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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
DETROIT DIVISION

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JUL 05 2005
CLERK'S OFFICE
DETROIT

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In re:)	Case No. 00-CV-00005
)	(Settlement Facility Matters)
DOW CORNING CORPORATION)	
)	HON. DENISE PAGE HOOD

**MOTION AND MEMORANDUM IN SUPPORT OF
CLAIMANT LAURA AYON-AZZAR'S REQUEST TO TOLL THE ONE YEAR
DEADLINE FOR CURING DISEASE CLAIM DEFICIENCIES AND REQUEST FOR SIX
MONTH EXTENSION FOR CURING PAST AND FUTURE DISEASE DEFICIENCIES**

Laura Ayon-Azzar (SID 6055738), through her counsel Bos & Glazier, P.L.C., respectfully requests that this Court toll the one year deadline for curing deficiencies in her disease claim and allow a six month extension for curing past and future disease deficiencies. In support of her motion, Ms. Ayon-Azzar states the following:

1. Ms. Ayon-Azzar submitted her disease claim for ACTD, disability level C on July 28, 2003.
2. On September 15, 2004, the Settlement Facility - Dow Corning Trust ("SF-DCT") mailed Ms. Ayon-Azzar a Notification of Status (NOS) regarding her disease claim.
3. The NOS letter stated that Ms. Ayon-Azzar's claim was deficient. The disease portion (ACTD) of Ms. Ayon-Azzar's claim was approved, however, the compensation (disability) level was not approved.
4. The NOS letter also stated that the deadline to cure the deficiency in Ms. Ayon-Azzar's claim is September 15, 2005.

5. The SF-DCT was contacted after receipt of the NOS letter and an appointment was made for a nurse to call and discuss the claim with regard to the requirements to cure the deficiency, *prior* to contacting Ms. Ayon-Azzar's treating physicians to get a supplemental report to cure the deficiency. During the telephone conversation with the nurse from the SF-DCT, the nurse simply reiterated the statements contained in Ms. Ayon-Azzar's NOS.

6. We believe that the SF-DCT has been overly harsh in their evaluation of disease claims in general and of Ms. Ayon-Azzar's claim in particular. Of this firm's 19 clients that have actually *received a response* to their disease claims, 17 have been reduced or outright denied in disability level.

7. The Motion of Claimants' Advisory Committee for the Disclosure of Substantive Criteria Created, Adopted and/or Being Applied by the Settlement Facility and Request for Expedited Consideration is currently pending, which requests the Court to order the SF-DCT to disclose all substantive, non-published criteria that they are applying in their review of disease claims.

8. It would be unfair and prejudicial to Ms. Ayon-Azzar to insist that she spend time and money in attempting to cure any deficiency in her disease claim, by way of obtaining additional documentation from her medical providers, until a decision has been rendered with regard to the pending motion and the claimants learn of any revisions to the criteria in proving a disability level to the SF-DCT.

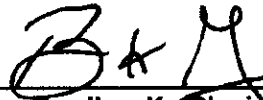
WHEREFORE, we respectfully request that this Court direct Laura Ayon-Azzar's disease claim cure deadline be tolled until a) the Court hears the Claimants' Advisory

Committee' pending motion regarding the disclosure of substantive criteria, and determines whether the SF-DCT has applied the proper criteria in reviewing disease claims; and b) until all substantive, non-published criteria are made publicly available to all claimants by the SF-DCT. In addition, we request that Ms. Ayon-Azzar be allowed a six month extension for curing past and future disease deficiencies.

BOS & GLAZIER, P.L.C.

Date: June 30, 2005

By:



Bradley K. Glazier (P33523)

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CERTIFICATE OF SERVICE

Bradley K. Glazier states that he is the attorney for claimant Laura Ayon-Azzar, with regard to the above-captioned matter, and that on the 1st day of July, 2005, he served Motion and Memorandum in Support of Claimant Laura Ayon-Azzar's Request to Toll the One Year Deadline for Curing Disease Claim Deficiencies and Request for Six Month Extension for Curing Past and Future Disease Deficiencies on the following person(s):

For the Claimants' Advisory Committee

Dianna Pendleton-Dominguez
P.O. Box 655
St. Mary's, Ohio 45885

For the Debtor's Representatives

Deborah E. Greenspan
Dickstein Shapiro Morin & Oshinsky LLP
2101 L Street, N.W.
Washington, DC 20037

For the Finance Committee

Claims Administrator
Settlement Facility - Dow Corning Trust
3100 Main Street, Suite 700
Houston, TX 77002

Service was made by first class mail on this date.


Bradley K. Glazier

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