

IN THE DISTRICT COURT OF LINCOLN COUNTY, STATE OF OKLAHOMA

If You Suffered Damage From The Earthquakes in Oklahoma Between January 19, 2019 And the Effective Date, You May Be Eligible For A Payment From Class Action Settlements.

A State Court authorized this Notice. This is not a solicitation from a lawyer.

- A total of \$555,000.00 in class Settlements have been reached in a class action lawsuit about whether certain Defendants operated wastewater disposal wells that allegedly contributed to causing the 5.1m earthquake near Prague, Oklahoma on February 2, 2024, and also in other areas in Oklahoma occurring within the Settlement Class Period. The Settlements resolve any and all claims against Spess Oil Company, Circle 9 Resources, and Culbreath Oil & Gas Co., Inc. (the “Settling Defendants”) alleged to arise from earthquakes that occurred between January 19, 2019, and the Effective Date with epicenters within the State of Oklahoma, including but not limited to the 5.1m earthquake near Prague, Oklahoma, on February 2, 2024. More details of each of the Settlements are provided on the Settlement Website at www.oklahomaearthquakeslawsuits2024.com and within each Settlement Agreement posted on the site.
- You may be eligible to participate in the proposed Settlements, if they are finally approved, if you owned or have had an interest in residential or commercial real estate properties within the borders of Oklahoma between January 19, 2019, through the Effective Date and suffered earthquake damages from earthquakes near Prague, Oklahoma, or other seismicity in other areas of Oklahoma.
- The Settlements will provide benefits to those who qualify. You will need to file a Claim Form to receive benefits from the Settlements.
- Your legal rights are affected whether you act or don’t act. Read this Notice carefully.

<u>YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENTS</u>	
SUBMIT A CLAIM FORM BY JANUARY 25, 2026	This is the only way to receive benefits.
EXCLUDE YOURSELF BY SEPTEMBER 27, 2025	Request to be excluded and get no benefits from the Settlements. This is the only option that allows you to start or continue your own lawsuit against the Settling Defendants for the claims at issue in the Settlements.
OBJECT BY OCTOBER 10, 2025	Write to the Court about why you do not like the Settlements or why you think the Settlements are unfair, inadequate or unreasonable.
GO TO A HEARING	Ask to speak in Court about the fairness of the Settlements.
DO NOTHING	Get no benefits. Give up any rights you might have to ever sue any Settling Defendants about the legal claims in this case and resolved by the Settlements.

- These rights and options—and the deadlines to exercise them—are explained in this Notice. The deadlines may be moved, canceled, or otherwise modified, so please check the Settlement Website at www.oklahomaearthquakeslawsuits2024.com regularly for updates and further details.
- The Court in charge of this case still must decide whether to approve the Settlements. Benefits will be provided to eligible participants only if the Court approves the Settlements and after any appeals are resolved. Please be patient.

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BASIC INFORMATION

1. What is this notice?

The Court authorized this Notice because you have a right to know about the proposed Settlements of a class action lawsuit, and about your options, before the Court decides whether to approve the Settlements.

District Court of Lincoln County, Oklahoma State Judge Sarah Bridge serves as the presiding judge. The case is titled *Salzman, et al. v. Freedom, et al.*, Case No. CJ-2024-0043 (the “Action”). This Notice explains the lawsuit, the Settlements, and your legal rights.

2. What is this lawsuit about?

Plaintiff alleges, generally, that a wastewater disposal well operated by the Settling Defendants contributed to causing the earthquake near Prague, Oklahoma, including but not limited to the 5.1m earthquake near Prague, Oklahoma, on February 2, 20224, and also in other areas of Oklahoma and occurring within the Settlement Class Period.

The Plaintiffs’ operative Petition, the Settlement Agreements, and other case-related documents are posted on the Settlement Website, www.oklahomaeearthquakeslawsuits2024.com.

Neither the acceptance by the Settling Defendants of the terms of the Settlement Agreements nor any of the related negotiations or proceedings constitute an admission with respect to the merits of the claims alleged in the Action. The Settling Defendants specifically deny any liability or wrongdoing of any kind associated with the claims alleged in the Action.

3. Why is this a class action?

In a class action, one or more people, called “Class Representatives,” sue on behalf of people who have similar claims. Together, all these people with similar claims (except for those who exclude themselves) are members of the “Settlement Class.”

4. Why are there Settlements?

The Court did not decide which side was right or whether the claims have any merit. Instead, both sides agreed to a settlement to avoid the costs and risks of further litigation and provide benefits to Class Members. The Settlements do not mean that a Court found that any Defendant broke any laws or did anything wrong. The Class Representatives and the lawyers representing them (called “Class Counsel”) believe that the Settlements are in the best interests of all Class Members.

WHO IS IN THE SETTLEMENTS?

5. How do I know if I am in the Settlements?

All persons, municipalities, county governments, or tribal governments, who own or owned real property within the borders of Oklahoma or have or had a property interest therein between January 19, 2019, through the Effective Date, and which suffered earthquake damages from earthquakes, foreshocks and aftershocks within the State of Oklahoma are “Settlement Class Members” and together are called the “Settlement Class.”

Excluded from the Settlement Class are the following:

- a) Any Settling Defendants and their owners, directors, officers, employees, and/or agents, the judge presiding over this Action and his immediate family members;
- b) Any person that timely and properly excludes himself/herself/itself pursuant to the orders of the Court; and
- c) Any person named as a Plaintiff in a lawsuit against any Settling Defendants and asserting damages due to earthquakes allegedly caused or contributed to by any Settling Defendants, and not a Related Action.

6. What if I am still not sure if I am included in the Settlements?

If you are not sure whether you are a Settlement Class Member, or have any other questions about the Settlement Agreements, visit the Settlement Website at www.oklahomaeearthquakeslawsuits2024.com, contact the Settlement Administrator by email at admin@oklahomaeearthquakeslawsuits2024.com, or call toll-free at 1-888-777-6403. You also may send questions to the Settlement Administrator at:

Salzman Class Action Settlement
Attn: Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

SETTLEMENT BENEFITS

7. What do the Settlements provide?

In consideration of and solely for purposes of the Settlements, and full, complete, and final settlements, including dismissal of the Action with prejudice as to the Settling Defendants, and the releases below, and subject to the Court's approval, the Settling Defendants will pay, in total, \$555,000.00 in cash into the Settlement Fund.

A Claim Form must provide evidence of the Claimant's damages suffered as a result of the February 2, 2024, earthquake occurring near Prague, Oklahoma, and/or any other earthquakes in other areas of Oklahoma, occurring between January 19, 2019, and the Effective Date, including but not limited to the 5.1M earthquake occurring on February 2, 2024, having an epicenter near Prague, Oklahoma, and also any other earthquakes occurring in Oklahoma, and make a claim for a sum certain not to exceed the amounts of the provided repair estimates and bills.

8. What can I get from the Settlements?

All Settlement Class Members who qualify and timely submit completed Claim Forms and supporting documentation of their damages may seek recovery of the repair damages incurred because of the earthquakes referenced in these class action Settlements.

The Net Proceeds of the Settlement Fund shall be distributed based upon the sum certain amounts stated in the approved Claim Forms and supported by the submitted evidence approved by the Settling Defendants and Class Counsel, or for those amounts determined by the Special Master on a motion.

Zone A Claimants: Claimants with damaged properties within Lincoln, Payne, Logan, Oklahoma, Cleveland, Pottawatomie, Seminole, Okfuskee and Creek counties in Oklahoma shall have preferred status as their causational damages links, based upon proximity of their properties to Settling Defendants' disposal wells and the operative Petition's alleged induced seismicity near Prague occurring on or about February 2, 2024, are the strongest of those within the Settlement Class. These claimants shall be placed within Zone A, and 90% of the Net Settlement Fund shall be distributed to Zone A claimants based upon their submitted damages evidence.

Zone B Claimants: Claimants with damaged properties outside of Lincoln, Payne, Logan, Oklahoma, Cleveland, Pottawatomie, Seminole, Okfuskee and Creek counties in Oklahoma, but within the borders of Oklahoma shall have a less-preferred status as their causational damages links, based upon proximity of their properties and Settling Defendants' disposal wells and the seismicity at issue, are not as strong as those in Zone A. However, such properties are located nearer to other alleged seismicity allegedly caused by the Settling Defendants. These claimants shall be placed within Zone B, and 10% of the Net Settlement Fund shall be distributed to Zone B claimants based upon their submitted damages evidence.

If the total approved claim sum certain amounts do not exceed the Net Proceeds of the Settlement Fund, the Net Proceeds of the Settlement Fund shall be distributed to the approved claimants based upon those sum certain amounts as described above. Any excess proceeds shall be returned to the Settling Defendants in relationship to the sums they contributed to the total Settlement Fund. If, however, the total claimed sum certain amounts exceed the Net Proceeds of the Settlement Fund, then the approved claimants shall receive their pro rata share of the Net Proceeds determined by dividing the sum certain claimed amount submitted by the approved claimant (and supported by the evidence of damages) on their Claim Form by the overall claimed sum certain amounts stated in all approved Claim Forms as described above.

To receive any amounts under the Settlements, Settlement Class Members must submit a Claim Form and supporting documentation to the Settlement Administrator at the address provided below, or at www.oklahomaeearthquakeslawsuits2024.com.

9. What am I giving up to stay in the Class?

Unless you exclude yourself from the Settlements, you can't sue a Settling Defendant, continue to sue, or be part of any other lawsuit against a Settling Defendant about the legal issues in this case. It also means that all the decisions by the Court will bind you. The Release is described more fully in the Settlement Agreements and describes exactly the legal claims that you give up if you stay in the Class. The Settlement Agreements are available at www.oklahomaeearthquakeslawsuits2024.com.

HOW TO GET BENEFITS

10. How can I receive benefits?

To receive benefits, all Settlement Class Members must complete and timely submit a Claim Form, provide evidence of damages and make a claim for a sum certain not to exceed the amounts of the provided repair estimates and bills. You can obtain a Claim Form at www.oklahomaeearthquakeslawsuits2024.com, by calling 1-888-777-6403, or writing to the address below:

Salzman Class Action Settlement
Attn: Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

Please read the instructions carefully, fill out the Claim Form, submit it electronically at www.oklahomaeearthquakeslawsuits2024.com, by email to admin@oklahomaeearthquakeslawsuits2024.com, or by mail to the Settlement Administrator postmarked no later than **January 25, 2026**, to the address above. If you do not submit a valid Claim Form by the deadline, you will not receive benefits.

11. When will I get my benefits?

Benefits will be mailed to Settlement Class Members who send in a valid and approved Claim Form within thirty (30) days after the later of (a) the Final Approval Order becoming Final, (b) the deadline for submission of Claims Form, or (c) the date that all objections to Claims or evidence deficiencies are finally resolved. If the Court approves the Settlements after a hearing on October 20, 2025, there may be appeals. It's always uncertain whether these appeals can be resolved and resolving them can take time.

EXCLUDING YOURSELF FROM THE SETTLEMENTS

12. How do I get out of the Settlements?

If you don't want a payment but you want to keep the right to sue a Settling Defendant over the legal issues in this case, then you must take steps to get out of the Settlements. This is called asking to be excluded from—or sometimes “opting out” of—the Settlements Class. To exclude yourself from the Settlements, you must be a Settlement Class Member and you must complete and mail to the Settlement Administrator a letter that includes the following:

- Your name, address, and telephone number;
- The name of the case (*Salzman, et al. v. Freedom, et al.*, Case No. CJ-2024-0043);
- A statement that you want to be excluded from the Settlements;
- The physical address of the property that suffered earthquake damages, and identification of the earthquake(s) causing such damage.
- Your signature.

You must mail your exclusion request, postmarked no later than **September 27, 2025** to:

Salzman Class Action Settlement
Attn: Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

All Settlement Class Members who do not submit a valid Request for Exclusion will be included in the Settlement Class and will be bound by the Settlement Agreements on the Effective Date. You may opt out of the Settlement Class only for yourself. So-called “mass” or “class” opt-outs, whether filed by third parties on behalf of a “mass” or “class” of Settlement Class Members or multiple Settlement Class Members where no personal statement has been signed by each and every individual Settlement Class Member, are not allowed.

13. If I don't exclude myself, can I sue any Settling Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue any Settling Defendants for the claims that these Settlements resolve. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately. You must exclude yourself from this Settlement Class to continue your own lawsuit against any of the Settling Defendants.

14. If I exclude myself, can I still receive benefits?

No. You will not receive any benefits from the Settlements if you exclude yourself. If you exclude yourself from the Settlements, do not send in a Claim Form asking for benefits.

OBJECTING TO THE SETTLEMENTS

15. How can I tell the Court if I do not like the Settlements?

Any Settlement Class Member who does not submit a timely and valid Request for Exclusion and who wishes to object to or oppose the approval of (a) the Settlement Agreements, (b) the Fees and Costs Applications, (c) the Incentive Award Applications, and/or (d) the proposed Final Approval Order shall file a written objection with the Court and serve it on the Parties at least ten (10) days before the Final Approval Hearing. The written objection must include:

- Your name, address and telephone number;
- The name, address, email address, and telephone number of your lawyer, if you have one;
- The name of the case (*Salzman, et al. v. Freedom, et al.*, Case No. CJ-2024-0043);

- Proof of your membership in the Settlement Class;
- A statement of the reasons for the objection and any evidence supporting the objection;
- A statement regarding whether you intend to appear at the Final Approval Hearing; and
- Your signature and, if you have one, your lawyer's signature.

Any Settlement Class Member who fails to file a timely written objection that meets the requirements of this paragraph shall be deemed to have waived such objection or opposition and forever shall be foreclosed from making such objection or opposition to the fairness, reasonableness, or adequacy of the Settlements, the payment of attorneys' fees, costs, expenses, and the incentive awards, or the Final Approval Order. Any Settlement Class Member who makes an objection shall submit to the jurisdiction of the Court and make himself or herself available for deposition by either Party within a reasonable time before the Final Approval Hearing.

Your objection, along with any supporting material you wish to submit, must be filed with the Court with a copy delivered to Class Counsel, and Settling Defendants' Counsel postmarked no later than **October 10, 2025**, at the following addresses:

<u>Clerk of the Court</u>	<u>Class Counsel</u>	<u>Settling Defendants' Counsel</u>
Clerk of the Court District Court of Lincoln County P.O. Box 307 Chandler, OK 74834	Scott Poynter Poynter Law Group 4924 Kavanaugh Boulevard Little Rock, AR 72207	E. Edd Pritchett, Jr. Durbin, Larimore & Bialick 920 North Harvey Avenue Oklahoma City, OK 73102 Charles D. Neal Steidley & Neal 2448 East 81st Street, 53rd Floor Tulsa, OK 74137 Alvin R. Wright Law Office of Alvin R. Wright 1504 Copper Rock Drive Edmond, OK 73025

16. What is the difference between objecting and excluding?

Objecting is simply telling the Court that you don't like something about the Settlements. You can object to the Settlements only if you do not exclude yourself from the Settlements. Excluding yourself from the Settlements is telling the Court that you do not want to be part of the Settlements. If you exclude yourself from the Settlements, you have no basis to object to the Settlements because they no longer affect you.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

Yes. The Court has appointed the following lawyer, called "Class Counsel," to represent all Settlement Class Members: Scott Poynter of Poynter Law Group. You will not be charged for this lawyer. If you want to be represented by your own lawyer, you may hire one at your own expense.

18. How will the lawyers be paid?

Class Counsel will ask the Court to approve attorneys' fees not to exceed 40% of the total Settlement Fund, and reasonable litigation expenses not to exceed \$25,000.00. The Court will determine the amount of fees and expenses to award. Class Counsel will request the Court to pay \$7,500.00 as an incentive award in this Action for each Class Representative within each approved Settlement. The fees and expenses and service awards awarded by the Court will be paid from the Settlement Fund.

THE COURT'S FINAL APPROVAL HEARING

19. When and where will the Court decide whether to approve the Settlements?

The Lincoln County District Court will hold a Final Approval Hearing on October 20, 2025 at 11:00 am at the District Court of Lincoln County, Oklahoma State of Oklahoma, before the Honorable Sarah Bridge, Lincoln County District Court, 811 Manvel Ave., Chandler, Oklahoma 74834.

The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.oklahomaeearthquakeslawsuits2024.com for updates. At the Final Approval Hearing, the Court will: (a) determine whether to grant final approval to the Settlements; (b) consider any timely objections to the Settlements and the Parties' responses to such objections; (c) rule on the Fees and Costs Applications; and (d) rule on the Incentive Awards Application. We do not know how long these decisions will take.

20. Do I have to come to the hearing?

No. Class Counsel will answer any questions that the Court may have. But, you may come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you mailed your written objection on time to the proper addresses, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

21. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must send a letter stating that it is your "Notice of Intent to Appear." In your letter, you must include the following:

- Your name, address and telephone number;
- The name, address, email address, and telephone number of your lawyer, if you have one;
- The name of the case (*Salzman, et al. v. Freedom, et al.*, Case No. CJ-2024-0043); and
- Your signature and, if you have one, your lawyer's signature.

You must mail your Notice of Intent to Appear, postmarked no later than October 10, 2025, to all of the addresses in Question 15.

IF YOU DO NOTHING

22. What happens if I do nothing at all?

If you do nothing, you will not get any benefits from the Settlements. Unless you exclude yourself, you won't be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against any Settling Defendants about the factual and legal issues in this case, ever again.

GETTING MORE INFORMATION

23. How do I get more information?

This Notice summarizes the proposed Settlements. More details are available in the Settlement Agreements. You can get a complete copy of the Settlement Agreements and other information at www.oklahomaeearthquakeslawsuits2024.com. If you have additional questions or want to request a Claim Form, you can visit the Settlement Website at www.oklahomaeearthquakeslawsuits2024.com, call the Settlement Administrator at 1-888-777-6403, or write to the Settlement Administrator at:

Salzman Class Action Settlement
Attn: Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

PLEASE DO NOT CONTACT THE COURT, CLERK OF THE COURT OR DEFENDANT CONCERNING THIS CASE.