

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**DECLARATION OF JEFFREY B. ELLMAN IN SUPPORT OF THE *EX PARTE*
APPLICATION OF THE DEBTOR FOR AN ORDER AUTHORIZING IT TO
RETAIN AND EMPLOY JONES DAY AS COUNSEL AS OF THE PETITION DATE**

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Jeffrey B. Ellman declares:

1. I am a partner with the law firm of Jones Day and am duly authorized to make this declaration on behalf of Jones Day. I make this declaration to supplement disclosures set forth in: (a) the *Ex Parte Application of the Debtor for an Order Authorizing It to Retain and Employ Jones Day as Counsel as of the Petition Date* [Dkt. 16] (the “Application”); (b) the *Declaration of Gregory M. Gordon* in support of the Application (the “Gordon Declaration”), which was attached to the Application as Exhibit C;² and (c) the prior supplemental declaration of Mr. Gregory M. Gordon filed on February 8, 2021 [Dkt. 657] (the “First Supplemental Declaration” and, together with the Gordon Declaration, the “Declarations”). The facts set forth in this declaration are personally known to me or have

¹ The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

² In addition, a supplemental declaration of Mr. Gregory M. Gordon in support of the Application was filed on February 21, 2020 [Dkt. 166] at the request of the Bankruptcy Administrator for the Western District of North Carolina (the “Bankruptcy Administrator”) to clarify that Jones Day would waive any claim for fees and expenses in excess of DBMP LLC’s prepetition retainer, if any, that were incurred prior to the Petition Date.

been collected for me under my direction and, if called as a witness, I could and would testify thereto.

2. On January 23, 2020, the above-captioned debtor and debtor in possession (the “Debtor”) filed the Application and the Gordon Declaration with the Court. By the Application, the Debtor sought authority to retain and employ Jones Day as counsel in this chapter 11 case (the “Chapter 11 Case”). On January 24, 2020, the Court entered an *ex parte* order [Dkt. 34] authorizing the retention of Jones Day as the Debtor’s counsel in the Chapter 11 Case as of the Petition Date. On March 17, 2020, the Court entered an amended order [Dkt. 201] authorizing the retention of Jones Day as the Debtor’s counsel in the Chapter 11 Case as of the Petition Date.

3. In connection with the Application, to check and clear potential conflicts of interest in the Chapter 11 Case, Jones Day researched its client database (the “Initial Conflicts Search”) to determine whether it had any relationships with the individuals or institutions set forth on Schedule 1 to the Gordon Declaration. A similar process was conducted in connection with the First Supplemental Declaration (the “First Supplemental Conflicts Search” and, together with the Initial Conflicts Search, the “Prior Conflict Searches”) with respect to the parties set forth in Schedule 1 to the First Supplemental Declaration (together with the parties set forth on Schedule 1 to the Gordon Declaration, the “Interested Parties”).

4. In the Declarations, Mr. Gordon disclosed that although Jones Day represented or currently represents certain of the Interested Parties included in the Prior Conflicts Search, those representations were or are in matters unrelated to the Chapter 11 Case, and Jones Day did not represent any entity or individual in a matter in which such entity or individual is adverse to the Debtor.

Second Supplemental Disclosure

5. In the Declarations, Mr. Gordon stated that Jones Day would, in accordance with Bankruptcy Rule 2014(a), supplement the information contained in those declarations with respect to, among other things, new relationships not set forth therein.

6. Jones Day now has further updated the examination of its relationships with interested parties in the Chapter 11 Case. In connection therewith, Jones Day researched its client database for the past two years (the “Second Supplemental Conflicts Search”) to determine whether:

- (a) since the completion of the First Supplemental Conflicts Search, Jones Day has ceased providing client services to any entities (or their affiliates) previously disclosed as clients of Jones Day in the Declarations;
- (b) any information relating to Jones Day’s relationship with any of the Interested Parties, or their affiliates, was inadvertently omitted from the Declarations;
- (c) since the completion of the First Supplemental Conflicts Search, Jones Day has undertaken to provide client services to any of the Interested Parties that were not clients of Jones Day at the time of the Declarations; and
- (d) any entities not identified as Interested Parties, because such entities (i) were unknown to Jones Day at the time of the Declarations or (ii) have taken on a role in matters relating to the Chapter 11 Case since the date of the Declarations, are current or former clients of Jones Day.

7. A list of the additional entities included in the Second Supplemental Conflicts Search (collectively, the “Additional Parties”) is set forth on Schedule 1 attached hereto.

Disinterestedness

8. To the extent that the Second Supplemental Conflict Search indicated that (a) the Declarations required updating or (b) Jones Day has been or currently is employed by any of the Additional Parties in matters unrelated to the Chapter 11 Case, the identities of those

entities and the nature of, or change in, Jones Day's relationship to them, as of July 26, 2021, are set forth on Schedule 2 attached hereto ("Schedule 2").

9. To the best of my knowledge, information and belief, Jones Day represents no interest adverse to the Debtor, its estate, its creditors or the Bankruptcy Administrator, and Jones Day does not represent any other party with an actual or potential interest in the Chapter 11 Case or such party's respective attorneys or accountants, except as set forth in Schedule 2 and in the Declarations.

10. I believe that Jones Day continues to be a "disinterested person," as defined in section 101(14) of title 11 of the United States Code (the "Bankruptcy Code") and required by section 327 of the Bankruptcy Code. The Debtor, however, is a complex entity with numerous creditors and other relationships, and I am unable to state with certainty whether every client representation or other connection has been disclosed. In this regard, if Jones Day discovers additional information that requires disclosure, it will file an additional supplemental disclosure with the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: October 27, 2021

/s/ Jeffrey B. Ellman

Jeffrey B. Ellman

SCHEDULE 1

Additional Parties as of July 26, 2021

Debtor's Retained Professionals

Donlin, Recano and Company, Inc.

Debtor's Significant Ordinary Course Professionals, Consultants and Service Providers

Hunter & Cole
Kean Miller LLP

Professionals to the Future Claimants' Representative

Alexander Ricks PLLC

Other Interested Parties

United States

Bankruptcy Rule 2002 Appearances

Bailey Cowan Heckaman PLLC
Bevan and Associates LPA, Inc.
Brayton Purcell LLP
Flint Law Firm, LLC
Francisco Galaviz
Keller, Fishback and Jackson LLP
Motley Rice LLC
Nass Cancelliere
Nemeroff Law Firm, PC
Rebecca S. Vinocur, P.A.
Reynolds Frizzell LLP
Simmons Hanly Conroy
The Lanier Law Firm
Thornton Law Firm, LLP
Wallace & Graham, P.A.
Waters & Kraus, LLP

SCHEDULE 2
SECOND SUPPLEMENTAL DISCLOSURE
IN RE DBMP LLC

SCHEDULE OF INTERESTED PARTIES AS OF JULY 26, 2021
THAT CURRENTLY EMPLOY OR HAVE FORMERLY EMPLOYED JONES DAY
IN MATTERS UNRELATED TO THE DEBTORS OR THEIR CHAPTER 11 CASE

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
NEW PARTIES IN INTEREST¹		
Donlin, Recano and Company, Inc.	Debtor's Retained Professional	<ul style="list-style-type: none"> Affiliated entity <i>AST Trust Company (Canada)</i> is a current client.
UPDATES TO PRIOR DISCLOSURE		
3M Company <i>PRIOR DISCLOSURE:</i> <ul style="list-style-type: none"> 3M Company and affiliate company 3M Purification are former clients (both closed 2018); and Affiliate companies <i>3M France</i> and <i>3M Media Company LLC</i> are current clients. 	Significant Co-Defendant in Asbestos Related Litigation	<ul style="list-style-type: none"> Affiliate company 3M France is now a former client (closed 2020).
<i>A. O. Smith Corporation</i> <i>PRIOR DISCLOSURE:</i> <ul style="list-style-type: none"> A. O. Smith Corporation is a former client (closed 2018). 	Significant Co-Defendant in Asbestos-Related Litigation	<ul style="list-style-type: none"> <i>A. O. Smith Corporation</i> is a new client (opened 2021).

¹ The parties listed herein are parties in interest (or affiliated entities) who are current clients of Jones Day or were clients of Jones Day within the last two years. The names of current clients of Jones Day appear in bold and italics. The disclosure of stockholder interests or other affiliate relationships among potentially related entities reflects only information known to Jones Day through its conflict reporting system. Jones Day has not performed independent research to identify all stockholder interests or other affiliate relationships with respect to interested parties. Moreover, Jones Day has not disclosed representations of trade associations and similar industry or special interest organizations in which interested parties are members.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<p>Bank of America, N.A. PRIOR DISCLOSURE:</p> <ul style="list-style-type: none"> • Bank of America, N.A. and affiliate companies Bank of America Securities Europe S.A., Bank of America Merrill Lynch International DAC – Milan Branch, Merrill Lynch International, Bank of America, N.A. London and Bank of America Business Credit are current clients; • Parent company Bank of America Corporation is: <ul style="list-style-type: none"> (a) a current client; (b) the employer of an individual who is a former client (closed 2019); and (c) a co-client in a current joint representation with affiliate company and current client Merrill Lynch Bank & Trust (Cayman) Limited and certain of its affiliate companies; • Affiliate company Bank of America Merrill Lynch International Designated Activity Company is a former co-client with current client Natixis in a joint representation closed in 2020; • Affiliate company Bank of America Merrill Lynch International Limited (n/k/a current client Bank of America Merrill Lynch International DAC) is a former co-client with current client Deutsche Bank AG New York in a matter closed in 2020; • Affiliate company Banc of America Strategic Investments Corporation is a minority joint venture partner in current client Visible Alpha LLC; 	<p>Depository and Disbursement Bank</p>	<ul style="list-style-type: none"> • Affiliate company Bank of America Merrill Lynch International DAC is now known as current client Bank of America Europe DAC (opened 2020); • Affiliate company Merrill Lynch Kingdom of Saudi Arabia Company is a new client (opened 2021); and • Affiliate company Merrill Lynch, Pierce, Fenner & Smith is now a former client (closed 2020). • <i>See also</i> entry below for Metropolitan Life Insurance Company (a/k/a MetLife) regarding related disclosure.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> • Affiliate company Bank of America Merrill Lynch is: (a) a member, with current client Goldman Sachs International, of a former group representation of lenders closed in 2018; and (b) the indemnitor for and former employer of an individual who is a former client (closed 2020); • Affiliate company Merrill Lynch, Pierce, Fenner & Smith Incorporated is: (a) a current client; and (b) a former co-client with current client Deutsche Bank AG New York in a matter closed in 2019; and • Affiliate companies Bank of America Merrill Lynch International (closed 2018); Merrill Lynch Capital Corporation (closed 2019); Merrill Lynch International, London Branch, Merrill Lynch Kingdom of Saudi Arabia Company and Merrill Lynch Bank & Trust (Cayman) Limited (all closed 2020) are former clients. 		

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<p><i>Bestwall LLC</i> <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> • <i>Bestwall LLC</i> is a current client; • Ultimate parent company <i>Koch Industries, Inc.</i> is: (a) a current client in matters unrelated to Bestwall or its chapter 11 case; (b) the owner of current client <i>Infor, Inc.</i>; and (c) a former equity holder of former client Truck-Lite Co. LLC (closed 2020); • Affiliate company <i>Georgia-Pacific LLC</i> is a current client in several matters with ultimate parent company <i>Koch Industries, Inc.</i> unrelated to Bestwall or its chapter 11 case; • Affiliate companies <i>Bittware, Inc., Guardian Industries, Guardian Europe Sàrl, Guardian Flachglas GmbH, Koch Biological Solutions LLC, Koch Fertilizer LLC, Koch Disruptive Technologies, Koch Minerals LLC, Koch Shipping Pte. Ltd., Koch Equity Development, Koch Companies Public Sector LLC, SRG Global, Inc., Molex Incorporated n/k/a Molex, LLC, Molex Elektronik GmbH, Invista International S.a.r.l., DSS Optical Solutions</i> and <i>Flint Hills Resources, L.P.</i> are current clients in matters unrelated to Bestwall or its chapter 11 case; and 	<p>Bankruptcy Rule 2002 Appearance</p> <p>Co-Defendant in Asbestos-Related Litigation</p>	<ul style="list-style-type: none"> • Affiliate companies <i>Koch Financial Assets III, LLC, Koch-Glitsch Italia S.r.l., Koch Real Estate Investments, Koch Strategic Platforms, Koch Technology Solutions, LLC, Koch Technology Solutions UK Limited</i> and <i>Koch Treasury</i> (all opened 2021); and <i>Koch Agronomic Services, Koch Chemical Technology Group S.L.</i> and <i>Koch Chemicals Technology Group Italia S.r.l.</i> (all opened 2020) are new clients; and • Affiliate companies <i>Bittware, Inc., Infor, Inc., Koch Shipping Pte Ltd. and Flint Hills Resources, L.P.</i> (all closed 2021); <i>Koch Fertilizer LLC, Guardian Industries and Invista International S.a.r.l.</i> (all closed 2020); and <i>Koch Metals Trading Limited</i> (closed 2019) are now former clients.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> Affiliate companies Koch AG & Energy Solutions, LLC, Koch Supply & Trading LLC, Molex Zetronic S.R.L., KCTG Japan Holdings Limited, Koch-Glitsch Italia S.R.L. and Molex Japan Co., Ltd. n/k/a Molex Japan LLC (all closed 2019); and Koch Biological Solutions and Koch Supply & Trading L.P. (both closed 2020) are former clients. 		
<p>CBS Corporation <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <i>CBS Corporation</i> and affiliate companies <i>CBS International (Netherlands) B.V.</i>, <i>CBS UK</i> and <i>Network Ten Pty Limited</i> are current clients; and Affiliate company CBS Studios International GmbH is a former client (closed 2018). 	<p>Significant Co-Defendant in Asbestos-Related Litigation</p>	<ul style="list-style-type: none"> CBS Corporation and Network Ten Pty Limited (both closed 2021); and affiliate companies CBS International (Netherlands) B.V. and CBS UK (both closed 2020) are now former clients. <i>See also</i> entry below for Westinghouse Electric Corporation regarding related disclosure.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<p>General Electric Co. <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> • General Electric Co. is: (a) a current client; (b) a former co-client with affiliate company and former co-client GE Medical Systems Italia S.p.a. in a matter closed in 2020; and (c) a former co-client with affiliate company and former co-client GE Energy Financial Services, Inc. in a matter closed in 2019; • Affiliate companies GE Transportation Parts LLC, General Electric International, Inc., GE Energy Products Finance SNC, GE Lighting LLC, GE Grid Solutions LLC, GE Power Services Belgium, S.A., GE Japan Corporation, GE Medical Systems Trade & Development (Shanghai) Co., Ltd., GE Power, GE Grid Australia Pty Ltd., GE IS&T S.A.S., GE Energy Power Conversion Technology, Ltd., GE-Hitachi Nuclear Energy Americas LLC, GE Wind France S.A.S., Baker Hughes, A GE Company, GE Medical Systems Information Technologies, Inc., GE Healthcare Limited, GE Water & Process Technologies, ABB Industrial Solutions (France) S.A.S. (f/k/a GE Power Controls France), ABB Electrification Solutions SLU (f/k/a GE Power Controls Iberica), ABB Industrial Solutions (Klodzko) SP Z.o.o. (f/k/a GE Power Controls Polska SP Z.o.o.), GE Energy Power Conversion France S.A.S., GE Energy Connections, GE SCF S.C.A., GE Aviation, GE Hydro France 	<p>Significant Co-Defendant in Asbestos-Related Litigation</p>	<ul style="list-style-type: none"> • Affiliate companies GE Energy Power Conversion UK Limited and GE Power Conversion Naval Systems, Inc. (both opened 2021) are new clients; • GE Global Operations France SAS, GE Energy Parts, Inc., General Electrik Ticaret Ve Servis AS, GE Energy Products France SNC and Consumer Lighting (U.S.) LLC a/k/a GE Lighting, a Savant Company (all opened 2020) are new clients; • Affiliate company Employers Reassurance Corporation is a member of new client Ad Hoc Group of NGL Energy Bondholders (opened 2021); • The group representation of General Motors term lenders in which affiliate company GE Capital Corporation and affiliated entity General Electric Pension Trust were members was closed in 2020; • Nihon Medi-Physics Co., Ltd., of which affiliate company GE Healthcare is a co-owner, is now a former client (closed 2020); • Aver, Inc., an entity in which affiliate company GE Ventures Ltd. is an investor, is now a former client (closed 2021); and • Affiliate companies GE Medical Systems Information Technologies, Inc., GE Aviation, GE Japan Corporation, GE Medical Systems Trade & Development (Shanghai) Co., Ltd., GE Grid Australia Pty Ltd. and GE IS&T S.A.S. (all closed 2021); GE Energy Connections, GE-Hitachi Nuclear Energy Americas, LLC, GE Power Services Belgium S.A. and GE Healthcare Limited (all closed 2020); and General Electric Energy UK Limited (closed 2019) are now former clients. • <i>See also</i> entries below for J.P. Morgan Chase and Metropolitan Life Insurance Company (a/k/a MetLife) regarding related disclosure.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<p>(a/k/a <i>Alstom Hydro France</i>) and <i>GE Renewable Management S.A.S.</i> are current clients;</p> <ul style="list-style-type: none"> • Affiliate company <i>GE Capital Corporation</i> and affiliated entity <i>General Electric Pension Trust</i> are co-clients in a current group representation of General Motors term lenders; • Affiliate company GE Healthcare is one of the owners of current client <i>Nihon Medi-Physics Co., Ltd.</i>; • Affiliate company GE Ventures Ltd. is an investor in current client <i>Aver, Inc.</i>; • Affiliate company GE Japan GK (n/k/a SMFL Capital Co., Ltd.) is a former client with current client <i>Sumitomo Mitsui Banking Corporation</i> in a matter closed in 2019; and • Affiliate companies GE Water & Process Technologies México, and GE Oil & Gas (both closed 2018); GE Oil & Gas Australia Pty Ltd., GE Capital Aviation Services, GE Electric Energy UK Limited, GE Capital Europe Ltd., Healthcare Financial Solutions LLC and GE Water & Process Technologies France (all closed 2019); and GE Digital LLC, GE Eoliennes SN and GE Energy Management (all closed 2020) are former clients. 		

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<p><i>J.P. Morgan Chase</i> <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> • Affiliate company <i>JPMorgan Trust Company of Delaware</i> is a current client; • Parent company <i>JPMorgan Chase & Co.</i> is: (a) a current client; (b) a member of current client <i>Ad Hoc Intelsat Jackson Unsecured Noteholders Group</i>; (c) a co-client in a current matter with current client <i>The Bank of Nova Scotia</i>; and (d) the employer and indemnitor of an individual who is a current client (opened 2020); • Affiliate company <i>JPMorgan Securities LLC</i> is: (a) a current client; (b) a co-client in a current matter with current client <i>Citigroup, Inc.</i>; (c) a former co-client with current client <i>Bank of America Corporation</i> in a matter closed in 2020; and (d) a former co-client with current client <i>Deutsche Bank AG New York</i> in a matter closed in 2019; • Affiliate company <i>JPMorgan Securities Plc</i> is: (a) a current client; (b) a former co-client with current client <i>UniCredit Bank AG</i> in a matter closed in 2019; and (c) a former co-client with current client <i>Intesa SanPaolo</i> in a matter closed in 2019; • Affiliate company Highbridge Capital Management LLC was a member of former client Ad Hoc Group of Savers LLC Term Loan Lenders (closed 2019); 	<p>Depository and Disbursement Bank</p>	<ul style="list-style-type: none"> • Parent company <i>JPMorgan Chase & Co.</i> is: (a) a member of a joint defense group representation of KWA underwriters opened in 2020; and (b) a stockholder of Nine Point Energy Holdings, Inc., the parent company of new client <i>Nine Point Energy, LLC</i> (opened 2021); and • Affiliated entity <i>JPMorgan Chase Retirement Plan Brigade</i> is a member of new client <i>Ad Hoc Group of NGL Energy Bondholders</i> (opened 2021). • See also entry above for <i>Bank of America, N.A.</i> and entry below for Metropolitan Life Insurance Company (a/k/a MetLife) regarding related disclosure.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> • Affiliated entities and current clients JPMorgan Chase Retirement Plan Brigade and JPMorgan Chase Retirement Plan Brigade Bank Loan; and JPMorgan Funds – Multi-Manager Alternatives Fund and JPMorgan Trust III – JPMorgan Multi-Manager Alternatives Fund are former co-clients in a group representation of Hexion noteholders closed in 2019; • Affiliated entity JPMorgan Chase Retirement Plan Brigade is: (a) a co-client in one current and one former group representation of iHeart Communications, Inc. former lenders and noteholders (closed 2020); and (b) a former co-client in a group representation of Bon-Ton second lien noteholders closed in 2019; • Affiliated entity JPMorgan Chase Retirement Plan Brigade Bank Loan is: (a) a co-client in a current group representation of iHeart Communications, Inc. former lenders and noteholders; (b) a former co-client with affiliated entity JPMorgan Chase Retirement Plan and current client Brigade Capital Management, L.P. in a matter closed in 2018; and (c) a former co-client in a group representation of Preferred Proppants term lenders closed in 2019; and 		

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> Affiliate companies JPMorgan Grupo Financiero, S.A. de C.V., JPMorgan Chase, National Association, JPMorgan Business Credit Corporation, and JPMorgan (all closed 2018); and JPMorgan LLC (closed 2019) are former clients. 		
<p>Metropolitan Life Insurance Company (a/k/a MetLife)</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> Parent company Bank of America Corporation is: (a) a current client; and (b) a former co-client with affiliate company MetLife Investment Advisors LLC in a matter closed in 2018. 	<p>Significant Co-Defendant in Asbestos-Related Litigation</p>	<ul style="list-style-type: none"> Affiliated entity Metropolitan Life Insurance Company Separate Account No. 558 is a member of new client Ad Hoc Group of NGL Energy Bondholders (opened 2021). See also entries above for Bank of America, N.A. and J.P. Morgan Chase regarding related disclosure.
<p>Union Carbide Corporation</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> Union Carbide Corporation and affiliate companies Dow Corning Corporation and Dow AgroSciences LLC are current clients; and Affiliate company The Dow Chemical Company is: (a) a current client; and (b) a co-owner in a joint venture of current client Sadara Chemical Company. 	<p>Significant Co-Defendant in Asbestos-Related Litigation</p>	<ul style="list-style-type: none"> Affiliate companies Dow Química Mexicana, S.A. de C.V. and The Dow Chemical Company are new clients (opened in 2020).
<p>Westinghouse Electric Corporation</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> Parent company CBS Corporation is a current client. 	<p>Significant Co-Defendant in Asbestos-Related Litigation</p>	<ul style="list-style-type: none"> Parent company CBS Corporation is now a former client (closed 2021). See also entry above for CBS Corporation regarding related disclosure.

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