

EXHIBIT D

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

| | | |
|-------------------------|---|-------------------------------|
| IN RE |) | Case No. 00-CV-00005-DT |
| |) | (Settlement Facility Matters) |
| |) | |
| DOW CORNING CORPORATION |) | Hon. Denise Page Hood |
| |) | |
| Reorganized Debtor |) | |
| |) | |
| |) | |

AFFIDAVIT OF JEAN M. ELIASON
CLAIMS ADMINISTRATOR FOR MDL 926 CLAIMS OFFICE

Comes now the undersigned and says as follows:

1. My name is Jean M. Eliason. I serve as Claims Administrator for the MDL 926 Claims Office and have held this position since October 31, 2003.
2. The Bristol, Baxter, 3M, McGhan & Union Carbide Revised Settlement Program (the "RSP") required that all settlement class members or claimants file a Proof of Manufacturer form ("POM") in which they identified the manufacturer or brand name of each of their implants. Hospital records and/or medical records were required to accompany the POM identifying the implant brand and/or manufacturer or containing the implant label.
3. If the claimant was unable to determine the brand name or manufacturer, the claimant was required to describe the steps she had taken to identify the brand name or manufacturer.
4. Each claimant signed her POM under penalty of perjury.
5. If a POM listed an RSP manufacturer only, such as Bristol, Baxter or 3M, no reduction was made to any disease benefits due the claimant. If a POM listed an RSP manufacturer and Dow, any disease benefits due the claimant were reduced by 50% as set forth in the RSP Notice sent to all claimants under Order 27, *Lindsey v. Dow Corning Corp.*, CV-94-P-11558-S, entered December 22, 1995. If a POM listed an RSP manufacturer and an unknown manufacturer, no reduction in disease benefits was made.
6. Advance payments to claimants under the RSP began in 1996. Payments to RSP claimants continue to the present under the RSP benefits grid. To date, over 86,000 claimants have received payment in the RSP.

7. When the Settlement Facility - Dow Corning Trust ("SF-DCT") was set up, their initial Claims Administrator, The Honorable Katie Kennedy, shared office space with my predecessor, the Honorable Ann Tyrell Cochran, who then served as Claims Administrator of the MDL 926 Claims Office. During that period of time, SF-DCT employees were also MDL 926 employees. SF-DCT was allowed access to MDL 926 claimant files.

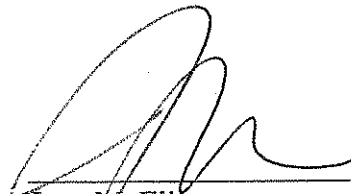
8. After SF-DCT set up a separate office, the MDL 926 Claims Office continued to share its claimant files with SF-DCT. In addition, certain computer information was shared between the two offices. As a result, MDL 926 discovered that certain MDL 926 claimants, who had been paid 100% disease benefits under the RSP, were also making claims to the SF-DCT under the Dow Settlement Program's disease benefits.

9. I discussed this issue with the Honorable Wendy Trachte-Huber, Ms. Kennedy's successor as SF-DCT's Claims Administrator, as well as the related issue of possible claims against the RSP by Dow claimants. Ms. Trachte-Huber agreed that, in order to maintain consistency between the two settlements, the appropriate method of handling such matters was MDL 926's filing of liens under SF-DCT's lien procedures and, if the situation arose of Dow claimants filing duplicate claims with MDL 926, SF-DCT would file liens under MDL 926's lien program.

10. As a result, my office filed 193 liens with the SF-DCT. To date, 23 of those liens have been withdrawn for various reasons, including error in filing and payment of the lien amount by the claimant. One of those liens is now being investigated for fraud on both MDL 926 and SF-DCT based on the claimant's statement of her knowledge at the time of filing both her POM with MDL 926 and Proof of Claim form with SF-DCT. Five of the liens were paid by the SF-DCT to MDL 926 during the period from September, 2005, through December, 2005. The status of 104 of these liens with the SF-DCT is unknown as MDL 926 has not received any notice of objection from SF-DCT under its lien procedures, nor any indication of whether the claims with the SF-DCT are ripe for payment. SF-DCT sent a Notice and Proof of Lien form to the MDL 926 Claims Office for 59 liens and MDL 926 has filed the Proof of Lien form with the SF-DCT for each of those liens. In addition, SF-DCT notified the MDL 926 Claims Office earlier this week that it will be sending a Notice and Proof of Lien form for one additional claimant but it has not been received.


Given this 28th day of June, 2007.





Jean M. Eliason
Claims Administrator
MDL 926 Claims Office

Sworn to and subscribed before me this
the 28 day of June, 2007.



Notary Public

(Seal)