

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

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NATIONAL TREASURY EMPLOYEES UNION,	)	
et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 02-128C
	)	Judge Firestone
THE UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	

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**JOINT PROPOSAL OF A DETAILED PLAN FOR PROVIDING THE COURT  
WITH REGULAR REPORTS FROM THE TRUSTEE**

The Settlement Distribution Plan submitted for preliminary approval in this case provides (at 8) that the Trustee must "make periodic reports to the court concerning the disbursements from the Trust and the status of settlement implementation." The Plan left for later resolution by the Court or class counsel the details of these reports (such as their frequency and content). By Order dated April 24, 2002, the Court directed the parties to jointly propose a detailed plan for the Trustee to report regularly to the Court on the disbursal of Trust funds and the Trustee's management activities. In accordance with that Order, the parties hereby jointly propose the following detailed plan, subject to modification as the Court deems appropriate.

**A. Financial and Claims Information.** The parties propose that the Trustee submit quarterly reports to the Court on a

calendar quarter basis, with the first report due at the end of the first quarter in which the government makes the Settlement Payment. Each report shall include the following information:

- (1) the balance of the assets held by the Trust at the beginning and ending of the quarter;
- (2) the total income on assets received by the Trust during the quarter and cumulatively since inception of the Trust;
- (3) the total number of class member claims, class member challenges, putative successor claims, putative successor challenges, and claims for class membership (collectively "claims and challenges") filed during the quarter and cumulatively since inception of the Trust;
- (4) statistical information regarding the status of the claims and challenges pending during the quarter and of all claims and challenges submitted since inception of the Trust;
- (5) the total number of claims on which disbursements were made and the total dollar amount of disbursements made to class members during the quarter and cumulatively since inception of the Trust;
- (6) the total disbursements made to the Trustee, the Settlement Administrator, the Settlement Adjudicator, the Custodian, and any other service provider during the quarter and cumulatively since the inception of the Trust;
- (7) the total disbursements for any taxes owed on Trust earnings made during the quarter and cumulatively since the inception of the Trust; and
- (8) the total of any other disbursements made during the quarter and cumulatively since inception of the Trust and the identity of the recipient of each such disbursement.

**B. Description of Activities.** The quarterly reports also shall include a narrative description of oversight activities undertaken by the Trustee during the quarter. The narrative would include a discussion of any problems identified by the Trustee and remedial actions initiated, and any decisions made by the Trustee pursuant to the discretion granted him by the settlement.

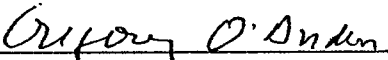
**C. Annual Reports.** The Trustee also shall provide annually cumulative reports containing all of the above information for the year covered by the report.

**D. Final Report.** The Trustee shall submit a final report when the Trust has terminated. This report shall contain total cumulative data for all the items addressed by the quarterly and annual reports.

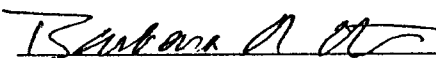
**E. Custodian Statements.** In addition to these periodic reports, the Settlement Trust Agreement (at 10) requires that the Trustee also furnish the Court with copies of the Trust's monthly and annual financial statements prepared by the Custodian, current reports on the Custodian's internal controls prepared in accordance with SAS 70, and the annual letters of opinion provided by an independent firm of certified public accountants.

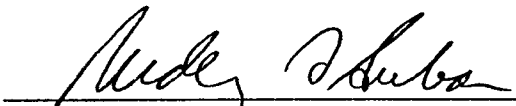
In addition to the foregoing, the Court may request additional reports from the Trustee, as needed, or it may request modifications to the reports being furnished by the Trustee to provide additional detail as deemed appropriate.

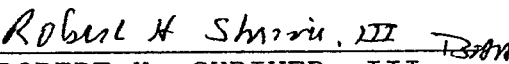
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