

## Supplement to Allocation Model and Allocation Neutral Report

Following completion of the Allocation Model and Allocation Neutral Report, Settlement Class Counsel and counsel for Taishan identified an action pending in Alabama state court (the "Alabama action") involving a single property owned by a husband and wife. Taishan's Counsel provided case materials about the property, including product identification photographs, the complaint (filed November 30, 2009), an Order setting the Alabama action for trial in December 2019, and the court docket. Taishan is a defendant in the Alabama action. Class Counsel and Defendants' Counsel have requested the Allocation Neutral to analyze the status of the Alabama action to determine the applicable Plaintiff Group.

The Alabama action has progressed through considerable discovery and motion practice. The plaintiffs are the original and continuous owners of the home. According to case materials, they have not remediated the home and continue to complain of ongoing problems resulting from the corrosive effects of alleged defective drywall. As noted on page 3 of the Allocation Model and Allocation Neutral Report, Class Counsel and Taishan agree that Taishan manufactured drywall sourced from Venture Supply.

While not as valuable as the claims of the *Amorin* plaintiffs, the value of the Alabama action exceeds the value of the claims of the *Brooke* plaintiffs. Based on my review of the information, I assign the Alabama action with a 70% value, for a multiple of .70.

This report and analysis applies solely to the Alabama action.

THIS, the 28<sup>th</sup> day of August, 2019.

/s/ J. Cal Mayo, Jr.

J. Cal Mayo, Jr.

Allocation Neutral

