

Exhibit 1



P.O. Box 52429
Houston, Texas 77052

Toll Free: (866) 874-6099
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March 10, 2022

KIM YEON-HO INTL LAW OFFICES
STE 4105 KOREA WORLD TRADE CTR BLDG
139-1 SAMSUNG-DONG KANGNAM-KU
SEOUL
KOREA, REPUBLIC OF

Late Submissions – Proof of Manufacturer and Disease Claims

Dear Counsel:

This letter responds to the receipt of Proof of Manufacturer Forms and Disease Claim Forms submitted after the June 3, 2019 submission deadline. Pursuant to the Closing Orders referenced below, the submission is late and is therefore, DENIED and dismissed.

Our records show that both you and the claimants were sent the Notice of Termination and Closing of the Settlement Facility in January 2018. In addition, on March 13, 2019 you were sent a **Specific Notice of June 3, 2019 Deadline** stating that there would be no exceptions or extension of the June 3, 2019 deadline.

The SF-DCT must process claims pursuant to the Court-ordered Closing Orders referenced below. Sufficient notice of the filing deadline was provided to you and the claimants.

Closing Order #1, Paragraph 3

All Breast Implant claims are classified in Plan Classes 5, 6.1 and 6.2. Class 5 consists of claimants who are deemed to be “Domestic” claimants. Classes 6.1 and 6.2 cover claimants residing in different countries outside the United States. The final deadline for submission of new claims and supporting materials for claimants in Classes 5, 6.1 and 6.2 (as explained more fully below) is **June 3, 2019**.

Closing Order #1, Paragraph 9

The Plan provides that the final deadline for submission of Disease or Expedited Release claims for claimants classified in Classes 5, 6.1 and 6.2 is June 3, 2019. (To be timely, a submission must be postmarked on or before June 3, 2019.)

Closing Order #2 Paragraph 4

Under Closing Order 1, the SF-DCT shall deny claims that are incomplete as of the filing deadline of **June 3, 2019** ...or that are late – meaning that they are submitted with a postmark date **after June 3, 2019**.

For assistance or questions call the Claims Assistance Program at 1.866.874.6099 (toll free), through electronic mail at info@sfdct.com, or go to www.dcssettlement.com on the internet.



SETTLEMENT FACILITY
DOW CORNING TRUST

P.O. Box 52429
Houston, Texas 77052

Toll Free: (866) 874-6099
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Claimant SID, Name, Address

2745843 - HYUN, MYUNG-SOOK
62 MONGMIN-RO 68 BEON-GIL, YEONGJU-SI, GYEONGSANGBUK 36112 KOREA, REPUBLIC OF

2745844 - SONG, JI-SOOK
#302, 15, JUNGDONG-RO, 161BEON-RO, BUCHEON-SI, GYEONGGI 14605 KOREA, REPUBLIC OF

2745845 - KIM, JAE-WHA
#401 11-10 GYEOMJAE-RO, 10-GIL, SEOUL, JUNGNANG-GU 02231 KOREA, REPUBLIC OF

2745846 - SHIN, HYANG-MI
2F, 158, YANGNYEONGDONG-GIL, DONGDAEMUN-GU, SEOUL, 02478 KOREA, REPUBLIC OF

2745847 - MO, JUNG-SOOK
969-48 BONGCHUN 1-DONG, KWANAK-GU SEOUL, KOREA, REPUBLIC OF

2745848 - HWANG, SUN-NAM
#401 77 WOLBAE-RO 74 SEO-GIL, DAEGU, DALSEO-GU 42824 KOREA, REPUBLIC OF

2745849 - CHOI, MI-SOON
609-21 GONGREUNG 1-DONG, NOWON-GU SEOUL, KOREA, REPUBLIC OF

2745850 - LIM, AE-SOOK
#401 8 SANGGONG-RO 82 BEON-GIL NAM-GU, POHANG-SI, GYEONGBUK 37826 KOREA, REPUBLIC OF

2745851 - KIM, MYUNG-SOOK
4F 19 GWANGSAN-RO, GWANGJU, GWANGSAN-GU 62430 KOREA, REPUBLIC OF

2745852 - JO, HYUN-MI
#401 29-19 WAUSAN-RO, SEOUL, MAPO-GU 04074 KOREA, REPUBLIC OF

2745859 - KIM, YOUNG-JI
#201 18 GODEOK-RO 8-GIL, SEOUL, GANGDONG-GU 05251 KOREA, REPUBLIC OF

2745864 - KIM, KYUNG-JA
2F 305 DONGSOMUN-RO, SEOUL, SEONGBUK-GU 02730 KOREA, REPUBLIC OF

2745865 - LEE, MEE-HYO
#301 49 DOSAN-DAERO 26-GIL, SEOUL, GANGNAM-GU 06041 KOREA, REPUBLIC OF

2745866 - KIM, MYUNG-SOON
51-4 GUNCHEONG-RO GOKSEONG-EUP, GOKSEONG-GUN, JEONNAM 57537 KOREA, REPUBLIC OF

2745867 - HA, KIL-JA
#401, 37, JEUNGSAN-RO 9-GIL, EUNPYEONG-GU, SEOUL, 03494 KOREA, REPUBLIC OF

2745868 - LEE, MI-YOUNG
#202 122-8 MYEONGDAL-RO, SEOUL, SEOCHO-GU 06658 KOREA, REPUBLIC OF

2745869 - LEE, KYUNG-SOON
#202, 12, EONNAM 20-GIL, SEOCHO-GU, SEOUL, 06782 KOREA, REPUBLIC OF

2745870 - KIM, SIN-YOUNG
12/1 1463 WOONCHUN-DONG, CHUNGJOO-SI CHOONGCHUNGBOOK-DO, KOREA, REPUBLIC OF

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2745872 - KIM, YOUNG-AE
265-422 HONGEUN-DONG, SEODAEMOON-GU SEOUL, KOREA, REPUBLIC OF

2745873 - JUN, HYO-SOON
301-4 NAEDUK 1-DONG, SANGDANG-GU CHUNGJOO-SI, KOREA, REPUBLIC OF

2745874 - KIM, GIL-YOUNG
54-106 HOIGI-DONG, DONGDAEMOON-GU SEOUL, KOREA, REPUBLIC OF

2745875 - AN, KYUNG-MI
#401, 68, GUUI-RO 4-GIL, GWANGJIN-GU, SEOUL, 05035 KOREA, REPUBLIC OF

2745876 - PARK, SOON-MI
189 GAEPO-DONG, KANGNAM-GU SEOUL, KOREA, REPUBLIC OF

2745877 - CHA, MOON-SOOK
1061 WHAGOK-DONG, GANGSEO-GU SEOUL, KOREA, REPUBLIC OF

2745879 - KIM, JUNG-JA
329-80 JOONGWHA 3-DONG, JOONGRANG-GU SEOUL, KOREA, REPUBLIC OF

2745880 - KIM, JIN-SOOK
2F, 20-1 GAMAGOL-GIL, DONGHAE-SI, GANGWON-DO 25733 KOREA, REPUBLIC OF

2745881 - KIM, JAE-HEE
140-2 SUNGSAN-DONG, MAPO-GU SEOUL, KOREA, REPUBLIC OF

2745882 - ROH, KYUNG-MI
118-30 NOKBUN-DONG, EUNPYUNG-GU SEOUL, KOREA, REPUBLIC OF

2745883 - LEE, MIN-JOO
340-30 NAMGAJOA-DONG, SEODAEMOON-GU SEOUL, KOREA, REPUBLIC OF

2745884 - PARK, KYUNG-SOOK
3F, 16 GYEONGSEO-RO, 7 GA-GIL, GURO-GU, SEOUL, 08232 KOREA, REPUBLIC OF

2745885 - MIN, EUN-SOOK
198-74 HEUGSUK 1-DONG, DONGJAK-GU SEOUL, KOREA, REPUBLIC OF

2745886 - CHOI, KEUM-SOON
147-12 GOOSAN-DONG, EUNPYUNG-GU SEOUL, KOREA, REPUBLIC OF

2745887 - KIM, SOOK-YOUNG
3F 4 JEONNONG-RO 5-GIL, SEOUL, DONGDAEMUN-GU 02599 KOREA, REPUBLIC OF

2745888 - KIM, GANG-JA
277-25 SUNGNAE-DONG, GANGDONG-GU SEOUL, KOREA, REPUBLIC OF

2745889 - SUNG, SU-YUN
507-6 MAJANG-DONG, SUNGDONG-GU SEOUL, KOREA, REPUBLIC OF

2745890 - KO, HYUN-MI
2F 36 GUKSABONG 2BA-GIL, SEOUL, DONGJAK-GU 07054 KOREA, REPUBLIC OF

2745891 - KONG, SOON-NAM
342-38 SINDAEBANG 2-DONG, DONGJAK-GU SEOUL, KOREA, REPUBLIC OF

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#302, 75, UJANGSAN-RO, 6-GIL, GANGSEO-GU, SEOUL, 07681 KOREA, REPUBLIC OF

2745893 - KANG, MI-KYUNG
1426-7 SINLIM-DONG, KWANAK-GU SEOUL, KOREA, REPUBLIC OF

2745894 - YUN, MYUNG-HEE
14-18 DEUNGCHON-DONG, GANGSEO-GU SEOUL, KOREA, REPUBLIC OF

2745895 - SONG, SOON-JA
#501, 26, SIHEUNG-DAERO, 88GA-GIL, GEUMCHEON-GU, SEOUL, 08620 KOREA, REPUBLIC OF

2745896 - KIM, NA-YOUNG
#202 13 NAMBUSUNHWAN-RO 36-GIL, SEOUL, YANGCHEON-GU 07909 KOREA, REPUBLIC OF

2745897 - LEE, GOOK-HEE
450-22 JOOAN 4-DONG, NAM-GU INCHUN-SI, KOREA, REPUBLIC OF

2745898 - O, MYUNG-RAN
3F, 21-5, GEOBUKGOL-RO, 22-GIL, SEODAEMUN-GU, SEOUL, 03680 KOREA, REPUBLIC OF

2745899 - MYUNG, MI-AE
116-3 JUNGREUNG 3-DONG, SUNGBOOK-GU SEOUL, KOREA, REPUBLIC OF

2745900 - KIM, KEUM-RAN
#301 11 GOMDALLAE-RO 19 GA-GIL, SEOUL, GANGSEO-GU 07772 KOREA, REPUBLIC OF

2745901 - KIM, KYUNG-EUN
94-3 BOKWANG-DONG, YONGSAN-GU SEOUL, KOREA, REPUBLIC OF

2745902 - YUN, EUN-HEE
#401, 10-1, SEONGNAECHEON-RO, 24-GIL, SONGPA-GU, SEOUL, 05754 KOREA, REPUBLIC OF

2745903 - SEO, BOK-SOON
147-3 MYUNMOK 1-DONG, JOONGRANG-GU SEOUL, KOREA, REPUBLIC OF

2745904 - BAEK, EUN-JOO
#202, 59 HANNAM-DAERO, 40-GIL, YONGSAN-GU, SEOUL, 04417 KOREA, REPUBLIC OF

2745905 - PARK, SOO-IM
374-6 CHANGSHIN-DONG, JONGRO-GU SEOUL, KOREA, REPUBLIC OF

2745906 - LEE, KYUNG-EUN
272-4 GALHYUN-DONG, EUNPYUNG-GU SEOUL, KOREA, REPUBLIC OF

2745907 - PARK, MOON-JA
#302, 27 JUNGANG-RO, 27-GIL, YANGCHEON-GU, SEOUL, 08076 KOREA, REPUBLIC OF

2745908 - SON, YOUNG-SOON
#402, 12-9, GONGHANG-DAERO, 53NA-GIL, GANGSEO-GU, SEOUL, 07570 KOREA, REPUBLIC OF

2745909 - PARK, MIN-JUNG
#301, 14 GWANGMYEONG-RO, 786 BEON-GIL, GWANGMYEONG-SI, GYEONGGI-DO 14281 KOREA, REPUBLIC OF

2745910 - KIM, JAE-KYUNG
#302, 10-8, WOLGOK-RO, 28-GIL, DALSEO-GU, DAEGU 42815 KOREA, REPUBLIC OF

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865-11 DAEYEUN 1-DONG, NAM-GU BUSAN-SI, KOREA, REPUBLIC OF

2745921 - BAK, SUNG-JA
3F, 71-14, GYEONGIN-RO, 1185 BEON-GILBUCHEON-SI, GYEONGGI-DO 14742 KOREA, REPUBLIC OF

2745932 - CHO, IN-WOO
#302, 35, GANGNAM-EOERO 100-GIL, GANGNAM-GU, SEOUL, 06128 KOREA, REPUBLIC OF

2745934 - MUN, SUNG-HEE
2F, 6, SUPYO-RO 6 GIL, JUNG-GU, SEOUL, 04554 KOREA, REPUBLIC OF

2745935 - KIM, NAM-KYUNG
4F 11 GAPO-RO 22-GIL, SEOUL, GANGNAM-GU 06308 KOREA, REPUBLIC OF

2745941 - GA, KYUNG-SOON
333-2 SANGIL-DONG, GANGDONG-GU SEOUL, KOREA, REPUBLIC OF

2745942 - HWANG, BOK-JA
3 WONDAE-RO 30 BEON-GIL, GANGNEUNG SI, GANGWON-DO 25501 KOREA, REPUBLIC OF

2745943 - BANG, SOO-MI
#202, 68-28, USANCHOGYO-GIL, WONJU-SI, GANGWON-DO 26340 KOREA, REPUBLIC OF

2745944 - LEE, SUN-MI
#501 7 DOBONG-RO 110 RA-GIL, SEOUL, DOBONG-GU 01458 KOREA, REPUBLIC OF

2745945 - PARK, SUNG-JOO
164 POLEE-DONG, KANGNAM-GU SEOUL, KOREA, REPUBLIC OF

2745946 - TAG, KYUNG-JA
85-6 JOOAN 1-DONG, NAM-GU INCHUN-SI, KOREA, REPUBLIC OF

2745947 - KIM, BOK-SOON
#402 32 UN PYEONGHWA-RO 3 BEON-GIL, BUSON, NAM-GU 48504 KOREA, REPUBLIC OF

2745948 - LEE, KYUNG-JA
1387-14 KWANYANG-DONG, DOUGAN-GU ANYANG-SI KYUNGGI-DO, KOREA, REPUBLIC OF

2745949 - YANG, YOUNG-JOO
#401, 53, GWANPYEONG 1-RO, YUSEONG-GU, DAEJEON, 34018 KOREA, REPUBLIC OF

2745950 - PARK, MI-JA
#401, 8, YEONMU-RO, 7 BEON-GIL, JANGAN-GU SUWON-SI, GYEONGGI 16220 KOREA, REPUBLIC OF

2745951 - KIM, KYUNG-MI
#102 20 BAEKBEOM-RO 21-GIL, SEOUL, MAPO-GU 04137 KOREA, REPUBLIC OF

2745953 - CHOI, YOUNG-JA
#202, 58, JUNGANG 4-GIL, ANSEONG-SI, GYEONGGI-DO 17589, KOREA, REPUBLIC OF

2745954 - LEE, GIL-JA
392-3 GAYANG 2-DONG, DONG-GU DAEJUN-SI, KOREA, REPUBLIC OF

2745955 - PARK, MI-HYUN
76-14 SOSA 2-DONG, SOSA-GU BUCHUN-SI KYUNGGI-DO, KOREA, REPUBLIC OF

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2745956 - KIM, DAE-SOON
500-31 2-GA KEUMHO-DONG, SUNGDONG-GU SEOUL, KOREA, REPUBLIC OF

2745957 - O, MYUNG-JOO
467-4 DAEYA-DONG, SIHEUNG-SI KYUNGGI-DO, KOREA, REPUBLIC OF

2745958 - YANG, WON-SOOK
#202, 18, SURE-RO 1092BEON-GIL, HWADO-EUP, NAMYANGJU-SI, GYEONGGI-DO 12197 KOREA,
REPUBLIC OF

2745959 - KU, BOK-SOON
#101-403 489 YANGCHEON-RO, SEOUL, GANGSEO-GU 07526 KOREA, REPUBLIC OF

2745960 - HEO, MYUNG-HEE
21-12, MAEYEONG-RO, 35 BEON-GIL, YEONGTONG-GU, SUWON-SI, GYEONGGI-DO 16524 KOREA,
REPUBLIC OF

2745961 - GIL, SUNG-MI
791-1178 MIA-DONG, GANGBUK-GU SEOUL, KOREA, REPUBLIC OF

2745962 - AN, HYUI-JUNG
1066 SANBUN 2-DONG, GUNPO-SI KYUNGGI-DO, KOREA, REPUBLIC OF

2745963 - KIM, KYUNG-MI
178-4 YUMRI-DONG, MAPO-GU SEOUL, KOREA, REPUBLIC OF

2745964 - JO, MI-RA
#201, 18-5, HYEONAM-RO, 89 BEON-GIL, SUJI-GU, YONGIN-SI, GYEONGGI-DO 16875 KOREA, REPUBLIC
OF

2745965 - KIM, NAN-YOUNG
#301 31 SEOGYEONG-RO 9-GIL, SEOUL, SEONGBUK-GU 02716 KOREA, REPUBLIC OF

2745966 - ROH, KYUNG-JA
321-2 DANJUNG-DONG, GUNPO-SI KYUNGGI-DO, KOREA, REPUBLIC OF

2745967 - KIM, KYUNG-NAM
226-52 SUNGNAE-DONG, GANGDONG-GU SEOUL, KOREA, REPUBLIC OF

2745968 - KO, SUNG-MI
498-86 BANGHAK 3-DONG, DOBONG-GU SEOUL, KOREA, REPUBLIC OF

2745969 - SEO, MYUNG-SOOK
310-17 KYOMUN-DONG, GURI-SI KYUNGGI-DO, KOREA, REPUBLIC OF

2745970 - NAM, YOUNG-MI
97-3 ANYANG 1-DONG, MANAN-GU ANYANG-SI KYUNGGI-DO, KOREA, REPUBLIC OF

2745971 - KU, EUN-SOOK
#308-104 208 OHYEON-RO, SEOUL, GONGBUK-GU 01225 KOREA, REPUBLIC OF

2745972 - PARK, MI-HEE
186-5 WHASEO-DONG, JANGAN-GU SUWON-SI KYUNGGI-DO, KOREA, REPUBLIC OF

2745973 - KIM, KWANG-SOOK
381-9 GIL-DONG, GANGDONG-GU SEOUL, KOREA, REPUBLIC OF

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214-63 SHIN YOUNG-DONG, JONGRO-GU SEOUL, KOREA, REPUBLIC OF

2745976 - SEO, HA-SOOK
251-30 BUGAE 1-DONG, BUPEOUNG-GU INCHON, KOREA, REPUBLIC OF

2745977 - SHIN, NAN-HEE
NA-506 JAESUNG MANSION, HANGCHON-DONG CHONGRO-GU, SEOUL, KOREA, REPUBLIC OF

2745978 - JUN, MI-JA
99-5 CHANGCHUN-DONG, SEODAEMOON-GU SEOUL, KOREA, REPUBLIC OF

2745979 - KIM, KEUM-YOUNG
443-21 EUNGAM-DONG, EUNPYUNG-GU SEOUL, KOREA, REPUBLIC OF

2745980 - JUNG, EUN-SOOK
330-1 CHANGSHIN-DONG, JOONGRO-GU SEOUL, KOREA, REPUBLIC OF

2745981 - YU, GUN-JA
#301, 35-12, MYEONMOK-RO, 40-GIL, JUNGNAENG-GU, SEOUL, 02249 KOREA, REPUBLIC OF

2745982 - KIM, EUN-SOOK
1821-7 DAEMYUNG 2-DONG, NAM-GU DAEGU-SI, KOREA, REPUBLIC OF

2745983 - LIM, KYUNG-AE
#201 25 YANGCHEON-RO 75-GIL, SEOUL, GANGSEO-GU 07541 KOREA, REPUBLIC OF

2745984 - PARK, BOK-JA
#401, 13-3, YANGJAE-DAERO, 100-GIL, GANGDONG-GU, SEOUL, 05363 KOREA, REPUBLIC OF

2745985 - KIM, SOON-YOUNG
#502 42 NANGYE-RO 15GIL, SEOUL, JUNG-GU 04574 KOREA, REPUBLIC OF

2745986 - KIM, YOUNG-HEE
#202 81-8 DABONG-RO 139-GIL, SEOUL, DOBONG-GU 01393 KOREA, REPUBLIC OF

2745987 - ROH, JU-YOUNG
1160-10 SOOJUNG 3-DONG, DONG-GU BUSAN-SI, KOREA, REPUBLIC OF

2745988 - PARK, MI-SUN
298-5 1-GA SAMSUN-DONG, SUNGBUK-GU SEOUL, KOREA, REPUBLIC OF

2745989 - PARK, MOON-SOOK
#301, 21-9, BOMUN-RO, 13 DA-GIL, SEONGBUK-GU, SEOUL, 02873 KOREA, REPUBLIC OF

2745990 - SONG, YOUNG-MI
2F, 3, GEUMHOSAN-GIL, SEONGDONG-GU, SEOUL, 04724 KOREA, REPUBLIC OF

2745991 - SON, JUNG-JA
257-15 SADANG-DONG, DONGJAK-GU SEOUL, KOREA, REPUBLIC OF

2745992 - SEO, KYUNG-SOOK
#202, 11, KYONGGIDAE-RO, IAN-GIL, SEODAEMUN-GU, SEOUL, 03751 KOREA, REPUBLIC OF

2745993 - KONG, JUNG-SOOK
188-107 GONGDUK-DONG, MAPO-GU SEOUL, KOREA, REPUBLIC OF

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2745994 - BAE, YU-MI
2F, 22, SINCHON-RO 22-GIL, MAPO-GU, SEOUL, 04103 KOREA, REPUBLIC OF

2745998 - KANG, SUN-YOUNG
1F 42-26 DOBONG-RO 173 DA-GIL, SEOUL, DOBONG-GU 01313 KOREA, REPUBLIC OF

2745999 - WOO, YOUNG-WHA
209-4 WONJONG 2-DONG, OJUNG-GU BUCHUN-SI KYUNGGI-DO, KOREA, REPUBLIC OF

2746000 - PARK, KYUNG-MI
75-205 JOOAN 1-DONG, NAM-GU INCHUN-SI, KOREA, REPUBLIC OF

2746001 - KU, MI-SUN
1F 34-7 SAMYANG-RO 169 GIL, SEOUL, GANGBUK-GU 01002 KOREA, REPUBLIC OF

2746002 - KANG, JI-YUN
1629-4 BONGCHUN-DONG, KWANAK-GU SEOUL, KOREA, REPUBLIC OF

2746003 - KWAK, KEUN-HWA
273-19 YUMCHANG-DONG, GANGSEO-GU SEOUL, KOREA, REPUBLIC OF

2746004 - AN, SUNG-SOOK
117-18 KEUMAM 2-DONG, DUKJIN-GU JUNJOO-SI JUNRABOOK-DO, KOREA, REPUBLIC OF

2746005 - LEE, NAM-SOOK
#301, 20, GANGDONG-DAERO, 7-GIL, SONGPA-GU, SEOUL, 05537 KOREA, REPUBLIC OF

2746006 - KO, JUNG-JA
167-28 LEEMUN 3-DONG, DONGDAEMUN-GU SEOUL, KOREA, REPUBLIC OF

2746007 - KWAK, MI-SOON
320-71 NEUNG-DONG, KWANGJIN-GU SEOUL, KOREA, REPUBLIC OF

2746008 - JOO, EUN-MI
647 JUNNING-DONG, DONGDAEMUN-GU SEOUL, KOREA, REPUBLIC OF

2746009 - SON, EUN-KYUNG
2F, 111, DEUNGYONG-RO, DONGJAK-GU, SEOUL, 06942 KOREA, REPUBLIC OF

2746010 - LEE, KEUM-OK
2F, 31, DONGJAK-DAERO, 35DA-GIL, DONGJAK-GU, SEOUL, 06991 KOREA, REPUBLIC OF

2746011 - SUN, SOON-HEE
#302, 22, YEONHUI-RO, 32NA-GIL, SEODAEMUN-GU, SEOUL, 03651 KOREA, REPUBLIC OF

2746012 - BAE, HYO-SOOK
218-16 KOCHUK 2-DONG, GURO-GU SEOUL, KOREA, REPUBLIC OF

2746013 - SEO, JUNG-EUN
25-8 SAN SHINLIM 9-DONG, KWANAK-GU SEOUL, KOREA, REPUBLIC OF

2746014 - O, YEON-OCK
1331-26 BONGCHON 8-DONG, KWANAUK-GU SEOUL, KOREA, REPUBLIC OF

2746015 - CHOI, YOUNG-AE
623-146 DOBONG 2-DONG, DOBONG-GU SEOUL, KOREA, REPUBLIC OF

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2746017 - KIM, YUN-MI
#301 8 MYEONGNYUN-RO 63 BEON-GIL, BUSON, DONGNAE-GU 47818 KOREA, REPUBLIC OF

2746018 - KIM, EUN-SIL
#201, 36, DONGJAK-DAERO, 33-BA-GIL, SEOUL, DONGJAK-GU 06991 KOREA, REPUBLIC OF

2746019 - JO, SOON-YOUNG
159-14 DOWHA-DONG, MAPO-GU SEOUL, KOREA, REPUBLIC OF

2746020 - YUN, YOUNG-SOOK
57-193 MANGWON-DONG, MAPO-GU SEOUL, KOREA, REPUBLIC OF

2746022 - CHOI, HYUN-YOUNG
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221-54 DAEJO-DONG, EUNPYUNG-GU SEOUL, KOREA, REPUBLIC OF

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13-1206 KODUKHYUNDAE APT, MOUNGLIE 2-DONG, KOREA, REPUBLIC OF

2746170 - SONG, SUK-HEE
3F, 33 SAMSEONGYO-RO, 18GA-GIL, SEONBUK-GU, SEOUL, 02863 KOREA, REPUBLIC OF

2746171 - JANG, EUN
#602, 54, YEOUIDAEBANG-RO, 26-GIL, DONGIAK-GU, SEOUL, 07055 KOREA, REPUBLIC OF

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2746178 - HA, JUNG-AE
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2746222 - DO, MI-RAN
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2746309 - KO, YOUNG-JA
#301 53 NOHAE-RO 63 DA-DIL, SEOUL, DOBONG-DU 01400 KOREA, REPUBLIC OF

2746310 - WOO, CHANG-SOOK
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#101 23-8 NEUNG DONG-RO 3DA-GIL, SEOUL, GWANGJIN-GU 05086 KOREA, REPUBLIC OF

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Exhibit 2

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE:

**SETTLEMENT FACILITY-
DOW CORNING TRUST**

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**CASE NO. 00-CV-00005-DT
(Settlement Facility Matters)**

Hon. Denise Page Hood

**ORDER AND JOINT STIPULATION OF THE CLAIMANTS’ ADVISORY
COMMITTEE AND DEBTOR’S REPRESENTATIVES FOR APPROVAL
TO PAY FULL PAYMENT LONG-TERM OPTION LATE CLAIMANTS
BASED ON RECOMMENDATION OF CLAIMS ADMINISTRATOR**

WHEREAS this Court has previously entered the December 12, 2007 *Agreed Order Allowing Certain Late Claimants Limited Rights To Participate In The Plan’s Settlement Facility*, ECF No. 606, PageID.8503 (hereinafter “Late Claim Order”);
and

WHEREAS the Late Claim Order allowed certain late claimants limited rights to participate in the settlement options under the Amended Joint Plan of Reorganization (the “Plan”). One of the settlement options – the Full Payment Long-Term Option – allowed claimants to elect full payment on all eligible benefit claims such as Rupture, Explant, and Disease; and

WHEREAS such payments were, by the terms of the Late Claim Order, deferred until timely filed claims were processed and until it was clear that payment of these late claims would not negatively affect first or second priority payments to timely claimants; and

WHEREAS the Late Claim Order provides that the Court may allow payment of these late claims after making certain findings as provided in paragraph 7 of the Late Claim Order – as set forth below; and

WHEREAS the Claims Administrator has confirmed that the prerequisites for payment of these late claims have been satisfied and further recommends that such claims be paid.

Now, therefore, the Claimants' Advisory Committee and the Debtor's Representatives, having received the analysis and recommendation of the Claims Administrator and having determined based on that analysis and recommendation that the conditions necessary to permit payment of these late claims have been met, jointly seek the approval of the Court to proceed to issue payments in accordance with Court-approved payment procedures and state as follows:

1. Pursuant to Paragraph 7 of the Late Claim Order, the Court must approve the payment of these claims before the payment process can be initiated.

Paragraph 7 provides that:

DCC Eligible Late Claimants who elect the Full Payment Long-Term Option shall be eligible to receive payment only if and after the Court determines that payment of such claims (a) will not have any effect on the payment of Base Payments to timely filed claimants, including timely NOI claimants, and (b) will not have a materially adverse effect on the payment of Premium Payments to timely filed claimants, including (if applicable) timely NOI claimants. The CAC and DCC may agree that the Court may make such determination on an expedited basis upon the joint submission of the CAC, DCC, and the Claims Administrator that includes the number of DCC Eligible Late Claimants who elect the Full Payment Long-Term Option, the number of such individuals who qualify for payment under such option, the aggregate cost of paying such qualified claims, the most recent analysis of the Independent Assessor estimating the funds required to pay pending and anticipated timely claims and NOI claims and showing that payment of the DCC Eligible Late Claimants who elect this option will not affect such payments.

Late Claim Order, ECF No. 606, PageID.8509-10.

2. The Claims Administrator has reported that all timely filed claims have been processed and will be paid (subject to address verification) during the Fourth Quarter of 2022 except for those claimants who elect to appeal their final claim decision or who must cure payment related issues. Declaration of Kimberly Smith-Mair (“Smith-Mair Dec.”), Exhibit 1 at ¶4.
3. The Claims Administrator has reported that the review of all Full Payment Long-Term Option claims under the Late Claim Order has also been completed, and that these claims are now ready to be paid, subject to address verification. Smith-Mair Dec. at ¶6.

4. The Claims Administrator has summarized the status of the claimants who elected the Full Payment Long-Term Option (Smith Mair Dec., at ¶¶7-13):
 - a. There are 96 individuals who elected the Full Payment Long-Term Option.
 - b. All of these claims have been reviewed and processed in accordance with the Plan.
 - c. The total aggregate amount payable to these 96 individual late claimants is \$1,882,200.
 - d. As of the end of September 2022, the Settlement Facility-Dow Corning Trust (the “SFDCT”) will have paid all eligible base payments to timely claimants and will have paid all Second Priority Payments to those eligible for such payments who have properly verified their addresses as required by Closing Order 2, and the NOI claimants will have all been paid.
 - e. The payment of these Full Payment Long Term Option claims will not affect any of the above noted payments and accordingly the conditions set forth in paragraph 7 have been satisfied. Smith-Mair Dec. at ¶¶10-13.
5. Accordingly, the parties submit that the Settlement Facility may be authorized to schedule the distribution of address verification letters to the Full Pay Long-

Term Option claimants and to issue payments to those individuals who provide a current verified address and who otherwise satisfy any applicable requirements for payment.

Accordingly, the Court finds that the conditions set forth in the Late Claim Order have been satisfied and that the Settlement Facility shall be authorized to take the necessary steps to commence the process of issuing payments to the eligible late claimants.

SO ORDERED.

Dated: June 30, 2022

S/DENISE PAGE HOOD
Denise Page Hood
United States District Judge

SO STIPULATED and AGREED:

BLANK ROME LLP

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EXHIBIT 1

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE:

**SETTLEMENT FACILITY-
DOW CORNING TRUST**

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**CASE NO. 00-CV-00005-DT
(Settlement Facility Matters)**

Hon. Denise Page Hood

DECLARATION OF KIMBERLY SMITH-MAIR

I, Kimberly D. Smith-Mair, declare as follows based upon my knowledge, recollection, and review of data and documents maintained by the Settlement Facility-Dow Corning Trust (“Settlement Facility” or “SF-DCT”):

1. I am the Claims Administrator for the Settlement Facility. I was appointed Claims Administrator on February 11, 2021 (effective March 1, 2021) by order of the United States District Court for the Eastern District of Michigan, 2:00-mc-00005, ECF No. 1590, PageID.27377.
2. Prior to that, from 2011 until March 1, 2021, I served as the Claims Operation Manager for the Settlement Facility. I have been employed in various departments at the SF-DCT since 2001.

3. I have personal knowledge of the claims data and of the information set forth herein.

4. All timely filed claims have been processed and will be paid both their Base Payment and any applicable Second Priority Payment (subject to address verification) during the Fourth Quarter of 2022 except for those claimants who elect to appeal their final claim decision or have other individual payment related circumstances that need to be addressed.

5. The maximum total amount that could potentially be paid for all the remaining claims is known.

6. The review of all Full Payment Long-Term Option claims under the December 12, 2007 *Agreed Order Allowing Certain Late Claimants Limited Rights to Participate In The Plan's Settlement Facility*, ECF No. 606, PageID.8503 ("Agreed Order") is complete in accordance with the Plan and the Agreed Order, and the claims are ready to be paid.

7. There are 96 individuals eligible under the Agreed Order who elected the Full Payment Long-Term Option.

8. This includes 70 claimants who are approved for Explant Payments totaling \$255,000; 85 claimants who are approved for Rupture Payments totaling \$1,212,000; 21 claimants who are approved for Disease Payments totaling \$310,000;

and 53 claimants who are approved for Expedited Release Payments totaling \$105,300.

9. The total aggregate amount payable to these 96 individual claimants is \$1,882,200.

10. The payment of these 96 Full Payment Long-Term Option claims will not affect any Base Payment or Premium Payment.

11. On September 7, 2007, the Court entered a *Consent Order Resolving The Motion of Dow Corning Corporation To Establish Procedure To Match Notices of Intent To Rule 3005 Claims And Limit Participation in Settlement Program By Non-Matched Notice of Intent Filers* (“Consent Order”). The SF-DCT has completed its review of all 3,146 eligible Notice of Intent (“NOI”) claims as well.

12. The payment of the 96 Full Payment Long-Term Option claims will not affect any Base Payment or Premium Payment to a timely NOI claimant.

13. There are sufficient funds available to the SF-DCT to make payments to eligible Late Claimants.

14. Based on this information, and after conferring with the Claimants Advisory Committee and Dow Silicones Corporation, the successor to Dow Corning Corporation, I recommend the Court approve payment to all Full Payment Long-Term Option Claimants at this time.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that
the foregoing is true and correct.

Executed this 29 day of June 2022.


Kimberly D. Smith-Mair
Claims Administrator