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Date: 3/22/2016 7:02:47 PM

Subject: Phasing Proposal

Attachments: Phasing Proposal for Implementation of Targets.docx

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Dear Becky and Monty,

Attached please find the phasing proposal language, which we have put into the most simplistic format we could conceive in order to make it understandable and appear "easy" enough for Plaintiffs to agree with. As you know, it took us significant thought processes to first conceive of what was needed in order to implement the target measures and then boil down the overall mechanics / concept to only what would be necessary to include in the Settlement Agreement.

We welcome any feedback from the Defense Team, and our hope is that we can get this proposal (or any revised proposal based on Team input) to the Plaintiffs as soon as possible.

Tony

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