

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' AMENDED 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 an Amended Notice of 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 was 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 were to 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. The undersigned filed an Initial Proposed Distribution on December 21, 2015.

3. The undersigned has learned that one of the proposed distribution sheets for William David Moore contained several errors. Specifically, distributions were allocated to certain individuals for Tract #1, who were not entitled to a distribution, and certain individuals were excluded from distributions who were entitled to a portion of that distribution. Those errors have been corrected on the attached Amended Proposed Distribution for William David Moore.

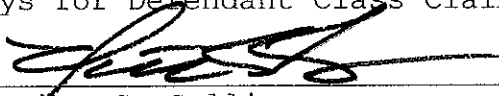
4. The Amended Proposed Distribution for William David Moore will be posted to the undersigned's website and in an effort to save on costs, the same will only be mailed to the

heirs of William David Moore, as those are the only persons that may or may not be affected by these changes.

This 8th day of January, 2016.

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

#344/112387-1

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served this Amended 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 8<sup>th</sup> day of January, 2016.



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

#344/112387-1

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	0.00%	\$0.00	\$184.47	\$184.47
Matilda Blount Jones	YES	YES	14.29%	\$1,772.71	\$184.47	\$1,957.18
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	0.00%	\$0.00	\$184.47	\$184.47
Victor Moore	YES	YES	14.29%	\$1,772.71	\$184.47	\$1,957.18
Erica Morris	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Angela Orr	NO	YES	0.00%	\$0.00	\$184.47	\$184.47
Mille Blount Rice	YES	YES	14.29%	\$1,772.71	\$184.47	\$1,957.18
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	0.00%	\$0.00	\$184.47	\$184.47
Kenneth McCarthy Blount	YES	YES	14.29%	\$1,772.71	\$184.47	\$1,957.18
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

\$12,407.72      \$4,980.75

#1 value less exp 12.15      \$62,026.18  
20% of \$62,026.18      \$12,405.24

#2 value less exp 12.15      \$34,889.72  
14.29% of \$34,889.72      \$4,985.74