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SMYSER KAPLAN & VESELKA, L.L.P.

BANK OF AMERICA CENTER
700 LOUISIANA SUITE 2300 HOUSTON, TEXAS 77002
TELEPHONE 713.221.2300 FACSIMILE 713.221.2320

с с

Author's E-mail Address: kmaloney@skv.com

Direct Dial Number: (713) 221-2382

September 6, 2018

Via Certified U.S. Mail and E-mail

Materna Custer & Associates via certified 9314 8699 0430 0050 4205 86 Attn: Ronald L. Broquet 2104 E 11 Mile Road, Suite 500 Madison Heights, MI 48091

Materna Custer & Associates via certified 9314 8699 0430 0050 4206 23
Attn: Ronald L. Broquet
28051 Dequindre Road
Madison Heights, MI 48071
Rbroquet@mc-lawyers.com

	Claimant	SID	Payment Type	Payment Amount	Payment Date
1		0605582	Rupture PP	\$1,250	11/13/2014
			Disease PP	\$1,000	12/11/2014

FINAL REQUEST FOR RETURN OF FUNDS OR PROOF OF DISTRIBUTION

Dear Mr. Broquet:

I represent the Finance Committee of the Settlement Facility-Dow Corning Trust ("SF-DCT"). Correspondence mailed to the Claimant by the SF-DCT regarding the breast implant claim payments referenced above was returned undeliverable, with no available forwarding address. At the time of the claim payments, your firm was the Claimant's attorney of record. The SF-DCT sent your firm written requests for an updated address for the Claimant, or in the event that the Claimant is deceased, the address of the person with authority to act on behalf of the Claim. The SF-DCT also requested probate information for any deceased Claimant. The SF-DCT has not received an updated address or probate information for Ms.

The SF-DCT has confirmed that the claim payment checks mailed to your office for distribution to the Claimant listed above have been cashed. Therefore, it is reasonable to assume that the Claimant's current address information, probate information (if applicable), and proof of distribution of the funds to the Claimant or her estate representative is available to you. However, your firm has failed to provide this information in response to requests from the SF-DCT. Accordingly, in the absence of confirmation that the claim payment was distributed to the Claimant/estate representative, the SF-DCT has sent you written requests for return of the funds. You have also failed to return the claim funds as requested.

Materna Custer & Associates Attn: Ronald L. Broquet September 6, 2018 Page 2

As previously stated in correspondence to you, pursuant to the Settlement Facility and Fund Distribution Agreement Article X Section 10.09, "all funds in the Settlement Facility are in the custody of the Court until the funds have actually been paid to and received by the Claimant (or a legally authorized recipient)." If you have been unable to locate a Claimant or the Claimant's estate representative to distribute the claim payment, you are required to return the funds intended for the Claimant.

Please return the funds directly to:

SF-DCT Quality Management Department P.O. Box 52429 Houston, Texas 77052

Should your office wish to recover fees and expenses in the absence of the Claimant or her legal heir, you may do so by returning the funds and applying for attorney's fees and expenses through the Lien Resolution Procedures.

Please be aware that if an updated address, probate information (if applicable) and proof of distribution to the Claimant is not received <u>or</u> the claim payments are not returned in full within ten days (10) days of the date of this letter, the Finance Committee of the SF-DCT will seek from the U.S. District Court for the Eastern District of Michigan an order to show cause why your firm should not be held in contempt or otherwise sanctioned for failure to return the funds or verify that the funds have been distributed to the Claimant (or a legally authorized representative). The Finance Committee of the SF-DCT has reserved time for show cause hearings, should the Court grant our motion, before Chief Judge Denise Page Hood on October 4, 2018 and December 13, 2018 in Detroit, Michigan.

The claims referenced above are on HOLD and any applicable future claim payments, including Premium Payments, will not be made until the funds described herein have been returned or proof of distribution to the Claimant has been provided with updated address information for the Claimant/estate representative and probate information (if applicable).

Any questions regarding this matter may be directed to me at (713) 221-2300 or kmaloney@skv.com.

Sincerely, Lavima Malorey

Karima G. Maloney

Attorney for the Finance Committee, SF-DCT

KM:ma