A CLAIM FORM.....	4
12. How can I get a payment?.....	4
13. When would I get my payment?	4
EXCLUDING YOURSELF FROM THE SETTLEMENT.....	4
14. Why would I ask to be excluded from the Class?.....	4
15. How do I ask to be excluded from the Class?.....	4
OBJECTING TO THE SETTLEMENT.....	5
16. How do I tell the Court that I like or dislike the Settlement?	5
17. What’s the difference between objecting and excluding myself?	5

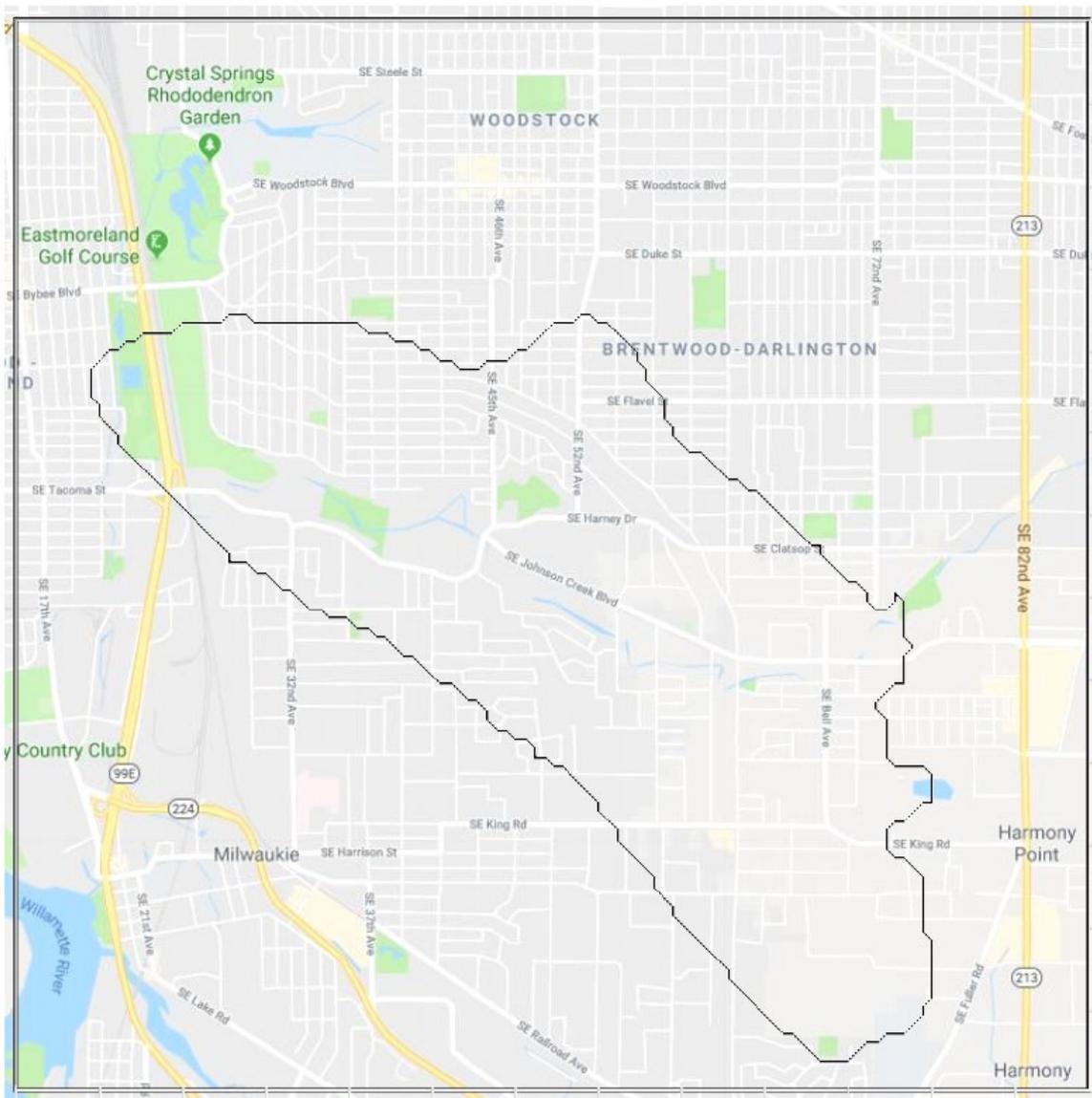
THE LAWYERS REPRESENTING YOU	5
18. Do I have a lawyer in this case?.....	5
19. Should I retain my own lawyer?.....	5
20. How will the lawyers be paid?.....	5
THE COURT’S FAIRNESS HEARING.....	6
21. When and where will the Court decide whether to approve the Settlement?	6
22. What happens if the Court does not approve the Settlement?	6
IF YOU DO NOTHING	6
23. What happens if I do nothing at all?	6
GETTING MORE INFORMATION.....	6
24. Are more details available?.....	6

GENERAL INFORMATION

1. Why did I receive this notice?

Public records show that on February 17, 2016, you may have owned or resided in a residential property in Southeast Portland alleged to have been affected by the emission and/or deposition of certain metals generated by PCC. Those properties are the “Class Properties.” If you were an owner of or resident at one of those Class Properties on February 17, 2016, your rights are affected by this notice. For general reference, the map below depicts the area in which the Class Properties are located (the “Class Area”).

PLEASE DO NOT CALL OR CONTACT THE COURT WITH QUESTIONS.



If you are unsure whether a property is in the Class Area, you may contact Class Counsel, the lawyers appointed to represent the Class, if you have any questions. Please see Question 24 of this notice for information on contacting Class Counsel.

You are not a member of the Class if you were only a temporary guest on residential property in the Class Area on February 17, 2016, or if you otherwise lacked legal property rights to a residential property in the Class Area on February 17, 2016.

If you change your address, or if this notice was not mailed to your correct address, and you want to submit a Claim Form (“Claim Form”) to participate in the Settlement, you must send your updated address, in writing, to: Precision Class Action Settlement, Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 170500, Milwaukee, WI 53217.

2. What is this lawsuit about?

This lawsuit is about whether certain metals, including nickel, allegedly emitted by the process of making nickel-based superalloys, titanium, stainless steel, and aluminum investment castings at PCC’s Large Parts Campus have been emitted, and/or deposited on, or interfered with the use and enjoyment of certain residential properties within Southeast Portland.

Judge Thomas M. Ryan of the Multnomah County Circuit Court of Oregon is overseeing this class action. The lawsuit is known as *Resendez, et al. v. Precision Castparts Corp. and PCC Structurals, Inc.*, Case No. 16CV16164.

PLEASE DO NOT CALL OR CONTACT THE COURT WITH QUESTIONS.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” or “Named Plaintiffs” (in this case Brian Anthony Resendez, Rodica Alina Resendez, and Debra Taevs) sue on behalf of other people who have similar claims. The people together are a “class” or “class members.” The people who sued and all the class members like them are called the Plaintiffs. The company they sued (in this case Precision Castparts Corp. and PCC Structurals Inc.) is called the Defendant.

4. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action because it meets the requirements of Oregon Rule of Civil Procedure 32, which governs class actions in Oregon state courts. A copy of the Court order certifying the Settlement Class and preliminarily approving this Settlement, as well as related materials, are available on the Settlement website, www.StructuralsSettlement.com.

THE CLAIMS IN THE LAWSUIT

5. What does the lawsuit complain about?

In the lawsuit, the Plaintiffs allege that certain metals, including nickel, allegedly emitted from PCC’s production have interfered with the use and enjoyment of property or have been emitted and/or deposited on their properties, or both, and have caused both physical damage and “stigma” damage to their properties.

6. How does PCC respond to the allegations?

PCC denies that any meaningful quantity of metals has been emitted and/or deposited on any property, denies that its emissions have interfered with the use and enjoyment of any property, and denies that its emissions have caused physical damage or “stigma” damage to any property.

7. Has the Court decided who is right?

The Court did not decide whether PCC or the Plaintiffs are correct. Instead, both sides have entered into this Class Action Settlement to resolve the Plaintiffs’ claims against PCC.

WHO IS IN THE CLASS

8. Am I a part of the Class?

Records show that you may have owned or resided in a residential property on February 17, 2016, that is within the boundary the Court certified for this class action. If you owned or resided in a residential property within the Class Area on February 17, 2016, then you are a Class Member.

You are not a member of the Class if you were only a temporary guest on residential property in the Class Area on February 17, 2016, or if you otherwise lacked legal property rights to a residential property in the Class Area on February 17, 2016.

Not included in the Class are PCC and any of its subsidiaries, affiliates, owners, offices, or employees; governmental entities; the judge to whom this case is assigned and that judge’s immediate family; and all persons who submit a timely and valid election to be excluded from the Class.

9. What if I’m not sure if I’m part of the Class?

If you are unsure whether a property is in the Class Area, you may contact Class Counsel to confirm if your property is on the list of Class Properties. You may also contact Class Counsel if you have any questions. Please see Question 24 of this notice for information on contacting Class Counsel.

THE SETTLEMENT BENEFITS

10. What does the Settlement provide?

The Settlement provides that PCC will install \$1.95 million worth of certain enhanced pollution controls at its facilities, at its own cost. All Class Members will benefit from this relief. PCC has also spent an additional \$7.7 million on emission control equipment since 2016 related to the emissions at issue in this litigation. In addition, PCC will pay \$12.5 million into a Settlement Fund for cash payments to Class Members, for Court-approved payments for administration of the Settlement, attorneys' fees and expenses, and to the Named Plaintiffs as class representative awards (see Question 11 below). All Class Members will benefit from PCC's enhanced pollution controls, regardless of whether they submit a Claim Form. But to be eligible for a money award from the Settlement, Class Members must submit a Claim Form (see Question 12 below).

11. What payments can I get from the Settlement?

After the costs are paid out of the Settlement Fund as explained above in Question 10, the remaining funds will be distributed to Class Members in a residual cash distribution.

Instructions for how to fill out a Claim Form are in Question 12 below.

Class Member Payments of Residual Amounts in Settlement Fund

After the payment of approved attorneys' fees and costs, approved case contribution awards to the Class Representatives, and approved Settlement Notice and Administration costs, the remaining amount in the Settlement Fund will be distributed to Class Members based on a formula that determines each Class Member's "share."

To be eligible to receive those shares, each Class Member—or subset of Class Members, to the extent those Class Members were residing together as a household on February 17, 2016—must submit a claim together as one "Claiming Class Member Household." A copy of the Claim Form is attached to this notice.

Each Claiming Class Member Household that submits a Claim Form shall be entitled to a total number of Settlement shares that is: (i) 2 times the number, if any, of single family homes in the Class Area owned on February 17, 2016, by such Claiming Class Member; plus (ii) if the Claiming Class Member Household resided in the Class Area on February 17, 2016, (a) 2 if the residence was a single family home, or (b) 1 if the residence was in a multifamily property; plus (iii) if the Claiming Class Member Household owned one or more multifamily properties in the Class Area on the Relevant Date, the lesser of (a) the number of dwelling units in such property, or (b) 20. These Settlement shares shall be totaled for each Claiming Class Member Household.

HOW TO GET A PAYMENT – SUBMITTING A CLAIM FORM

12. How can I get a payment?

To qualify for payment, you must timely submit a Claim Form, a copy of which is attached to this notice and can also be found at www.StructuralsSettlement.com. Read the instructions carefully. Once you complete the Claim Form, include all the documents the form asks for, sign it, and mail it postmarked no later than April 9, 2022, to Precision Class Action Settlement, Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 170500, Milwaukee, WI 53217.

13. When would I get my payment?

The Court will hold a Fairness Hearing on May 6, 2022, to decide whether to approve the Settlement. After the Fairness Hearing, there could be appeals. It's always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. Please be patient.

If you receive a payment from the Settlement, you are responsible for any tax consequences of that payment. Neither the Parties nor Settlement Administrator are providing, or have obligation or expertise to provide, advice as to the tax consequences of any payments made under this Settlement Agreement.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. Why would I ask to be excluded from the Class?

If you already have a separate lawsuit against PCC based on alleged emissions from PCC's operations and want to continue with it, or if you wish to pursue a claim against PCC with your own lawyer, you need to ask to be excluded from the Class Settlement. If you exclude yourself from the Class—which also means to remove yourself from the Class, and is sometimes called "opting out" of the Class—you won't get any money from this Settlement. However, if you exclude yourself, you may retain the right to sue or continue to sue PCC independently. If you exclude yourself, you will not be legally bound by the Court's judgments in this class action.

If you start your own lawsuit against PCC after you exclude yourself, you'll have to hire and potentially pay your own lawyer for that lawsuit, and you'll have to prove your claims. If you do exclude yourself so you can start or continue your own lawsuit against PCC, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations.

If you exclude yourself from the Class Settlement, you will not be eligible to receive any monetary payment from the Class Settlement.

15. How do I ask to be excluded from the Class?

To be excluded, you must complete and return the "Exclusion Request Form" provided with this notice and return it to:

Precision Class Action Settlement
EXCLUSIONS
c/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI 53217

You may also obtain an Exclusion Request Form at the website www.StructuralsSettlement.com.

To be valid, the Exclusion Request Form must be filled out, signed, and postmarked no later than April 9, 2022. Exclusion Request Forms postmarked after this date may be rejected.

If you do not wish to be excluded, do not complete an Exclusion Request Form.

A term of the Settlement Agreement provides PCC the opportunity to declare the Settlement to be null and void at its election (sometimes referred to as a “blow-up” provision) if more than five percent of Class Members timely exclude themselves from the Settlement.

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I like or dislike the Settlement?

If you’re a Class Member and you don’t exclude yourself, you can object to the Settlement if you don’t like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views.

To object, you must send a letter saying that you object to *Resendez, et al. v. Precision Castparts Corp. and PCC Structural, Inc.*, Case No. 16CV16164. You must include your printed name, address, telephone number, your signature, information or documentation establishing your status as a Class Member, and the reasons you object to the Settlement. You must include the specific reasons for each such objection, including any evidence and legal authority you wish to bring to the Court’s attention.

Mail the objection to these three different places postmarked no later than April 9, 2022:

Court	Class Counsel	Defense Counsel
Multnomah County Circuit Court Attention: Civil Department 1200 SW First Avenue Portland, OR 97204	Keller Rohrback L.L.P. Daniel P. Mensher Matthew J. Preusch Amy Williams-Derry 1201 Third Avenue, Suite 3200 Seattle, WA 98101	Angeli Law Group LLC David Angeli Kristen Tranetzki Colin Hunter 121 SW Morrison St., Suite 400 Portland, OR 97204

You do not need to hire an attorney to submit an objection on your behalf, but if you choose to do so at your own expense, that attorney must (a) file a notice of appearance with the Court by no later than April 22, 2022; (b) file a sworn declaration attesting to their representation of the Class Member on whose behalf the objection is being filed; (c) include in that sworn declaration a list of any objections that attorney has filed on behalf of class members in any proposed class settlement in the last five years; and (d) satisfy (on behalf of the Class Member) all substantive requirements for objection described in this Section.

Any Class Member (or their authorized representative, including but not limited to their attorney) who wishes to appear in person at the Fairness Hearing must file a written notice of intent to do so with the Court no later than April 22, 2022. See Question 21 below for information on the Fairness Hearing.

Unless the Court directs otherwise, any Class Member who fails to comply with the requirements for objecting will waive and forever forfeit the right to object to the Settlement, to appear and be heard on any such objection at the Fairness Hearing, and/or to appeal from the Court’s disposition of the Settlement.

PLEASE DO NOT CALL OR CONTACT THE COURT WITH QUESTIONS.

17. What’s the difference between objecting and excluding myself?

Objecting is simply telling the Court that you don’t like something about the Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don’t want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

The Court has appointed Keller Rohrback L.L.P., the Law Office of Karl G. Anuta, P.C., Smith & Lowney, PLLC, and Kampmeier & Knutsen PLLC to represent you and the rest of the Class Members in the class action. Together the law firms are called “Class Counsel.” Their contact information is provided below (see “Getting More Information” as described below in Question 24).

19. Should I retain my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask your own lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you.

20. How will the lawyers be paid?

Class Counsel has brought and litigated this case on a contingency basis, which means that Class Counsel has not been paid for any of its time spent on the litigation to date, and that Class Counsel has also forwarded all costs of litigation.

At the final Fairness Hearing on May 6, 2022, Class Counsel will be seeking the Court's final approval of the Settlement Agreement and asking the Court for an award of attorneys' fees not to exceed one-third of the \$12.5 Settlement Cash Payment, plus expenses. Class Counsel will also seek approval of a \$7,500 payment to each of the Named Plaintiffs for their efforts in representing the Class.

THE COURT'S FAIRNESS HEARING

21. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing on May 6, 2022, at 9:00 a.m. at the Multnomah County Circuit Court, 1200 SW First Avenue., Portland, Oregon 97204. At this hearing the Court will consider whether the Settlement Agreement and proposed Settlement is a fair, reasonable, and adequate resolution of the lawsuit. If there are timely and properly submitted objections, the Court will consider them, and any response Plaintiffs and PCC may have to those objections. The Court may listen to people who have asked to speak at the hearing. At or after the hearing, the Court will decide whether to approve the Settlement. The Court also will decide how much Class Counsel and Named Plaintiffs will be paid from the Settlement Fund, and will make an award for approved litigation, notice, and settlement administration costs.

You do not have to attend the Fairness Hearing. Class Counsel will answer questions the Court may have. But you are welcome to attend at your own expense. If you timely and properly sent an objection, you may attend the Fairness Hearing and talk about your objection, or you may have your own lawyer speak for you. However, you do not have to attend the Fairness Hearing even if you send an objection. As long as you timely and properly send a written objection, the Court will consider it even if you do not attend.

22. What happens if the Court does not approve the Settlement?

If the Court ultimately does not approve the Settlement, or if the Court's approval is reversed on appeal or the Settlement Agreement is terminated, then the Settlement will become null and void. If the Settlement becomes null and void, the case will proceed as though the Settlement Agreement was never entered into.

A term of the Settlement Agreement provides PCC the opportunity to declare the Settlement to be null and void at its election (sometimes referred to as a "blow-up" provision) if more than five percent of Class Members timely exclude themselves from the Settlement.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

By doing nothing you will stay in the Class and you will benefit from the injunctive relief provided in the Settlement, namely PCC's promise to install certain enhanced pollution controls at its facilities and the enhanced pollution controls it has already installed since this litigation began. But you will not receive any monetary benefits from the Settlement.

If you do nothing, you will not be able to sue, or continue to sue, PCC—as part of any other lawsuit—about certain legal claims because you will be legally bound by the Settlement Agreement. In the Settlement Agreement, you will give up your right to make certain legal claims against PCC. The claims you will give up include all claims that arise from, relate to, or are in connection with airborne emissions from the PCC facility. You can review a full copy of the Settlement Agreement, including a full description of the claims you will give up if you do nothing, at www.StructuralsSettlement.com. If you wish to keep those claims, you must exclude yourself from the Class. If you wish to further evaluate the Settlement Agreement's release of claims in light of your personal circumstances, you should immediately consult a lawyer to discuss your situation. If you have general questions about the types of claims you will give up if you do nothing, you may contact Class Counsel as described below in Question 24.

If you are a member of the Class and do not take action to exclude yourself, you will be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action.

GETTING MORE INFORMATION

24. Are more details available?

If you have any questions or want to review documents that have been filed in this case, you may visit www.StructuralsSettlement.com. All current dates are available on the website, although dates may be subject to change with approval of the Court.

You may also contact Class Counsel by mail, email, or phone as follows:

Keller Rohrback L.L.P.
Matthew J. Preusch
Daniel P. Mensher
1201 Third Avenue
Suite 3200
Seattle, WA 98101
(888) 684-7049

PrecisionClassAction@KellerRohrback.com

Law Office of Karl G. Anuta, P.C.
Karl G. Anuta
735 SW First Avenue
2nd Floor
Portland, OR 97204
(503) 827-0320
KGA@integra.net

Smith & Lowney, PLLC
Claire E. Tonry
Knoll D. Lowney
2317 E. John Street
Seattle, WA 98112
(206) 860-2883
claire@smithandlowney.com
knoll@smithandlowney.com

Kampmeier & Knutsen PLLC
Brian A. Knutsen
1300 SE Stark Street, Suite 202
Portland, Oregon 97214
(503) 841-6515
brian@kampmeierknutsen.com

Court documents are also available for inspection at the Multnomah County Circuit Court, Attention: Civil Department, 1200 SW First Avenue, Portland, Oregon 97204, during normal business hours. Please do not contact the Judge, the Clerk of Court, PCC, or their attorneys with questions.

EXCLUSION REQUEST FORM

Only fill out and submit this form if you want to exclude yourself from this class action.

If you exclude yourself from the Class, you won't get any money from this lawsuit, but you won't be legally bound by the Court's judgments in this class action, including a release of PCC.

I believe I am a member of the Class in *Resendez, et al. v. Precision Castparts Corp. and PCC Structurals, Inc.*, Case No. 16CV16164. I have reviewed the class action notice, and I do not want to be a part of the class action. I want to exclude myself from it. I understand that I could be represented in the class action case either by Class Counsel or by an attorney that I hire myself, but I do not wish to participate in the class action case in any manner. I understand that by excluding myself from this class action, I am not eligible to receive any monetary payment from it.

NAME (printed): _____

CURRENT RESIDENTIAL ADDRESS: _____

RESIDENTIAL ADDRESS ON
FEBRUARY 17, 2016: _____

PHONE NUMBER: _____ EMAIL: _____

YOUR SIGNATURE: _____ DATE: _____

This request must be postmarked by April 9, 2022, and sent by mail to this address:

Precision Class Action Settlement
EXCLUSIONS
c/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI 53217