

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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| In Re: |) | Bankruptcy |
| |) | Chapter 11 |
| Dow Corning Corporation |) | Case No. 95-20512 |
| |) | |
| Debtor. |) | Hon. Denise Page Hood |
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| |) | |
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**MOTION OF KOREAN CLAIMANTS FOR THE SETTLEMENT FACILITY TO
LOCATE QUALIFIED MEDICAL DOCTOR OF KOREA AND EITHER PAY FOR
THAT QUALIFIED MEDICAL DOCTOR TO TRAVEL TO KOREA AND CONDUCT
THE DISEASE EVALUATIONS OR HIRE QUALIFIED MEDICAL DOCTOR IN
KOREA TO CONDUCT THE REVIEWS AT THE SETTLEMENT FACILITY'S
EXPENSE**

A handwritten signature in black ink, appearing to read "Yeon-Ho Kim", written over a horizontal line.

Yeon-Ho Kim
Yeon-Ho Kim International Law Office
Suite 4105, Trade Tower
159 Samsung-dong, Kangnam-ku
Seoul, 135-729, Korea
Tel: 82-2-551-1256,
Cell Phone: 82-11-305-5570
Fax: 82-2-551-5570
e-mail: yhkimlaw@unitel.co.kr

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Korean Claimants(hereinafter, the "Movants"), by and through their attorney, Yeon-Ho Kim, hereby file this Motion for the Settlement Facility to locate Qualified Medical Doctor(hereinafter, "QMD") of Korea and either pay for that QMD to travel to Korea and conduct disease evaluations or hire QMD in Korea to conduct the reviews at the Settlement Facility's expense in case that each Movant apply for a disease claim. For the reason set forth herein, Movants respectively request this Honorable Court grant their Motion, aver as follows:

1. From June 28, 1999 to July 30, 1999, while the hearings for confirmation of the

Amended Joint Plan of Reorganization Plan(hereinafter, the "Plan") in the Bankruptcy Court in Michigan were held, Dow Corning Corporation and the Official Committee of Tort Claimants(collectively, the "Proponents"), by and through Diana Pendleton, a member of the Tort Committee, and Barbara Houser, a lead attorney of Dow Corning Corporation, met Yeon-Ho Kim, the attorney of the Movants, and asked what the Movants wanted. At that time, the Movants asserted that the Plan should not be confirmed by having filed the Motion for Change from "Agree" to "Disagree" on the Plan.

2. Yeon-Ho Kim and Diana Pendleton, sometimes with Barbara Houser, discussed the matters raised by the Movants in Court or out of Court in numerous occasions during the hearings.

3. Among the points agreed, there was about the issue of QMD. The Movants raised the issue because the Movants had an experience in MDL-926 that disease claims were not accepted by their claim office for the reason of QMD defficiency.

4. Movants and the Proponents agreed that QMD issue raised by Movants shall be taken care of. The Proponents modified Dow Corning Settlement Program and Claims Resolution Procedures, Annex A, To Settlement Facility And Fund Distribution Agreement. On Annex A-92 page, the Proponents included the new sentence, " The Plan Proponents or the Claimants' Advisory Committee and Debtor's Representatives shall specify the categories, degrees or certification of doctors that will qualify as Qualified Medical Doctors in Class 6.2 countries.

5. Even after more than five years passed by, Movants did not receive any specification of the categories, degrees or certification of QMD of Korea.

6. Last September, 2004, Movants authorized Yeon-Ho Kim to meet and discuss QMD issue again with Wendy Tracht-Huber, the Claims Administrator of the Settlement Facility and

Diana Pendleton, a member of Claimants' Advisory Committee(hereinafter, the "CAC").

7. At the meeting of 2:00 p.m. September 27, 2004 in the conference room of the Settlement Facility, Movants, through and by Yeon-Ho Kim, asked for the selection of QMD in Korea to apply for disease claim and further asked for the bearing of costs of examination by the selected QMD by the Settlement Facility.

8. The Claims Administrator together with Diana Pendleton, a member of CAC, agreed that the Settlement Facility shall locate a QMD of Korea and would either pay for that QMD to travel to Korea and conduct the disease evaluations or hire a QMD in Korea to conduct the reviews at the Settlement Facility's expense.

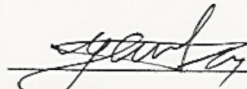
9. As provisioned in Annex A-1 page to the Settlement Facility and Fund Distribution Agreement, the Claims Administrator shall administer the Claims Resolution Procedures consistent with the terms of the Settlement Facility and Fund Distribution Agreement. If a member of CAC with the Claims Administrator agreed on QMD of Movants, the agreement is to evolve into the terms of the Settlement Facility and Fund Distribution Agreement.

10. On November 15, 2004, the Claims Administrator, however, wrote the Movants an e-mail that there has been confusion over the terms of agreement, explaining that the selection of QMD is a responsibility of Movants and the Settlement Facility is not going to bear the costs of disease examination by the QMD.

11. The Claims Administrator is in a position to keep her promise made to Movants and thus not free to change the promise later with no certain reason explained. The Settlement Facility shall keep it.

12. Therefore, the Korean claimants respectfully request this Honorable Court to grant their motion for the Settlement Facility to locate QMD of Korea and either pay for that QMD to travel to Korea and conduct the disease evaluations or hire a QMD in Korea to conduct the

reviews at the Settlement Facility's expense.



Yeon-Ho Kim

Yeon-Ho Kim International Law Office

Suite 4105, Trade Tower

159 Samsung-dong, Kangnam-ku

Seoul, 135-729, Korea

Tel: 82-2-551-1256,

Cell Phone: 82-11-305-5570

Fax: 82-2-551-5570

e-mail: yhkimlaw@unitel.co.kr

DATED: Dec. 13, 2004

CERTIFICATE OF SERVICE

Yeon-Ho Kim, an attorney admitted to practice in this District, hereby certifies that on December 13, 2004 he caused a true copy of the foregoing Motion to be served by overnight courier upon each of the following counsel at the address stated:

Deborah E. Greenspan, Esq.
The Feinberg Group, LLP
1120 20th Street, N.W.
Suite 740 South
Washington D.C. 20036

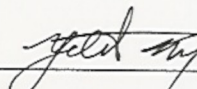
For Dow Corning Corporation

Dianna Pendleton-Dominguez, Esq.
Blizzard, McCarthy & Nabers LLP
440 Louisiana Street, Suite 1710
Houston, TX 77002

For Claimants' Advisory Committee

Seoul, Korea

Dated: Dec.13, 2004



Yeon-Ho Kim