

The Coalition seeks to use its broad perspective to provide the Court with evidence that asbestos plaintiffs exploit the disconnect between the asbestos trust and tort systems to manipulate exposure evidence and frustrate the ability of tort defendants to prove alternative exposures. The brief provides background that supports allowing Debtor to obtain discovery of trust claim submissions by claimants who filed tort claims against it. This information would allow the Court and Debtor to determine whether Debtor’s “participation in the tort system was infected by the manipulation of exposure evidence by plaintiffs and their lawyers.” *In re Garlock Sealing Techs., LLC*, 504 B.R. 71, 82 (W.D.N.C. Bankr. 2014). The proposed brief does not seek to simply repeat arguments made by the parties.

No party’s counsel authored the proposed brief in whole or in part. No party or a party’s counsel contributed money that was intended to fund preparing or submitting the brief. No person—other than *amicus*, its members, or its counsel—contributed money that was intended to fund the preparation or submission of the brief.

For these reasons, we respectfully request that the Court grant our Motion.

Respectfully submitted,

/s/ Caroline M. Gieser

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CERTIFICATE OF SERVICE

I certify that on this 30th day of September, 2021, a copy of the foregoing was filed electronically via the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Caroline M. Gieser
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