

LEGAL NOTICE

If You Suffered Property Damage And/Or Were Required to Clean your Property As a Result of the Catalyst Release on September 6, 2010

A \$1.3 million settlement has been reached with Chalmette Refining, LLC. and Eaton Corporation ("Defendants"). The lawsuit is about whether or not the Plaintiffs class in a certain geographic area suffered damage as a result of the catalyst discharge on September 6, 2010. The Settlement provides payments to people who submit valid claim forms and who may be eligible.

The 34th Judicial District Court for the Parish of St. Bernard, Louisiana will have a hearing to decide whether to give final approval to the Settlement so that payments can be made. You can get a detailed notice at www.Carusoclassaction.com or by calling 504-840-3850.

What is the lawsuit about?

The lawsuit claims that Defendants were responsible for the discharge of catalyst on September 6, 2010 unto the Plaintiffs class in a certain geographic area and this caused damage of a non-permanent nature which included the cost of cleaning affected property. The Settlement does not mean that Defendants did anything wrong. The parties agreed to the Settlement to avoid the cost and risk of trial.

Am I Included?

In order to be part of the Settlement you must meet the following requirements: (1) Owner or renter of a property within the litigation zone on September 6, 2010; or (2) Owned a car located in the litigation zone on September 6, 2010; and (3) that your property or car suffered damage as a result of the catalyst discharge of a non-permanent nature which included the cost of cleaning affected property.

What does the Settlement Provide?

The Settlement created a \$1.3 million Settlement Fund to pay eligible Class Members. The amount remaining in the Settlement Fund after deducting attorneys fees, attorneys costs, payments to Class Representatives, administrative costs associated with the settlement, and any additional costs, will be paid to eligible Class Members who submit valid claims.

The Settlement Agreement, available at the website or by calling the phone number, describes all of the details about the Settlement.

How much money could I get?

The exact amount of your payment cannot be determined at this time. Your payment will depend on the number of valid claims that are filed.

How to get benefits?

To get a payment you need to fill out and send in the a Claim Form by **February 15, 2019**. You can get a Claim Form at www.Carusoclassaction.com or by calling 504-840-3850.

What are my other options?

If you don't want a payment from this Settlement you can simply do nothing. However, this is the final resolution of these claims so you won't be able to sue Defendants about the claims in this case. You may object or comment about the terms of this settlement by **January 2, 2019**. The detailed notice explains how to object or comment about the terms of this settlement.

The Court will hold a hearing in the case, known as Vincent Caruso Jr. et. al v. Chalmette Refining, LLC. and Eaton Corporation, No.118-188 c/w 119-194, on **January 17, 2019**, to consider whether to approve the Settlement and a request by Class Counsel for attorneys' fees of up to 40% and their cost out of the Settlement Fund. Class Counsel will also ask for a payment of up to \$2,500.00 for the Class Representatives and plaintiffs who helped the lawyers on behalf of the whole Class. If you wish, you or your own lawyer may ask to appear and speak at the hearing at your own cost.

How to get more information?

For more information, call or go to the website shown below, calling 504-840-3850, or write to Caruso Class Action Administrators, P.O. Box 60600, New Orleans, LA. 70160.

FILED
NOV 19 2018
DEPUTY CLERK OF COURT
ST. BERNARD PARISH

For more Information:

Phone: 504-840-3850

www.Carusoclassaction.com

www.gonitro.com /S/ JEANINE PELLEGRINI

EXHIBIT 2-B