KARIUNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

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In re:	8	Case No. 00-CV-00005
	§	(Settlement Facility Matters)
SETTLEMENT FACILITY DOW	§	
CORNING TRUST	§	
	§	Hon. Denise Page Hood
	§	

RESPONSE OF DOW SILICONES CORPORATION, THE DEBTOR'S REPRESENTATIVES, THE CLAIMANTS' ADVISORY COMMITTEE AND THE FINANCE COMMITTEE TO THE KOREAN CLAIMANTS' MOTION FOR EXPEDITED RELIEF

Dow Silicones Corporation ("Dow Silicones"),¹ the Debtor's Representatives

(the "DRs"), the Claimants' Advisory Committee ("CAC"), and the Finance

Committee ("FC") (collectively, "Respondents") respectfully submit this Response

to Korean Claimants' Motion for Expedited Relief, ECF No. 1757.

In consideration of the filings regarding this issue²:

 The Korean Claimants filed a Motion for Order to Correct the Disposition of the SF-DCT ("Motion to Correct") on December 15, 2023, ECF No. 1752.

¹ As Dow Silicones Corporation previously advised the Court, Dow Corning Corporation changed its name to Dow Silicones Corporation on February 1, 2018.

² Respondents will not repeat at length the arguments it made in its previous pleadings but adopts them herein in response to the Motion for Expedited Relief.

- Respondents filed a Response to the Motion to Correct on December 29, 2023, ECF No. 1754.
- The Korean Claimants filed a Reply to Response Regarding the Motion for Order to Correct the Disposition of the SF-DCT on January 2, 2024, ECF No. 1755.
- Respondents filed a Motion for Leave to File a Sur-Reply in Further Response to the Motion to Correct ("Motion to File Sur-Reply") on January 12, 2024, ECF No. 1756.
- The Korean Claimants filed the Motion for Expedited Relief on January 15, 2024, ECF No. 1757.
- The Court granted the Motion to File Sur-Reply on January 26, 2024, ECF No. 1761.

The Respondents do not object to expedited consideration and procedure for disposition, including oral argument, of the Motion to Correct and related filings and, if the Court desires, are prepared on an expedited basis to proceed with a hearing to explain why the Motion to Correct should be denied. Dated: January 29, 2024

/s/ Karima Maloney

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<u>/s/ Ernest H. Hornsby</u> Ernest H. Hornsby FARMER PRICE LLP 100 Adris Place Dothan, AL 36303 Telephone: (334) 793-2424 Ernie@farmerprice.com

Claimants' Advisory Committee

Respectfully submitted,

<u>/s/ Deborah E. Greenspan</u>

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<u>/s/ Dianna L. Pendleton-Dominguez</u> Dianna L. Pendleton-Dominguez LAW OFFICE OF DIANNA PENDLETON 401 N. Main Street St. Marys, OH 45885 Telephone: (419) 394-0717 DPend440@aol.com

Claimants' Advisory Committee

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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

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In re:

SETTLEMENT FACILITY DOW CORNING TRUST

Case No. 00-CV-00005

Hon. Denise Page Hood

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2024, I electronically filed the foregoing document with the Clerk of the Court using the ECF System which will send notification of such filing to all registered counsel in this case.

Dated: January 29, 2024

/s/ Deborah E. Greenspan

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