Jan Apo
APO, RECK & KUSACHI
24 North Church Street, Suite 302
Wailuku, HI 96793
jankapo@jankapo.com
Tel: 808-244-6073

Jesse Max Creed
PANISH | SHEA | RAVIPUDI LLP
11111 Santa Monica Blvd., Suite 700
Los Angeles, CA 90025
jcreed@psbr.law
Tel: 310-477-1700

Jacob Lowenthal
LOWENTHAL & LOWENTHAL LLLC
122 Maa St. B, Kahului, HI 96732
jkl@lowenthal-Hawai'i.com
Tel: 808-242-5000

Cynthia K. Wong
CYNTHIA K. WONG, ATTORNEY AT
LAW, LLLC
2035 Main Street, Suite 2, Wailuku, HI
96793
cyn@legalmaui.net
Tel: 808-727-2921

Liaison Counsel for Individual Action Plaintiffs

IN THE CIRCUIT COURT OF THE SECOND CIRCUIT

STATE OF HAWAI'I

IN THE MATTER OF THE PETITION FOR THE COORDINATION OF INDIVIDUAL PLAINTIFFS MAUI FIRE CASES	Civil Case No. 2CSP-23-0000057 (Other Non-Vehicle Tort) **DECLARATION OF CATHY YANNI IN SUPPORT OF INDIVIDUAL PLAINTIFFS' MOTION TO APPOINT INDIVIDUAL SETTLEMENT ADMINISTRATORS FOR THE PURPOSES OF EFFECTUATING THE INDIVIDUAL SETTLEMENT AGREEMENT** Judge: Hon. Peter T. Cahill

I, Cathy Yanni, declare under penalty of law as follows:

1. I am an attorney at law licensed to practice law in the state of California. I am in good standing. I am duly authorized to make this Declaration (the "**Declaration**"). Unless otherwise stated in this Declaration, I have knowledge of the facts set forth herein and, if called as a witness, I would testify thereto:

2. I joined JAMS in 1998 and specialize in Alternative Dispute Resolution including Special Master and Mass Tort allocation appointments.
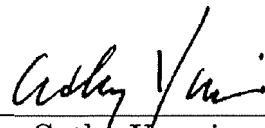
3. Over the last two decades, I have allocated billions of dollars to claimants across dozens of mass tort cases. This has included the following responsibilities:

   a. I was appointed by the Honorable Dennis Montali to be the Administrator and Trustee of the Fire Victim Trust, which was created as part of PG&E's bankruptcy settlement. The U.S. Bankruptcy Court approved the formation and funding of the $14.2 billion Trust to compensate the nearly 72,000 claimants alleging damages arising from the 2015 Butte Fire, 2017 North Bay Fires, and 2018 Camp Fire.

   b. Before PG&E's bankruptcy plan was confirmed and the Fire Victim Trust was created, I was appointed by the Honorable Dennis Montali to be the Administrator of the Wildfire Assistance Program, a $105 million fund established for victims of the 2017 North Bay Fires and 2018 Camp Fire.

   c. I worked to formulate a resolution program for the 2007 San Diego fire cases, ultimately acting as mediator and arbitrator for the program.

   d. I was the Appellate Review Officer for the $140 million Takata Airbag Tort Compensation Trust Fund. The Trust Fund was established pursuant to a

February 2017 criminal plea agreement between the US Department of Justice and Takata to resolve felony charges brought by the government against Takata in connection with the design, manufacture, and sale of defective airbag inflators.

e. I was appointed by the Honorable Joseph Goodwin of the Southern District of West Virginia as Special Master in the transvaginal mesh (TVM) cases. I assisted in the settlement and allocation of multiple settlements in the Boston Scientific, Covidien, Coloplast, AMS, and BARD MDLs, involving thousands of claims and hundreds of telephonic and video appeals.

f. I was appointed Settlement Special Master for the *In re National Prescription Opiate Litigation* MDL, pending in the U.S. District Court for the Northern District of Ohio, by the Honorable Dan Polster.

g. I was appointed by the Honorable M. Casey Rodgers of the Northern District of Florida as Settlement Special Master for the Abilify MDL.

h. I was appointed by the Honorable John H. Ehrlich of the Circuit Court of Cook County, Illinois as Allocation Neutral in two separate toxic mass tort settlements involving ethylene oxide.

i. I was appointed by the Honorable David A. Katz of the Northern District of Ohio as Special Master for *In re: DePuy Orthopedics, Inc., ASR™ Hip Implant Products Liability Litigation* to assist with distribution of multiple billion dollar settlements.

Dated: March 18, 2025

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Cathy Yanni