

**NOTICE OF PROPOSED FINAL SETTLEMENT OF CLASS ACTION  
AGAINST THE UNITED STATES**

*A Court authorized this notice. This is not a solicitation from a lawyer.*

**THIS SETTLEMENT AFFECTS YOUR LEGAL RIGHTS. READ THIS NOTICE CAREFULLY!**

i. INTRODUCTION

You are receiving notice because you submitted a Claim Form and opted in to be a member of a Plaintiff Class that the United States Court of Federal Claims certified in a class action. Plaintiff in that Lawsuit, titled *Silver Buckle Mines, Inc. v. United States*, Case No. 13-476C (Court of Federal Claims), sought compensation from the United States based upon allegations that the Bureau of Land Management lacked the legal authority to collect maintenance fees in 2012 for lode claims, mill sites, and tunnel sites located before August 10, 1993. The Plaintiff alleged that due to the lack of legal authority to collect these maintenance fees, the United States Government illegally exacted these fees.

The United States of America denied the allegations and denied that plaintiff is entitled to Compensation. The Court granted Summary Judgment in favor of the plaintiff.

ii. THE PROPOSED SETTLEMENT

The plaintiff and the United States propose settling this matter. Under the terms of the settlement, the United States will make a total cash payment to the Class in an amount not to exceed \$2,354,520.00. In exchange, plaintiff agrees that this settlement constitutes a full, complete, and final resolution of any and all of plaintiff's claims against the United States, legal or equitable, and stipulates to voluntary dismissal of this action with prejudice. The parties believe that the proposed settlement is fair, reasonable, adequate, and the best result for all Class Members.

iii. ATTORNEYS' FEES

From the total settlement amount of \$2,354,520.00, 20% will be deducted for Attorneys' Fees and Costs in the amount of \$470,904.00. An additional \$125,000.00 will be deducted for fees and costs of the Claims Administrator, KCC, for its work in notifying Class Members of their rights, processing settlement payments, and maintaining the class action website. The attorneys' fees and costs and the Claims Administrator's recovery will be deducted from the total amount. After deducting fees and costs, the total settlement payment from the United States to the Class is \$1,758,616.00, or \$104.57 for each eligible mining claim, mill site, or tunnel site.

All attorneys' fees are subject to Court Approval.

**PLEASE BE AWARE: The Claims Administrator cannot send your payment unless you provide the Claims Administrator with your Taxpayer Identification Number, Social Security Number or Employer Identification Number.**

iv. CLASS MEMBERSHIP

In August of 2018, eligible Class Members received notice of the class action and the opportunity to opt in to the Class. The Court certified as members of the Plaintiff class all those who opted in, meaning that they were to be bound to the terms of any judgment or any settlement that the Court may approve. If the Court approves the settlement described herein, the terms of the settlement will bind all Class Members.

v. HEARING AND COMMENTS

Members of the Class, as well as members of the public, may attend and participate in a public hearing on April 11, 2024 at 10:00 a.m. Eastern Daylight Time before the Honorable Edward H. Meyers, United States Court of Federal Claims Judge at the United States Court of Federal Claims, located at 717 Madison Place NW, Washington, DC 20439. PLEASE NOTE: At this hearing, the parties will request that the Court approve the proposed settlement. Any member of the Class wanting the opportunity to comment in person at the public hearing on the proposed settlement must advise the Court through Class Counsel, Michael Siderius, in writing at the address listed below by March 18, 2024. Class Counsel will file all comments received with the Court. Only those Class Members who have provided timely written notice of their intention to address the Court may speak at the hearing. You must send your written notice stating your intent to object to, approve of, or otherwise comment on the proposed settlement by mail or fax to:

Mail: Michael Siderius, Siderius Lonergan and Martin, LLP, 500 Union St., Suite 847, Seattle, WA 98101.  
ATTN: Silver Buckle Mines Settlement

FAX: Michael Siderius ATTN: Silver Buckle Mines Settlement, (206) 624-2805

Comments must be postmarked or faxed by **March 18, 2024**. Each objection must provide the following information: (a) identification of the case name and number (*Silver Buckle Mines v. United States*, Case No. 13-476C (Fed. Cl.)); (b) description of the basis for the objection; including all citations to legal authority and evidence supporting the objection; (c) the objector's name, address, and telephone number, and if represented by counsel, the name, address, email address, and telephone number of counsel; (d) whether the objector has filed a Claim Form and opted in to the case; and (e) whether the objector intends to appear at the Fairness Hearing.