APPENDIX II

Reply to Respondents' Response to Motion for Stay

Case No.: *22-1753*

United States Court of Appeals for the Sixth Circuit

In re: SETTLEMENT FACILITY DOW CORNING TRUST

Debtor

KOREAN CLAIMANTS

Interested Parties - Appellant

v.

DOW SILICONES CORPORATION; DEBTOR'S REPRESENTATIVES;

CLAIMANTS' ADVISORY COMMITTEE

Interested Parties - Appellees

FINANCE COMMITTEE

Movant – Appellee

MOTION FOR ALLOWANCE TO FILE REPLY

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I. GROUNDS FOR RELIEF

The Respondents ("the Appellees") filed the Response to the Motion for Stay filed by the Korean Claimants ("the Appellant") on September 6, 2022.

On September 1, 2022, this Court ordered the Appellees to file a response to the Appellant's Motion until 5pm EDT on Tuesday, September 6, 2022. However, this Court did not specify whether the Appellant is allowed to file a reply to the Appellees' Response filed by that date.

The Appellees' Response raised several arguments which were not stated in the Appellant's Motion for Stay. It is necessary for the Appellant to reply to the Response. Otherwise, there is a danger to the Appellant regarding the Motion for Stay that this Court might adopt the allegations of the Appellees in deliberating whether this Court grant or deny a stay for Closing Order 5.

Under Rule 27, (a) (1) of Federal Rules of Appellate Procedure, an application for a relief should be made by motion.

II. REQUESTED RELIEF

For the forgoing reason, the Appellant respectfully request that this Court allow the Appellant to file a reply to the Appellees' Response.

Date: September 8, 2022

Respectfully submitted,

(signed by) Yeon-Ho Kim
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REPLY TO RESPONDENTS' RESPONSE TO MOTION FOR STAY

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The Respondents set out several contentions which did not reflect the truth in their Response. This kind of contentions has not been unfamiliar during the process of several Motions that the Korean Claimants have filed with United States of District Court for the Eastern District of Michigan. It is necessary for the Korean Claimants to file this Reply to the Response.

To simplify the arguments that the Korean Claimants want to make, the Korean Claimants assert point-to-point in accordance with titles in the Response.

I. Reply to Introduction and Background

There is no comment.

II. Reply to Preliminary Statement

Closing Order 5 has not been served before issuance nor heard. Closing Order 5 was taken after Closing Order 2 whose legitimacy was challenged pending this Court.

The District Court required verification of each Claimant's current address but this requirement has not been agreed nor consented in the confirmed Plan. If the District Court had needed to assure proper distribution of the Settlement Fund assets by way of a confirmed current address, it should have guided the Plan proponents to include that clause in the Plan. The District Court simply

issued a series of Closing Orders without a notice and a hearing to modify the Plan.

Closing Order 5 like other Closing Orders is not an administrative measure directing the SF-DCT to follow once all timely Claims have been liquidated and paid or otherwise resolved. Closing Order 5 is actually to get rid of the basic rights of the Korean Claimants under the SF-DCT as creditors. Therefore Closing Order 5 is a substantive measure of the District Court taking away due process of the Korean Claimants who were duly represented by the Attorney of Record of the SF-DCT.

Yeon-Ho Kim, the Attorney of Record of the SF-DCT, subscribed the Newsletter of the Claimants' Advisory Committee. The Respondents allege that Closing Order 5 was discussed in the Newsletters of June 15, 2022, June 21, 2022, July 6, 2022 and August 16, 2022.

However, Yeon-Ho Kim did not receive the Newsletters of June 15, 2022, June 21, 2022 and July 6, 2022 of the Claimants' Advisory Committee. (*See* Appendix 1, Photocopy of Yeon-Ho Kim's yhkimlaw@naver.com email box[1])

Yeon-Ho Kim received the Newsletter of August 16, 2022 only. (*See* Appendix 1. The email list shows that Claimants Advisory Committee

[1] There is no email arrived from the Claimants' Advisory Committee at those dates. (*See* the list of emails)

Newsletter Volume 19, No.6 arrived on August 16, 2022 at 09:28 local time.)

There is also a record on Appendix 1 that the Korean Claimants filed Notice of Appeal on August 26, 2022 at 12:36 local time, which should be timely.

The Respondents contend that Yeon-Ho Kim listed as counsel of record for Korean Claimants on the ECF system of the District Court cannot assert excusable neglect due to his unawareness that Closing Order 5 was issued on June 13, 2022.

However, Yeon-Ho Kim did not receive the notice sent electronically to the email address of Yeon-Ho Kim (yhkimlaw@naver.com) for Closing Order 5.

Whether Yeon-Ho Kim received Closing Order 5 through the ECF system on June 13, 2022 can be easily verified if the Respondents ask the District Court which is accessible by the Respondents.

Yeon-Ho Kim found through the Newsletter of August 16, 2022 of the Claimants' Advisory Committee that the District Court issued Closing Order 5 and then went to the website of the SF-DCT[2] and downloaded it.

[2] The Respondents implied that Yeon-Ho Kim subscribed the website of the SF-DCT and accordingly, Yeon-Ho Kim should have known the issuance of Closing Order 5 on June 13, 2022. However, Yeon-Ho Kim and the staffs of the law office do not open the website of the SF-DCT. In addition, Yeon-Ho Kim did not ask The SF-DCT to issue the ID and the Password to access to the files of each Claimant. Yeon-Ho Kim did not subscribe the website of the SF-DCT. Anyone can

III. Reply to Summary

First, the Korean Claimants filed the notice of appeal within 30 days from the awareness of Closing Order 5. Closing Order 5 was issued on June 13, 2022 but it was not served at that date. The Korean Claimants found the issuance of Closing Order 5 on August 19, 2022 (*at least* on August 16, 2022 when the Newsletter of June 13, 2022 of the Claimants' Advisory committee arrived in the mail box of Yeon-Ho Kim). Therefore the Notice of Appeal of August 25, 2022 was filed timely.

Second, although the Korean Claimants filed the Motion for Stay with the District Court, to proceed first in the District Court under Rule 8 (2) of Federal Rules of Appellate Procedure is impracticable. The Korean Claimants did not receive the ruling on the Motion for Stay for Case No. 21-2665 pending this Court from filing with the District Court for nearly one year.

Third, if the Motion for Stay is denied by this Court, the Korean Claimants will be harmed irreparably because Closing Order 5 directed the SF-DCT to close the Claims of the Korean Claimants which were *mostly* included in the list of the SID numbers with bad address and non-responding address on the website of the SF-DCT.

The Respondents allege that the underlying dispute over claimant addresses

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open the website of the SF-DCT.

is already the subject of another fully briefed appeal and if the Korean Claimants prevail on that appeal, the District Court will be able to fashion adequate relief.

This allegation is a sugar-coating because Closing Order 5 was to eliminate the process of Claims of the Korean Claimants from the SF-DCT *permanently* and to implement to close the SF-DCT which consumes $460,000 a month quickly. There is no way for the District Court to fashion adequate relief even if the Korean Claimants win in Case No. 21-2665 pending this Court. If the Respondents contemplated so, the Respondents should not have filed the request for Closing Order 5 with the District Court.

IV. Reply to Brief Background of the Plan and Closing Order 5

The Respondents stated brief background of the Plan and Closing Order 5 as they wanted.

The Confirmed Plan agreed by the creditors did not include any provision regarding a confirmed current address of the Claimants to be paid after a long process of examination on documents in the SF-DCT.

Verification of the Claimants' current address by the SF-DCT has been challenged for several years. The practice of the SF-DCT to ask the Claimants to respond whether they live at the address which happened to be provided

during submission of documents for eligibility began in 2015.

The District Court approved the practice of the SF-DCT in 2019 through Closing Order 2. Closing Order 5 is to implement Closing Order 2 pending this Court. Serious violations of the confirmed Plan and the District Court's disinterest to the newly invented practice of the SF-DCT for a confirmed current address enabled the practice of the SF-DCT from 2015 into dare forms of Closing Order 2, 3, and 5 eliminating the Korean Claimants' right of payments permanently. (*See* Appendix 2, the Appellant Brief of Case No. 21-2665)[3]

V. Reply to Argument

The Korean Claimants did not receive notice of Closing Order 5 on June 13, 2022. ECF of the District Court did not reach to the email box of Yeon-Ho Kim. The Respondents can easily verify it through an inquiry to the District Court. The unawareness of counsel after the arrival of notice is not an issue to find whether the Korean Claimants filed Notice of Appeal timely.

This Motion for Stay should be considered on merits whether or not the Korean Claimants have already filed the Motion for Stay with the District Court. The Korean Claimants did not file the Motion for Stay with this Court on the

[3] The Respondents reiterated their arguments in the Response of Case No. 21-2665 so the Korean Claimants request this Court to refer to.

speculation that the District Court would deny the Motion and would not do so promptly.

The Korean Claimants are under irreparable harm if Closing Order 5 is implemented by the SF-DCT on September 17, 2022.

The Korean Claimants have moved first in the District Court on August 29, 2022, three days earlier than the Motion with this Court. This Court issued a procedural order to make the Respondents to respond but the District Court did not although the District Court received the same Motion earlier. This difference itself suggests the evidence that moving first in the District Court would be impracticable to the Korean Claimants. There is nothing in the intent of the Korean Claimants, as the Respondents alleged.

The Respondents, with respect to four factors for Motion for Stay, contend that the Korean Claimants are not likely to succeed on appeal. The Respondents impair their own assertion that the District Court would fashion adequate relief if the Korean Claimants win in Case No. 2665 pending this Court and therefore there is no need that this Court considers the Motion for Stay for the Korean Claimants.

Closing Order 5 is identical to Closing Order 2 regarding the issue of a confirmed current address so that the Korean claimants are likely to succeed on appeal of Closing Order 5 since the foundings of the Korean Claimants in the

Appellate Brief of Case No. 21-2665 are persuasive.

The Respondents contend that many Korean Claimants have already provided their current contact information and have thus complied with Closing Order 5 in accordance with Declaration of the Claims Administrator.

The Claims Administrator prohibited the Attorney of Record of the SF-DCT from providing the Claimants' current address in 2020. When Yeon-Ho Kim submitted over 600 Claimants' current address on June 1, 2019, the SF-DCT disrespected and categorized all of them into "bad address", which is subjected to Closing Order 5 now. The Claims Administrator has never explained why the SF-DCT has done so and has refused a meeting of Yeon-Ho Kim over the years.

Yeon-Ho Kim have been managing over 2,600 Claimants' Claims. The Claims Administrator stated in her Declaration that the 33 Claimants included in the list of Closing Order 5 have provided their current contact information only.

The Respondents allege on the basis of the Declaration that *many* Korean Claimants have complied with Closing Order 5. It is not *many*. Around 1,400 Claimants were included in the list of bad address at the website of the SF-DCT. Yeon-Ho Kim is managing around 2,600 Claimants' Claim.

The Respondents have always misled the District Court to win regarding several Motions filed by the Korean Claimants.

The Respondents contend that the SF-DCT is not terminating on September 17, 2022 and the Korean Claimants may seek relief at a later date if they suffer irreparable harm without a stay. The Korean Claimants raised the issue of a confirmed current address to the SF-DCT from 2015 and filed Motions to correct with the District Court from 2017. All of them were denied. In addition, Closing Order 5 is to get rid of whole process of Claims for the Korean Claimants from the SF-DCT permanently. That the Korean Claimants may seek relief at a later date without stay is just a wishful thought.

The Respondents contend that other Claimants including the SF-DCT and Dow Corning Corporation would bear harm and delay if this Court grants the stay. It is obvious that the SF-DCT and the Dow Corning Corporation worry about the costs to maintain the SF-DCT because other Claimants have been paid in full except the Korean Claimants.

The SF-DCT and the Finance Committee have offered Yeon-Ho Kim a mediation to settle the Korean Claims as a group in 2012. As this Court knows, Dow Corning Corporation denied the agreed settlement entered into between the Korean Claimants and the Finance Committee. The Claimants' Advisory Committee did not object to it. If Dow Corning Corporation and the SF-DCT worry about the excess costs for maintenance of the SF-DCT if this Court grants the stay of Closing Order 5, the Korean Claimants offer a settlement for the Korean Claims as a group reflecting the (drafted) settlement agreement of 2012 so that even if a stay of Closing Order 5 is granted there would be a harm and

delay to the SF-DCT and Dow Corning Corporation not to mention other Claimants.

The Respondents contend that the Plan did not purport to and indeed cannot define the detailed administrative operational procedures necessary to implement the terms of a confirmed current address but the Claims Administrator shall have discretion to develop and define necessary detailed procedures. The Respondents further contend that the District Court deemed the address verification requirement to be necessary to assure that funds will be received by the eligible claimant. The Respondents assert that it is the public interest.

However, the public interest is that the creditors under the Plan receive payments when their Claims were acceptable. The address verification of the Korean Claimants is to enforce the AOR of the SF-DCT to violate the Personal Information Protection Act of Korea. In practice, the attorney can take care of the funds when the payments from the SF-DCT arrived. If the Claimants were not located or not responding to the attorney, the attorney is able to put the remaining funds excluding attorney fees and expenses applied to the Claimant on public bond with a local court. The local court oversees the funds until the Claimant appears and claim the fund held by the Court.

The SF-DCT is overreaching its power by policing whether the AOR embezzles the funds of the Claimants. If the SF-DCT wanted to exercise that

power, the Plan proponents must have included the precise provision regarding a confirmed current address in the proposed Plan.

VI. Conclusion

For the foregoing Reply to the Respondents' Response and Requested Relief for Motion for Stay filed, the Korean Claimants request this Court to grant a stay of Closing Order 5 to the extent that the Korean Claimants' Claims without a confirmed current address by September 17, 2022 shall be closed permanently.

Date: September 8, 2022

Respectfully submitted,

(signed by) Yeon-Ho Kim
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CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2022, I have electronically filed the above document with the Clerk of Court by ECF system that will notify to all relevant parties in the record.

Date: September 8, 2022 Signed by Yeon-Ho Kim

LIST OF APPENDIX

Appendix 1

받은메일함 : 네이버 메일

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ca06-ecf-noticed···	22-1771 In re: Settlement Facility Dow Corning Trust "appearance form"	09-02 07:02	4.4 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "appearance form"	09-02 07:00	4.4 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "appearance form"	09-02 07:00	4.4 KB
ca06-ecf-noticed···	22-1750 In re: Settlement Facility Dow Corning Trust "appearance form"	09-02 06:58	4.4 KB
ca06-ecf-noticed···	22-1750 In re: Settlement Facility Dow Corning Trust "appearance form"	09-02 06:58	4.4 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "ruling letter sent"	09-02 02:24	4.6 KB
CLE	The Cannabis Industry: Best Practices For Attorneys	09-02 00:46	85.4 KB
우리카드	[우리카드] 김연호 님의 2022년09월10일(결제일) 이용대금명세서입니다.	09-01 23:44	403.9 KB
Amy Lee	RE: Nordic- Separate Property Project	09-01 18:24	39.8 KB
Amy Lee	RE: Nordic- Separate Property Project	09-01 17:29	35.2 KB

1 2 3 4 5 6 7 8 9 10

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"4"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

NAVER 메일

김연호

메일쓰기 내게쓰기

0 안읽음 | 중요 | 첨부 | TO 받는사람

- 전체메일 정리하기
- 받은메일함
- 보낸메일함 수신확인
- 임시보관함
- 내게쓴메일함 빠른첨부

내 메일함
- 노종빈김성일
- 구미기자 리스트
- 새범뷰티

스마트메일함
- 프로모션
- 청구·결제
- SNS
- 카페

스팸메일함 711
휴지통 2820
외부메일 가져오기

메일 스마트봇 | 메일 도움말

+25GB

메일검색 | 상세 | 받은메일함 0/3256 | 안읽은 메일 삭제 | [안내] 외부메일 가져오기 기능 변경

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "motion stay district court order"	09-01 14:30	4.5 KB
ca06-ecf-noticed···	22-1771 In re: Settlement Facility Dow Corning Trust "corporate disclosure"	09-01 11:31	4.5 KB
ca06-ecf-noticed···	22-1771 In re: Settlement Facility Dow Corning Trust "appearance form"	09-01 11:30	4.4 KB
ca06-ecf-noticed···	22-1771 In re: Settlement Facility Dow Corning Trust "corporate disclosure"	09-01 06:26	4.5 KB
ca06-ecf-noticed···	22-1771 In re: Settlement Facility Dow Corning Trust "corporate disclosure"	09-01 06:25	4.5 KB
ca06-ecf-noticed···	22-1771 In re: Settlement Facility Dow Corning Trust "appearance form"	09-01 06:23	4.5 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "corporate disclosure"	09-01 06:10	4.5 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "corporate disclosure"	09-01 06:09	4.5 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "appearance form"	09-01 06:07	4.5 KB
ca06-ecf-noticed···	22-1750 In re: Settlement Facility Dow Corning Trust "corporate disclosure"	09-01 05:47	4.5 KB
ca06-ecf-noticed···	22-1750 In re: Settlement Facility Dow Corning Trust "corporate disclosure"	09-01 05:45	4.5 KB
ca06-ecf-noticed···	22-1750 In re: Settlement Facility Dow Corning Trust "appearance form"	09-01 05:44	4.4 KB
New York CLE	(Time-Sensitive) $87 New York CLE Compliance Bundle. 70% OFF	09-01 05:42	102.5 KB
ca06-ecf-noticed···	22-1771 In re: Settlement Facility Dow Corning Trust "briefing letter sent setting briefing schedule"	09-01 05:06	4.6 KB
ca06-ecf-noticed···	22-1771 In re: Settlement Facility Dow Corning Trust "Bankruptcy Case Docketed" (2:00-mc-00005)	09-01 05:04	4.6 KB

1 2 3 4 5 6 7 8 9 10

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"5"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

NAVER 메일

김연호

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스팸메일함 711
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외부메일 가져오기

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+25GB

메일검색 상세 받은메일함 0/3256 안읽은 메일 삭제

[안내] 네이버 사칭 메일 주의

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· 필터

받은메일함 프로모션 청구·결제 SNS 카페 스마트 메일함 설정

Rock n Roll Law	The Essentials of Music Copyright Law with Ethics via The Beatles	09-01 02:11	36.7 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "corporate disclosure"	09-01 00:27	4.5 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "appearance form"	09-01 00:26	4.4 KB
ca06-ecf-noticed···	22-1750 In re: Settlement Facility Dow Corning Trust "corporate disclosure"	09-01 00:24	4.5 KB
ca06-ecf-noticed···	22-1750 In re: Settlement Facility Dow Corning Trust "appearance form"	09-01 00:24	4.4 KB
cmecfadmin@mie···	Certificate of Service of Notice of Appeal - 6th Circuit in 2:00-mc-00005-DPH In Re: Settlement Facility	08-31 20:52	9.3 KB
Zoom	미리 알림: KCAB INTERNATIONAL & FRIENDS 25- "중국법원의 중재판정 승인 및 집행"이(가) 1시간에 시작	08-31 14:55	9.4 KB
Regine Mahe	Automatic reply: Nordic- Separate Property Project	08-31 14:39	8.8 KB
International Aca···	IAFL AsPacEd - August 2022 Newsletter	08-31 14:37	171.8 KB
KCAB Next	[Last Chance to Register!] "KCAB Next Networking Event" (2 September 2022)	08-31 13:40	28.4 KB
cmecfadmin@mie···	Motion to Stay in 2:00-mc-00005-DPH In Re: Settlement Facility	08-31 12:06	13.6 KB
cmecfadmin@mie···	Notice of Appeal in 2:00-mc-00005-DPH In Re: Settlement Facility	08-31 09:10	13.3 KB
do_not_reply@ps···	Pay.gov Payment Confirmation: MICHIGAN EASTERN DISTRICT COURT	08-31 09:08	5.0 KB
0x431cvecfs@sco···	마산지원 2022카합20030 (채권자 정정혜, 채무자 주식회사 비지에프리테일) 답변서부본(22.08.30.자)이(가) 전자발송되었습니다.	08-31 09:07	6.5 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "appearance form"	08-30 23:54	4.5 KB

1 2 3 4 5 6 7 8 9 10

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"6"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

NAVER 메일

김연호

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- 구미기자 리스트
- 새범뷰티

스마트메일함
- 프로모션
- 청구·결제
- SNS
- 카페

- 스팸메일함 711
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- 외부메일 가져오기

메일 스마트봇 | 메일 도움말

+25GB

메일검색 상세 받은메일함 0/3256 안읽은 메일 삭제

[안내] 네이버 사칭 메일 주의

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· 필터

받은메일함 프로모션 청구·결제 SNS 카페 스마트 메일함 설정

ca06-ecf-noticed···	22-1750 In re: Settlement Facility Dow Corning Trust "appearance form"	08-30 23:53	4.5 KB
ca06-ecf-noticed···	Re-send: 22-1753 In re: Settlement Facility Dow Corning Trust "appearance form"	08-30 23:28	4.5 KB
ca06-ecf-noticed···	Re-send: 22-1750 In re: Settlement Facility Dow Corning Trust "appearance form"	08-30 23:21	4.5 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "appearance form"	08-30 22:54	4.5 KB
ca06-ecf-noticed···	22-1750 In re: Settlement Facility Dow Corning Trust "appearance form"	08-30 22:52	4.5 KB
Zoom	미리 알림: KCAB INTERNATIONAL & FRIENDS 25- "중국법원의 중재판정 승인 및 집행"이(가) 1일에 시작	08-30 16:13	9.4 KB
贸仲委	Full Program | China Arbitration Summit 2022	08-30 15:35	21.7 KB
Gary Tang	IPLink ~ Monthly Update - August 2022	08-30 15:28	91.3 KB
cmecfadmin@mie···	Motion to Stay in 2:00-mc-00005-DPH In Re: Settlement Facility	08-30 09:23	13.5 KB
서울시[ETAX]	[서울시] 2022년 08월 주민세(개인분) (정기분) 고지서 재발송	08-29 10:09	211.5 KB
KIM MIN WOO	디지털플랫폼정부_자소소/직무계획서 검토 요청	08-28 07:26	465.6 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "briefing letter sent setting briefing schedule"	08-27 05:12	4.6 KB
ca06-ecf-noticed···	22-1753 In re: Settlement Facility Dow Corning Trust "Bankruptcy Case Docketed" (2:00-mc-00005)	08-27 05:09	4.6 KB
ca06-ecf-noticed···	22-1750 In re: Settlement Facility Dow Corning Trust "briefing letter sent setting briefing schedule"	08-26 23:16	4.6 KB
ca06-ecf-noticed···	22-1750 In re: Settlement Facility Dow Corning Trust "Bankruptcy Case Docketed" (2:00-mc-00005)	08-26 23:14	4.6 KB

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용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"7"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

NAVER 메일

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스마트메일함
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스팸메일함 711
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외부메일 가져오기

메일 스마트봇 | 메일 도움말

+25GB

메일검색 상세 받은메일함 0/3256 안읽은 메일 삭제

[안내] 네이버 사칭 메일 주의

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· 필터

받은메일함 프로모션 청구·결제 SNS 카페 스마트 메일함 설정

cmecfadmin@mie···	Certificate of Service of Notice of Appeal - 6th Circuit in 2:00-mc-00005-DPH In Re: Settlement Facility	08-26 22:03	9.3 KB
cmecfadmin@mie···	Notice of Appeal in 2:00-mc-00005-DPH In Re: Settlement Facility	08-26 12:36	13.3 KB
do_not_reply@ps···	Pay.gov Payment Confirmation: MICHIGAN EASTERN DISTRICT COURT	08-26 12:35	5.1 KB
do_not_reply@ps···	PACER Account Settings Changed	08-26 12:34	7.7 KB
조선미디어	[조선미디어] 개인정보 이용내역 통지 안내	08-25 12:01	6.7 KB
KCAB INTERNATI···	[Webinar] Yonsei Arbitration Day 2022 "War and Arbitration" (26 August 2022)	08-25 10:13	30.7 KB
CLE	CLE: Unbundling Legal Services - The Modern Law Firm	08-25 03:10	87.0 KB
Amy Lee	RE: Nordic- Separate Property Project	08-24 16:44	29.3 KB
법과학융합연구센터	[한국법과학융합연구센터] 법정 또는 수사과정에서의 법과학서비스안내	08-24 15:44	1.2 MB
KCAB Next	[KCAB Next] "KCAB Next Networking Event" (2 September 2022)	08-24 15:16	28.3 KB
auchi	자녀분 납부서입니다.	08-24 10:18	255.6 KB
대한상사중재원 ···	[웨비나-한국어] KCAB INTERNATIONAL & FRIENDS 25 -"중국법원의 중재판정 승인 및 집행 (8월 31일 수, 오후 4시)	08-23 13:52	27.4 KB
주식회사파워리텍	사업자등록증, 입금계좌	08-23 09:26	2.3 KB
0x431cvecfs@sco···	마산지원 2022카합20030에 대한 보정서(문건) 접수되었습니다.	08-22 17:33	5.5 KB
Zoom	AP Hour - 22 August 2022 확인	08-22 17:11	28.8 KB

1 2 3 4 5 6 7 8 9 10

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"8"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

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내 메일함
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- 구미기자 리스트
- 새범뷰티

스마트메일함
- 프로모션
- 청구·결제
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+25GB

메일검색 상세 받은메일함 0/3256 안읽은 메일 삭제

[안내] 스마트메일함 첫 사용 가이드

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· 필터

받은메일함 프로모션 청구·결제 SNS 카페 스마트 메일함 설정

0x431cvecfs@sco…	마산지원 2022가단105637에 대한 주소보정서(주식회사 비지에프리테일)(문건) 접수되었습니다.	08-22 16:47	5.6 KB
0x431cvecfs@sco…	마산지원 2022카합20030 (채권자 정정혜, 채무자 주식회사 비지에프리테일) 변경기일통지서이(가) 전자발송되었습니다.	08-22 11:43	6.5 KB
Upbit info	[중요] 케이뱅크 한도제한 계좌 1일 이체한도 설정에 따른 원화 입금 유의사항 안내	08-19 06:17	84.7 KB
careful child relo…	New country profiles	08-18 22:31	149.2 KB
0x431cvecfs@sco…	마산지원 2022가단105637 (원고 정정혜, 피고 주식회사 비지에프리테일) 주소보정명령등본이(가) 전자발송되었습니다.	08-18 10:06	6.5 KB
CLUB850	2617호 김연호 임대인님 2차년도(2022.08.06~2023.08.05) 한정 임대조건 변경 신청 안내에 관한 건	08-18 10:01	194.0 KB
KCAB INTERNATI…	[웨비나-한국어] KCAB INTERNATIONAL & FRIENDS 25 -"중국법원의 중재판정 승인 및 집행 (8월 31일 수, 오후 4시)	08-18 09:33	29.0 KB
사법정책연구원(…	[사법정책연구원] 뉴스레터 제39호 연구수요조사 안내 (2022년 8월)	08-18 07:33	476.7 KB
Microsoft Family …	기다려왔던 멋진 기능을 살펴보세요.	08-17 19:30	29.0 KB
Microsoft 계정 팀	일회용 코드	08-17 19:27	7.7 KB
Microsoft Family …	ethanmwkim@outlook.kr 님이 가족에 초대함	08-17 19:18	20.5 KB
My Office Account	Kim Min Woo님이 귀하와 Microsoft 365 Family을(를) 공유했습니다.	08-17 19:17	14.2 KB
Amy Lee	RE: Nordic- Separate Property Project	08-17 17:55	17.6 KB
Regine Mahe	Nordic- Separate Property Project	08-17 17:45	11.7 KB
Regine Mahe	RE: Separate Property	08-17 17:42	52.0 KB

1 2 3 4 5 6 7 8 9 10

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"9"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

NAVER 메일

김연호

메일쓰기 내게쓰기

0 안읽음 | 중요 | 첨부 | TO 받는사람

- 전체메일 정리하기
- 받은메일함
- 보낸메일함 수신확인
- 임시보관함
- 내게쓴메일함 빠른첨부

내 메일함
- 노종빈김성일
- 구미기자 리스트
- 새범뷰티

스마트메일함
- 프로모션
- 청구·결제
- SNS
- 카페

스팸메일함 711
휴지통 2820
외부메일 가져오기

메일 스마트봇 | 메일 도움말

+25GB

메일검색 | 상세 | 받은메일함 0/3256 | 안읽은 메일 삭제 | [안내] 외부메일 가져오기 기능 변경

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

박규영	김연호님 21년도 종합소득세 납부서를 보내드립니다.	08-17 15:00	585.5 KB
KCAB Next	[KCAB Next] "KCAB Next Networking Event" (2 September 2022)	08-17 13:15	28.3 KB
New York CLE	(Time-Sensitive) $87 New York CLE Compliance Bundle. 70% OFF	08-17 00:38	102.5 KB
CLAIMANTS' AD···	CLAIMANTS' ADVISORY COMMITTEE E-NEWSLETTER Volume 19, No. 6	08-16 23:02	22.1 KB
cmecfadmin@mie···	Certificate of Service of Notice of Appeal - 6th Circuit in 2:00-mc-00005-DPH In Re: Settlement Facility	08-16 09:28	9.3 KB
cmecfadmin@mie···	Notice of Appeal in 2:00-mc-00005-DPH In Re: Settlement Facility	08-16 07:29	13.3 KB
do_not_reply@ps···	Pay.gov Payment Confirmation: MICHIGAN EASTERN DISTRICT COURT	08-16 07:28	5.2 KB
International Aca···	Reminder: AP Hour - 22 August 2022	08-16 06:59	90.0 KB
김연호	alrnrvksruf	08-14 09:23	558.0 KB
PR Tracker	Brand new buy alert issued	08-14 00:05	6.4 KB
cmecfadmin@mie···	Order on Motion for Order in 2:00-mc-00005-DPH In Re: Settlement Facility	08-13 03:05	13.2 KB
cmecfadmin@mie···	Order on Motion for Order in 2:00-mc-00005-DPH In Re: Settlement Facility	08-13 02:59	12.9 KB
cmecfadmin@mie···	Order on Motion to Stay in 2:00-mc-00005-DPH In Re: Settlement Facility	08-13 02:56	13.0 KB
Bill	Expires tonight	08-12 23:11	6.3 KB
Regine Mahe	RE: Separate Property	08-12 17:47	63.2 KB

1 2 3 4 5 6 7 8 9 10

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"10"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

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- 내게쓴메일함 빠른첨부

내 메일함
- 노종빈김성일
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- 새범뷰티

스마트메일함
- 프로모션
- 청구·결제
- SNS
- 카페

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메일검색 상세 받은메일함 0/3256 안읽은 메일 삭제

[안내] 스마트메일함 첫 사용 가이드

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· 필터

받은메일함 프로모션 청구·결제 SNS 카페 스마트 메일함 설정

주식회사파워리텍	RE: (주)파워리텍 강북공영 손해배상 청구 관련 근거자료 송부드립니다.	08-12 17:44	31.0 KB
주식회사파워리텍	세금계산서 발행 요청	08-12 16:52	2.4 KB
주식회사파워리텍	RE: (주)파워리텍 강북공영 손해배상 청구 관련 근거자료 송부드립니다.	08-12 14:00	2.7 MB
김석우	Re: 시행령	08-12 09:55	11.1 KB
From BP's iPhone	Alert 0811	08-12 04:35	6.8 KB
Tom Sasser, Pre···	IAFL Annual Meeting, Marrakech, Registration Now Open!	08-12 00:01	84.6 KB
KCAB INTERNATI···	[Upcoming Events] KCAB INTERNATIONAL Events in August & September	08-11 13:43	72.3 KB
주식회사파워리텍	RE: (주)파워리텍 강북공영 손해배상 청구 관련 근거자료 송부드립니다.	08-11 12:57	20.7 KB
서울시[ETAX]	[서울시] 2022년 08월 주민세(개인분) (정기분) 고지서 발송	08-11 12:11	211.1 KB
중재전문가아카데미	[대한상사중재원] 제19기 중재전문가 아카데미 홍보	08-11 09:58	8.4 MB
IAFL Asia Pacific···	IAFL Asia Pacific Chapter Notice & Agenda for AGM	08-10 22:39	65.6 KB
신한카드	[신한카드] 해외거래 정기청구 확인 안내	08-10 16:56	19.0 KB
주식회사파워리텍	RE: (주)파워리텍 강북공영 손해배상 청구 관련 근거자료 송부드립니다.	08-10 16:23	77.5 KB
주식회사파워리텍	RE: (주)파워리텍 강북공영 손해배상 청구 관련 근거자료 송부드립니다.	08-10 16:17	17.4 KB
Zoom	KCAB INTERNATIONAL & FRIENDS 25- "중국법원의 중재판정 승인 및 집행" 확인	08-10 15:36	26.4 KB

1 2 3 4 5 6 7 8 9 10

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"11"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

NAVER 메일

김연호

메일쓰기 내게쓰기

0 안읽음 | 중요 | 첨부 | TO 받는사람

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내 메일함
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- 새범뷰티

스마트메일함
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스팸메일함 711
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메일 스마트봇 | 메일 도움말

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메일검색 상세 받은메일함 0/3256 안읽은 메일 삭제

[안내] 네이버 사칭 메일 주의

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ... 필터

받은메일함 프로모션 청구·결제 SNS 카페 스마트 메일함 설정

KCAB INTERNATI…	[웨비나-한국어] KCAB INTERNATIONAL & FRIENDS 25 -"중국법원의 중재판정 승인 및 집행 (8월 31일 수, 오후 4시)	08-10 15:21	29.0 KB
주식회사파워리텍	RE: (주)파워리텍 강북공영 손해배상 청구 관련 근거자료 송부드립니다.	08-10 14:56	14.6 KB
주식회사파워리텍	RE: (주)파워리텍 강북공영 손해배상 청구 관련 근거자료 송부드립니다.	08-10 10:38	12.6 KB
CLE	CLE: Lifecycle Of Intellectual Property Creation And Protection	08-10 01:28	87.8 KB
0x431cvecfs@sco…	마산지원 2022카합20030 (채권자 정정혜, 채무자 주식회사 비지에프리테일) 심문기일소환장이(가) 전자발송되었습니다.	08-09 20:34	6.5 KB
Regine Mahe	RE: Separate Property	08-09 19:18	50.5 KB
Regine Mahe	RE: Separate Property	08-09 18:37	43.8 KB
Regine Mahe	RE: Separate Property	08-09 17:31	653.1 KB
주식회사파워리텍	(주)파워리텍 강북공영 손해배상 청구 관련 근거자료 송부드립니다.	08-09 16:12	73.6 KB
KCAB Next	[KCAB Next] "KCAB Next Networking Event" (2 September 2022)	08-09 16:00	28.3 KB
CIETAC	Invitation| China Arbitration Summit 2022 and the 2nd Global Arbitrators Forum| 6 September 2022 (Beijing)	08-09 14:34	4.5 MB
복대리	[복대리 앱] 폭우에 따른 재판 현황 안내	08-09 10:29	117.9 KB
Bill	Urgent notice about your account	08-09 06:11	6.6 KB
CLUB850	제1차년도 임대료지연입금 보상금에 대한 원천징수 영수증 전달의 건	08-08 18:07	1.0 MB
CLUB850	2617호 김연호님의 제주드림타워복합리조트 제1차년도 임대료 지급 안내문	08-08 17:24	153.8 KB

11 12 13 14 15 16 17 18 19 20

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"12"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

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0 안읽음 | 중요 | 첨부 | TO 받는사람

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스마트메일함
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메일 스마트봇 | 메일 도움말

+25GB

메일검색 | 상세 | 받은메일함 0/3256 | 안읽은 메일 삭제 | [안내] 외부메일 가져오기 기능 변경

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

송여진	[법무법인 소백]김석우 검사님, 김연호 변호사님, 참고자료 제출서입니다.	08-08 13:52	2.5 MB
0x210cvecfs@sco…	서울중앙지법 2021가소138912 (원고 말레비치 그제고스, 피고 대한상사 중재원 KCAB) 답변서부본(22.08.03.자)이(가) 전자발송되었습니다.	08-08 11:37	6.5 KB
0x431cvecfs@sco…	마산지원 2022카합20030에 대한 신청서(문건) 접수되었습니다.	08-08 11:18	5.5 KB
Rachel's English…	MODULE 3: Imitation Skills Completed	08-08 07:34	5.7 KB
From BP's iPhone	last chance (gone tonight)	08-07 22:23	6.6 KB
Zillow	13 home-buying myths, busted	08-07 17:47	55.4 KB
Zillow	Your Home Report for 57-020 Kuilima Dr UNIT 313 - Zestimate and Neighborhood Updates	08-06 04:46	121.3 KB
From BP's iPhone	your account	08-05 23:44	6.7 KB
0x420cvecfs@sco…	창원지법 2022카합102340에 대한 참고자료(문건) 접수되었습니다.	08-05 17:49	5.5 KB
0x420cvecfs@sco…	창원지법 2022가단1170670에 대한 소장(문건) 접수되었습니다.	08-05 17:21	5.5 KB
0x420cvecfs@sco…	창원지법 2022카합102340에 대한 보정서(문건) 접수되었습니다.	08-05 09:52	5.5 KB
Bill	Please download while you still can	08-05 04:08	7.0 KB
0x420cvecfs@sco…	창원지법 2022카합102340에 대한 신청서(문건) 접수되었습니다.	08-04 19:14	5.5 KB
PR Tracker	Your link expires	08-04 04:31	6.9 KB
PR Member Supp…	Your 3-step recession plan	08-03 01:21	7.3 KB

11 12 13 14 15 16 17 18 19 20

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"13"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

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메일검색 | 상세 | 받은메일함 0/3256 | 안읽은 메일 삭제 | [안내] 네이버 사칭 메일 주의

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ... | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

careful child relo…	Will all children return after the summer holiday?	08-03 01:17	109.1 KB
네이버메일	[발송실패 안내] yhkimlaw@unitel.co.kr으로 메일이 전송되지 못했습니다.	08-02 18:10	28.5 KB
삼성카드	[삼성카드] 2022년 개인정보 이용내역 안내	08-02 15:19	7.5 KB
KCAB INTERNATI…	[Upcoming Events] KCAB INTERNATIONAL Events in August	08-02 14:06	49.6 KB
서울시[ETAX]	[서울시] 2022년 08월 주민세 사업소분(주민세 사업소분) (신고분) 고지서 발송	08-02 09:51	209.9 KB
b.p.	You have been issued this 1 alert	08-02 05:59	6.5 KB
Regine Mahe	RE: Separate Property	08-01 17:31	97.1 KB
Regine Mahe	Nordic Capital Separate Property- South Korea	08-01 17:30	26.3 KB
Regine Mahe	RE: Separate Property	08-01 17:20	89.7 KB
Regine Mahe	RE: Separate Property	08-01 17:10	80.2 KB
네이버 캘린더 알림	[일정 알림] Nordic Capital Separate Property- South Korea - 08.01(월) 오후 04:00 서울 (GMT+09:00) (Microsoft Teams Meeting)	08-01 15:50	15.2 KB
Regine Mahe	Automatic reply: Separate Property	08-01 15:19	9.3 KB
박규영	[세무법인삼성]김연호 21년도 소득금액증명	08-01 10:26	451.2 KB
박규영	[세무법인삼성]김연호 19,20년도 종합소득세신고서 및 소득금액증명	08-01 10:24	2.0 MB
PR Member Supp…	Your document is ready for download	08-01 00:21	6.9 MB

11 12 13 14 15 16 17 18 19 20

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"14"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

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- 임시보관함
- 내게쓴메일함 빠른첨부

내 메일함
- 노종빈김성일
- 구미기자 리스트
- 새범뷰티

스마트메일함
- 프로모션
- 청구·결제
- SNS
- 카페

스팸메일함 711
휴지통 2820
외부메일 가져오기

메일 스마트봇 | 메일 도움말

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메일검색 상세 받은메일함 0 / 3256 안읽은 메일 삭제

[안내] 스마트메일함 첫 사용 가이드

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· 필터

받은메일함 프로모션 청구·결제 SNS 카페 스마트 메일함 설정

Zillow	5 homes in the best cities for dating	07-31 17:46	117.3 KB
Bill	Final notice (gone tonight)	07-31 00:07	6.6 KB
Google	yhkimlaw1@gmail.com 관련 보안 경고	07-30 03:33	14.6 KB
PR Tracker	did u see this yesterday?	07-30 00:24	6.7 KB
박규영	[김연호]19,20년도 표준합계시산표 등을 보내드립니다.	07-29 18:25	1.4 MB
club850@jejudrea···	제주드림타워복합리조트 2차년도 세금계산서 발행일정 안내	07-29 17:25	166.1 KB
postndr@wooriba···	배달되지 않음: 대출신청자료추가	07-29 17:13	20.1 KB
박규영	21년도 의정부, 제주 표준합계시산표 등을 보내드립니다.	07-29 17:12	1.4 MB
postndr@wooriba···	배달되지 않음: 표준재무제표증명	07-29 17:12	8.2 KB
postndr@wooriba···	배달되지 않음: 대출신청자료추가	07-29 16:42	20.0 KB
postndr@wooriba···	배달되지 않음: 대출신청자료추가	07-29 16:34	19.5 KB
박규영	[김연호의정부]22년1기확정부가세 납부서를 보내드립니다.	07-29 16:06	117.1 KB
Greenspan, Deb···	In re Settlement Facility Matters	07-28 10:36	16.4 KB
변규식	준비서면입니다.	07-28 10:02	5.8 MB
Regine Mahe	RE: Separate Property	07-27 22:44	676.1 KB

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용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"15"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

NAVER 메일

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- 새범뷰티

스마트메일함
- 프로모션
- 청구·결제
- SNS
- 카페

- 스팸메일함 711
- 휴지통 2820
- 외부메일 가져오기

메일 스마트봇 | 메일 도움말

+25GB

메일검색 | 상세 | 받은메일함 0/3256 | 안읽은 메일 삭제 | [안내] 외부메일 가져오기 기능 변경

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

Regine Mahe	Nordic Capital Separate Property- South Korea	07-27 22:39	26.1 KB
Regine Mahe	RE: Separate Property	07-27 22:33	42.9 KB
International Aca···	IAFL AsPacEd - July 2022 Newsletter	07-27 17:21	131.4 KB
Regine Mahe	RE: Separate Property	07-27 17:02	30.3 KB
서울시[ETAX]	[서울시] 2022년 07월 재산세(주택1기분) (정기분) 고지서 재발송	07-27 11:17	212.3 KB
서울시[ETAX]	[서울시] 2022년 07월 재산세(주택1기분) (정기분) 고지서 재발송	07-27 11:17	212.4 KB
Regine Mahe	Separate Property	07-26 23:23	15.6 KB
김원호	RE: 위임장 양식 송부	07-26 13:01	349.4 KB
김석우	참고자료	07-26 12:38	1.4 MB
송여진	[법무법인 소백]김연호 변호사님, 가처분 사건기록 보내드립니다	07-26 10:20	22.4 KB
International Aca···	AP Happy Hour - 22 August 2022 - Join Us!	07-26 10:14	93.4 KB
IAFL European C···	Reminder IAFL Introduction to European Family Law Conference Ibiza: Registration Open	07-25 20:49	84.0 KB
장석종	Re : 문의사항	07-25 08:45	10.0 KB
CLUB850	제주드림타워 Club 850 2차년도 세금계산서 발행 안내문 관련 안내	07-22 18:01	54.1 KB
cmecfadmin@mie···	Order in 2:00-mc-00005-DPH In Re: Settlement Facility	07-22 00:48	13.2 KB

11 12 13 14 15 16 17 18 19 20

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"16"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

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- 외부메일 가져오기

메일 스마트봇 | 메일 도움말

+25GB

메일검색 | 상세 | 받은메일함 | 0 / 3256 | 안읽은 메일 삭제

[안내] 외부메일 가져오기 기능 변경

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

cmecfadmin@mie···	Order in 2:00-mc-00005-DPH In Re: Settlement Facility	07-22 00:47	13.2 KB
cmecfadmin@mie···	Order in 2:00-mc-00005-DPH In Re: Settlement Facility	07-22 00:46	13.2 KB
Client Care	What questions can I answer for you?	07-21 23:00	22.0 KB
KCAB INTERNATI···	[웨비나] 대한상사중재원 제1회 ESG 포럼 (7월 22일 오후 4시 30분)	07-21 16:16	26.3 KB
cmecfadmin@mie···	Reply to Response to Motion in 2:00-mc-00005-DPH In Re: Settlement Facility	07-20 17:00	13.6 KB
사법정책연구원(···	[미래를 여는 사법정책연구원] 뉴스레터 제38호 (2022년 7월)	07-20 11:16	450.7 KB
Zillow	96731 Market Report	07-20 04:10	70.5 KB
cmecfadmin@mie···	Response to Motion in 2:00-mc-00005-DPH In Re: Settlement Facility	07-20 03:30	13.3 KB
복대리	재판현황 중계서비스 서울남부지방법원 개시	07-19 14:19	296.5 KB
cmecfadmin@mie···	Response to Motion in 2:00-mc-00005-DPH In Re: Settlement Facility	07-19 10:21	18.3 KB
CIETAC	22 July | CIETAC IP Arbitration Center Inauguration & Seminar	07-18 21:13	4.4 MB
KCAB INTERNATI···	[Webinar] Construction Disputes: Australia, South Korea and Thailand (17 August 2022)	07-18 13:38	30.6 KB
KCAB INTERNATI···	[웨비나] 대한상사중재원 제1회 ESG 포럼 (7월 22일 오후 4시 30분)	07-13 16:01	27.8 KB
서울시[ETAX]	[서울시] 2022년 07월 재산세(주택1기분) (정기분) 고지서 발송	07-13 15:48	211.9 KB
서울시[ETAX]	[서울시] 2022년 07월 재산세(주택1기분) (정기분) 고지서 발송	07-13 15:48	212.0 KB

받은메일함 : 네이버 메일

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- 내게쓴메일함 빠른첨부

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- 새범뷰티

스마트메일함
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- 외부메일 가져오기

메일 스마트봇 | 메일 도움말

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메일검색 | 상세 | 받은메일함 0/3256 | 안읽은 메일 삭제 | [안내] 스마트메일함 첫 사용 가이드

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

Rachel's English···	MODULE 2: Placement Completed		07-13 08:04	5.6 KB
KCAB INTERNATI···	[Supporting Event - Webinar] "Ad-hoc Arbitration in Maritime and Insurance Sectors" (15 July 2022)		07-12 16:51	32.7 KB
송여진	[법무법인 소백]김원호 보좌관님, 증거제출서입니다.		07-12 13:12	25.1 KB
KCAB INTERNATI···	[Webinar] THAC-KCAB INTERNATIONAL-JCAA Joint Webinar (12 July 2022)		07-12 10:37	28.7 KB
송여진	[법무법인 소백]김원호 보좌관님, 준비서면입니다.		07-12 10:34	1.2 MB
철감	FW: [법무법인 소백]피청구인 준비서면, 특별대리인 선임신청서 송부		07-11 18:07	12.6 MB
Free Wheeler	Re: 계약서		07-11 15:29	11.1 KB
DO_NOT_REPLY···	2708013 July 2022 PACER Quarterly Statement of Account		07-09 11:02	65.8 KB
Zillow	Your Home Report for 57-020 Kuilima Dr UNIT 313 - Zestimate and Neighborhood Updates		07-09 04:44	74.2 KB
Philip Askew	Re: Divorce and Settlement Plans - Philip Askew		07-07 16:59	401.6 KB
KCAB INTERNATI···	[웨비나] 대한상사중재원 제1회 ESG 포럼 (7월 22일 오후 4시 30분)		07-07 15:32	27.8 KB
국세청	(김연호->롯데관광개발주식회사)		07-07 11:47	133.1 KB
CLUB850	제주드림타워 Club850 2022년 2분기 세금계산서 발행 안내		07-07 11:17	367.0 KB
International Aca···	AP Happy Hour - 11 July 2022 - Do Join Us!		07-06 20:17	88.4 KB
KCAB INTERNATI···	[Webinar] "Most Preferred Arbitral Institutions in Vietnam" (8 July 2022)		07-06 15:18	33.2 KB

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용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

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- 새범뷰티

스마트메일함
- 프로모션
- 청구·결제
- SNS
- 카페

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+25GB

메일검색 | 상세 | 받은메일함 0/3256 | 안읽은 메일 삭제 | [안내] 외부메일 가져오기 기능 변경

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

Kim Jooyeon	!Re: [대한변협 국제팀] 제5차 국제위원회 개최 안내(회신 기한: ~6월 13일까지)	07-06 15:13	3.0 MB
CA06db_DO_NOT···	2022 Sixth Circuit Judicial Conference - Registration Reminder	07-06 13:54	4.1 KB
Gary Tang	COVID is Easing? Looking Towards More New Developments	07-06 11:57	12.7 KB
0x210cvecfs@sco···	서울중앙지법 2021가소138912에 대한 준비서면(문건) 접수되었습니다.	07-06 10:43	5.5 KB
문화체육과	2022 정오의 문화공연 안내입니다.	07-06 10:38	280.2 KB
IAFL European C···	IAFL Introduction to European Family Law Conference Ibiza: Registration Open	07-05 23:04	82.6 KB
KCAB INTERNATI···	[Webinar] 2022 Arbitration Webinar "Most Preferred Arbitral Institutions in Vietnam" (8 July 2022)	07-05 14:19	33.3 KB
KCAB Next	[In-Person Event] "YSIAC & KCAB Next Happy Hour in Seoul" (18 July 2022)	07-05 13:38	28.7 KB
구정진 (마산지점)	삼원 정정혜고객님 금리제안서 발송	07-05 12:21	295.5 KB
송여진	[법무법인 소백]김연호 변호사님, 준비서면 및 변론요지서입니다.	07-05 11:02	2.9 MB
인텔리콘연구소	(광고) 지긋지긋한 문서관리 이젠 안녕~ 문서 깔때기 '도큐브레인'으로 방대한 소송문서도 편리하게!👍	07-04 08:58	19.3 KB
Netflix	김연호 님의 취향에 맞는 영화 등록 알림	07-03 12:32	63.2 KB
Corinne Remedios	Re: ICLG - Family Law 2023 question	07-01 12:27	12.8 KB
박규영	RE: [김연호님] 2021 종합소득세 납부기한 연장 서류	07-01 10:55	268.1 KB
박규영	[김연호님] 2021 종합소득세 납부기한 연장 서류	07-01 10:40	634.8 KB

11 12 13 14 15 16 17 18 19 20

용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"19"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

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내 메일함
- 노종빈김성일
- 구미기자 리스트
- 새범뷰티

스마트메일함
- 프로모션
- 청구·결제
- SNS
- 카페

스팸메일함 711
휴지통 2820
외부메일 가져오기

메일 스마트봇 | 메일 도움말

+25GB

메일검색 | 상세 | 받은메일함 0/3256 | 안읽은 메일 삭제 | [안내] 스마트메일함 첫 사용 가이드

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

김연호	RE: ㅋㅋ ㄷㅅㄷ 떠멕여줘도 못받아먹더니	07-01 09:10	15.4 KB
cmecfadmin@mie···	Order in 2:00-mc-00005-DPH In Re: Settlement Facility	07-01 02:59	13.4 KB
KCAB INTERNATI···	[Press Release] KCAB INTERNATIONAL Welcomes 49 New Names into Its International Panel of Arbitrators	06-30 11:18	30.5 KB
Carefulchildreloc···	Child relocation: a new website	06-30 03:53	120.9 KB
Corinne Remedios	Re: ICLG - Family Law 2023 question	06-29 20:30	8.6 KB
천미영	7.12. 변론 관련 안내 사항	06-29 16:43	627.7 KB
KCAB INTERNATI···	[Save the Date!] The 11th Asia-Pacific ADR Virtual Conference (9-10 November, 2022)	06-29 15:57	33.3 KB
김석우	참고자료	06-29 10:30	8.1 MB
International Aca···	IAFL AsPacEd - June 2022 Newsletter	06-29 10:00	190.2 KB
Kim Jooyeon	!Re: [대한변협 국제팀] 제5차 국제위원회 개최 안내(회신 기한: ~6월 13일까지)	06-28 15:25	270.0 KB
박규영	[김연호 님] 2021 종합소득세 납부서	06-28 14:29	213.9 KB
CLUB850	제주드림타워 Club850 2022년 2분기 세금계산서 발행 안내	06-28 11:50	77.4 KB
IAFL Asia Pacific···	IAFL AsPac 2022 Nominations for Election	06-28 09:59	69.5 KB
KCAB INTERNATI···	[Webinar] Yoon & Yang Round Table Discussion with KCAB INTERNATIONAL (29 June 2022 / 4 PM)	06-28 09:23	28.8 KB
CLE	Last chance to register! The Legal Fundamentals Of Cannabis Business	06-28 02:44	87.6 KB

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용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"20"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

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메일검색 | 상세 | 받은메일함 | 0 / 3256 | 안읽은 메일 삭제

[안내] 외부메일 가져오기 기능 변경

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

Simon Wan	ICLG to: Family Law 2023 - Korean chapter	06-27 16:52	103.2 KB
서울시[ETAX]	[서울시] 2022년 06월 자동차세(자동차) (정기분) 고지서 재발송	06-27 09:31	211.2 KB
Zillow	Should you move to a vacation town?	06-26 21:23	59.0 KB
Netflix	비밀번호를 재설정해 주세요	06-26 16:06	42.2 KB
카카오 T 비즈니스	[카카오 T 비즈니스] 청구서 입니다.	06-26 15:03	13.8 KB
Kenneth Loomis	FW: 21-2665 - change of email address	06-24 22:31	130.8 KB
do_not_reply@ps···	NextGen CM/ECF Account Update Status	06-24 21:05	5.1 KB
do_not_reply@ps···	NextGen CM/ECF Account Update Status	06-24 21:04	5.2 KB
Sangyub (Sean) ···	RE: 새로운 이메일주소 등록요청	06-24 18:05	20.4 KB
Sangyub (Sean) ···	RE: 새로운 이메일주소 등록요청	06-24 17:51	15.1 KB
한국법조인대관	[법률신문-한국법조인대관] 이력 수정 완료하였습니다.	06-24 17:24	24.6 KB
do_not_reply@ps···	PACER Account Settings Changed	06-24 13:16	7.7 KB
Annie Dunster	Court literature for children & reminder re Chapter newsletters	06-22 22:22	66.8 KB
Kim Jooyeon	!Re: [대한변협 국제팀] 제7차 영미소위원회 회의록 전달 및 발표자 모집의 건	06-22 09:50	113.3 KB
송여진	[법무법인 소백]김연호 변호사님, 권한쟁의 청구기록 보내드립니다	06-21 17:03	23.1 KB

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용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

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받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"21"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

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메일검색 상세 받은메일함 0/3256 안읽은 메일 삭제

[안내] 스마트메일함 첫 사용 가이드

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· 필터

받은메일함 프로모션 청구·결제 SNS 카페 스마트 메일함 설정

김원호	RE: 현재위임장	06-21 16:28	342.1 KB
Clear Speak Acc···	Re: Fwd: Touching base	06-21 02:33	9.8 KB
International Aca···	IAFL USA Chapter Fellows Chat: June 24	06-21 01:47	55.0 KB
Min	안녕하세요 카카오 단톡 방장입니다.	06-19 10:29	2.3 KB
네이버 MYBOX	[네이버 MYBOX] 서비스 이용 약관 변경 안내 (휴면 처리 정책 변경)	06-18 18:15	14.5 KB
0x210cvecfs@sco···	서울중앙지법 2021나67253 (원고 임애화, 피고 박영임) 변론기일통지서이(가) 전자발송되었습니다.	06-17 15:31	6.4 KB
비씨카드	김연호 고객님의 이메일명세서로 신청(변경)하신 확인메일 입니다.	06-17 10:02	11.9 KB
CLE	Reminder: Hair Texture Discrimination: The Law, CROWN Act, and Solutions to Employment Regulations in the Workplace	06-17 01:32	90.8 KB
Kim Jooyeon	!Re: [대한변협 국제팀] 제7차 영미소위원회 화상회의 개최 안내	06-16 16:00	229.2 KB
우리카드	우리카드 김연호 고객님께서 요청하신 승인내역입니다.	06-16 12:39	493.1 KB
삼성카드	[삼성카드] 김연호님 요청하신 삼성카드이용상세내역서(엑셀 다운로드 가능) 입니다.	06-16 09:53	2.2 MB
신한카드	[신한카드]개인(사업자) 과거매출내역 (엑셀타입)	06-16 09:28	92.9 KB
International Aca···	Sad Loss: Floyd Nadler	06-16 02:56	63.7 KB
New York CLE	Tonight Only! $87 New York CLE Compliance Bundle. (70% OFF)	06-16 02:17	101.7 KB
CLE	Reminder: Hair Texture Discrimination: The Law, CROWN Act, and Solutions to Employment Regulations in the Workplace	06-14 23:43	90.8 KB

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용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

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받은메일함 : 네이버 메일

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메일검색 | 상세 | 받은메일함 | 0 / 3256 | 안읽은 메일 삭제

[안내] 네이버 사칭 메일 주의

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

Annie Dunster	IAFL Chapter Newsletters and more!	06-14 18:13	67.4 KB
Kim Jooyeon	![대한변협 국제팀] 제7차 영미소위원회 화상회의 개최 안내	06-14 18:01	24.6 KB
대한변호사협회	[대한변협] 법률사무소 방화 테러사건 희생자 추모를 위한 온라인 분향소 마련 안내	06-14 17:26	43.5 KB
대한변호사협회	[대한변협]대한변협 지정 「인정연수」 안내 (4개 기관, 총 4개 연수)	06-14 13:58	109.7 KB
대한변호사협회	(신청마감 연장) UN 법무국 주최, 2022 아시아·태평양 지역 국제법 연수 신청 안내(마감: 6.27.)	06-14 11:28	32.0 KB
Clear Speak Acc···	Fwd: Touching base	06-14 02:41	6.2 KB
서울지방변호사회	강제철거 관련 법률 개정안 발의를 위한 토론회 개최 안내	06-13 15:11	31.8 KB
국세청	전자고지안내	06-13 15:01	12.8 KB
서울시[ETAX]	[서울시] 2022년 06월 자동차세(자동차) (정기분) 고지서 발송	06-13 10:33	210.8 KB
Zillow	Take the next step on 57-101 W Kuilima Dr #139.	06-13 03:19	25.3 KB
Zillow	Live on the water for under $860K	06-12 20:49	59.9 KB
Zillow	Your Home Report for 57-020 Kuilima Dr UNIT 313 - Zestimate and Neighborhood Updates	06-11 07:33	74.2 KB
Annie Dunster	IAFL Alaskan cruise Survey	06-10 23:19	66.1 KB
Daphne Da Rosa	Re: Hello - change of email & Password	06-10 11:18	12.3 KB
Morrisons	Morrisons fixed rate limited coupon	06-10 01:37	60.0 KB

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용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

https://mail.naver.com/#%7B"fClass"%3A"list"%2C"oParameter"%3A%7B"page"%3A"23"%2C"sortField"%3A"1"%2C"sortType"%3A"0"%2C"folderSN"%3A"0"%2C"type"%3A""%2C"isUnread"%3Afalse%7D%7D

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[안내] 외부메일 가져오기 기능 변경

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

Annie Dunster	Re: Hello – change of email & Password	06-10 01:20	11.5 KB
Morrisons	Helping customers since 1899	06-09 23:50	59.9 KB
Daphne Da Rosa	Re: Hello – change of email & Password	06-09 23:20	7.3 KB
Trading and Inve···	Enabling renewables to power the grid	06-09 19:09	56.6 KB
Annie Dunster	Fwd: change of email address – access to IAFL website	06-09 17:47	151.0 KB
Eunhae Shin	RE: [대한변협 국제팀] 제7차 영미소위원회 개최 안내(회신기한: ~6월 14일 화)	06-09 11:58	16.4 KB
Corinne Remedios	Fwd: Reminder: AP Hour 20th June 2022 – all welcome	06-09 11:56	44.6 KB
Kim Jooyeon	![대한변협 국제팀] 제7차 영미소위원회 개최 안내(회신기한: ~6월 14일 화)	06-09 11:39	65.2 KB
Corinne Remedios	Re: change of email address	06-09 11:29	135.9 KB
서울지방변호사회	2022년도 회원친선 야유회(한국민속촌) 참가 신청을 받습니다	06-09 10:12	21.0 KB
Corinne Remedios	Re: change of email address	06-09 09:30	10.5 KB
서울지방변호사회	중대재해처벌법의 최초 모법인 영국 2007 Act 관련 세미나 개최 안내	06-09 09:18	25.5 KB
Google	yhkimlaw1@gmail.com 관련 보안 경고	06-09 07:45	14.5 KB
CLE	REMINDER: Introduction To Blockchain Technology And The Law: A Primer For Attorneys	06-08 23:58	87.3 KB
서울지방변호사회	2022년도 하반기 채무자회생법 특강 개최 안내	06-08 13:15	51.6 KB

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용량 1.82GB / 5GB | 환경설정 | 스킨설정 | POP3 로그인 기록보기 | 모바일 메일

스팸정책 | 공지사항 | 메일 고객센터

받은메일함 : 네이버 메일

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NAVER 메일

김연호

메일쓰기 내게쓰기

0 안읽음 | 중요 | 첨부 | TO 받는사람

- 전체메일 정리하기
- 받은메일함
- 보낸메일함 수신확인
- 임시보관함
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내 메일함
- 노종빈김성일
- 구미기자 리스트
- 새범뷰티

스마트메일함
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- 외부메일 가져오기

메일 스마트봇 | 메일 도움말

+25GB

메일검색 상세 받은메일함 0/3256 안읽은 메일 삭제

[안내] 외부메일 가져오기 기능 변경

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· 필터

받은메일함 프로모션 청구·결제 SNS 카페 스마트 메일함 설정

대한변호사협회	제373기 「N번방 방지법 관련 성폭력 특별법(경기중앙)」 특별연수 신청안내	06-07 17:49	59.0 KB
서울지방변호사회	서울지방변호사회보 6월호가 발간되었습니다	06-07 17:09	3.1 KB
서울지방변호사회	세계한인법률가회(IAKL) 멘토링 행사 개최 안내	06-07 15:26	19.8 KB
서울지방변호사회	여름철 법정 내 변호사 복장 간소화 안내	06-07 11:29	21.9 KB
Google	yhkimlaw1@gmail.com 관련 보안 경고	06-06 16:00	14.5 KB
Trading and Inve···	Meet the Beatles (well, their film doubles) hottest film of 2022	06-06 00:01	58.7 KB
Zillow	5 truly adorable homes under $344K	06-05 08:12	59.2 KB
Kim Jooyeon	![대한변협 국제팀] 제5차 국제위원회 개최 안내(회신 기한: ~6월 13일까지)	06-03 11:26	67.5 KB
CLE-TRT	Cybersecurity For Lawyers: Is Your Firm Safe From Cyber Attacks	06-03 06:10	116.7 KB
TRTCLE	Extended! Memorial Day CLE Sale! 75% OFF CLE!	06-02 23:39	79.2 KB
贠仲委	CIETAC Wishes You Peace and Health on the Dragon Boat Festival	06-02 18:05	4.3 KB
Sangyub (Sean) ···	RE: 중재판정초안(20113-0032)	06-02 12:41	73.3 KB
카카오 T 비즈니스	[카카오 T 비즈니스] 청구서 입니다.	06-01 15:01	13.8 KB
건강보험공단	2022년도 2분기 사업장 건강보험 제도 안내	06-01 12:59	7.0 KB
Trading and Inve···	The best investment flats and houses on the market in Leeds	05-31 20:04	44.8 KB

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메일 스마트봇 | 메일 도움말

+25GB

메일검색 | 상세 | 받은메일함 | 0 / 3256 | 안읽은 메일 삭제 | [안내] 네이버 사칭 메일 주의

읽음 | 삭제 | 스팸신고 | 답장 | 전체답장 | 전달 | 이동 | ··· | 필터

받은메일함 | 프로모션 | 청구·결제 | SNS | 카페 | 스마트 메일함 설정

김연호	해지통고서		05-31 18:21	157.2 KB
정정혜	FW: 조사 중지 신청 및 문답서 작성 件		05-31 13:37	49.0 KB
Zillow	16 alternatives to traditional home buying		05-29 09:08	83.7 KB
KIM MIN WOO	Fwd: Your Alaska Airlines credit certificate		05-29 06:38	54.9 KB
박규영	[정정혜님- 포항] 수정신고서 및 납부서		05-27 11:45	5.1 MB
Trading and Inve···	Birmingham apartments with investor payment plans		05-26 19:30	41.6 KB
Zillow	96731 Market Report		05-26 05:31	77.2 KB
대한변호사협회	[대한변호사협회] 코로나-19 팬데믹 이후 구속피고인에 대한 변호인의 접견권 침해 관련 토론회 개최 안내		05-25 16:51	21.4 KB
대한변호사협회	[대한변협] 제371기 「형사증거법•법과학(전북)」 특별연수 신청안내		05-25 14:25	285.6 KB
대한변호사협회	[대한변호사협회] 변호사정보센터 '나의 변호사' 대국민 서비스 개시		05-25 10:26	24.1 KB
대한상사중재원 ···	[대한상사중재원] 2022년도 중재인 정보 업데이트 요청		05-24 13:02	93.9 KB
유성기	감일동 내용증명		05-24 08:57	25.6 KB
유정기	FW: 내용증명		05-23 07:27	25.8 KB
서울지방변호사회	서초동회관 지하 2층 서리풀홀 이용 안내		05-18 10:07	21.0 KB
Zillow	How buyers can navigate a hot market		05-17 12:49	46.1 KB

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스팸정책 | 공지사항 | 메일 고객센터

Appendix 2

Case No: 21-*2665*

United States Court of Appeals for the Sixth Circuit

In re: SETTLEMENT DOW CORNING TRUST

KOREAN CLAIMANTS

Interested Parties – Appellant

v.

CLAIMANTS' ADVISORY COMMITTEE; FINANCE COMMITTEE; DOW SILICONES CORPORATION; DEBTOR'S REPRESENTATIVES

Defendants – Appellees

Brief of Appellant Korean Claimants

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I. STATEMENT IN SUPPORT OF ORAL ARGUMENT

The Korean Claimants filed Motion for Premium Payments on July 6, 2020. Dow Silicones Corporation and Debtor's Representatives filed Response to deny Korean Claimants' Motion on July 20, 2020. The Finance Committee filed Response to deny the Korean Claimants' Motion on July 20, 2020.

The Finance Committee filed Recommendation and Motion for Authorization to Make Second Priority Payments on December 23, 2020. Dow Silicones Corporation and the Debtor's Representatives filed Response to oppose the Finance Committee's Recommendation and Motion on January 27, 2021. The Korean Claimants filed Response to object to the Finance Committee's Recommendation and Motion on January 27, 2021. The Finance Committee filed Reply on February 10, 2021. The Claimants' Advisory Committee filed Reply to support the Finance Committee's Recommendation and Motion on February 10, 2021.

The Korean Claimants filed Motion for Vacating Decision of Settlement Facility regarding Address Update/Confirmation on January 15, 2021. Dow Silicones and Debtor's Representatives, and the Claimants' Advisory Committee filed Response to deny the Korean Claimants' Motion for Vacating

Decision of Settlement Facility regarding Address Update/Confirmation on February 26. The Korean Claimants filed Reply on April 2, 2021.

The District Court issued Memorandum Opinion and Order regarding the Finance Committee's Motion for Authorization to make Second Priority Payments, the Korean Claimants' Motion for Premium Payments and the Korean Claimants' Motion for Order Vacating Decision of the Settlement Facility regarding Address Update/Confirmation on June 24, 2021.

The Korean Claimants appealed on June 28, 2021.

The Korean Claimants did not have a chance to be heard fully for the Motion for Premium Payments and the Motion for Vacating the Decision of Settlement Facility regarding Address Update/Confirmation. In addition, the reasoning of the District Court in the Order denying the Motions for Premium Payments and for Vacating the Decision of Settlement Facility regarding Address Update/Confirmation is based upon Closing Order 2 of March 19, 2019, which has never been served, nor briefed and argued in the District Court. The reasoning of the District Court was unpredictable. Therefore, Korean Claimants request this Court to provide an oral argument.

II. STATEMENT OF JURISDICTION

The United States District Court Eastern District of Michigan has jurisdiction over the Amended Joint Plan of Reorganization of Dow Corning Corporation effective on June 1, 2004 ("the Plan") to resolve controversies and disputes regarding interpretation and implementation of the Plan and the Plan Documents including the SFA.

On June 24, 2021, the District Court issued Memorandum Opinion and Order regarding the Finance Committee's Motion for Authorization to make Second Priority Payments, the Korean Claimants' Motion for Premium Payments and the Korean Claimants' Motion for Order Vacating Decision of the Settlement Facility regarding Address Update/Confirmation.

The Korean Claimants filed this appeal in a timely manner. The Order of the District Court is the final order which cannot be contested in the District Court. Therefore, the United States Court of Appeals for the Sixth Circuit has jurisdiction over this appeal.

III. STATEMENT OF ISSUES

The first issue is whether the Finance Committee's recommendation to make second premium payments while the Korean Claimants were denied first premium payments is reasonable and should be approved considering that (a) the Finance Committee was not a three-member committee required under the Plan when it recommended to the District Court (b) the Claimants' Advisory Committee supported the Finance Committee's recommendation by breaching a fiduciary duty to Korean Claimants as the agent in fact (c) Finance Committee ignored the Korean Claimants' request for first premium payments (d) the conclusion of the Independent Assessor that there would be a $172,595,097 surplus of funds even after first and second priority payments is unreliable.

The second issue is whether the District Court's Order to deny the Korean Claimants' Motions for Premium Payments and for Vacating Settlement Facility's Decision on Address Update/Confirmation must be upheld considering that (a) Closing Order 2 of March 2019, the basis for denial of the Korean Claimants' Motions, was not served nor briefed before issuance (b) Closing Order 2 was to impose the Korean Claimants' address update/confirmation obligation that is not in accordance with the Plan and is a violation of the Bankruptcy Code (c) the Korean Claimants must be exempted from address update/confirmation because of laws of Korea that counsel is not allowed without permission of the Claimants (d) address of the Claimants is protected by attorney-client privilege under the US laws (e) the practice of the Settlement Facility that ordered the Korean Claimants address update/confirmation from May 2015 should not be excused by Closing Order 2.

IV. STATEMENT OF CASE

After delaying processing of Korean Claims for many years, the Settlement Facility began sending letters asking valid, current address confirmation from May 2015.(RE1569 Pg ID:#26277-26282) Address update/confirmation to the Korean Claimants has never been raised before May 2015.

Counsel submitted the Settlement Facility the Government-issued Resident Registry (RE1569 Pg ID:#26824) in the year of 2005 and 2006 to prove that the Korean Claimants were not a fake claimant but a real claimant. The Government-issued Resident Registry of the Claimants was submitted pursuant to the request of the Settlement Facility.

The Settlement Facility issued 6.2 Class checks to six hundred sixty one (661) Korean Claimants in 2009. The Settlement Facility did not ask counsel to update their address or that their address had to be confirmed by the Settlement Facility before issuing checks. Accordingly, there was no issue about address update/confirmation at that time. The Settlement Facility did not ask counsel to update the address of his clients either.

The Settlement Facility withdrew the decision on affirmative statements of Korean implanting physicians and then cancelled the approval of manufacturer and put the processing of Korean claims on hold.

The Finance Committee proposed counsel to mediate the Korean claims in 2012. The Finance Committee reached a settlement agreement for 5 million dollars but walked away by saying that Dow Silicones Corporation and Debtor's Representatives did not authorize the mediation. The Finance Committee did not reimburse the expenses and costs incurred during mediation process to counsel and the Korean Claimants.

As soon as the Korean Claimants filed request for re-categorization in 2014, the Finance Committee granted re-categorization of South Korea in 2014 and changed the Korean Claimants not paid by then from 6.2 Class to 6.1 Class. However, the Finance Committee applied the re-categorization from the year of 2015, not 2010, the year of the South Korea's 60 % surpass of GDP per capita of the United States of America. And then, the Settlement Facility quickly issued 6.2 Class checks to five hundred (500) Korean Claimants in 2014. As the result, the Finance Committee made the Settlement Facility save over a million and twenty thousand (1,200,000) dollars and thus those Korean Claimants lost it.

Following re-categorization and quick issuance of checks of 6.2 Class, the Settlement Facility started asking valid, current address confirmation to counsel from May 2015. The Korean Claimants who have been asked for address update/confirmation were randomly chosen by the Settlement Facility whether or not their claim had been approved. From May 2015 to June 3, 2019, six hundred seventy six (676) Korean Claimants were asked for address update/confirmation.

However, the Korean Claimants did not want to submit their updated current address to the Settlement Facility for their personal reasons. From the beginning of 1994, when the client-attorney relationship was established with counsel, the Korean Claimants marked the box of CONFIDENTIAL for participation in the Global Settlement Program. Since then, the Korean Claimants wanted commitment from counsel that their privacy must be kept and counsel must not send a mailing to their home and they wanted to correspond over the phone (cellular phone) if necessary and mailings from the US must not be delivered to their home.

Upon receiving a lot of complaints from the Claimants because the Settlement Facility began sending mailings requesting address update/confirmation to the Korean Claimants from May 2015, counsel wrote two letters to the Settlement Facility.

On June 8, 2017, counsel explained the Settlement Facility that most of the Korean Claimants did not want to receive a letter including the award letter from the Settlement Facility, and did not want their family members including husband to know whether they underwent a breast implant surgery or whether they received the payments in relation to diseases claims due to the surgery, and really wanted counsel to keep their filings confidential to others including the Settlement Facility, and the Claimants protested that counsel had released their address to the Settlement Facility without consent. (RE1569 Pg ID:#26286)

Counsel further explained that counsel was not allowed to release clients' address information ("personal information") without permission under the Personal Information Protection Act of Korea but counsel kept cellular phone number of each Claimant thus had no problem to contact them when necessary including distribution of checks from Settlement Facility.

On July 28, 2017, counsel explained the Settlement Facility in a response letter that the Settlement Facility did not maintain consistency in processing Korean claims and the Korean Claimants did not want to update their address and counsel was not allowed to do so without their permission under the Korean personal information protection laws and counsel must keep the laws of his jurisdiction of Korea. (RE1569 Pg ID:#26288-26289)

Counsel explained additionally that whether further processing would occur for the enclosed Claimants[1]was up to the Settlement Facility and the Korean Claimants would file a Motion to vacate decision of the Settlement Facility by saying that counsel wanted to receive the final letter that the enclosed Claimants failed to comply with the Settlement Facility's request for address update/confirmation and the Settlement Facility determined to stop processing claims of Korean Claimants permanently.

[1] The Settlement Facility enclosed the list of the whole Korean Claimants by suggesting that all of the Korean Claimants should be held processing of their Claim.

Counsel for the Finance Committee warned counsel in a letter of December 2017 that address of one hundred forty eight (148) Korean Claimants randomly chosen by the Settlement Facility failed to update and, if not updated immediately, counsel would face sanctions.

Counsel of the Korean Claimants filed an application form for address update of sixty (60) Claimants out of one hundred forty eight (148) Claimants. Eighty eight (88) Claimants submitted the address update/confirmation form marked "UNCHANGED"

On January 10, 2018, the Finance Committee filed Motion for Entry Order to Show Cause. The Finance Committee sought an Order to return $370,500 paid to the eighty eight (88) Claimants from counsel pending the District Court. (RE1569 Pg ID:#26291-26298)

On July 25, 2018, Closing Order 1 was docketed on the District Court site. (RE1447 Pg ID:#23937-23950, RE1569 Pg ID:#26300-26313).

On January 14, 2019, this Court dismissed the Korean Claimants' appeal to the Order of the District Court denying Motions for Reversal of the Settlement Facility's Product of Manufacturer Decision and Re-Categorization. (RE1569 Pg ID:#26315-26325)

On January 29, 2019, the District Court issued an Order that the Settlement

Facility must promptly execute processing and payments of fifty (50) percents of all Second Priority Payments. (RE1476 Pg ID:#24065-24066)

On March 13, 2019, the Settlement Facility sent a letter titled as Specific Notice of June 3, 2019 Deadline via email and regular mail to counsel indicating that certain Claims would not be issued any payments for which they might be eligible and counsel must provide address in the format as recommended by the US Postal Service and all Claimants eligible for partial premium payments must confirm their current address and partial premium payments could be issued only after the Settlement Facility received address in the proper format described and Korean Claimants with deficiencies as described would be adversely affected if counsel failed to take an action as required by Notice and Closing Orders and all deficiencies must be resolved by the June 3, 2019 deadline or the claims will be denied. (RE1569 Pg ID:#26330-26331, RE1546 Pg ID:#24833-24834)

On March 19, 2019, Closing Order 2 was docketed on the District Court site. (RE1482 Pg ID:#24084-24097) Closing Order 2 has never been served or briefed before issuance.

On April 4, 2019, the Settlement Facility mailed a letter titled as Second Priority Payments-Immediate Action Required including a list of the Korean Claimants to counsel. (RE1569 Pg ID:#26348-26395) This letter was delivered in mid-July 2019. The US Postal Service took over three months to be delivered

to counsel. This letter of the Settlement Facility was delivered to counsel after the deadline of June 3, 2019.

The Claims Administrator testified in the Court's Declaration (RE1569 Pg ID:#26397-26403, RE1545 Pg ID:#24816-24822), "The letter included as an enclosure a form listing 924 claimants. The form was structured so that Mr. Kim could fill in language to confirm whether the identified address for each Claimant was correct or to provide an updated address or to indicate if counsel no longer represented the Claimant. The Address listed on the form for each Claimant was the address that Settlement Facility had on file."

This letter did not explain that the form included in the letter was structured so that counsel could fill in language to confirm whether the identified address for each Claimant was correct or to provide an update address or to indicate if counsel no longer represented Claimants.

The Claims Administrator testified in the Court's Declaration, "Mr. Kim did not return the form sent with the April 4, 2019 mailing." But this letter was not delivered by the deadline of June 3, 2019. It was delivered in mid-July 2019. In addition, the Settlement Facility has already said to counsel in the letter of March 13, 2019 that all Claimants eligible for partial premium payments must confirm their current address with the proper format by the June 3, 2019 deadline. (RE1569 Pg ID:#26330-26331, RE1546 Pg ID:#24833-24834) Even if counsel had returned the form with the April 4, 2019 mailing, it must have been

useless.

On June 3, 2019, counsel submitted address update application/correction form (RE1569 Pg ID:#26405) for six hundred seventy six (676) Korean Claimants that had received a Missing or Invalid Address Notice from May 2015 up to that time. (RE1569 Pg ID:#26281) They were a variety of Claimants. They even included Claimants with no Claim filed. The Settlement Facility required address update/confirmation even to non-filing Claimants who did not submit any claim with a proof of manufacturer.

On January 13, 2020, the Settlement Facility sent counsel a letter titled as Notice of Payment Hold for Invalid Claimant Address by indicating, "Correspondence sent to confirm the updated address, provided by you, was returned as undeliverable." (RE1569 Pg ID:#26457-26480) This letter was delivered on September 1, 2020, eight months late.

On March 3, 2020, the Settlement Facility sent counsel a letter titled as Closing Order 2 Required Claimant Confirmation of Current Address with a list of the Korean Claimants and Closing Order 2. (RE1569 Pg ID:#26408-26465) This letter was delivered on July 3, 2020, four months later. The US Postal Service took four months for delivery.

This letter indicated on the basis of Closing Order 2 that payments shall be sent to counsel for distribution to the Korean Claimants after the Claimants

directly confirmed that they currently resided at the address that counsel has provided. The Claims Administrator imposed a significant obligation and restricted on counsel that the Korean Claimants must confirm their valid, current address directly to the Settlement Facility.

The Claims Administrator testified in the Court's Declaration, "The Settlement Facility has not received any additional address information for the Korean Claimants since the notification was sent to Mr. Kim in March." Logically, it was impossible to receive any additional address information for the Korean Claimants because not only did the June 3, 2019 deadline expire but the Korean Claimants did not want to update their current address.

The Claims Administrator testified in the Court's Declaration that the Settlement Facility conducted an audit of the Korean Claimants' mailings for address update application/correction form in early 2020. The Claims Administrator also testified that the audit revealed that of 1,382 Claimants who were eligible for future payments, 600 had correspondence sent directly to Claimants that has been returned as undeliverable, 39.2% of mailings to 2,476 Claimants with eligible Class 5 and 6 claims were returned and undeliverable, and 50% of the mailings to updated addresses provided in January 2018 were returned and undeliverable.

Assuming that the Claims Administrator's testimony correctly reflected the audit, the audit was not shared with counsel before submission to the Court. In

addition, the audit was unreliable because data of mailings were based on incorrect delivery or far-late delivery of the US Postal Service to South Korea.

Late delivery of the US Postal Service to Korea is notorious. Many cases may exist that a mailing via the US Postal Service has never been delivered to counsel. Counsel received a lot of calls from the Claimants that they had received a letter from the US (RE1599 Pg ID:#28577) but there was no such letter for those Claimants that were delivered to counsel in many instances.

On June 1, 2020, this Court dismissed the Korean Claimants' appeal to the District Court's Order denying Recognition and Enforcement of Mediation Agreement. (RE 1569 Pg ID:#26482-26494)

On June 6, 2020, counsel filed Motion for Premium Payments. (RE1545 Pg ID:#24488-24490)

On July 19, 2020, counsel protested the Claims Administrator that counsel has experienced non-delivery and late delivery over the years so that counsel must receive letters of the Settlement Facility via the Federal Express rather than the US Postal Service. (RE1569 Pg ID:#26504-26505) The Claims Administrator denied it. (RE1569 Pg ID:26500-26501) The denial was a violation of Section 9 of Claimant Information Guide. (RE1599 Pg ID:#28323-28532)

On December 23, 2020, the Finance Committee filed Recommendation and

Motion for Authorization to Make Second Priority Payments. (RE1560, Pg ID:#25620-25631) This Motion of the Finance Committee is a violation of 4.08 (a) the Settlement Facility and Fund Distribution Agreement. (RE1584 Pg ID:#26656-26695)

On January 15, 2021, the Korean Claimants filed Motion for Vacating Decision of Settlement Facility regarding Address Update/Confirmation (RE1569 Pg ID#26261-26273).

On April 21, 2021, Closing Order 3 was docketed on the District Court site. (RE1598 Pg ID:#28284-28298)

On June 24, 2021, the District Court issued Memorandum Opinion and Order regarding Finance Committee's Motion for Authorization to Make Second Priority Payments, Korean Claimants' Motion for Premium Payments and Korean Claimants' Motion for Order Vacating Decision of Settlement Facility regarding Address Update/Confirmation. (RE1607 Pg ID#28602-28632).

V. SUMMARY OF ARGUMENT

The Korean Claimants argue that the Finance Committee's recommendation to make second priority payments was made in breach of the Plan. The ruling of the District Court that the Court appointed a new member later on time and the

new member did not object to the recommendation and therefore the lack of member composition became moot was not contemplated under the Plan.

The Finance Committee's recommendation was made on the premise that even if second premium payments were paid there must be a virtual guarantee in the funds available for the Settlement Facility. However, the Independent Assessor's report for the Finance Committee is not reliable.

The Claimants' Advisory Committee's support to the Finance Committee's recommendation was a breach of fiduciary duty to Korean Claimants. The Korean Claimants have a standing to object the Finance Committee's recommendation. The District Court should have ruled whether Claimants Advisory Committee was an agent in fact and whether it breached a fiduciary duty.

The District Court's ruling that Closing Order 2 prescribed that any payment including premium payments shall be made only to the Claimants who provided address update/confirmation with the Settlement Facility has no founding under the Plan and violates §1129(b).

Furthermore, Closing Order 2 is void since it was not served and briefed and argued by the Claimants before issuance.

Closing Order 2 was to approve the wrongdoings of the Settlement Facility

done to the Korean Claimants regarding address update/confirmation retroactively, which is not allowed in principal.

Even if Closing Order 2 is in effect, the premise of the sentence of paragraph 11 of Closing Order 2 was not met for the Settlement Facility's decision that the Korean Claimants must directly confirm their address that counsel had provided to the Settlement Facility.

The Settlement Facility's denial to first premium payments is not only a violation of the District Court's Order directing to proceed promptly with payment of 50% percent of all second priority payments but unauthorized.

The Korean Claimants did not want to update their address and counsel could not have submitted their address update/confirmation without permission under Korean laws even if counsel submitted six hundred seventy six (676) Claimants' address update/confirmation form on June 3, 2019.

Counsel should be exempted from the requirement of address update/confirmation of the Korean Claimants under Closing Order 2 because the Korean laws do not allow counsel to client's personal information including address to disclose without permission and address of the Korean Claimants should be a counsel's attorney-client privilege.

Finally, the Settlement Facility eliminated the requirement of a valid,

confirmed current address on its own so that the Korean Claimants are no longer responsible for address update/confirmation.

Therefore, the ruling of the District Court dismissing the Motions of the Korean Claimants should be overturned and the decisions of the Settlement Facility should be cancelled.

VI. ARGUMENTS

A. Finance Committee's Recommendation and Finance Committee's Motion

1. Finance Committee's Recommendation to Make Second Priority Payments breached the Plan

The Standard of review for this argument is an abuse of discretion. ("holding that a bankruptcy court's legal conclusions regarding the Bankruptcy Code were subject to de novo review, but that interpretation of the terms of a bankruptcy plan were reviewed under an abuse of discretion standard.", *In re Settlement Facility Dow Corning Trust* 628 F.3d 769 at 5 (Sixth Cir. 2010))

The Finance Committee shall be composed of three members consisting of individuals holding the following positions: Special Master, Appeals Judge, and Claims Administrator. (§4.08 (a) the SFA) The three-member composition is a

requirement for the Finance Committee. If any position of three members is vacant, the Finance Committee's decisions shall be invalid. The position of Special Master was vacant because the Special Master passed away. There were only two members remaining in the Finance Committee when the Finance Committee recommended to the Court.

The Supreme Court ruled with respect to the composition of National Labor Relations Board that the composition of the Board shall not be confused with quorum provision. ("We thus hold that the delegation clause requires that a delegee group maintain a membership three in order to exercise the delegated authority of the Board." *New Process Steel.,L.P. v. National Labor Relations Board*, 130 S.Ct. 2635, 687-688 (Supreme Court, 2010); "*New Process Steel* renders the three-member-composition requirement "a threshold limitation" on the scope of the power delegated to the Board by the NLRA; the Board cannot exercise its power through a delegee group if that group has fewer than three members. This statutory mandate is therefore jurisdictional." *National Labor Relations Board v. New Vista Nursing and Rehabilitation*, 719 F.3d 203, 212 (third Cir. 2014))

Like the National Labor Relations Board, the three-member-composition requirement under the Plan should be interpreted a threshold limitation on the

scope of the power delegated to the Finance Committee. §4.08 (c) the SFA, "The Finance Committee shall act by majority vote", would not modify the three-member-composition requirement of §4.08 (a) the SFA, "The Finance Committee shall be composed of three members consisting of the individuals holding the following positions: the Special Master, a single Appeals Judge, and the Claims Administrator."

The District Court ruled that the Court has now appointed the Special Master and no member of the Finance Committee has raised any objection to the instant recommendation and therefore any argument that the Finance Committee was not acting in full capacity was moot.

The difference of the Finance Committee and the National Labor Relations Board is whether the Finance Committee is not a statutory entity. The Finance Committee was set up by the agreement of creditors and debtor and debtor's representatives in bankruptcy setting. In comparison with private sector employees under the National Labor Relations Board, creditors under the Finance Committee should be considered in a bigger weight. Therefore, the three-member-composition requirement should not be moot by a later action of the Court that appointed a new Special Master. The Finance Committee's Recommendation was flawed so that the District Court's ruling should be overturned.

2. Finance Committee's was made on the premise of virtual guarantee but

Independent Assessor's report was not reliable

The Standard of review for this argument is an abuse of discretion.

The conclusion of the Independent Assessor that there would be a $172,595,097 surplus of funds even after making First and Second Priority Payments and paying administrative expenditures through 2024 is unreliable.

The conclusion was made from claims data of the Settlement Facility. The Finance Committee's recommendation to make second priority payments was based upon the conclusion of the Independent Assessor. What the Independent Assessor has done for report did not include full potential claims pending the Settlement Facility.

For example, the Korean Claimants were two thousand six hundred (2,600) Claimants pending the Settlement Facility. Over five hundred (500) Claimants filed Motion for Extension the Deadline for filing Claim with the District Court. (RE1586 Pg ID#:27065-27072) The Korean Claimants who filed the Motion were not counted by the Independent Assessor for its report.

The Finance Committee recommended to make second priority payments but saved the funds available for distribution of second priority payments by squeezing the Korean Claimants.

The Finance Committee with Claims Administrator overturned the approval of product identification with affirmative statement of Korean implanting physicians. The Finance Committee proposed mediation to counsel and reached a settlement agreement with Korean Claimants but walked away by saying that Dow Corning Corporation and Debtor's Representatives opposed. The Finance Committee caused Korean Claimants to spend a lot of expenses and costs during mediation process and has never reimbursed. The Finance Committee did not apply re-categorization of South Korea based upon change of GDP per capita in accordance with the Plan. In principal, the Finance Committee is responsible for re-categorization of the whole countries of the world for Class allocation (§6.05(h)(ii) the Dow Corning Settlement Program and Claims Resolution Procedures, RE1584 Pg ID:#26936-27052) but has never done it during last sixteen years. The Finance Committee only once accepted re-categorization of South Korea by counsel's filing with the District Court but applied not from the year of surpassing sixty (60) percents of GDP per capita of United States of America but from the year of requesting by counsel. The Korean Claimants lost over one million two hundred thousand (120) dollars.

These decisions of the Finance Committee generated a huge gain to the funds available for distribution of second priority payments. It is a result of the Finance Committee's saving effort of the funds available for distribution of second priority payments.

Furthermore, the Finance Committee did not respect the District Court's Order

of January 29, 2019 that the Settlement Facility was directed to promptly proceed first premium payments. The Settlement Facility denied first premium payment of Korean Claimants on the basis of Closing Order 2. However, Closing Order 2 was issued on March 19, 2019, two months later than the District Court's Order. The Finance Committee authorized the Settlement Facility to apply Closing Order 2 retroactively to deny premium payments to the Korean Claimants.

The Finance Committee hiding behind the Settlement Facility was to protect the interests of Class 5 Claimants in nature. The Finance Committee with Claims Administrator created numerous administrative obstacles against the Korean filings in the Settlement Facility.

History of actions of the Finance Committee with respect to the Korean Claimants has shown that the Finance Committee was biased and the Finance Committee's recommendation to make second priority payments was hasty.

The founding that the Finance Committee relies on for recommendation is not reliable. The conclusion of the Independent Assessor that there would be a $172,595,097 surplus of funds even after making First and Second Priority Payments and paying administrative expenditures through 2024 is not reliable.

The District Court's ruling that there was a virtual guarantee for paying all claims and expenditures even if second priority payments were made right away

should be overturned because of unsubstantiated assumption based upon the Independent Assessor's report and the Finance Committee's biased recommendation.

3. Korean Claimants has a standing to object Finance Committee's recommendation to make second priority payments

The Standard of review for this argument is de novo review.

The Finance Committee filed Recommendation and Motion for authorization to make second priority payments and served on the Claimants' Advisory Committee. The Finance Committee did not serve on the Korean Claimants. To obtain authorization to distribute second priority payments, the Finance Committee shall serve on the Claimants' Advisory Committee, the Debtor's Representatives, the Shareholders, and all Non-Settling Personal Injury Claimants with pending claims and such parties shall have the opportunity to be heard with the respect to the motion. §7.03 (a) the SFA

The Claimants' Advisory Committee consists of three members to fulfill the functions under the SFA and Litigation Facility Agreement, Funding Payment Agreement, and other Plan Documents. (§4.09 (b) the SFA) Three members are two American lawyers and one Class 5 Claimant unknown whether she is still alive. (RE1584 Pg ID:#26697-26698)

The Claimants' Advisory Committee has extensive powers. The powers of Claimants' Advisory Committee include matters of foreign Claimants' claim even if there is no member with an understanding as to foreign claims.

The Claimants' Advisory Committee acted as an agent in fact for the Korean Claimants although not specifically empowered in writing.

The Claimants' Advisory Committee's agency relationship with the Korean Claimants is supported by the facts that the decisions of the Claimants' Advisory Committee have influenced the Claimants extensively. The Claimants' Advisory Committee has sent out several booklets explaining what benefits the Claimants would receive under the Settlement Program if the Korean Claimants participated in settlement program and how the Claimants could submit the documents for benefit to the Settlement Facility and opened a homepage and SNS and has distributed periodical leaflets.

The Finance Committee's recommendation was not shared with counsel of the Korean Claimants. Counsel asked the Claimants' Advisory Committee to oppose the Finance Committee's Motion. (RE1584 Pg ID:#26808) But the Claimants' Advisory Committee rather supported it.

The Claimants' Advisory Committee breached a fiduciary duty. The District Court relied on Claimants' Advisory Committee's support heavily in ruling in favor of the Finance Committee and therefore the outcome of breach of

fiduciary duty was extremely harmful to the Korean Claimants.

The District Court did not rule whether the Claimants' Advisory Committee was an agent in fact for Korean Claimants. The District Court should have decided it. The District Court rather ruled that the Korean Claimants did not choose to litigate their claims under the Litigation Facility but intend to settle their claims under the SFA and some of their grievances have been resolved by the District Court and the Sixth Circuit of Appeals. Whether the Korean Claimants intended to settle under the SFA has nothing to do with whether the Claimants' Advisory Committee should act as a fiduciary. In addition, any grievances of the Korean Claimants have never been resolved favorably by the District Court. Counsel lost all of Motions filed for the Korean Claimants with the District Court.

The Korean Claimants were not precluded from objecting the Finance Committee's recommendation and Motion to make second priority payments as creditors under Bankruptcy laws. ("W(w)e hold that a creditor or creditors' committee may have derivative standing to initiate an avoidance action where: 1) a demand has been made upon the statutorily authorized party to take action; 2) the demand is declined; 3) a colorable claim that would benefit the estate if successful exists, based on a cost-benefit analysis performed by the court, and 4) the in action is an abuse of discretion ("unjustified") in light of the debtor-in-possession's duties in a Chapter 11 case. A creditor has met its burden to show standing to file an avoidance action if it has fulfilled the first three requirements

and the trustee or debtor-in-possession declined to take action without stating a reason. The burden then shifts to the debtor-in-possession to establish, by a preponderance of the evidence, that its reason for not acting is justified." *In re The Gibson Group, Inc*. 66 3d 1436, 1440 (Sixth Cir. 1995))

The Korean Claimants had a colorable claim that would benefit the estate if successful exists. The Finance Committee's Motion to make the second priority payments inevitably lessens the possibility of receiving benefits by the Korean Claims pending the Settlement Facility. Therefore, the Korean Claimants had a standing. The ruling of the District Court should be reconsidered by this Court.

B. Korean Claimants' Motions

1. Closing Order 2 is void

The Standard of review for this argument is de novo review.

The District Court ruled that on March 29, 2019, the Court entered Closing Order 2 which includes protocols designed and intended to authorize the Settlement Facility to take actions to ensure that Settlement Fund payments are distributed to the Claimants as required by the Plan, Closing Order 2 prohibits the Settlement Facility from issuing payments to the Claimants who cannot be located, the Settlement Facility cannot issue payments to or for the Claimants unless the Settlement Facility has a confirmed current address for such Claimant,

a confirmed current address means an address that has been verified as a mailing address where the Claimant is receiving mail so that the Settlement Facility is able to verify that the Claimant will actually receive the mailed check, this requirement applies both to Claimants who are unrepresented and Claimants who are represented and whose payment check might be mailed to the Claimant's attorney, the Korean Claimants did not appeal this Order to the Sixth Circuit of Appeals, the Settlement Facility is bound by this Order, the Korean Claimants have no authority to appeal any determination by Claims Administrator regarding payment if Claims Administrator and/or the Settlement Facility is not authorized to issue any payment if the requirement in Closing Order 2 is not followed, the Korean Claimants' Motion for Premium Payments is denied as to those Claimants whose address cannot be verified as required by Closing Order 2, the Korean Claimants' Motion for Order Vacating Decision of Settlement Facility regarding Address Update/Confirmation is denied because the Settlement Facility has no authority to issue payments if the requirements of Closing Order 2 is not met, and the Korean Claimants have no authority to appeal any decision made by the Settlement Facility regarding address update/confirmation requirements.

Pursuant to the ruling of the District Court, whether Korean Claimants' Motions are denied hinges on Closing Order 2 as a whole.

In this regard, Apellees contended at the District Court that the Korean Claimants easily could have objected to Closing Order 2 in 2019 had they

believed that there was a justifiable basis to oppose the Order. Appellees alleged that to object to the Order nearly two years after its entry is untenable.

The Korean Claimants were not notified or heard before the Order was entered. Notice of filing a motion must be preceded before hearing. Hearing was not held because there was no notice. The lack of notice and hearing before the Order was entered is a grave defect of Closing Order 2.

Fed. R. Civ. P. section 60(b) prescribes several grounds for relief from a final order. The grounds, (1)(2)(3) of the section, are applicable to section 60(c) which limits a motion made no more than a year after the entry of the order. However, the ground of section 60(b)(4), "The order is void", shall not be applied by the one year limitation. Then, the issue is rather whether the Korean Claimants' request for relief from Closing Order 2 is reasonable under Fed. R. Civ. P. section 60(c)(1), "(1) Timing. A motion under Rule 60(b) must be made within a reasonable time." Appellees contend that a motion for relief raised nearly two years after entry of the Order cannot be considered a "reasonable" period of time. However, what constitutes a reasonable time depends on the facts of each case. (*Ghaleb v. American Steamship Company*, No. 18-1742770, Fed. Appx. 249 at 2 (6th Cir. May 9, 2019))

The Korean Claimants did not receive a notice of hearing for Closing Order 2. A hearing was not held because of the lack of notice. The Order is void. Therefore, The Korean Claimants' Motion for Vacating Decision of Settlement

Facility regarding Address Update/Confirmation is timely to the extent that the Korean Claimants seek to vacate Closing Order 2. The District Court's ruling that the Korean Claimants did not appeal this Order to the Sixth Circuit of Appeals and the Settlement Facility is bound by this Order should be overturned.

2. Closing Order 2 was to approve wrongdoings of the Settlement Facility

The Standard of review for this argument is an abuse of discretion.

Even if Closing Order 2 is not void and therefore applicable to the Korean claimants, Closing Order 2 was to approve wrongdoings of the Settlement Facility so that it should be ineffective to the extent that it was applied to deny premium payments to the Korean Claimants.

Section C of Closing Order, that claimants and attorneys must notify the Settlement Facility of changes in address and the Settlement Facility may not issue without a confirmed current address, is nearly identical to the paragraph in letters of the Settlement Facility, received by counsel (RE1599 Pg ID:#26277-26282) from May 2015. In other words, the Settlement Facility has begun sending letters titled as "Missing or Invalid Address" massively to counsel and the Korean Claimants from 2015. The letters of Missing or Invalid Address included a phrase; After the Address Update/Correcting Form is received and verified, the Settlement Facility will reactivate the processing and review of

your claim.

It means that the Settlement Facility not only has set up the requirement of a valid, confirmed current address inside the Settlement Facility (because it said, "reactivate") but has also applied the requirement to the Korean Claimants from May 2015 secretly. The Settlement Facility has applied the requirement of a valid, confirmed current address to the Korean Claimants three or four years earlier than Closing Order 2. Closing Order 2 is retroactive authorization of the Settlement Facility's practice. It is a principle that laws shall not be applied retroactively.

The District Court ruled that Closing Order 2 includes protocols designed and intended to authorize the Settlement Facility to take actions to ensure that Settlement Fund payments are distributed to the Claimants as required by the Plan, and Closing Order 2 prohibits the Settlement Facility from issuing payments to the Claimants who cannot be located, and the Settlement Facility cannot issue payments to or for the Claimants unless the Settlement Facility has a confirmed current address for such Claimant, and a confirmed current address means an address that has been verified as a mailing address where the Claimant is receiving mail so that the Settlement Facility is able to verify that the Claimant will actually receive the mailed check.

Counsel has always wondered if there was any legal basis for the Settlement Facility to oblige counsel to submit a valid, confirmed current address of the

Claimants.

Closing Order 2 is a product of an overdue attempt to justify the practice of the Settlement Facility unauthorized under the Plan.

Appellees produced at the District Court the Claimant Information Guide of 2004 as the evidence to prove the address verification requirement to the Korean Claimants. (RE1599, Pg ID:#28323-28531)

However, the Claimant Information Guide cannot be a basis to impose an obligation to maintain a valid, confirmed current address on the Korean Claimants. It is merely a guide just as found in a shopping mall. In addition, the relevant Clauses (§9 Q9-14, 9-15, §10 Q10-8, 10-9) of the Claimant Information Guide that Appellees attempted to prove the address verification requirement to the Korean Claimants have nothing to do with the requirement of a valid, confirmed current address for the payments when a Claimant became eligible after claims review by the Settlement Facility. Specifically, (a) Q9-14 is about the deadlines to apply for settlement benefits so that it has nothing to do with the payment after the Claimants became eligible for payment ("*If I move and forget to notify the Settlement Facility in writing, my Notification of Status letter might take days or weeks to be forwarded to my new address. Will any of the time periods and deadlines be extended because of this?*"), (b) Q9-15 is about the Participation Form to elect to withdraw or litigate so that it has nothing to do with the payment after the Claimants became eligible for payment

("*I moved and did not notify the Bankruptcy Court or Settlement Facility of my new address and I missed the deadline to file the Participation Form to elect to withdraw or litigate. Can I file it now?*"), (c) Q10-8 is about proof of claim so that it has nothing to do with the payment after the Claimants became eligible for payment ("*I moved since I sent my proof of claim to the Bankruptcy Court. Can I e-mail my new address to you or give it to you over the telephone?*"), and (d) Q10-9 is about proof of claim so that it has nothing to do with the payment after the Claimants became eligible for payment ("*I sent my Proof of Claim form to the Bankruptcy Court in 1997. I have since married and changed my name. How can I update my file with my new married name?*").

In other words, the Settlement Facility has used the above Clauses of the Claimant Information Guide to deny payments to the eligible Korean Claimants from 2015.

The District Court's ruling that Closing Order 2 prohibits the Settlement Facility from issuing first premium payments to the Korean Claimants should be overturned because the Settlement Facility misapplied the Claimants Information Guide and Closing Order 2 was to approve the wrongdoings of the Settlement Facility as to the requirement of valid, confirmed current address to the Korean Claimants.

The Settlement Facility has been biased against the Korean Claimants. The Settlement Facility was quick to pay to the Class 5 Claimants. Counsel knew it

since a dozen of the Class 5 Claimants, through counsel, filed their claims with medical records identical to the Class 6.2 Claimants. The Class 5 Claimants were accepted easily and furthermore have never been asked by the Settlement Facility to submit a valid, confirmed current address before payment. But the Korean Claimants, whether Class 6.2 Claimants or Class 6.1 Claimants, were different. The Settlement Facility ordered counsel to submit a valid, confirmed current address to issue premium payment's checks for the 924 Claimants who were eligible. (RE1569 Pg ID:#26408-26455)

3. Closing Order 2 has no founding under the Plan and violates §1129(b)

The Standard of review for this argument is de novo review.

The District Court ruled that Closing Order 2 includes protocols designed and intended to authorize the Settlement Facility to take actions to ensure that Settlement Fund payments are distributed to the Claimants as required by the Plan and Closing Order 2 prohibits the Settlement Facility from issuing payments to the Claimants who cannot be located.

Appellees contended at the District Court that the Motion for Vacating asks this Court to eliminate this important procedure leaving the Court and the Settlement Facility with no way to verify that claimants have received the funds.

The procedures of claims processing of the Settlement Facility, however, shall

be in accordance with the Plan. Not only shall the Settlement Facility uphold the provisions of the Plan documents, but the Settlement Facility shall not invent a procedure to affect the rights of the Claimants or decrease the possibility of claim payment. The requirement of a valid, confirmed current address was adopted by the Settlement Facility to save money of the funds[2] on the pretense that the funds shall be received by the eligible Claimants who were located by the Settlement Facility.

"Under the Bankruptcy Code, a plan may not be confirmed by a court over the objection of a class of creditors unless, among other things, the following requirements are met: (1) under the plan, the class would receive an amount that is equal to or greater to or greater than the amount they would receive if the debtor's assets were liquidated *see* 11 U.S.C. §1129(a)(7); and (2) the plan is found to be fair and equitable *see* 11 U.S.C. §1129(b)(1). By incorporating the fair and equitable standard in §1129(b) of the Code, Congress codified the "absolute priority rule," which provides that absent full satisfaction of a creditor's allowed claims, no member of a class junior in priority to that creditor may receive anything at all on account of their claim or equity interest. *Case v. L.A. Lumber Prods. Co*. 308 U.S.106, 115, 60 S.Ct.184 L.Ed.110(1939)" *In re. Settlement Facility Dow Corning Trust*, 656 F.3d. 668 at 3 (Sixth Cir. 2006)

This Court ruled that the District Court shall not violate §1129(b)'s fair and

[2] The Korean Claim's value was estimated twelve(12) million dollars before the Bankruptcy Court in 1999 but the Korean Claimants have been paid about seven(7) million dollars so far.

equitable requirement in interpreting the Plan. ("Although the bankruptcy court did not abuse its discretion by interpreting the plan as requiring the payment of pendency interest at a non-default, fixed rate, the bankruptcy court still may have done so if it construed the plan such a way as to cause it to violate §1129(b)'s fair and equitable requirement." *Id*. at 6)

The requirement of a valid, confirmed current address affected substantive rights of the Korean Claimants because it actually prohibited the eligible Claimants from receiving payments including premium payments. There are many eligible Korean Claimants not paid although they were found "acceptable" after claims review. The requirement of a valid, confirmed current address is not merely a procedure of the Payments.

To the contrary, the Class 5 Claimants were not required to file a valid, confirmed current address for first premium payments which were finished.

The Settlement Facility adopted such procedures as a valid, confirmed current address to deny premium payments of the Korean Claimants. Closing Order 2 authorized the practice of the Settlement and even expanded the requirement of a valid, confirmed current address to all payments to the Korean Claimants.

The Settlement Facility attempted to stop processing of the Korean Claims without a valid, confirmed current address without a foundation under the Plan.

Therefore, Closing Order 2 should be overturned to the extent that it requires the Korean Claimants to submit a valid, confirmed current address to the Settlement Facility.

4. Premise of Sentence of Paragraph 11 of Closing Order 2 was not met

The Standard of review for this argument is an abuse of discretion.

The sentence of Paragraph 11 of Closing Order 2, "T[t]he SF-DCT may seek additional confirmation as appropriate, for example, in instances where prior mailings were returned as undeliverable or where prior address confirmations were not accurate", does not support a ***new*** condition imposed by the Settlement Facility that the Korean Claimants must directly confirms that they currently reside at the address that counsel has provided. The Settlement Facility has applied the requirement of a valid, confirmed current address to Korean Claimants through the letter of March 3, 2020 and directed that the Korean Claimants should directly confirm that they currently reside at the address that counsel has provided. ("Payments will be sent to your office for distribution to the Claimant after the Claimant directly confirms that they currently reside at the address you have provided." RE1569, Pg ID:#26408)

First of all, the sentence of Paragraph 11 of Closing Order 2 is so vague and abstract that it should not be interpreted so that it empowers the Settlement Facility to deny address updates by counsel and to only accept address updates

directly confirmed by the Claimants. The phrase in the sentence, "may seek additional confirmation as appropriate", does not specify that the Settlement Facility can impose such condition of address updates on the Korean Claimants and counsel.

Second, even assuming that the sentence of Paragraph 11 includes such application, the premise to apply the sentence to the Korean Claimants, that prior mailings were returned as undeliverable or prior address confirmations were not accurate, must be met. However, it was not. The Claims Administrator testified in her Declaration of July 20, 2020 (RE1595, Pg ID:#28195-28201) that of the 924 letters sent to the Korean Claimants, 436 have been returned as undeliverable to date and that the Settlement Facility conducted an audit of mailings to the Korean Claimants in early 2020, and the audit revealed that of 1,382 Claimants represented by counsel who are eligible for future payments, 600 had correspondence sent to directly to the Claimants that has been returned as undeliverable, and that the audit also revealed that 39.2% of mailings to 2,476 Claimants with eligible Class 5 and 6 claims were returned as undeliverable, and that the audit also revealed that 50% of the mailings to updated addresses provided by counsel in January 2018 were returned as undeliverable.

Whether or not the numbers in the Claims Administrator's testimony are accurate, it is obvious that neither were all of the mailings of the Settlement Facility returned as undeliverable nor prior address confirmations by counsel

were inaccurate one hundred percents (100%).

The mailings returned as undeliverable must be assessed individually, not on the basis of a rate. The Settlement Facility's practice that the rate of the mailings returned as undeliverable to the Korean Claimants far exceeds the rate of undeliverable mail that the Settlement Facility has experienced with other counsel must be disclosed to counsel. The Settlement Facility must present a chart of comparison of different counsels including the origin of country. The conclusion of the Settlement Facility that the percentage of returned mail from mailings to the Korean Claimants represented by counsel is much higher than the general rate of returned mail that the Settlement facility has experienced and several mailings have resulted in a 40 to 50 percent return rate must be completely disclosed. The Settlement Facility must present a chart of comparison of the general rate and the rate of the Korean Claimants including the origin of country. The Korean Claimants did not agree to the audit and counsel was not informed of the audit of the Settlement Facility. The Korean Claimants request this Court to order the Settlement Facility to provide the audit documents of the early 2020 in full to counsel.

The decision of the Settlement Facility of March 3, 2020 that the Korean Claimants should directly confirm that they currently reside at the address that counsel have provided is arbitrary and the District Court's ruling that did not rule whether the premise of the sentence of paragraph 11 of Closing Order 2 was met by the Settlement Facility should be overturned.

5. Korean Claimants should be exempted from Closing Order 2

The Standard of review for this argument is de novo review.

The Korean Claimants have a reasonable basis for exemption from address verification requirement under Closing Order 2.

Appellees contended at the District Court that the privacy argument of the Korean Claimants is belied by their own submission.

Appellees do not understand how and why counsel has ended up submitting the Korean Claimants' address information to the Settlement Facility in 2005 and 2006. The Settlement Facility asked counsel to submit Social Security Number ("SSN") to prove that the Korean Claimants were not bogus claimants but real claimants when the claims were first filed in 2005 and 2006. Counsel replied that there was no such SSN type (000-00-0000) thing existing in Korea. The Settlement Facility asked counsel what was comparable to SSN of the United States in Korea. Counsel answered that there was Resident Registration Number ("RRN", 000000-0000000, RE1569 Pg ID:#26284). Then, the Settlement Facility asked counsel to submit RRN instead of SSN. Counsel filed RRN and attached Government-issued Resident Registry to prove RRN of the Claimants. However, the Government-issued Resident Registry happened to include the Claimants' current address and previous addresses. It is a formality

of Government-issued Resident Registry.

The Korean Claimants did not want to submit address information to the Settlement Facility when they hired counsel for filing their claim.

Furthermore, the Class 5 Claimants that counsel was representing did not submit address information to the Settlement Facility when they filed the claims in 2005 and 2006. Counsel submitted driver's license, permanent resident card or a US passport for Class 5 Claimants, which does not include address information. The Class 5 claimants were not required to submit address information to the Settlement Facility. Likewise, the Korean Claimants were not required to submit their address to the Settlement Facility when they filed their claim in 2005 and 2006.

But the Settlement Facility used the Government-issued Resident Registry to keep the Korean Claimants' address at its files. The Settlement Facility has exploited the address information in it to ask counsel to update their address from May 2015. Counsel tried to explain the Claims Administrator through meeting in the context of address information on several occasions but proposal for meeting was turned down.

The contention of Appellees that there is no cogent explanation as to why the Korean Claimants filed address information in 2005 and 2006 and then object to the request for address verification on the basis of privacy is actually a

misunderstanding of how and why the Korean Claimants have ended up providing address information to the Settlement Facility.

Counsel is not allowed to submit a valid, confirmed current address of a Claimant without permission of the Claimants under Personal Information Protection Act of Korea. Counsel is not allowed to disclose client's personal information. Address of individual is personal information under Personal Information Protection Act of Korea. In addition, no court in Korea orders counsel to update address of client or submit a valid, confirmed current address of counsel's clients.

Besides, the Korean Claimants retained counsel. Without counsel, then the Settlement Facility would have a reason or a reasonable basis for asking address information from the Claimants. However, the Korean Claimants were represented by counsel from 1994 when Global Breast Implant Settlement Program was proposed. Under these circumstances, that the Settlement Facility denies payments to the eligible Claimants and even holds claims processing itself on the basis of address update/confirmation is a violation of the rights of counsel. Attorney-client privilege should be applied. ("The federal forum is unanimously in accord with the general rule that the identity of a client is, with limited exceptions, not within protective ambit of the attorney-client privilege…Another exception to the general rule that the identity of a client is not privileged arises where disclosure of the identity would be tantamount to disclosing an otherwise protected confidential information." *In re Grand Jury*

Investigation 83-2-35, 723 F.2d 447 at 5, 8 (Sixth Cir. 1983))

Under the New York laws which apply for interpretation of the Plan, address of the Korean Claimants is an attorney-client privilege. ("An a general matter, communication between a lawyer and client, including disclosure of the client's address, is privileged because it serves the policy of frank revelation by the client to the attorney." *Elliott Associates, L.P. v. Republic of Peru*, 176.F.R.D.93 (S.D.N.Y. 1997) at 5) When the Korean Claimants hired counsel, they asked counsel not to disclose their address for filing purposes of claims to the Settlement Facility and thus keeping the asking of the Korean Claimants served frank revelation to counsel.

Appellees contended at the District Court that it seemed that counsel for Korean Claimants objected to the efforts of the Settlement Facility to obtain address verification from the Claimants as opposed to counsel.

The Korean Claimants do not want to receive a mailing of the Settlement Facility at their home address nor want to update/confirm their address. They marked on "CONFIDENTIAL" when they retained counsel. They asked counsel not to send any mailings to their home. Under these circumstances, if counsel submits their updated or current address without permission to follow the request of the Settlement Facility, counsel might be charged for a violation of Personal Information Protection Act.

Appellees contended that counsel did not have accurate and complete records of current addresses by his own admission and this conclusion was consistent with the experience of the Settlement Facility because the Settlement Facility's records showed that prior address updates provided by counsel have not proven to be accurate.

There is no provision in the laws of Korea that counsel must keep updated and current address of clients. If a client does not give her updated address to counsel or does not want her address to be updated, it is fine. Besides, there is a plenty of ways for counsel to communicate with clients. The Korean Claimants have no problem to communicate with counsel over the phone. The counsel's law office is open all the times. On the contrary of the Appellees' allegation, counsel has never admitted that he did not have accurate and complete records of current address of the Claimants to the Settlement Facility.

In addition, whether counsel provided updated address to the Settlement Facility and how many address updates provided by counsel were returned as undelivered, and, more importantly, why such differences took place should be a question as to facts. Appellees contended that the records of the Settlement Facility confirm that counsel has failed and refused to provide such information. The Settlement Facility did not provide the records to counsel. Counsel asked the Settlement Facility to provide the whole documents of the audit of the early 2020 and the list of mailings of address update/confirmation of the Settlement Facility sent to the Korean Claimants from 2015. The Settlement Facility denied.

Appellees contended that the Korean Claimants subjected themselves to the jurisdiction of the Court in filing their claims and thereby subjected themselves to the rules and requirements for receiving compensation.

First of all, the Settlement Facility modified the rules and requirement under the SFA and the Annex A to the Dow Corning Settlement Facility and fund Distribution Agreement by arbitrarily including the requirement of a valid, confirmed current address in claims processing. (11 U.S. Code section 1127, “The proponent of a plan may modify such plan at any time before confirmation but may not modify such plan so that such plan as modified fails to meet the requirements of sections 1122 and 1123 of this title”) The requirement of a valid, confirmed current address violates equal treatment. (Section 1123(a)(4), “Notwithstanding any otherwise applicable non-bankruptcy law, a plan shall provide the same treatment for each claim or interest of a particular class, unless the holder of a particular claim or interest agrees to a less favorable treatment of such particular claim or interest”)

Second, the procedures of verification of a valid, confirmed current address violate equal treatment too. Since the postal system is different country to country, the Settlement Facility must use the postal system of each country. However, the Settlement Facility adopted the US Postal Service only for verification of address of the Korean Claimants. The Settlement Facility contemplated the other additional delivery services in Claimant Information

Guide. (RE1599 Pg ID:#28321-28532)

Q 9-4 What are the acceptable methods to mail or deliver my Participation Form to the Settlement Facility?

Mail or deliver the Participation Form to the Settlement Facility using one (1) of the following three (3) delivery methods:

1. Use a delivery service (e.g., Federal Express, Airborne Express, U.P.S. etc.) and make sure that the airbill or invoice clearly lists the date of mailing as on or before [T.B.D.] if you are withdrawing your claim or on or before [T.B.D.] if you are rejecting settlement and intend to file a lawsuit against DCC Litigation Facility, Inc.: OR
2. Mail the Participation Form by United States certified or registered mail as long as the certified or registered mail is postmarked on or before [T.B.D.] if you are withdrawing your claim or on or before [T.B.D.] if you are rejecting settlement and intend to file a lawsuit against Litigation Facility Inc. Please check with the U.S. Post Office on how to send a certified or registered letter so that it has the correct postmark (for claimants who reside outside of the U.S., the Settlement Facility will rely on the postmark date used by your country's version of "certified" or "registered" mail): OR
3. If you mail the Participation Form by regular U.S. mail or by using a national mail service in the country in which you reside, then the Participation Form must be received by the Settlement Facility by 5:00 p.m. Central Time on or before [T.B.D.] if your withdrawing your claim and on or before [T.B.D.] if you are rejecting settlement and intend to file a lawsuit against DCC Litigation Facility Inc. It is important to mail you Participation Form early enough so that the Settlement Facility receives it on or before the applicable deadline. The postmark date on the envelope will **NOT** be used by the Settlement Facility if you use regular U.S. mail or a national mail service in a country other than the U.S.

Q 9-11 What are the acceptable methods to mail or deliver my Claim Forms to the Settlement Facility?

Mail or deliver the Claim Forms to the Settlement Facility using one (1) of the following three (3) delivery methods:

1. Use a delivery service (e.g., Federal Express, Airborne Express, U.P.S. etc.) and make sure that the airbill or invoice clearly lists the date of mailing as on or before the deadline: OR
2. Mail the Claim Forms by U.S. certified or registered mail as long as the certified or registered mail is postmarked on or before the deadline. Please check with the U.S. Post Office on how to send a certified or registered letter so that it has the correct postmark (for claimants who reside outside of the U.S., the Settlement Facility will rely on the postmark date used by your country's version of "certified" or "registered" mail): OR
3. If you mail the Claim Forms by regular U.S. mail or by using a national mail service in the country in which you reside, then the Claim Forms must be received by the Settlement Facility by 5:00 p.m. Central Time on or before the deadline. It is important to mail you Claim Forms early enough so that the Settlement Facility receives them on or before the deadline for the settlement benefit. The postmark date on the envelope will **NOT** be used by the Settlement Facility if you use regular U.S. mail or a national mail service in a country other than the U.S.

The Settlement Facility contemplated other delivery services such as Federal Express, Airborne Express. The Settlement Facility also contemplated a national mail service in the country other than the U.S., in which a claimant resides.

However, the Settlement Facility adopted the US Postal Service only for verification of address of the Korean Claimants. The practice of the Settlement Facility contradicted its own admission in the Claimant Information Guide.

The US Postal Service for verification of address for payments is not an equal treatment to the Korean Claimants.

In fact, the US Postal Service is not accurate in delivering mailings to the

Korean Claimants. Even worse, it is clear that the US Postal Service delivered to counsel's law office several (three to seven) months late under the circumstances that the deadlines to submit a document for cure of a deficiency of claims were critical to protect the rights of the Claimants.

Therefore, the Korean Claimants should be exempted from Closing Order 2 to the extent that the Settlement Facility requires counsel to submit a valid, confirmed current address of the Korean Claimants and the District Court's ruling effectuating Appellees' contentions should be overturned.

6. Settlement Facility eliminated the requirement of a valid, confirmed current address on its own

The Standard of review for this argument is de novo review.

The letter of the Settlement Facility of March 13, 2019 eliminated the requirement of a valid, confirmed current address requirement under Closing Order 2 on its own.

Appellees contended at the District Court that the obligation for claimants to provide and for the Settlement Facility to seek address updates was ongoing and did not expire at a filing date and the Korean Claimants were mistaken to the extent that the June 3, 2019 deadline fixed a final date for address updates.

This contention is contradictory on its own.

On March 13, 2019, the Settlement Facility sent a letter via email and regular mail to counsel addressing that certain Claims would not be issued any payments for which they might be eligible, counsel must provide addresses in the format as recommended by the US Postal Service, all Claimants eligible for partial premium payment must confirm their current addresses, The partial premium payments could be issued only after the Settlement Facility received an address in the proper format described, the Korean Claimants with deficiencies as described would be adversely affected, and *all deficiencies must be resolved by the June 3, 2019 deadline or the Claims will be denied* (RE1569 Pg ID:#24833-24834), as written in the following;

> The SF-DCT previously sent you letters requesting an updated address for claimants with an eligible payment, whose mail was returned to the SF-DCT by the Postal Service (a sample copy of the letter previously sent is attached). Without an updated address (***by June 3, 2019***) these claims will not be issued any payments for which they may be eligible. ,…, Although you have received the Notice of Final Filing Deadline June 3, 2019, this letter is specific notice to you that your claimants with deficiencies as described above will be adversely affected if you fail to take action as required by the Notice and Closing Orders. All deficiencies must be resolved by the June 3, 2019 deadline or the claims will be denied.

The Settlement Facility fixed the June 3, 2019 deadline as the final date for address updates of the Korean Claimants undoubtedly.

Nevertheless, after having received address update form of six hundred seventy six (676) Claimants from counsel on June 3, 2019, the Settlement

Facility put the address update forms into audit and then Appellees mockingly contended that Korean Claimants had multiple options to provide their current address, for example, for counsel to contact the claimants through cell phones and advise them to provide updated addresses to the Settlement Facility via email, telephone or written correspondence.

If the Settlement Facility keeps denying the payments by forcing counsel to submit personal information of client, counsel is put at risk. The Personal Information Protection Act of Korea does not allow counsel to provide the client's address to a third party without permission. Counsel happened to submit the Korean Claimants' address to the Settlement Facility when counsel filed their claims in 2005 and 2006. Counsel is not allowed to update their address which has already been submitted to the Settlement Facility without their permission.

Appellees must keep the Settlement Facility's decision that address updates must be resolved by June 3, 2019.

Appellees contended at the District Court that there was no excuse for a multi-year dispute over the efficiency of mail service in the United States and Korea. Appellees admitted that there has been the dispute over the efficiency of mail service between the United States and Korea for multi-years.

Actually, there were many mailings of the Settlement Facility, which have

never arrived in Korea. The records about how many mailings of the Settlement Facility were returned as undeliverable are kept only at the Settlement Facility (which was not shared with counsel) and nobody know why those mailings were returned as undeliverable. There were several Claimants who called counsel that they put their mailings of the United States in the box of return mail without opening envelope. There were many Claimants who complained counsel why counsel disclosed their address to the United States. The Settlement Facility assumed that if mailings to the Korean Claimant were returned as undeliverable, the address of the Claimants was not valid and should be updated within ninety (90) days[3]. This assumption is nonsense and merely a jump to conclusion.

Furthermore, there were many cases that the Settlement Facility mailed to wrong address where the Claimants did not live. More importantly, the mailing system of US Postal Service for delivery in Korea is not reliable. It took at least three to seven months for the Settlement Facility's mailings to arrive at counsel's law office which is extremely open to the public and, in many occasions, the mailings of the Settlement Facility have never arrived to

[3] How address of the Korean Claimants can be updated within ninety (90) days with the US Postal Service whose mailings including a request of the Settlement Facility for address update/confirmation arrive in Korea three or four months late? However, the Settlement Facility wrote back to counsel, "We do not agree that any mail delivery issue has deprived you of the opportunity to meet cure deadlines for your clients." (RE1569 Pg ID:#26500-26502)

counsel's law office although the Claimants notified counsel that they had received them. Counsel asked the Settlement Facility to use the Federal Express or DHL for mailings to counsel but the Settlement Facility turned it down.

The Settlement Facility presented the Claimant Information Guide as the founding to ask counsel and the Korean Claimants to submit a valid, confirmed current address. The Claimant Information Guide contemplated the other mail services besides the US Postal Service. The Settlement Facility declined the counsel's request for using the Federal Express or DHL by saying that it would unduly jeopardize the corpus of the Trust and the Settlement Facility did not manipulate any mailing systems in its correspondence with counsel. (RE1569 Pg ID:#26500-16502) To follow the Claimant Information Guide shall not be to jeopardize the corpus of the Trust. Whether the Settlement Facility manipulated any mailing systems in its correspondence with counsel is self-proving in that the Settlement Facility did not use other mailing services except the US Postal Service to obtain address verification of the Korean Claimants.

VII. Conclusion

For the foregoing reasons, the Korean Claimants request this Court to Overturn the District Court's Order as to the Finance Committee's Motion for Authorization to Make Second Priority Payments, the Korean Claimant's Motion for Premium Payments and the Korean Claimants' Motion for Order Vacating Decision of the Settlement Facility regarding Address

Update/Confirmation and Grant the Motions of the Korean Claimants.

Date: August 31, 2021

Respectfully submitted,

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For the Korean Claimants

APPENDIX

Recommendation for Authorization to Make Second Priority Payments Page ID:#26525-26600

RE.1584 Response of Korean Claimants to Finance Committee's Recommendation to Make Second Priority Payments Page ID:#26643-27062

RE.1586 Motion for Extension of Deadline for Filing Claim Page ID:#27065-27348

RE.1587 Reply of Claimants' Advisory Committee to Response of Dow Silicones Corporation and the Debtor's Representatives to the Revised Finance Committee's Recommendation and Motion for Authorization to Make Second Priority Payments Page ID:#27349-27358

RE.1588 Finance Committee's Reply in Support of the Recommendation and Motion for Authorization to Make Second Priority Payments Page ID:#27364-27371

RE.1592 Response of Dow Silicones Corporation, the Debtor's Representatives, and the Claimants' Advisory Committee to the Motion for Extension of Deadline for Filing Claim Page ID:#27382-27804

RE.1593 Finance Committee's Joinder in Response of Dow Silicones Corporation, the Debtor's Representatives, and the Claimants' Advisory Committee to the Motion for Extension of Deadline for Filing Claim Page ID:#27806-27807

RE.1594 Korean Claimants' Reply to Response of Dow Corning

	Corporation, the Debtor's Representatives, the Claimants' Advisory Committee and the Finance Committee to the Motion for Extension of Deadline for Filing ClaimPage ID:#27808-27838
RE.1595	Response of Dow Silicones Corporation, the Debtor's Representatives and Claimants' Advisory Committee to the Motion for Vacating Decision of Settlement Facility regarding Address Update/Confirmation Page ID:#27839-28217
RE.1597	Transcript Page ID:#28220-28283
RE.1598	Closing Order 3 Page ID:#28284-28298
RE.1599	Korean Claimants' Reply to Response of Dow Silicones Corporation, the Debtor's Representatives and Claimants' Advisory Committee and the Finance Committee to the Motion for Vacating Decision of Settlement Facility regarding Address Update/Confirmation Page ID:#28299-28593
RE.1607	Memorandum Opinion and Order regarding the Finance Committee's Motion for Authorization to Make Second Priority Payments, the Korean Claimants' Motion for Premium Payments and the Korean Claimants' Motion for Vacating Decision of the Settlement Facility regarding Address Update/Confirmation Page ID:#28602-28632

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2021, I have electronically filed the above document with the Clerk of Court by ECF system that will notify to all relevant parties in the record.

Date: August 31, 2021 Signed by Yeon-Ho Kim