

Behar v. Northrop Grumman Corporation, et al.
Case No. 2:21-cv-03946-HDV-SK
United States District Court for the Central District of California

CLAIM AND RELEASE FORM

Owner Mailing Address: <<Owner Name>> <<Owner Address 1>> <<Owner Address 2>> <<City, State Zip>>	Covered Property Information: <<Address>> <<City, State Zip>> <<Unique ID>> <<PIN>>
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INSTRUCTIONS

If you own or owned a single-family home or townhome located within the Class Area shown on the map below (i) as of the date of the Notice of Class Action Settlement, or (ii) as of July 1, 2024 and you have since sold the home as of the date of that Notice, you may be eligible for a settlement payment in *Behar v. Northrop Grumman Corporation, et al.*, Case No. 2:21-cv-03946-HDV-SK, if the Court approves the Settlement.

YOU MUST COMPLETE AND SUBMIT THIS CLAIM AND RELEASE FORM, WITH PROOF OF OWNERSHIP, TO RECEIVE A SETTLEMENT PAYMENT.

The amount of any final payment will depend on the Court's award of attorneys' fees and costs, the Court's award of service awards, the costs of settlement administration, the geographic sub-area in which your property is located, and the number of Settlement Class Members who submit timely and valid Claim Forms. See the Notice for details.

This Claim and Release Form, together with the required documentation, must be postmarked or received by the Class Administrator no later than **October 10, 2026**. You may also complete and submit this Claim and Release Form online at www.CanogaParkClassAction.com using the following login information:

Unique ID: <<Unique ID>>

PIN: <<PIN>>

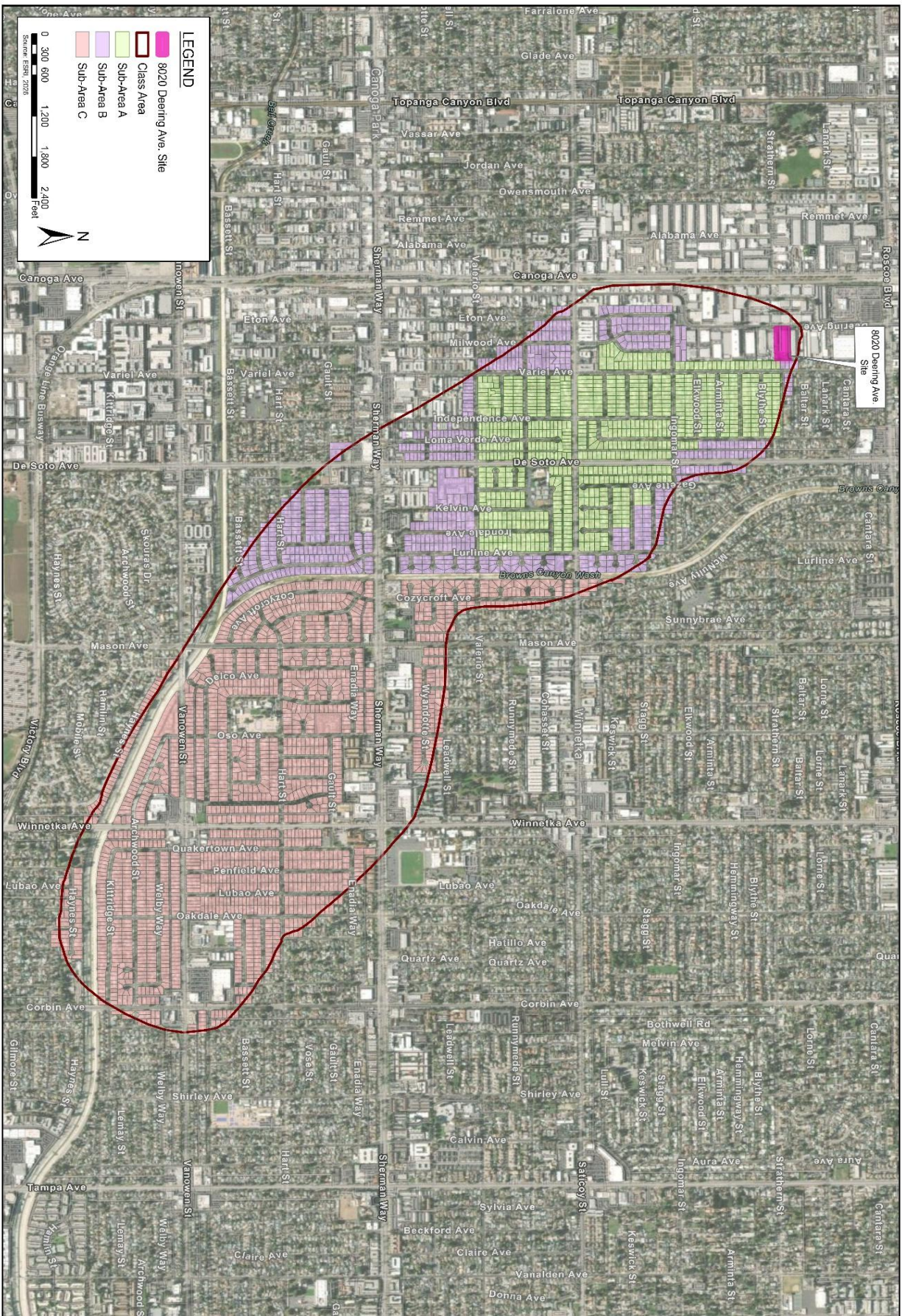
Only Claim Forms submitted directly to the Class Administrator are valid. Claim Forms submitted through a third-party claims aggregator will not be accepted. For more information, please visit www.CanogaParkClassAction.com or call 833-419-5050.

LEGEND

- 8020 Deering Ave. Site
- Class Area
- Sub-Area A
- Sub-Area B
- Sub-Area C

0 300 600 1,200 1,800 2,400 feet

8020 Deering Ave. Site



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CONTACT INFORMATION		
Name:		
(First)	(Middle)	(Last)
Telephone No.: _____		
Email Address: _____		
Current Mailing Address: _____ (Street) (Unit / Apt #) _____ (City) (State) (Zip Code)		
Social Security No.: _____ ~OR~		
Tax ID No.: _____		

PROPERTY OWNERSHIP INFORMATION

If you own or owned more than one single-family home or townhome in the Class Area, please complete a separate Claim Form for each property. Additional Claim Forms are available at www.CanogaParkClassAction.com or by calling 833-419-5050.

Address of eligible property in Class Area:

_____	_____
(Street)	(Unit / Apt #)
_____	_____
(City)	(State) (Zip Code)

Period of Ownership

1. When did you purchase or otherwise acquire title to the property? _____ / _____ (Month / Year)

2. Did you own the property as of July 1, 2024? ☐ Yes ☐ No

3. Do you currently own the property? ☐ Yes ☐ No

4. If you answered “No” to Question 3, when did you sell or otherwise transfer your interest in the property?
_____ / _____ (Month / Year)

5. Did you or do you currently own the Property with anyone else (for example, a spouse or co-owner)?

☐ Yes ☐ No

6. If you answered “Yes” to Question 5, please list all other co-owners of the property (each co-owner must either complete his or her own Claim and Release Form or sign this Claim and Release Form below):

(Co-owner #1) _____

(Co-owner #2) _____

(Co-owner #3) _____

EMPLOYEE VERIFICATION

By checking the box below, I verify under penalty of perjury that I am not an employee of Northrop Grumman Corporation or Northrop Grumman Systems Corporation. Employees of Defendants are excluded from the Settlement Class and are not eligible to participate in the Settlement.

☐ I verify that I am not an employee of Northrop Grumman Corporation or Northrop Grumman Systems Corporation.

PROOF OF OWNERSHIP

Attach documentary proof of ownership of the property showing that you owned the property either as of July 1, 2024, or as of the date of the Notice of Class Action Settlement. The following types of documents are acceptable proof of ownership.

Please attach a copy of one of the following documents and check the corresponding box.

☐ Property deed

☐ Title insurance policy

☐ Mortgage statement

☐ Property tax statement or bill

☐ Settlement / closing statement (e.g., HUD-1, Closing Disclosure)

☐ Homeowners insurance policy declaration page

☐ Certificate of title

☐ Government record evidencing ownership

☐ Utility bill (water, electric, gas, sewer, or trash) listing the Settlement Class Member’s name and the address of the property in the Class Area

☐ Other (please describe): _____

Proof of ownership will be subject to verification by the Class Administrator. The Class Administrator may request additional documentation if necessary to verify your claim.

CERTIFICATION AND RELEASE OF CLAIMS

Read this Section carefully. By signing below, you are agreeing to release legal claims you may have against the Defendants and Released Parties.

Certification.

I hereby certify, under penalty of perjury under the laws of the United States, that: (1) the foregoing information is true and correct to the best of my knowledge; (2) I am not an employee of Defendants; and (3) I either currently own, or owned as of July 1, 2024 (and have since sold), the single-family home or townhome at the address identified above and located within the Class Area.

Released Parties.

“Released Parties” shall mean Defendants Northrop Grumman Corporation and Northrop Grumman Systems Corporation, including each of their past and present successors, subsidiaries, parents, holding companies, sister and affiliated companies, divisions and other related entities, as well as the successors, predecessors, shareholders, subsidiaries, investors, parent, sister and affiliated companies, including but not limited to Northrop Grumman Guidance and Electronics Company, Inc., officers, directors, partners, assigns, agents, employees, principals, heirs, administrators, attorneys, vendors, accountants, auditors, consultants, fiduciaries, insurers, reinsurers, employee benefit plans, and representatives of each of them, both individually and in their official capacities, past or present, as well as all persons acting by, through, under, or in concert with, any of these persons or entities.

Release of Claims.

In exchange for, and upon receipt of, the settlement payment for which I am submitting this Claim and Release Form, and as a Settlement Class Member who has not opted out of the Settlement, I (on behalf of myself and my heirs, executors, administrators, successors, and assigns) hereby fully release and forever discharge the Released Parties from any and all claims, judgments, liens, losses, debts, liabilities, demands, obligations, guarantees, penalties, costs, expenses, attorneys’ fees, damages, indemnities, actions, causes of action, and obligations of every kind and nature, in law, equity, or otherwise, known or unknown, suspected or unsuspected, foreseen or unforeseen, developed or undeveloped, disclosed or undisclosed, contingent or accrued, liquidated or unliquidated, arising under common law, regulatory law, statutory law, or otherwise, whether based on federal, state or local law, statute, ordinance, regulation, code, contract, common law, or any other source, that I ever had, now have, may have, or hereafter can, shall, or may ever have against the Released Parties for property damage or Mitigation Measures that arise out of or relate to the facts alleged in the Second Amended Complaint (Dkt. 91) or Section VII of the Proposed Final Pretrial Conference Order (Dkt. 348-1 at 10–20) (the “Released Claims”).

The Released Claims include any unknown claims for property damage or Mitigation Measures that I do not know or suspect to exist in my favor, which, if known by me, might have affected this release. The Released Claims do NOT include claims for personal injury, wrongful death, or claims for medical monitoring.

Waiver of California Civil Code Section 1542.

I expressly, knowingly, and voluntarily waive the provisions of California Civil Code section 1542, and any similar law of any other state or jurisdiction, which provides:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.

I acknowledge that I am aware that I or my attorneys may hereafter discover claims or facts in addition to or different from those I now know or believe exist with respect to the Released Claims, but it is my intention to fully, finally, and forever settle and release all of the Released Claims, known or unknown, suspected or unsuspected, asserted or unasserted, or past, present or future, that I have against the Released Parties. I have had the opportunity to seek the advice of counsel regarding the contents and effect of section 1542.

No Assignment.

I represent and warrant that I have not assigned, sold, or otherwise transferred any portion of the Released Claims to any other person or entity.

SIGN AND DATE

You must sign this Claim and Release Form under penalty of perjury. Please make sure all information is true and correct before signing.

Property Owner's Signature

Co-Owner's Signature (if applicable)

Print Name

Print Name

Date: _____

Date: _____

Dates of property ownership (Month/Year to Month/Year): _____ to _____.

If you are signing on behalf of an entity, trust, or estate (i.e., you are not the individual property owner), please also complete the following:

I certify under penalty of perjury that (1) I am an authorized officer, partner, trustee, executor, guardian, or other legal representative of the property owner/claimant; and (2) I am authorized to sign this Claim and Release Form on behalf of the property owner/claimant.

Name of Person Signing (Print): _____

Capacity (e.g., Trustee, Executor, Officer): _____

Signature: _____ Date: _____

HOW TO SUBMIT YOUR CLAIM AND RELEASE FORM

Mail your completed Claim and Release Form, together with the required documentation, **postmarked no later than October 10, 2026**, to:

Behar v. Northrop Grumman Class Administrator
c/o A.B. Data, Ltd.
P.O. Box 173072
Milwaukee, WI 53217

You may also complete and submit this Claim and Release Form and supporting documents online at www.CanogaParkClassAction.com using the Unique ID and PIN printed above.

Only Claim Forms submitted directly to the Class Administrator are valid. Claim Forms submitted through third-party claims aggregators will not be accepted, although the Class Administrator may, in its discretion, treat such Claim Forms as timely if a corresponding direct submission is made within 30 days of the claims deadline.