

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

IN ADMIRALTY

In the Matter of the Complaint

of

Case No. 3:15-cv-1297-HES-MCR

Sea Star Line, LLC, d/b/a TOTE
Maritime Puerto Rico, as owner; and
TOTE Services, Inc., as Owner *pro hac*
vice of the *S.S. El Faro* for Exoneration
from or Limitation of Liability

**CORRECTED SECOND NOTICE OF SETTLEMENT
OF SEA STAR LINE, LLC AND TOTE SERVICES, INC.**

Petitioners Sea Star Line, LLC, d/b/a TOTE Maritime Puerto Rico, and TOTE Services, Inc. hereby notify the Court pursuant to Local Rule 3.08 that the Petitioners have settled the following claims and state:

1. On January 22, 2016, Petitioners filed a Notice of Settlement (Docket No. 152) reporting that Petitioners had settled wrongful death claims with ten (10) of the Personal Representatives of the Estates of deceased crewmembers of the EL FARO ("First Notice of Settlement").

2. Petitioners now file this Second Notice of Settlement reporting on their settlement with the Estates of the following claims. This Second Notice of Settlement is WITHOUT PREJUDICE TO PETITIONERS' RIGHTS IN THE ABOVE CAPTIONED EXONERATION/LIMITATION PROCEEDING AGAINST CLAIMANTS OTHER THAN THOSE SPECIFIED IN THE FIRST NOTICE OF SETTLEMENT AND THOSE SPECIFIED BELOW, AND WITHOUT PREJUDICE TO PETITIONERS' RIGHTS TO SEEK AN APPROPRIATE CREDIT AGAINST THE LIMITATION FUND IN THIS ACTION FOR

SETTLEMENTS WITH THE CLAIMANTS SPECIFIED IN THE FIRST NOTICE OF SETTLEMENT AND THOSE CLAIMANTS SPECIFIED BELOW.

a. **Addreisha Shirliea Jones as Personal Representative of the Estate of Jackie Robert Jones, Jr.** has reached a full and final settlement of all claims filed in this action (Docket No. 194) in the amount of FIVE HUNDRED THOUSAND DOLLARS (\$500,000.00) for all non-pecuniary (pre-death pain and suffering) damages and an agreed upon amount for pecuniary (economic losses) damages covering the Estate's full economic loss.

b. **Elaine Meklin and Karl Meklin as Personal Representatives of the Estate of Dylan O. Meklin** have reached a full and final settlement of all claims filed in this action (Docket No. 73) in the amount of FIVE HUNDRED THOUSAND DOLLARS (\$500,000.00) for all non-pecuniary (pre-death pain and suffering) damages and an agreed upon amount for pecuniary (economic losses) damages covering the Estate's full economic loss.

c. **Laurie D. Bobilot and Kenneth W. Randolph as Personal Representatives of the Estate of Danielle Laura Randolph** have reached a full and final settlement of all claims filed in this action (Docket No. 72) in the amount of FIVE HUNDRED THOUSAND DOLLARS (\$500,000.00) for all non-pecuniary (pre-death pain and suffering) damages and an agreed upon amount for pecuniary (economic losses) damages covering the Estate's full economic loss.

d. **Deborah Roberts as Personal Representative of the Estate of Michael Lee Holland** has reached a full and final settlement of all claims filed in this action (Docket No.249) in the amount of FIVE HUNDRED THOUSAND DOLLARS (\$500,000.00) for all non-pecuniary (pre-death pain and suffering) damages and an agreed upon amount for pecuniary (economic losses) damages covering the Estate's full economic loss.

3. Further details of the foregoing settlements will be provided to the Court when Petitioners seek an appropriate credit for their settlements against the Limitation Fund in this action.

Respectfully Submitted,

/s/ Jerry D. Hamilton

/s/ George D. Gabel, Jr.

<p>JERRY D. HAMILTON Florida Bar No. 970700 jhamilton@hamiltonmillerlaw.com ROBERT B. BIRTHISEL Florida Bar Number: 906654 rbirthisel@hamiltonmillerlaw.com WILLIAM F. CLAIR Florida Bar Number: 693741 wclair@hamiltonmillerlaw.com KARINA CERDA COLLAZO Florida Bar Number 0626775 kcerda@hamiltonmillerlaw.com JULES V. MASSEE Florida Bar Number: 0041554 jmassee@hamiltonmillerlaw.com MICHAEL J. DONO Florida Bar Number: 0576492 mdono@hamiltonmillerlaw.com</p> <p>HAMILTON, MILLER & BIRTHISEL, LLP 150 Southeast Second Avenue, Suite 1200 Miami, Florida 33131 Telephone: 305-379-3686 Facsimile: 305-379-3690</p>	<p>GEORGE D. GABEL, JR. Florida Bar No. 27220 George.gabel@hkclaw.com</p> <p>HOLLAND & KNIGHT, LLP 50 North Laura Street, Suite 3900 Jacksonville, Florida 32202 Telephone: (904) 353-2000 Facsimile: (904) 358-1872</p>
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 1, 2016, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that a copy of the foregoing has been furnished to all counsel of record via the CM/ECF system this 1st day of March, 2016.

/s/ Jerry D. Hamilton
Jerry D. Hamilton, Esq.