

EXHIBIT 2

Affidavit of Sybil Niden Goldrich

AFFIDAVIT OF SYBIL NIDEN GOLDRICH

My name is Sybil Niden Goldrich. The following statements are true and accurate to the best of my recollection.

1. I am one of the co-founders of Command Trust Network, a non-profit breast implant information clearinghouse established in 1988. I have been active as a consumer advocate on behalf of breast implant patients since that time. I am also a member of the Claimants' Advisory Committee in the Dow Coming bankruptcy.
2. Since 1988, as part of my work as co-founder of Command Trust Network, I have helped women find physicians who would treat them and who were near enough to their homes so that travel would not be difficult or expensive. To that end, I spoke to Norman Cole, M.D., president of the American College of Plastic Surgeons and asked for his organization to give me a list of physicians who would take out implants. He agreed to provide the list but no such list ever was offered despite my asking repeatedly.
3. I attended a meeting of the American College of Surgeons so that I could talk to plastic surgeons about explantation. At that meeting I was invited to breakfast with the incoming president of the American College of Plastic Surgery (Dr. Zook). I told him of the women's difficulty in finding physicians and he agreed to work on establishing a physician committee to find doctors to remove implants. Despite his promises to me, nothing happened.
4. I met with William Shaw, M.D., Chairman of the Department of Plastic and Reconstructive Surgery at UCLA and he suggested one or two people to do explant surgery. At the time, there was no EAP but those doctors still remove implants.
5. As one of the three negotiators of the Plan of Reorganization, I was particularly interested in establishing an Explant Assistance Program and was pleased that the idea of the program was accepted by both sides.
6. When Wendy Trachte-Huber was the Claims Administrator I asked when the Explant Assistance Program would be operational. It was many months after the Effective Date any Explant Assistance documents were sent to claimants and then only because the Claimants' Advisory Committee kept questioning Trachte-Huber about this important issue. This put claimants at a terrible disadvantage given the two-year deadline for submitting a rupture claim.

7. For the first year after the Effective Date, the Explant Assistance Program was virtually non-existent. I participated in many calls in which I and the other CAC members expressed our concern that this program was not operational and was seriously and, I believe, fatally flawed.

8. During the past two years since the Effective Date, I called every plastic surgeon I knew and asked for their help in this program. Most of them declined to be put on a list because they did not trust that the funds (which were already lower than their usual rate) would be forthcoming quickly. They were used to being paid for their services up front or have some sort of guarantee in place assuring them that their fees and expenses would be paid. Other excuses for not taking patients in this program were that they didn't want to be part of a "law suit" and concern that they would be sued or would be drawn into the litigation.

9. I called support group leaders around the U.S. to ask about the names of doctors in their communities who were removing breast implants.

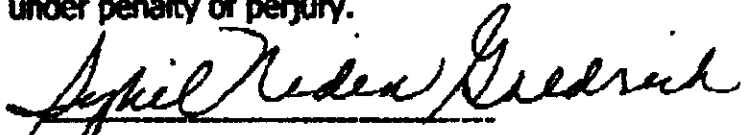
10. The current costs for removing implants, depending on what area of the country you are in, range from \$8,000 to in excess of \$15,000 (use of surgical center operating room, anesthesia, surgery, pathology and follow-up, plus pre-surgical diagnostic testing such as MRI and special breast implant mammography). The \$5,000 Explant Payment is typically not sufficient to pay for the total costs of the surgery. I have been informed by claimants that some doctors have asked them to make up the difference in costs.

11. Over the past two years, I have spent many hours on the phone with claimants from all over the U.S. helping them to find doctors for explantation through the Explant Assistance Program. Many reported back that they were not able to be explanted because they could not find any doctor willing to participate.

12. When David Austern became the successor Claims Administrator in June 2005, the status of the Explant Assistance Program was high on my list of priorities, and I communicated this to him in many conversations and e-mails. In late 2005, I finally noticed some improvements in how the SF-DCT managed the Explant Assistance Program internally. I believe these improvements, while needed and appreciated by me, were too late in coming to give claimants any real relief. It often takes months to schedule an appointment with a plastic surgeon, to conduct pre-surgical tests to determine if the implant is ruptured (which often is needed to convince insurers that the surgery is medically necessary), to schedule surgery around both the claimant's and surgeon's schedules (which necessitates time off of work for claimants), and most importantly, to handle the exchange of paperwork between the doctor and the SF-DCT for pre-authorization of payment. It also then takes approximately 4-6

weeks or longer after the surgery to obtain the medical records, including the pathology report, for a follow-up appointment, and to obtain the supplemental statement from the doctor or other expert confirming the rupture. By the time the improvements were made internally at the SF-DCT in how it managed the Explant Assistance Program, there simply was not enough time for claimants to take advantage of it and meet the June 1, 2006 deadline for rupture.

I make these statements voluntarily and under penalty of perjury.

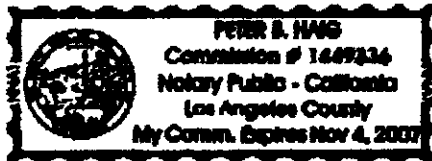



Sybil Niden Goldrich



Date

Before me appeared Sybil Niden Goldrich this 28th day of June, 2006 and signed the above affidavit having been sworn under oath. I attest that this is her signature.





Notary Public

EXHIBIT 4

**Declaration of Melissa Ferarri,
Esq.**

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

IN RE:	§	CASE No. 95-202051
	§	Case No. 00-CV-00005-DT
DOW CORNING CORPORATION	§	(Settlement Facility Matters)
	§	Judge Denise Page Hood
DEBTOR	§	

**SWORN STATEMENT OF MELISSA R. FERRARI
(CLASS 6.1 COUNSEL)**

I, Melissa R. Ferrari, Kroeftaler Strasse 5, 61479 Glashuetten, Germany, under penalty of perjury pursuant to 28 U.S.C. 1746 hereby declare as follows:

1. In conjunction with O'Haire & Fiore Attorneys at Law, Frankfurt, Germany, I represent more than 500 Class 6.1 claimants.
2. The e-mail correspondence of the SF-DCT dated June 27, 2006, attached as Exhibit A, only confirms how difficult, to date, it has been to draw the attention of doctors to the Explant Assistance Program.
3. So far, only one (1) doctor located outside the United States has been willing to participate in the Explant Assistance Program: Dr. med. Thomas B. Winzen, formerly located in Hamm, Germany, now practicing medicine in Luxembourg.
4. Until now, the "assistance" that SFDCT has been able to offer Class 6.1 claimants interested in participating in the Explant Assistance Program has unfortunately been marginal to non-existent.
5. As Foreign Claimant Counsel to the Claimants' Advisory Committee, I have attempted to find medical support for claimants who wish to participate in the EAP. It was the undersigned, not SF-DCT, who established the initial contact with Dr. med. Winzen and encouraged him to participate in the EAP.

6. Due to the high cost of transportation in Europe¹, long distance travel for the purpose of explantation surgery is extremely difficult for many Class 6.1 claimants.
7. Many Class 6.1 claimants would like to participate in the EAP. However, due to their great difficulty in finding a doctor in their vicinity willing to participate in the EAP, many Class 6.1 claimants were unable to arrange for their explantation surgery prior to June 1, 2006.
8. Only five (5) Class 6.1 claimants have successfully completed the Explant Assistance Program prior to June 1, 2006.
9. Additional time and effort will be necessary to enable all those Class 6.1 claimants who wish to participate in the EAP to do so.
10. Therefore, an extension of the rupture filing deadline for Class 6.1 claimants who wish to participate in the EAP would only further the purpose of the EAP, would offer real "assistance" to claimants, and would, under the present circumstances, be fair and reasonable.

I hereby declare under penalty of perjury under the laws of the United States of America that the following is true and correct.

June 30, 2006



Melissa R. Ferrari
Kroefeler Strasse 5
61479 Glashuetten
Germany

011 49 6174 934 103 Telephone
011 49 6174 256 204 Fax

¹ For example, the current price of gasoline in Germany is well over €1.25 / liter (\$5.90 / gallon at the current exchange rate).

Mail In Ordner:

Allgemeine Daten
Betreff RE: Explant Assistance Program
Absender info@sfdct.com
Empfänger mail@ferrari-law.com
CC
BCC
Sendedatum 27.06.2006 16:46:04
Größe 10 KB
Priorität

Inhalt und Attachments
Dear Counsel:

Thank you for your request. Claims Assistance can provide you with the names of physicians in your area who have participated in the Explant Assistance Program. Providing you with these physicians' names is not a recommendation of the physician and is not a guarantee that the physician will participate again in the program.

Here is the information:

Thomas B Winzen
Chefarzt der Frauenklinik
St. Barbara Klinik
Hamm-Heesen
Am Heessener Wald 1
59073 Hamm
Germany

If you have further questions or need assistance, please call (toll-free) 866-874-6099.

Sincerely,
Claims Assistance Program
Info@sfdct.com

-----Original Message-----
From: mail@ferrari-law.com [mailto:mail@ferrari-law.com]
Sent: Tuesday, June 27, 2006 7:24 AM
To: Info
Subject: Explant Assistance Program

Dear SFDCT,
Would you kindly send me the names and addresses of all doctors located outside the US who are willing to participate in the Explant Assistance Program?
Thanks,
Melissa R. Ferrari