

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GLENN TIBBLE et al., individually and as
representatives of a class of similarly situated persons
and on behalf of the Plan,

Plaintiffs,

v.

EDISON INTERNATIONAL et al.,

Defendants.

Case No. CV 07-5359 SVW (AGRx)

**NOTICE REGARDING MOTION FOR
NONTAXABLE COSTS**

Judge: Hon. Stephen V. Wilson

Courtroom: 10A

*A federal court has authorized this Notice. This is **not** a solicitation from a lawyer.*

PLEASE READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR RIGHTS.

You are receiving this notice because the records maintained by Edison International ("Edison"), a Defendant in the above-captioned federal lawsuit, or one of its agents, indicate that you are or have been a participant in the Edison 401(k) Savings Plan (the "Plan"), and were invested in one of the following funds during the timeframes set forth below:

1. PIMCO CCM Capital Appreciation Fund (later named the Allianz CCM Capital Appreciation Fund and the Managers Cadence Capital Appreciation Fund) - August 16, 2001 to January 31, 2011;
2. American Century International Growth Fund - August 16, 2001 to September 30, 2005;
3. American Funds American Balanced Fund - May 15, 2002 to January 31, 2011;
4. American Funds Europacific Growth Fund - May 15, 2002 to January 31, 2011;
5. American Funds-Washington Mutual Investors - May 15, 2002 to January 31, 2011;
6. Dreyfus Founders Growth Fund - January 1, 2002 to June 30, 2002;
7. Kemper-Dreman High Return Equity Fund (later named the Scudder-Dreman High Return Equity Fund and DWS Dreman High Return Equity Fund and the DWS Strategic Value Fund) - August 16, 2001 to October 15, 2009;
8. Franklin Small Cap Growth Fund (later named the Franklin Small-Mid Cap Growth Fund) - August 16, 2001 to September 28, 2007;
9. Berger Small Cap Value Fund (later named the Janus Small Cap Value Fund, Investor shares) - August 16, 2001 to September 28, 2007;
10. Morgan Stanley Dean Witter Institutional Equity Growth Fund, B shares (later named the Morgan Stanley Institutional Equity Growth Fund) - August 16, 2001 to October 1, 2003;
11. MAS Value Fund, Advisor shares (later named the Morgan Stanley Institutional Value Fund, Advisor shares) - August 16, 2001 to October 1, 2003;
12. PIMCO Long-Term U.S. Government Fund - August 16, 2001 to January 31, 2011;
13. PIMCO Low Duration Fund - August 16, 2001 to January 31, 2011;
14. PIMCO Total Return Fund - August 16, 2001 to January 31, 2011;
15. Putnam International Growth Fund (later named the Putnam International Equity Fund) - August 16, 2001 to December 18, 2003;
16. Putnam Voyager Fund - August 16, 2001 to September 15, 2004; and
17. Templeton Developing Markets Fund - August 16, 2001 to September 15, 2004.

After trial, the Court has found that Defendants breached their ERISA fiduciary duty of prudence by causing the Plan to invest in higher-cost share classes of the aforementioned mutual funds when lower-cost share classes were available. The parties have since stipulated to damages of \$13,161,491 resulting from the Plan's investment in higher-cost shares for these 17 mutual funds, and Defendants have agreed separately to pay Plaintiffs' counsel \$5,800,000 in attorneys' fees and costs under provisions of ERISA allowing litigants to seek recovery of such fees and costs from the opposing party. The stipulation reached between the parties means that you do not pay any attorneys' fees for Class Counsel's work over the past ten years incurred to obtain the recovery on your behalf and you do not pay any costs incurred other than for expert witnesses, such as for depositions, travel, document production and review. Expert witness fees cannot be shifted to the Edison Defendants under the law, and therefore Plaintiffs have filed a motion to recover such costs that Class Counsel paid and had been carrying from then \$13,161,491 damages award. In addition, Plaintiffs seek the payment of \$25,000 "case contribution awards" out of the damages award for each of the six class representatives who brought the case and provided information to pursue it. A complete copy of Plaintiffs' Motion is available at www.tibblejudgment.com.

If the Court grants Plaintiffs' Motion, damages available to Plan participants investing in one or more of the 17 funds during the timeframes stated above (collectively, "Class Members") will be allocated after these expenses are paid. As such, you have a right to object to Plaintiffs' Motion by no later than to **April 30, 2018**.

The Opportunity to Object to Plaintiffs' Motion

Prior to the hearing on Plaintiffs' Motion, scheduled for May 7, 2018, Plan participants invested in one or more of the 17 funds during the timeframes enumerated above will have the opportunity if they wish to object to approval of Plaintiffs' Motion. You do not need to do so and do not need to do anything at this time.

To object, you must send your objection to the Court, at the United States District Court for the Central District of California, located at 350 W. 1st Street, Suite 4311, Los Angeles, CA 90012-4565, and to the Parties at the following addresses:

<p>For Filing with the Court: United States District Court Central District of California 350 W. 1st Street, Suite 4311 Los Angeles, CA 90012-4565 Re: <i>Tibble, et al. v. Edison International, et al.</i> (Case No. 2:07-cv-05359-SVW)</p>	<p>To Class Counsel: Jerome J. Schlichter Schlichter, Bogard & Denton LLP 100 South Fourth Street, Suite 1200 St Louis, MO 63102</p>	<p>To Defendants' Counsel: Brian D. Boyle O'Melveny & Myers LLP 1625 Eye Street, NW Washington, D.C. 20006</p>
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Objections must be filed with the Court Clerk on or before to **April 30, 2018**.

Objections filed after that date will not be considered. Any Class Member failing to submit a timely objection will be deemed to have waived any objection they might have, and any untimely objection will be barred absent an order from the Court. Objections must include: (1) the case name and number; (2) your full name, current address, telephone number and signature; (3) a statement that you are a Class Member and an explanation of the basis upon which you claim to be a Class Member; and (4) all grounds for the objection, accompanied by any legal support known to you or your counsel.

The Court will consider Class Member comments and objections in deciding whether to grant Plaintiffs' Motion. Class Members who do not comply with these procedures, or who miss the deadline to file an objection, lose the opportunity to have their objection considered by the Court or to appeal from any order or judgment entered by the Court regarding the Motion.