

# CONSTANTINE | CANNON

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Wayne T. Lamprey  
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June 19, 2020

Contra Costa Fire Protection District  
Attn: Lewis Broschard  
Fire Chief  
4005 Port Chicago Highway, Ste 250  
Concord, CA 94520

Re: *State of California ex rel. OnTheGo Wireless, LLC v. Cellco Partnership d/b/a Verizon Wireless, et al.*, Case No. 34-2012-00127517 (Sacramento Superior Court)  
**Settlement with Verizon: Action Required**

Dear Sir or Madam:

The enclosed Notice of Settlement is directed to Contra Costa Fire Protection District as a non-intervening real party in interest ("Non-Intervenor") in the above case, in the form required by order of the Court with respect to a settlement between Plaintiffs and Defendant Cellco Partnership d/b/a Verizon Wireless ("Verizon").

**YOUR RESPONSE TO THIS NOTICE WILL DETERMINE THE AMOUNT OF MONEY THAT Contra Costa Fire Protection District WILL RECEIVE AS A RESULT OF THE SETTLEMENT WITH VERIZON.** The settlement payment to Contra Costa Fire Protection District can be calculated from information in the enclosed pleadings. For your convenience, we outline the calculations here:

Total settlement amount for California government entities	\$68,231,673
Verizon revenue from Contra Costa Fire Protection District during relevant time period <sup>94</sup>	\$1,185,601
Share of all Verizon California revenue and settlement for Contra Costa Fire Protection District	0.151%
Gross settlement allocation to Contra Costa Fire Protection District (0.151% of \$68,231,673)	\$102,789

<sup>94</sup> Verizon provided revenue information in discovery, subject to a court confidentiality order. Information about the determination of Verizon revenues and the calculation of total optimizable charges is set forth in the Declaration of Philip Kline in the enclosed pleadings. To review an unredacted version of the Kline Declaration, you must acknowledge the confidentiality designation; please contact us to do so and receive an unredacted copy.

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Requested relator's share of Non-Intervenor recoveries, subject to court approval	43%
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<b>Net settlement allocation to Contra Costa Fire Protection District after Relator's Share</b>	<b>\$58,590</b>
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**In order to receive the entire Net Settlement Allocation, Contra Costa Fire Protection District must execute the Consent Page, as set forth in the attached, and return it to Plaintiffs' counsel by September 17, 2020.** Pursuant to the terms of the settlement, if Contra Costa Fire Protection District does not return an executed Consent Page by that date, its **settlement allocation will be reduced by 10%.**

Please note that a separate Consent Page must be returned for each settling defendant.

We encourage you to contact us directly with any questions about the Verizon Settlement or the enclosed notification and documents. You can leave a message for Wayne Lamprey, Anne Hartman, or Ari Yampolsky at (415) 639-4001.

Sincerely,

CONSTANTINE CANNON LLP



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Wayne T. Lamprey  
Anne Hayes Hartman  
Ari Yampolsky  
Attorneys for Plaintiffs Regents of the  
University of California, et al. and Plaintiff-  
Relator OnTheGo Wireless, LLC