

STATE OF NORTH CAROLINA
IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
14 Cvs 327

BEAUFORT COUNTY

PCS PHOSPHATE COMPANY, INC.)
Plaintiff)
v.)
ESSIE MOORE LONG, MARCELLUS)
BLOUNT, AND BERNARD MOORE,)
each individually and as a)
Representative of the Class)
of All Heirs of ELIZA ANN)
MOORE DIAMOND,)
Defendants.)

DEFENDANTS' NOTICE OF FILING
OF THE INITIAL PROPOSED
DISTRIBUTION

NOW COMES Matthew S. Sullivan, as counsel for the Defendant Class, and pursuant to that Settlement Agreement ("Agreement") and Court Order approving the Agreement, files the Initial Proposed Distribution. In support of this filing, the undersigned shows unto the Court as follows:

1. Pursuant to paragraph 9 of the Agreement, the undersigned is required to file with the Court two recommended distributions, one for each tract, showing the percentage of Net Settlement Proceeds each Confirmed Claimant would receive. The recommended distributions must also include an estimated distribution amount for each Confirmed Claimant, based on the undersigned's best estimate of the amount of the Net Settlement Proceeds and a report of the costs incurred to date and estimated for remaining notifications.

2. Attached to this Notice of Filing are those required notifications set forth in Paragraph 9. The undersigned, based on the current costs, subject only to any additional hearings and transportation expense, does not believe that any further mailing expenses (including any mail that may need to be tracked) will exceed the sum of ONE THOUSAND DOLLARS (\$1,000).

3. Simultaneously with the filing of this Notice of Filing of the Initial Proposed Distribution, the undersigned will post the information on the firm website and notify each Confirmed Claimant of such posting and the information contained herein.

This th day of December, 2015.

WHITE & ALLEN, P.A.
Attorneys for Defendant Class Claimants

By: 

Matthew S. Sullivan
P. O. Box 3169
Kinston, N.C. 28502-3169
Tel.: (252) 527-8000
N.C. State Bar #22343

#316/112387-1

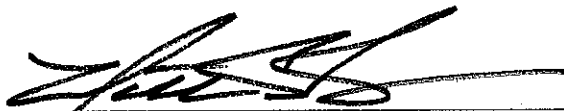
CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served this Notice of Filing in the above entitled action upon all other parties to this cause by hand delivering a copy hereof to the said parties or attorneys for said parties to:

William P.H. Cary
BROOKS, PIERCE, MCLENDON,
HUMPHREY & LEONARD, L.L.P.
Suite 2000, 230 N. Elm Street
Greensboro, North Carolina 27401

Fred Holscher
RODMAN HOLSCHER PECK & EDWARDS
P.O. Box 1747
Washington, NC 27889

This 17th day of December, 2015.



Matthew S. Sullivan
Attorney for Defendants
WHITE & ALLEN, P.A.
P. O. Box 3169
Kinston, N.C. 28502-3169
Tel.: (252) 527-8000
N.C. State Bar # 22343

#336/112387-1

General Information Used for Purposes of the Initial Proposed Distribution

Gross Settlement Amount	100,000.00
Expenses to Date	3,084.10
Anticipated Expenses	
Allocation of Gross Settlement to Tract #1	\$64,000
Allocation of Gross Settlement to Tract #2	\$36,000
Case Expense to Tract #1 based on % recovery	1,973.82
Case Expense to Tract #2 based on % recovery	1,110.28
Current Allocation for Tract #1 less expense	62,026.18
Current Allocation for Tract #2 less expense	34,889.72

All net numbers subject to change based on Expense

MARY JANE MOORE
Confirmed Claimants

Claimant	Tract 1	Tract 2	% Tract 1	% Tract 2	Allocation #1	Allocation #2	Initial Proposed Dist.
Loretta Moore Johnson	NO	YES	0.00%	14.29%	\$0.00	\$4,984.00	\$711.96
Edward Lee Moore	NO	YES	0.00%	14.29%	\$0.00	\$711.96	\$711.96
Mattie Bell Moore	NO	YES	0.00%	14.29%	\$0.00	\$711.96	\$711.96
Thomas Earl Moore	NO	YES	0.00%	14.29%	\$0.00	\$711.96	\$711.96
Annie Richardson	NO	YES	0.00%	14.29%	\$0.00	\$711.96	\$711.96
Chad Jones	NO	YES	0.00%	14.29%	\$0.00	\$711.96	\$711.96
Edith Verna Wright Moore	NO	YES	0.00%	14.29%	\$0.00	\$711.96	\$711.96

\$4,983.75

#2 value less exp 12.15
14.29% of \$34,889.72

\$34,889.72

\$4,985.74

JOHN ALLEN MOORE
Confirmed Claimants

Claimant	Tract 1	Tract 2	% #1	% #2	Allocation #1	Allocation #2	Initial Prop. Distrib.
Willie Mae Keyes	YES	YES	20.00%	0.2	\$12,405.24	\$4,984.00	\$3,477.85
Corene McLean	YES	YES	20.00%	20.00%	\$2,481.05	\$996.80	\$3,477.85
Jean Simms	YES	YES	20.00%	20.00%	\$2,481.05	\$996.80	\$3,477.85
Sarah Moore Felton	YES	YES	20.00%	20.00%	\$2,481.05	\$996.80	\$3,477.85
Clyde Moore III	YES	YES	20.00%	20.00%	\$2,481.05	\$996.80	\$3,477.85
					\$12,405.24	\$4,984.00	

#1 value less exp 12.15
20% of \$62,026.18

\$62,026.18
\$12,405.24

#2 value less exp 12.15
14.29% of \$34889.72

\$34,889.72
\$4,985.74

WILLIAM THOMAS MOORE

Confirmed Claimants

Claimant	Tract 1	Tract 2	% #1	% #2	Allocation #1	Allocation #2	Initial Prop. Distrib
				0.14285		\$4,985.74	
Mary Louise Crawford Johnson	NO	YES	0.00%	33.33%	\$0.00	\$1,661.75	\$1,661.75
Milton Crawford	NO	YES	0.00%	33.33%	\$0.00	\$1,661.75	\$1,661.75
Lee Van Crawford, Jr.	NO	YES	0.00%	33.33%	\$0.00	\$1,661.75	\$1,661.75
						\$4,985.24	

#2 value less exp 12.15
14.29% of \$34,889.72

\$34,889.72
\$4,985.74

HEZEKIAH MOORE
Confirmed Claimants

Claimant	Tract 1	Tract 2	% #1	% #2	Allocation # 1	Allocation #2	Initial Prop. Distrib.
Minerva Little Moore	YES	YES	16.66%	0.14285	\$2,066.71	\$830.62	\$2,897.34
Paul T. Little	YES	YES	16.66%	16.66%	\$2,066.71	\$830.62	\$2,897.34
Addie Little Moore	YES	YES	16.66%	16.66%	\$2,066.71	\$830.62	\$2,897.34
Ralph N. Moore	YES	YES	16.66%	16.66%	\$2,066.71	\$830.62	\$2,897.34
Dorris Little Smith	YES	YES	16.66%	16.66%	\$2,066.71	\$830.62	\$2,897.34
Ruebell Moore Blount	YES	YES	16.66%	16.66%	\$2,066.71	\$830.62	\$2,897.34
					\$12,400.28	\$4,983.75	

#1 value less exp 12.15
20% of \$62,026.18

#2 value less exp 12.15
14.29% of \$34889.72

MILLIE MOORE

Confirmed Claimants

Claimant	Tract 1	Tract 2	% #1	% # 2	Allocation #1	Allocation #2	Initial Prop. Distrib.
				0.14285		\$4,985.74	
Vandy Cutler	NO	YES	0.00%	10.00%	\$0.00	\$498.57	\$498.57
William Cutler	NO	YES	0.00%	10.00%	\$0.00	\$498.57	\$498.57
Gary Cutler	NO	YES	0.00%	10.00%	\$0.00	\$498.57	\$498.57
Cynthia Mayhand	NO	YES	0.00%	10.00%	\$0.00	\$498.57	\$498.57
Joshua Moore	NO	YES	0.00%	10.00%	\$0.00	\$498.57	\$498.57
Veima J Law	NO	YES	0.00%	10.00%	\$0.00	\$498.57	\$498.57
Edna Thomas	NO	YES	0.00%	10.00%	\$0.00	\$498.57	\$498.57
Andrea Moore	NO	YES	0.00%	10.00%	\$0.00	\$498.57	\$498.57
Mildred Hines	NO	YES	0.00%	10.00%	\$0.00	\$498.57	\$498.57
Agrippi Moore	NO	YES	0.00%	10.00%	\$0.00	\$498.57	\$498.57

\$4,985.74

#2 value less exp 12.15

14.29% of \$34,889.72

\$34,889.72

\$4,985.74

WILLIAM DAVID MOORE
Confirmed Claimants

Claimant	Tract 1	Tract 2 % #1	% #2	Alloc. # 1	Alloc #2	Initial Prop. Distrib.
John McKinley Adams	NO	YES	0.2	\$12,405.24	\$4,985.74	\$184.47
Joseph Blount	YES	YES	0.00%	\$0.00	\$184.47	\$1,956.56
Marcellus Blount	YES	YES	14.29%	\$1,772.09	\$184.47	\$1,956.56
Florence Bonaparte	YES	YES	14.29%	\$1,772.09	\$184.47	\$1,957.18
Eddie Bryant	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
William Jerome Bryant	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Carstella Jones-Greer	NO	YES	14.29%	\$1,772.09	\$184.47	\$1,956.56
Matilda Blount Jones	YES	YES	0.00%	\$0.00	\$184.47	\$184.47
Velma Kelly	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Angela Moore Little	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Bernard Moore	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Carlos Moore	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Carolyn Moore	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Corena Moore	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Daniel Moore	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Ivory Moore	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Sadie Moore	NO	YES	14.29%	\$1,772.09	\$184.47	\$1,956.56
Victor Moore	YES	YES	0.00%	\$0.00	\$184.47	\$184.47
Erica Morris	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Angela Orr	NO	YES	14.29%	\$1,772.09	\$184.47	\$1,956.56
Mille Blount Rice	YES	YES	0.00%	\$0.00	\$184.47	\$184.47
Antoinette Sawyer	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Mary Washington	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Edith Wright	NO	YES	14.29%	\$1,772.09	\$184.47	\$1,956.56
Kenneth McCarthy Blount	YES	YES	0.00%	\$0.00	\$184.47	\$184.47
Edwin Moore	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
George E. Moore, Jr.	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
				\$12,405.24	\$4,980.75	

#1 value less exp 12.15
20% of \$62,026.18

WILLIAM DAVID MOORE
Confirmed Claimants

#2 value less exp 12.15
14.29% of \$34889.72

\$34,889.72
\$4,985.74

BETSY WILLIAMS

Confirmed Claimants

Claimant	Tract 1	Tract 2 % #1	% #2	Alloc. #1	Alloc. #2	Initial Prop. Distrib.
		20.00%	14.29%	\$12,405.24	\$4,985.74	
Cleopatra Williams Bragg	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Anna Battle	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Jermaine Clemons	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Vandy Leon Cutler	YES	NO	2.08%	0.00%	\$258.03	\$258.03
William Alexander Cutler	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Sarah Moore Felton	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Gary Anthony Cutler	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Joe N. Foreman	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Joyce Foreman Gay	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Virginia Foreman Gray	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Patricia Willis Harding	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Cheryl Regina Harris	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Ahmed Hassan	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Elsie Hill	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Althea Elva Williams King	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Velma J Law	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Essie Mae Moore Long	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Cynethia Mayhand	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Nequan McMillian	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Eileen Rocker Milford	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Agrippi Moore	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Andrea Moore	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Corrina Bell Moore	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Jerry M. Moore	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Johnny Tyrone Moore	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Monique Pough Green	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Joshua Moore	YES	NO	2.08%	0.00%	\$258.03	\$258.03
Mildred Virginia Moore	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Jeanine Ahmard Priestly	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Jean Moore Sims	YES	NO	2.08%	0.00%	\$258.03	\$258.03
William Goldie Smith	YES	YES	2.08%	3.45%	\$258.03	\$430.04
Edna Denise Thomas	YES	NO	2.08%	0.00%	\$258.03	\$258.03

BETSY WILLIAMS

Confirmed Claimants

Angelo Jerome Williams	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Carol Y. Williams	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Dashaun Tyrek Williams	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Devin Mitchell Williams Sr.	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Grendel Williams	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Jalrik Deion Tyson Williams	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Julius Rosenwald Williams	NO	YES	0.00%	3.45%	\$0.00	\$172.01	\$172.01
Jay Kevin Williams	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Rayford Dale Williams	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Reginald Dillar Willis	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Dexter Derek Williams	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Mary J. Cumberbatch	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Irvin Lewis Chapman	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Yulonda Moore Hayes	YES	NO	2.08%	0.00%	\$258.03	\$0.00	\$258.03
Clyde Moore III	YES	NO	2.08%	0.00%	\$258.03	\$0.00	\$258.03
Connie Chapman Pearsall	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04
Judy Elaine Young	YES	YES	2.08%	3.45%	\$258.03	\$172.01	\$430.04

\$12,385.39 \$4,988.23

Niema Hassan

Tasnim Hassan

Zelda Robinson

Milton Moore

#1 value less exp 12.15
20% of \$62,026.18

\$62,026.18
\$12,405.24

#2 value less exp 12.15
14.29% of \$34889.72

\$34,889.72
\$4,985.74