IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX

IN RE: RED DUST CLAIMS

MASTER CASE NO. SX-15-CV-620 COMPLEX LITIGATION DIVISION

NOTICE OF SUBMISSION OF DEFENDANTS' PROPOSED DISCOVERY ORDER

Defendants St. Croix Alumina, LLC, Alcoa Inc. k/n/a Arconic Inc., Glencore Ltd. and St. Croix Renaissance Group circulated the attached proposed discovery order to counsel for plaintiffs in this matter on February 11, 2019 for purposes of initiating a dialogue on a joint proposed discovery order. Subsequently, defendants scheduled a telephone conference with plaintiffs' counsel for March 18, 2019 to attempt to "meet and confer" regarding a joint proposed discovery order. Counsel for plaintiffs apparently believed that the attached proposed order had been submitted to the Court and served an "Opposition to Defendants' Proposed Discovery Order" on March 14, 2019. Accordingly, Defendants are filing their Proposed Discovery Order and ask that it be accepted nunc pro tunc to February 11, 2019.

Defendants will file a separate report on the results of the telephone conference between all parties.

Respectfully submitted,

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March 22, 2019

In re Red Mud Notice of Submission of Defendants' Proposed Discovery Order Civ. No. SX-15-cv-620 Page 2

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CERTIFICATE OF SERVICE

I certify that this document complies with the font/page/word limitations of V.I.R.Civ.P. 6-1(e) and that on March 22, 2019, I served the foregoing document on the following counsel of record at the email addresses specified below in accordance with V.I.R. Civ. P. 5(b)(2(E):

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