

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**KIMBERLEE WILLIAMS, *et al.***

Plaintiffs,

vs.

**BASF CATALYSTS LLC, *et al.***

Defendants.

No. 2:11-cv-01754 (ES) (JAD)

CIVIL ACTION

**Consent Order Amending Deadlines**

**WHEREAS**, on September 3, 2020, the Court entered an Order Preliminarily Approving the proposed Class Action Settlement of this matter (ECF No. 623); and

**WHEREAS**, the Court's Preliminary Approval Order established a schedule of deadlines for notice, filing of claims and other steps to effectuate the Settlement Agreement and Plan of Distribution; and

**WHEREAS**, on September 17, 2020, the Notice Administrator commenced providing direct notice by United States first class mail to living putative class members, relatives of deceased putative class members and attorneys who had represented putative class members in

Underlying Lawsuits, and in addition provided notice by publication, all in compliance with ECF No. 623; and

**WHEREAS**, the Notice Administrator has reported that 84.6% of Class Members have been reached directly and through at least one relative; and

**WHEREAS**, despite their due diligence, putative class members and counsel seeking to file claims on behalf of putative class members have encountered unforeseen difficulties because of the COVID-19 pandemic in obtaining the necessary information and documentation to file claims by the claims deadline originally set forth in the Preliminary Approval Order ( ECF No. 623); and

**WHEREAS**, upon learning of the difficulties being encountered the Special Master directed the Parties to the Settlement Agreement to forthwith meet and confer on the situation; and

**WHEREAS**, in light of the foregoing, the Parties have agreed that a reasonable extension of deadlines established in the Preliminary Approval Order are required to ameliorate the difficulties in the claims filing and approval process; and

**WHEREAS**, the Parties through respective counsel have consented to the entry of this Order amending the Preliminary Approval Order ;

**IT IS** on this 11<sup>th</sup> day of January, 2021, hereby **ORDERED** that the Deadlines established in ECF No. 623 are hereby amended as follows:

Objection Submission Deadline	February 16, 2021
Opt-Out Deadline	February 16, 2021
Opt-Out Revocation Deadline	March 2, 2021
Final Op-Out List Generated	March 8, 2021
Claims Filing Deadline	March 16, 2021
Document Submission Deadline	April 20, 2021
Objection Response Deadline	June 29, 2021
Motion for Final Approval Deadline	June 29, 2021

The Amended Deadlines established in this Order shall be prominently displayed on the Settlement Administration Website.

The Final Approval Fairness Hearing remains scheduled before this Court on **July 29, 2021, at 10:00 am.**

BY THE COURT

/s/ Joseph A. Dickson  
Hon. Joseph A. Dickson  
United States Magistrate Judge

Dated: January 11, 2021