

Kabateck LLP

BRIDGFORD,
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McNICHOLAS, LLP
TRIAL LAWYERS

August 1, 2022

PINHOLE LEAK CASE

Del Rivero v. Centex Homes of California, LLC, et al.

Orange County Superior Court, Case No.: 30-2013-00649338-CU-CD-CXC

Dear Fellow Ladera Ranch Homeowner:

We are the attorneys who represent a class of homeowners seeking to recover the cost to replace copper pipes we contend are prone to pinhole leaks in homes like yours in Ladera Ranch.

We believe that you may be a potential class member. But to continue, we need your response to a simple question to help us confirm class membership in the case:

- HAS YOUR HOME BEEN REPIPED OR EPOXY-COATED?

Both homeowners who *have not* repiped their homes and homeowners who *have already paid* to repipe or epoxy their home's pipes may recover the cost to do so as class members if we prevail in this lawsuit.

Please help us identify whether you are a class member by completing the attached declaration. Once completed, either:

1. **Mail back** the attached declaration in the prepaid return envelope;
OR
2. **Scan and email** the declaration back to my associate Brian Sutter at Brian.Sutter@BridgfordLaw.com.

Alternatively, you may visit our website www.bridgfordlaw.com/areas/pinhole-leaks/ to complete the declaration **digitally**.

And should you have any questions, please feel free to contact me directly.

Sincerely,



Michael H. Artinian, Esq.
BRIDGFORD GLEASON & ARTINIAN
Phone: (949) 831-6611

1 **DECLARATION**

2

3 I, _____ [WRITE YOUR NAME], HEREBY DECLARE AS

4 **FOLLOWS:**

5

6 1. I am presently an owner of the home located at _____,

7 Ladera Ranch, CA 92694. I have personal knowledge of the facts set forth in this declaration and if

8 called upon to do so, I could and would be willing to competently testify thereto.

9

10 **EITHER:**

11 A. My home currently has its original copper pipe. I have not replaced the original copper

12 pipes, nor have I epoxy-coated the copper pipes – nor do I have any information that the

13 pipes have been replaced or epoxy-coated by anyone else. _____ [INITIAL].

14 **OR**

15 B. My home has been:

16 a. Repiped _____ [INITIAL],

17 **OR**

18 b. Epoxy-coated _____ [INITIAL].

19 **AND**

20 C. I paid for the repipe/epoxy _____ [INITIAL],

21 **OR**

22 D. A prior owner paid for the repipe/epoxy _____ [INITIAL].

23

24 I declare under penalty of perjury under the laws of the State of California that the foregoing is

25 true and correct. Executed this _____ day of _____, 2022 at Ladera Ranch, California.

26

27 _____

28 Declarant

CONTACT INFORMATION FORM

Name: _____

Mailing Address: _____

Telephone Number: _____

Email: _____

Preferred Method for Contact and Best Time for Contact _____