

# NOTICE OF CLASS ACTION SETTLEMENT

*Wheeler, et al. v. Arkema Inc.*  
Settlement Administrator  
501 Riverchase Parkway East, Ste. 100  
Hoover, AL 35244  
855-711-2079

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**To all residents and real  
property owners at any  
time since August 30, 2017,  
located within a 7-mile  
radius of the Crosby  
Arkema Inc. Chemical  
Plant.**

**Please read  
to learn your rights.**



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A proposed class action settlement has been reached with Arkema Inc. (“Defendant”), regarding fires that occurred at its facility located at 18000 Crosby Eastgate Rd., Crosby, Texas 77532, during Hurricane Harvey in late August and early September 2017. The settlement resolves a lawsuit entitled *Wheeler, et al. v. Arkema Inc.*, Case No. 4:17-cv-2960 (the “Lawsuit”), United States District Court for the Southern District of Texas (the “Court”). The Court authorized this notice.

The Lawsuit alleges that the fires at Defendant's facility deposited dioxin compounds on properties surrounding the facility. Defendant denies all allegations and claims. The Court has not decided the Lawsuit, but the parties have agreed to a class settlement to resolve the dispute.

You received this notice because real property records reflect that you may be a member of the Class. The Class includes all residents and real property owners at any time since August 30, 2017 located within a 7-mile radius of the Crosby Arkema Inc. Chemical Plant.

**If you are a member of the Class and currently own real property located within a 7-mile radius of the Crosby Arkema Inc. Chemical Plant, you will be eligible to have your real property tested for dioxin compounds, if you so request. Depending on the results, you may be eligible to have dioxin compounds removed from your real property. Additionally, all Class Members will have the opportunity to participate in a study that will track the potential for future development of certain diseases in the community. The settlement makes more than \$20 million available for property testing removal, and an additional \$1.7 million for the disease study.**

**To see a more detailed notice of the terms of the settlement, answers to frequently asked questions, and other information about the Lawsuit, please visit the settlement website: [crosbyharveysettlement.com](http://crosbyharveysettlement.com).** If you cannot access the website, you can obtain the detailed notice by contacting the Settlement Administrator at the address or phone number on the reverse side of this card.

If the settlement is approved by the Court, any legal claims you have against the Defendant that were or could have been raised in the Lawsuit will be released that (1) seek injunctive, declaratory, equitable, or non-monetary relief; (2) arise under the Resource Conservation and Recovery Act or Comprehensive Environmental Response, Compensation, and Liability Act; and/or (3) are brought in a representative or collective capacity.

You have the right to object to the settlement. Your objection must be received by April 22, 2024. For details on how to object, visit the settlement website at [crosbyharveysettlement.com](http://crosbyharveysettlement.com).

The Court will hold a final approval hearing on June 6, 2024 at 10 a.m. to consider whether to approve the settlement. Class Counsel will ask the Court to award them \$8,500,000 in Attorneys' Fees, as well as lawsuit expenses, and an incentive award to the individuals who started the Lawsuit. These funds are in addition to the amounts available for property testing and remediation and the disease study. You may appear at the hearing, but you do not have to.

**For more information, please visit the settlement website at [crosbyharveysettlement.com](http://crosbyharveysettlement.com).**