

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

In re  DBMP LLC, <sup>1</sup>  <div style="text-align: right;">Debtor.</div>	: : : : : : : : : :	Chapter 11  Case No. 20-30080 (JCW)
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**AMENDED JOINT EXHIBIT LIST FOR OCTOBER 21-22, 2021 HEARINGS**

DBMP, LLC (the “Debtor”), the Official Committee of Asbestos Claimants (the “ACC”) and Sander L. Esserman, in his capacity as the Future Claimants’ Representative (the “FCR”) and, together with the Debtor and the ACC, the “Parties”) submit the exhibits identified on Exhibits A, B, and C for admission into evidence in connection with the hearings on (i) the *Debtor’s Motion for Bankruptcy Rule 2004 Examination of Asbestos Trusts* (Dkt. 416) (the “Trust Discovery Motion”), (ii) the *Debtor’s Motion for Order Pursuant to Bankruptcy Rule 2004 Directing Submission of Personal Injury Questionnaires by Pending Mesothelioma Claimants* (Dkt. 417), and (iii) the *Official Committee of Asbestos Personal Injury Claimants’ Conditional Motion Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure for an Order Directing the Submission of Information by Debtors Defense Counsel* (Dkt. 904) (collectively, the “Discovery Motions”). In addition, the Manville Personal Injury Settlement Trust and Delaware Claims Processing Facility (the “Non-Party Objectors”) submit the exhibits identified on Exhibit D for admission into evidence in connection with the hearing on the Trust

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

Discovery Motion. This submission is being made subject to the following clarifications and reservations:

1. Exhibit A contains the exhibits submitted by the Debtor. The ACC and the FCR lodged objections to certain exhibits (as indicated) but those objections have been resolved subject to the terms set forth below.
2. Exhibit B contains the exhibits submitted by the ACC.
3. Exhibit C contains the exhibits submitted by the FCR.
4. Exhibit D contains the exhibits submitted by the Non-Party Objectors. The Non-Party Objectors also rely on all documents they filed in opposition to the Motion and the exhibits thereto, *see* Dkt. Nos. 864-868, 881, and 892, as well as on the exhibits filed by the Parties.
5. The objections that were asserted by the ACC and the FCR to the exhibits submitted by the Debtor are set forth on Exhibit A. As further set forth on Exhibit A, the Debtor has agreed that certain exhibits subject to a hearsay objection are not being offered for the truth of the matters set forth therein (as indicated in the Debtor's response to the objections for such documents). With the understanding that such exhibits subject to a hearsay objection are not being offered for the truth of the matters set forth therein, the ACC and FCR do not object to the admission of those exhibits on that condition but reserve their right to challenge or dispute whether any statement or contention contained in any exhibit is true or correct.
6. Any exhibit that constitutes testimony being offered for the truth of the matters asserted is being admitted subject to all rights of any Party to dispute or challenge the truth or accuracy of any statement or contention contained therein including, without limitation, by reference to any other declaration or designation of deposition testimony. Without limiting the generality of the foregoing and for the avoidance of doubt, the ACC and FCR dispute certain

statements and conclusions made by Dr. Charles Bates and Michael Starczewski contained in the declarations and deposition testimony included in the Debtor's exhibit list, and the admission of the declarations and deposition testimony of Dr. Bates and Mr. Starczewski into evidence is being made subject to the designations of deposition testimony submitted by the ACC and FCR and their continued right to challenge or dispute any statements or contentions made by Dr. Bates and Mr. Starczewski for any reason.

7. The admission of any exhibit into evidence shall not be construed as an admission by any Party that any statement or contention contained in any exhibit is true or correct.

8. The exhibits identified on Exhibits A – D attached hereto are, subject to the reservations and clarifications set forth above, being admitted solely for purposes of the Discovery Motions and their admission for purposes of the Discovery Motions shall not constitute their admission into evidence for any other purpose.

[Signatures on Following Page]

Dated: November 5, 2021

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**EXHIBIT A**

**DEBTOR'S EXHIBIT LIST**

**Debtor's Final Exhibit List for Hearing on PIQ Motion, In re DBMP LLC**

<b>Ex. No.</b>	<b>D.E. No.</b>	<b>Description</b>	<b>ACC / FCR Objection(s)</b>	<b>Debtor's Response</b>
D-1	417-3	Declaration of Dr. Charles E. Bates (August 19, 2020)	Lack of Personal Knowledge; Inadmissible Expert Opinion; Hearsay	Competent expert testimony; also based on personal knowledge; declarations may be offered on a motion and are not hearsay (Rule 9017, Rule 43(c)); ACC and FCR have offered depositions in which this declaration was an exhibit, so also appropriate counter-designation and necessary for completeness (Rule 106); ACC and FCR had full opportunity to cross-examine
D-2	417-5	Declaration of Michael T. Starczewski (August 19, 2020)	Lack of Personal Knowledge; Inadmissible Lay Opinion; Hearsay	Competent testimony based on personal knowledge; fact, not opinion, testimony; satisfies standard for lay opinion testimony; declarations may be offered on a motion and are not hearsay (Rule 9017, Rule 43(c)); ACC and FCR have offered depositions in which this declaration was an exhibit, so also appropriate counter-designation and necessary for completeness (Rule 106); ACC and FCR had full opportunity to cross-examine
D-3	417-4	<i>In re: Garlock Sealing Technologies LLC</i> , No. 10—BK-31607, Corrected Transcript of Hearing on (5333) Debtors' Motion for Entry of an Order Approving Disclosure Statement of the Joint Plan of		

Ex. No.	D.E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
		Reorganization of Garlock Sealing Technologies, LLC, et al. and Oldco, LLC, Proposed Successor by Merger to Coltec Industries, Inc. and Hearing on (5341) Debtors' Motion for Entry of an Order Approving Solicitation and Confirmation of the Joint Plan Before the Honorable J. Craig Whitley, United States Bankruptcy Judge (July 27, 2016)		
D-4	417-6	Letter from Chambers of Robert R. Merhige, Jr., District Judge and Dalkon Shield User Claim Form (Sept. 1986) (excerpt)		
D-5	417-7	<i>In re: USG Corporation</i> , Case No. 01-2094 (JKF), Order Re: Personal Injury Claims Estimation (Bankr. D. Del. Oct. 17, 2005) and Debtor's Standard Questionnaire to Select Personal Injury Asbestos Claimants		
D-6	417-8	<i>In re: Specialty Products Holding Corp.</i> , No. 10-11780, Order Granting in Part and Denying in Part Debtors' Motion for an Order Directing Submission of Information by Current Asbestos Claimants (Bankr. D. Del. 2011) and SPHC/Bondex Mesothelioma Claim Information Form		
D-7	417-9	<i>In re: G-I Holdings Inc.</i> , No. 01-30135, Fourth Amended Order		



Ex. No.	D.E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
		Implementing G-I's Claimant Questionnaire and Sampling Protocol (Bankr. D.N.J. July 7, 2008) and G-I Holdings Asbestos Personal Injury Questionnaire		
D-8	417-10	<i>In re: W.R. Grace &amp; Co.</i> , No. 01-1139, Case Management Order for the Estimation of Asbestos Personal Injury Liabilities (Bankr. D. Del. Aug. 29, 2005) and W.R. Grace Asbestos Personal Injury Questionnaire		
D-9	417-11; 417-12	<i>In re: Garlock Sealing Techs. LLC</i> , No. 10-31607, Order Authorizing the Debtors to Issue Questionnaire to Holders of Pending Mesothelioma Claims and Governing the Confidentiality of Information Provided in Responses (Bankr. W.D.N.C. June 21, 2011) and Garlock Sealing Technologies LLC Mesothelioma Claim Questionnaire		
D-10	417-13; 417-14	<i>In re: Garlock Sealing Techs. LLC</i> , No. 10-31607, Order Authorizing Debtors to Issue Supplemental Exposure Questionnaire and Governing Confidentiality of Information Provided in Responses (Bankr. W.D.N.C. June 29, 2012) and Supplemental Exposure Questionnaire		

Ex. No.	D.E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
D-11	417-15	<i>In re: Garlock Sealing Techs. LLC</i> , No. 10-31607, Transcript of Proceedings Before the Honorable George R. Hodges United States Bankruptcy Judge (May 17, 2012) (excerpts)		
D-12	417-16	<i>In re: Garlock Sealing Techs. LLC</i> , No. 10-31607, Order Authorizing Debtors to Issue Supplemental Settlement Payment Questionnaire and Governing the Confidentiality of Information Provided in Responses (Bankr. W.D.N.C. June 29, 2012) and Supplemental Settlement Payment Questionnaire		
D-13	417-17	<i>In re: Garlock Sealing Techs. LLC</i> , No. 10-31607, Transcript of Estimation Trial Before the Honorable George R. Hodges United States Bankruptcy Judge (Aug. 2, 2013) (excerpts of testimony)	Inadmissible Expert Opinion; Hearsay	Not offered for truth or as an expert opinion but to show facts presented to and considered by previous court; Court may take judicial notice of records from prior case
D-14	417-18	Precedent for Areas of Inquiry in DBMP Questionnaire (Chart)	Hearsay; Pleading	Admissible summary under Rule 1006; exhibit also offered for demonstrative purposes
D-15	417-19	<i>In re: Specialty Products Holding Corp.</i> , No. 10-11780, Agreed Protective Order Governing Confidential Information (Bankr. D. Del. Oct. 21, 2010)		

Ex. No.	D.E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
D-16	947, beginning on pg. 28	<i>In re: Bestwall LLC</i> , Case No. 17-31795-LTB, Order Pursuant to Bankruptcy Rule 2004 Directing Submission of Personal Injury Questionnaires by Pending Mesothelioma Claimants and Governing the Confidentiality of Responses (Mar. 23, 2021)		
D-17	947, beginning on pg. 80	<i>In re: DBMP, LLC</i> , Case No. 20-30080 (JCW), Videotaped Remote Deposition of Michael Starczewski (Apr. 30, 2021) (excerpts)	Hearsay	Sworn testimony may be offered on a motion and is not hearsay (Rule 9017, Rule 43(c)); ACC and FCR have offered depositions in which this declaration was an exhibit, so also appropriate counter-designation and necessary for completeness (Rule 106); ACC and FCR had full opportunity to cross-examine
D-18	947, beginning on pg. 130	<i>In re: Bestwall LLC</i> , Case No. 17-31795-LTB, Transcript of Proceeding Before the Honorable Laura Turner Beyer, United States Bankruptcy Judge (Mar. 4, 2021) (excerpts)		
D-19	947, beginning on pg. 137	<i>In re: DBMP, LLC</i> , Case No. 20-30080 (JCW), Remotely Conducted Videotaped Deposition of Charles E. Bates, PhD (Apr. 16, 2021) (excerpts)	Lack of Personal Knowledge; Inadmissible Expert Opinion; Hearsay	Sworn testimony may be offered on a motion and is not hearsay (Rule 9017, Rule 43(c)); ACC and FCR have offered depositions in which this declaration was an exhibit, so also appropriate counter-designation and necessary for completeness (Rule 106); ACC and FCR had full opportunity to cross-examine; testimony is based on personal knowledge and is also competent expert opinion

Ex. No.	D.E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
D-20	947, beginning on pg. 159	<i>In re Los Angeles Asbestos Litigation</i> , LAOSD Standard Interrogatories to Plaintiffs		
D-21	947, beginning on pg. 197	<i>In re: W.R. Grace &amp; Co.</i> , Case No. 07-01139 (JKF), Dkt. 17695, Grace's Memorandum in Opposition to Claimants' Motions to Exclude Expert Testimony (excerpt)	Hearsay; Pleading	Not offered for truth, but to show what was presented to and considered by court in prior case; Court may take judicial notice of records from prior case
D-22	947, beginning on pg. 210	Report of Charles H. Mullin, Ph.D. (Bondex Report) (excerpt)	Inadmissible Expert Opinion; Hearsay	Not offered for truth or as expert opinion, but to show what was presented to and considered by court in prior case; Court may take judicial notice of records from prior case

**Debtor's Final Exhibit List for Hearing on Trust Discovery Motion, In re DBMP LLC**

<b>Ex. No.</b>	<b>D. E. No.</b>	<b>Description</b>	<b>ACC / FCR Objection(s)</b>	<b>Debtor's Response</b>
D-23	416-3	Declaration of Dr. Charles E. Bates (August 19, 2020) (Debtor's Motion Ex. 3)	Lack of Personal Knowledge; Inadmissible Expert Opinion; Hearsay	Competent expert testimony; also based on personal knowledge; declarations may be offered on a motion and are not hearsay (Rule 9017, Rule 43(c)); ACC and FCR have offered depositions in which this declaration was an exhibit, so also appropriate counter-designation and necessary for completeness (Rule 106); ACC and FCR had full opportunity to cross-examine
D-24	416-2	<i>In re: Garlock Sealing Technologies LLC</i> , No. 10—BK-31607, Vol. XI-A Morning Session, Transcript of Estimation Trial Before the Honorable George R. Hodges, August 5, 2013 (excerpts – testimony by Dr. Charles Bates) (Debtor's Motion Ex. 2)	Inadmissible Expert Opinion; Hearsay	Not offered for truth or as an expert opinion but to show facts presented to and considered by previous court; Court may take judicial notice of records from prior case

Ex. No.	D. E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
D-25	416-4	<i>In re: Garlock Sealing Technologies LLC</i> , No. 10—BK-31607, Dkt. No. 2430, Order Granting in Part and Overruling in Part Objections to Subpoena by Delaware Claims Processing Facility, LLC and Associated Trusts, Establishing Claimant Objection Procedures and Governing the Confidentiality of Information Provided in Response to the Subpoena (Aug. 7, 2012) (Debtor's Motion Ex. 4)		
D-26	416-5	<i>In re: Garlock Sealing Technologies LLC</i> , No. 10—BK-31607, Estimation Trial Ex. 8001 - "Omissions in RFA-1 Cases Based on DCPF and Ballot Data Only" (Debtor's Motion Ex. 5)	Hearsay; Summary	Not offered for truth, but to show what was presented to and considered by court in prior case; Court may take judicial notice of records from prior case
D-27	416-6	<i>Congoleum Corp. v. ACE Am. Ins. Co.</i> , Misc. No 09M-01-084, Memorandum Opinion (Del. Super. Aug, 4, 2009) (Debtor's Motion Ex. 6)		
D-28	416-7	<i>Nat. Union Fire Ins. Co. v. Porter Hayden Co.</i> , No. CCB-03-3408, Memorandum (D. Md. Feb. 24, 2012) (Debtor's Motion Ex. 7)		
D-29	416-8	Plaintiff 1 – Reporter's Transcript of Proceedings (Trial – Afternoon Session), May 1, 2019 (excerpts; redacted) (Debtor's Motion Ex. 8)	Hearsay	Not for truth of matter asserted
D-30	416-9	Plaintiff 1 - Reporter's Transcript of Proceedings (Trial – Afternoon Session), May 2, 2019 (excerpts; redacted) (Debtor's Motion Ex. 9)	Hearsay	Not for truth of matter asserted
D-31	416-10	Plaintiff 1 - Reporter's Transcript of Proceedings (Jury Trial), May 2, 2019 (excerpts; redacted) (Debtor's Motion Ex. 10)	Hearsay	Not for truth of matter asserted

<b>Ex. No.</b>	<b>D. E. No.</b>	<b>Description</b>	<b>ACC / FCR Objection(s)</b>	<b>Debtor's Response</b>
D-32	416-11	Plaintiff 1 – Case No. RG18922207, Order Granting in Part Defendant A. Teichert & Son., Inc. dba Teichert Construction's Motion for Sanctions (May 14, 2019) (redacted) (Debtor's Motion Ex. 11)		
D-33	416-12	Plaintiff 1 – CA Claims Intake Center – 09122018, Addendum to VA Form 21-526EZ (Sept. 12, 2018) (redacted) (Debtor's Motion Ex. 12)	Hearsay; Pleading	Not for truth of matter asserted
D-34	416-13	Plaintiff 2 – Consolidated Case No. 24X11000785, Defendant CertainTeed Corporation's Motion for Sanctions and Request for Hearing (Aug. 26, 2013) (redacted) (Debtor's Motion Ex. 13)	Hearsay; Pleading	Not for truth of matter asserted
D-35	416-14	Plaintiff 3 – No. CJ-08-238, Memorandum in Support of Defendant CertainTeed Corporation's Motion to Strike the Testimony of Jasper Hubbard and for Sanctions Due to Plaintiff's Discovery Abuses & Exhibits (Dec. 27, 2011) (redacted) (Debtor's Motion Ex. 14)	Hearsay; Pleading	Not for truth of matter asserted
D-36	416-15	Plaintiff 4 - Plaintiff's Supplemental and Amended Response to Defendant CertainTeed Corporation's Pre-Trial Interrogatories (June 1, 2006) (redacted) (Debtor's Motion Ex. 15)	Hearsay; Pleading	Not for truth of matter asserted
D-37	416-16	Plaintiff 4 – No. 447559, Declaration of [REDACTED] in Supplemental Opposition to Defendant CertainTeed Corporation's Motion for Summary Judgment Or, in the Alternative, Summary Adjudication (July 20, 2006) (redacted) (Debtor's Motion Ex. 16)	Hearsay; Pleading	Not for truth of matter asserted

<b>Ex. No.</b>	<b>D. E. No.</b>	<b>Description</b>	<b>ACC / FCR Objection(s)</b>	<b>Debtor's Response</b>
D-38	416-17	Plaintiff 4 – No. 447559, Declaration of Bernard Panella in Support of Plaintiff's Supplemental Opposition to Defendant CertainTeed Corporation's Motion for Summary Judgment Or, in the Alternative, for Summary Adjudication (July 20, 2006) (redacted) (Debtor's Motion Ex. 17)	Hearsay; Pleading	Not for truth of matter asserted
D-39	416-18	Plaintiff 4 - San Francisco Standard Interrogatories to Plaintiffs (Personal Injury), Set 2 (Debtor's Motion Ex. 18)	Hearsay; Pleading	Not for truth of matter asserted
D-40	416-19	Plaintiff 4 – Answers to Interrogatories (Dec. 29, 2005) (redacted) (Debtor's Motion Ex. 19)	Hearsay; Pleading	Not for truth of matter asserted
D-41	416-20	Plaintiff 4 - Supplemental Responses Interrogatories (June 9, 2006) (redacted) (Debtor's Motion Ex. 20)	Hearsay; Pleading	Not for truth of matter asserted
D-42	416-21	Plaintiff 4 - Pre-Trial Interrogatories Propounded to Plaintiffs by Defendant CertainTeed Corporation [First Set] (Feb. 16, 2006) (redacted) (Debtor's Motion Ex. 21)	Hearsay; Pleading	Not for truth of matter asserted
D-43	416-22	Plaintiff 4 - Plaintiff's Responses to Defendant CertainTeed Corporation's Pre-Trial Interrogatories (Mar. 27, 2006) (redacted) (Debtor's Motion Ex. 22)	Hearsay; Pleading	Not for truth of matter asserted
D-44	416-23	Plaintiff 4 - Discovery Deposition of [REDACTED], Volume I (Mar. 29, 2006) (excerpts; redacted) (Debtor's Motion Ex. 23)	Hearsay	Not for truth of matter asserted
D-45	416-24	Plaintiff 4 - Discovery Deposition of [REDACTED], Volume II (Mar. 30, 2006) (excerpts; redacted) (Debtor's Motion Ex. 24)	Hearsay	Not for truth of matter asserted
D-46	416-25	Plaintiff 4 - Discovery Deposition of [REDACTED], Volume III (Mar. 31, 2006) (excerpts; redacted) (Debtor's Motion Ex. 25)	Hearsay	Not for truth of matter asserted
D-47	416-26	Plaintiff 4 - Discovery Deposition of [REDACTED], Volume IV (Apr. 1, 2006) (excerpts; redacted) (Debtor's Motion Ex. 26)	Hearsay	Not for truth of matter asserted



Ex. No.	D. E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
D-48	416-27	Plaintiff 4 – Collection of ballots in four cases (redacted) (Debtor's Motion Ex. 27)	Hearsay	Not for truth of matter asserted
D-49	416-28	Plaintiff 5 – Videotaped Oral Deposition of [REDACTED] (Dec. 16, 2009) (excerpts; redacted) (Debtor's Motion Ex. 28)	Hearsay	Not for truth of matter asserted
D-50	416-29	<i>In re: Asbestos Litigation</i> , Civil Action Number 77C-ASB-2, Standing Order No. 1 – Amended on December 21, 2007 (Del. Super. Dec. 27, 2007) (Debtor's Motion Ex. 29)		
D-51	416-30	Plaintiff 5 – Oral Deposition of [REDACTED] (Dec. 16, 2009) (excerpts; redacted) (Debtor's Motion Ex. 30)	Hearsay	Not for truth of matter asserted
D-52	416-31	Plaintiff 5 – C.A. No. N09C-10-088 ASB, Plaintiffs' Answers to Interrogatories Directed to Plaintiffs by All Defendants and Response to Request for Production (excerpts; redacted) (Debtor's Motion Ex. 31)	Hearsay; Pleading	Not for truth of matter asserted
D-53	416-32; 416-33; 416-34; 416-35; 416-36; 416-37; 416-38	Plaintiff 5 – Garlock Sealing Technologies LLC, Mesothelioma Claim Questionnaire, Claim Questionnaire for: [REDACTED] (Debtor's Motion Ex. 32)	Hearsay	Not for truth of matter asserted
D-54	416-39	Plaintiff 6 - Defendant CertainTeed Corporation's Pre-Trial Interrogatories Propounded to Plaintiff [First Set] (excerpts; redacted) (Debtor's Motion Ex. 33)	Hearsay; Pleading	Not for truth of matter asserted
D-55	416-40	Plaintiff 6 – Videotaped Discovery Deposition of [REDACTED], Volume II (Apr. 21, 2009) (excerpts; redacted) (Debtor's Motion Ex. 34)	Hearsay	Not for truth of matter asserted

<b>Ex. No.</b>	<b>D. E. No.</b>	<b>Description</b>	<b>ACC / FCR Objection(s)</b>	<b>Debtor's Response</b>
D-56	416-41	Plaintiff 6 - Videotaped Discovery Deposition of [REDACTED], Volume VI (Apr. 25, 2009) (excerpts; redacted) (Debtor's Motion Ex. 35)	Hearsay	Not for truth of matter asserted
D-57	416-42	Plaintiff 6 – Case No. RG09441080, Cooper Industries, LLC's Special Interrogatories to Plaintiffs (June 8, 2009) (excerpts; redacted) (Debtor's Motion Ex. 36)	Hearsay; Pleading	Not for truth of matter asserted
D-58	416-43	Plaintiff 6 - Case No. RG09441080, Cooper Industries, LLC's Inspection Demands to Plaintiffs (June 8, 2009) (redacted) (Debtor's Motion Ex. 37)	Hearsay; Pleading	Not for truth of matter asserted
D-59	416-44	Plaintiff 6 - Defendant CertainTeed Corporation's Pre-Trial Interrogatories Propounded to Plaintiff [First Set] (Apr. 4, 2007) (excerpts; redacted) (Debtor's Motion Ex. 38)	Hearsay; Pleading	Not for truth of matter asserted
D-60	416-45	Plaintiff 6 - Request for Production of Documents to Plaintiff Propounded by Defendant CertainTeed Corporation [First Set] (Apr. 7, 2009) (redacted) (Debtor's Motion Ex. 39)	Hearsay; Pleading	Not for truth of matter asserted
D-61	416-46	Plaintiff 6 - Case No. RG09441080, Defendant CertainTeed Corporation's Pre-Trial Interrogatories Propounded to Plaintiffs [First Set] (Apr. 7, 2009) (excerpts; redacted) (Debtor's Motion Ex. 40)	Hearsay; Pleading	Not for truth of matter asserted
D-62	416-47	Plaintiff 6 - First Supplemental Interrogatory to Plaintiff by Defendant (July 20, 2009) (redacted) (Debtor's Motion Ex. 41)	Hearsay; Pleading	Not for truth of matter asserted
D-63	416-48	Plaintiff 6 – First Supplemental Request for Production of Documents to Plaintiff by Defendant (July 29, 2009) (redacted) (Debtor's Motion Ex. 42)	Hearsay; Pleading	Not for truth of matter asserted
D-64	416-49	Plaintiff 6 - Plaintiffs' Response to Defendant CertainTeed Corporation's First Supplemental Interrogatory to Plaintiffs (Sept. 3, 2009) (redacted) (Debtor's Motion Ex. 43)	Hearsay; Pleading	Not for truth of matter asserted

<b>Ex. No.</b>	<b>D. E. No.</b>	<b>Description</b>	<b>ACC / FCR Objection(s)</b>	<b>Debtor's Response</b>
D-65	416-50	Plaintiff 6 - Plaintiffs' Response to Defendant CertainTeed Corporation's First Supplemental Request for Production of Documents to Plaintiffs (Sept. 3, 2009) (redacted) (Debtor's Motion Ex. 44)	Hearsay; Pleading	Not for truth of matter asserted
D-66	416-51; 416-52	Plaintiff 6 - Garlock Sealing Technologies LLC, Mesothelioma Claim Questionnaire, Claim Questionnaire for: [REDACTED] (Debtor's Motion Ex. 45)	Hearsay	Not for truth of matter asserted
D-67	416-53	Plaintiff 6 – "Plaintiff 6 Ballots" (redacted) (Debtor's Motion Ex. 46)	Hearsay	Not for truth of matter asserted
D-68	416-54	Plaintiff 6 – No. RG09441080, Videotaped Direct Deposition of [REDACTED] (Apr. 20, 2009) (excerpts; redacted) (Debtor's Motion Ex. 47)	Hearsay	Not for truth of matter asserted
D-69	416-55	Plaintiff 7 – Case No. RG-09-487668, Plaintiffs Second Supplemental Answers to Standard Interrogatories Propounded by Defendants (Personal Injury) Set 1 (May 4, 2010) (redacted) (Debtor's Motion Ex. 48)	Hearsay; Pleading	Not for truth of matter asserted
D-70	416-56	Plaintiff 7 - No. RG-09-487668, Videotaped Deposition of [REDACTED] (Volume 1) (Feb. 2, 2010) (excerpts, redacted) (Debtor's Motion Ex. 49)	Hearsay	Not for truth of matter asserted
D-71	416-57	Plaintiff 7 - No. RG-09-487668, Videotaped Deposition of [REDACTED] (Volume 2) (Feb. 3, 2010) (excerpts, redacted) (Debtor's Motion Ex. 50)	Hearsay	Not for truth of matter asserted
D-72	416-58	Plaintiff 7 - No. RG-09-487668, Videotaped Deposition of [REDACTED] (Volume 3) (Feb. 8, 2010) (excerpts, redacted) (Debtor's Motion Ex. 51)	Hearsay	Not for truth of matter asserted

<b>Ex. No.</b>	<b>D. E. No.</b>	<b>Description</b>	<b>ACC / FCR Objection(s)</b>	<b>Debtor's Response</b>
D-73	416-59	Plaintiff 7 – “Garlock PIQ Table B” (Debtor’s Motion Ex. 52)	Hearsay; Summary	Not for truth of matter asserted; this is information submitted by claimant in response to required Questionnaire—summary objection is not proper
D-74	416-60	Plaintiff 7 - Declaration of [REDACTED] (AKA [REDACTED]) (June 2, 2010) (Debtor’s Motion Ex. 53)	Hearsay	Not for truth of matter asserted
D-75	416-61	Plaintiff 8 – Case No. 2009 L 011213, Transcript of Deposition of [REDACTED] (Oct. 29, 2010) (excerpts, redacted) (Debtor’s Motion Ex. 54)	Hearsay	Not for truth of matter asserted
D-76	416-62; 416-63; 416-64; 416-65; 416-66	Plaintiff 8 - Garlock Sealing Technologies LLC, Mesothelioma Claim Questionnaire, Claim Questionnaire for: [REDACTED] (Debtor’s Motion Ex. 55)	Hearsay	Not for truth of matter asserted
D-77	416-67	Plaintiff 8 – NO. 09 L 011213, Plaintiff’s Response to Defendants’ Consolidated Requests for Production of Documents (Oct. 5, 2009) (excerpt, redacted) (Debtor’s Motion Ex. 56)	Hearsay; Pleading	Not for truth of matter asserted
D-78	416-68	Frequently Asked Questions Related to Third Party Discovery of Information and Documents Pursuant to the 2002 Manville Trust TDP, Revised March 2019 (Debtor’s Motion Ex. 57)		
D-79	416-69	USG Corporation Projected Liabilities for Asbestos Personal Injury Claims As of June 2001, Mark A. Peterson, Legal Analysis Systems, May 2006 (excerpts) (Debtor’s Motion Ex. 58)	Inadmissible Expert Opinion; Hearsay	Not for truth or as expert opinion

Ex. No.	D. E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
D-80	416-70	Letter from Stephen M. Juris to Garland S. Cassada Re: <i>In re: Garlock Sealing Technologies LLC</i> , 10-BK-31607, dated Sept. 5, 2012 (Debtor's Motion Ex. 59)	Hearsay	Not for truth of matter asserted
D-81	416-71	<i>In re: Garlock Sealing Technologies LLC</i> , No. 10—BK-31607, Dkt. No. 4721, Order Granting in Part and Denying in Part Debtors' Motion for Leave to Serve Subpoena on Manville Trust (July 24, 2015) (Debtor's Motion Ex. 60)		
D-82	416-72	<i>In re: W.R. Grace &amp; Co.</i> , Case No. 07-01139 (JKF), Transcript of Hearing Before Honorable Judith K. Fitzgerald (Aug. 29, 2007) (excerpts) (Debtor's Motion Ex. 61)		
D-83	416-73	<i>In re: W.R. Grace &amp; Co.</i> , Case No. 07-01139 (JKF), Order Regarding W.R. Grace & Company's Motions to Compel Discovery Materials from Celotex Asbestos Settlement Trust (Oct. 3, 2007) (Debtor's Motion Ex. 62)		
D-84	416-74	<i>In re: W.R. Grace &amp; Co.</i> , Case No. 07-01139 (JKF), Order Regarding W.R. Grace & Company's Motion to Compel Discovery Materials from the DII Industries, LLC Asbestos PI Trust (Oct. 9, 2007) (Debtor's Motion Ex. 63)		
D-85	416-75	<i>In re: Motors Liquidation Company</i> , Case No. 09-50026 (REG), Order Pursuant to Bankruptcy Rule 2004 Authorizing the Official Committee of Unsecured Creditors of Motors Liquidation Company to Obtain Discovery from (I) the Claims Processing Facilities for Certain Trusts Created Pursuant to Bankruptcy Code Section 524(g), (II) the Trusts, and (III) General Motors LLC and the Debtors (Aug. 24, 2010) (Debtor's Motion Ex. 64)		

Ex. No.	D. E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
D-86	416-76	<i>In re: Motors Liquidation Company</i> , Case No. 09-50026 (REG), Hearing Transcript (Aug. 9, 2010) (excerpts) (Debtor's Motion Ex. 65)		
D-87	416-77	<i>In re: Motors Liquidation Company</i> , Case No. 09-50026 (REG), Stipulation and Order (Dec. 6, 2010) (Debtor's Motion Ex. 66)		
D-88	416-78	<i>In re Specialty Products Holding Corp.</i> , Case No. 10-11780 (JKF), Debtor's Objection to T H Agriculture & Nutrition Asbestos Personal Injury Trust and Verus Claims Services, LLC's Joint Motion to Quash and, Alternatively, for Issuance of a Protective Order (Nov. 12, 2012) (Debtor's Motion Ex. 67)	Hearsay; Pleading	Not offered for truth, but to show what was presented to and considered by court in prior case; Court may take judicial notice of records from prior case
D-89	416-79	<i>In re Specialty Products Holding Corp.</i> , Case No. 10-11780 (JKF), Order Denying T H Agriculture & Nutrition Asbestos Personal Injury Trust & Verus Claims Services, LLC's Joint Motion to Quash and, Alternatively, for Issuance of a Protective Order (Dec. 10, 2012) (Debtor's Motion Ex. 68)		
D-90	867-1	Second Amended and Restated Armstrong World Industries, Inc. Asbestos Personal Injury Settlement Trust Distribution Procedures (Winner Decl. Ex. A) (Dkt. 867) <sup>1</sup>		
D-91	949-4	"[E]xcerpt from Plaintiff 1's interrogatory responses containing name, date of birth, last four digits of social security number, and other identifying information (redacted by the Debtor)." (Debtor's Reply Ex. D)	Hearsay; Pleading	Not for truth of matter asserted

<sup>1</sup> This is the only exhibit from disclosed Ex. No. 8 "Declaration and exhibits thereto of Declaration of Richard Winner (Dkt. 867)" that the Debtor offers as evidence.

Ex. No.	D. E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
D-92	949-5	<i>In re: Bestwall LLC</i> , Case No. 17-31795-LTB, Transcript of Proceeding Before the Honorable Laura Turner Beyer, United States Bankruptcy Judge (Mar. 4, 2021) (excerpts) (Debtor's Reply Ex. E)		
D-93	949-6	<i>In re: Bestwall LLC</i> , Case No. 1:21-mc-00141-CFC, Motion of Third Party Asbestos Trusts to Quash or Modify Subpoenas (Debtor's Reply Ex. F)		
D-94	949-7	<i>In re: DBMP, LLC</i> , Case No. 20-30080 (JCW), Zoom Videotaped Deposition of Mark Peterson, Volume I (July 27, 2021) (excerpts) (Debtor's Reply Ex. G)		
D-95	949-8	<i>In re: Kaiser Gypsum Co., Inc.</i> , Case No. 16-31602 (JCW), Statement of Interest on Behalf of the United States of America Regarding Plans of Reorganization for Kaiser Gypsum Company, Inc. and Hanson Permanente Cement, Inc. (Sept. 13, 2018) (Debtor's Reply Ex. H)	Hearsay; Pleading	Not offered for truth, but to show what was presented to and considered by court in prior case; Court may take judicial notice of records from prior case
D-96	949-9	<i>In re: Garlock Sealing Technologies LLC</i> , No. 10—BK-31607, Order on Motions to Seal Materials in Record of Estimation Proceeding and Protocol for Redaction of Record (Oct. 31, 2014) (Debtor's Reply Ex. I)		
D-97	949-10	DBMP LLC's Responses and Objections to the Official Committee of Asbestos Personal Injury Claimants' and Future Claimants' Representative's Second Requests for Discovery Pursuant to Federal Rules of Bankruptcy Procedure 7026, 7033, 7036, and 9014 (May 5, 2021) (Debtor's Reply Ex. J)		

Ex. No.	D. E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
D-98	949-11	<i>In re Specialty Products Holding Corp.</i> , Case No. 10-11780 (JKF), Transcript of Proceedings Before the Honorable Judith K. Fitzgerald, United States Bankruptcy Judge (July 25, 2011) (excerpts) (Debtor's Reply Ex. K)		
D-99	949-12	<i>In re: Garlock Sealing Technologies LLC</i> , No. 10—BK-31607, Motion of Debtors for Leave to Serve Subpoena on Delaware Claims Processing Facility, LLC (excerpts) (Debtor's Reply Ex. L)	Hearsay; Pleading	Not offered for truth, but to show what was presented to and considered by court in prior case; Court may take judicial notice of records from prior case
D-100	949-13	<i>In re: Motors Liquidation Company</i> , Case No. 09-50026 (REG), Order Concerning ACC's Request for an Anonymity Protocol (Oct. 22, 2010) (Debtor's Reply Ex. M)		
D-101	949-14	<i>In re: Bestwall LLC</i> , Case No. 17-31795-LTB, Transcript of Proceeding Before the Honorable Laura Turner Beyer, United States Bankruptcy Judge, Volume I (Jan. 1, 2021) (excerpts) (Debtor's Reply Ex. N)		
D-102		<i>In re Owens Corning</i> , 560 B.R. 229 (Bankr. D. Del. 2016) (the "Access Decision") <sup>2</sup>		
D-103	423; 847; 911; 958	Certificates of service of the Debtor's Trust Motion and related briefing (Dkts. 423, 847, 911, 958)	Vague	"Vague" is not a proper objection; the Debtor has listed specific certificates of services that show the Trusts were served

<sup>2</sup> The Debtor's disclosed as Ex. No. 10 "Exhibits or documents cited in Reply in Support of Debtor's Motion for Bankruptcy Rule 2004 Examination of Asbestos Trusts (Dkt. 949)," which includes the Access Decision. Consistent with the ACC and FCR's approach, the Debtor used the next available sub-exhibit number to label this exhibit.



<b>Ex. No.</b>	<b>D. E. No.</b>	<b>Description</b>	<b>ACC / FCR Objection(s)</b>	<b>Debtor's Response</b>
D-104		Plaintiff 2 Celotex Claim Form (DBMP-BR_0035521-0035532) <sup>3</sup>	Hearsay; Completeness	Not for truth of matter asserted; entire claim form provided
D-105		Plaintiff 2 11/14/08 Deposition Transcript (excerpts) (DBMP-BR_0035023)	Hearsay; Completeness	Not for truth of matter asserted; entire deposition transcript can be provided
D-106		Plaintiff 2 National Gypsum Certified Statement (DBMP-BR_0035693)	Hearsay; Completeness	Not for truth of matter asserted; entire claim form provided
D-107		Plaintiff 4 Release (excerpt) (DBMP-BR_0167096) (DBMP-BR_0167096)	Hearsay; Completeness	Not for truth of matter asserted; entire release can be provided
D-108		DBMP LLC's Responses and Objections to the Official Committee of Asbestos Personal Injury Claimants' and Future Claimants' Representative's First Requests for Discovery Pursuant to Federal Rules of Bankruptcy Procedure 7026, 7033, 7036, and 9014 (Oct. 5, 2020) (excerpts)		
D-109		Armstrong World Industries, Inc. Asbestos Personal Injury Settlement Trust, Annual Report for the Year Ended December 31, 2014		
D-110		Armstrong World Industries, Inc. Asbestos Personal Injury Settlement Trust, Annual Report for the Year Ended December 31, 2020		

<sup>3</sup> Exhibits 14-A through 14-D are the only exhibits from disclosed Ex. No. 14 "Discovery responses by any party or entity in this proceeding" that the Debtor offers as evidence, other than Ex. 27-B.

<b>Ex. No.</b>	<b>D. E. No.</b>	<b>Description</b>	<b>ACC / FCR Objection(s)</b>	<b>Debtor's Response</b>
D-111		Annual Report and Account of the Babcock & Wilcox Company Asbestos PI Trust for the Fiscal Year Ending December 31, 2020		
D-112		Annual Report, Summary of Claims Disposed, Financial Statement, and Account of the Trustee of the Asbestos Settlement Trust for the Period January 1, 2020 to December 31, 2020, In re Celotex Corp., et al., Case Nos. 90-10016-MGW, 90-10017-MGW (Bankr. M.D. Fla.)		
D-113		DII Industries, LLC Asbestos PI Trust's 2020 Annual Report		
D-114		Annual Report and Account of the Federal-Mogul Asbestos Personal Injury Trust for the Fiscal Year Ending December 31, 2020		
D-115		The Flintkote Asbestos Trust, Annual Report for the Year Ended December 31, 2020; h. Annual Report and Account of the Owens Corning/Fibreboard Asbestos Personal Injury Trust for the Fiscal Year Ending December 31, 2020		
D-116		Annual Report and Account of the United States Gypsum Personal Injury Settlement Trust for the Fiscal Year Ending December 31, 2020		
D-117		Annual Report and Account of the WRG Asbestos PI Trust for the Fiscal Year Ending December 31, 2020		

Ex. No.	D. E. No.	Description	ACC / FCR Objection(s)	Debtor's Response
D-118		<i>In re: Motors Liquidation Company</i> , Case No. 09-50026 (REG), Hearing Transcript (Aug. 9, 2010) (excerpts) <sup>4</sup>	Hearsay; Vague	Not offered for truth, but to show what was presented to and considered by court in prior case; Court may take judicial notice of records from prior case; excerpts are pages 9, 21-23, 37-38
D-119		Order Establishing the Protocol for Production of 2019 Exhibits, <i>In re W.R. Grace &amp; Co.</i> , Case No, 01-01139 (Bankr. D. Del. April. 9, 2013) (D.I. 30490) (the “ <u>Protocol Order</u> ”) <sup>5</sup>		

<sup>4</sup> This is the only exhibit from disclosed Ex. No. 34 “Any pleadings or other public filings in *In re Motors Liquidation Co.*, C.A. No. 09-50026 (Bankr. S.D.N.Y.)” that the Debtor offers as evidence.

<sup>5</sup> This is the only exhibit from disclosed Ex. No. 35 “Any pleadings or other public filings in *In re W.R. Grace & Co.*, C.A. No. 01-1139 (Bankr. D. Del.)” that the Debtor offers as evidence.

**EXHIBIT B**

**ACC'S EXHIBIT LIST**

**Committee's Final Exhibit List for Hearing on Trust Discovery Motion and DCQ Motion, In re DBMP LLC**

Note: The list does not include deposition designations, which have already been disclosed.

Ex. No.	Description	Dkt. No.
1	<i>In re Bestwall, LLC</i> , Case No. 1:21-mc-00141 (D. Del. Jun. 1, 2021), <i>Memorandum Granting Motion of Third-Party Asbestos Trusts to Quash or Modify Subpoenas</i> (Also an exhibit for the PIQ hearing)	<i>In re Bestwall, LLC</i> , Case No. 1:21-mc-00141 (D. Del. Jun. 1, 2021), Dkt. No. 29
2	<i>In re Bestwall, LLC</i> , Case No. 1:21-mc-00141 (D. Del. Jun. 1, 2021), <i>Order Granting Motion of Third-Party Asbestos Trusts to Quash or Modify Subpoenas</i> (Also an exhibit for the PIQ hearing)	<i>In re Bestwall, LLC</i> , Case No. 1:21-mc-00141 (D. Del. Jun. 1, 2021), Dkt. No. 30
3	<i>In re Specialty Prods. Holding Corp.</i> , Case No. 10-11780, <i>Dep. Tr. of Charles E. Bates, Ph.D.</i> (Bankr. D. Del. Feb. 3, 2011)	
4	<i>In re Imerys Talc America, Inc.</i> , Case No. 19-10289, <i>Dep. Tr. of David Levi</i> (Bankr. D. Del. Apr. 9, 2021)	
5	<i>In re Bestwall, LLC</i> , Case No. 1:21-mc-00141 (D. Del. Apr. 19, 2021) <i>Motion of Third-Party Asbestos Trusts to Quash or Modify Subpoenas</i>	<i>In re Bestwall, LLC</i> , Case No. 1:21-mc-00141 (D. Del. Apr. 19, 2021), Dkt. No. 1
6	Hr'g Tr., <i>In re Motors Liquidation Co.</i> , Case No. 09-50026 (Bankr. S.D.N.Y.)	Exhibit G to Dkt. No. 874
7	<i>In re Motors Liquidation Co.</i> , Case No. 09-50026 (Bankr. S.D.N.Y.), <i>Order Concerning ACC's Request for Anonymity Protocol</i>	Exhibit H to Dkt. No. 874
8	<i>Appl. and Amicus Curiae Br. of Bates White LLC in Supp. of Resp'ts, 2, O'Neil v. Crane Co</i> , Action No. S177401 (Cal. S. Ct. Jul. 28, 2010)	Exhibit I to Dkt. No. 874
9	<i>In re Garlock Sealing Techs. LLC</i> , Case No. 10-31607, <i>Hr'g Tr.</i> , Jun. 30, 2015	
10	<i>Debtor's Ex Parte Application for Order Authorizing Retention and Employment of Robinson, Bradshaw &amp; Hinson, P.A. as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel for Debtor as of the Petition Date</i>	Dkt. No. 18
11	<i>Debtor's Ex Parte Application for Order Authorizing Retention and Employment of Bates White LLP as Asbestos Consultants as of the Petition Date</i>	Dkt. No. 19
12	Plaintiff No. 1 Dep. Tr., Jan. 14, 2019*	Exhibit P1 A-1 to Dkt. No. 874
13	[Redacted] v. [Redacted] CA Super. Ct., County of Alameda, Trial Transcript Apr. 29 2019*	Exhibit P1 A-2 to Dkt. No. 874

Ex. No.	Description	Dkt. No.
14	Plaintiff's Complaint for Damages, <i>[Redacted]</i> v. Air & Liquid Systems Corporation et al CA Super. Ct., County of Alameda*	Exhibit P1 A-3 to Dkt. No. 874
15	Plaintiff No. 1 Dep. Tr. Vol. 2, Jan. 15, 2019*	Exhibit P1 A-4 to Dkt. No. 874
16	<i>[Redacted]</i> v. <i>[Redacted]</i> CA Super. Ct., County of Alameda, Trial Transcript May 7, 2019*	Exhibit P1 A-5 to Dkt. No. 874
17	<i>[Redacted]</i> v. <i>[Redacted]</i> CA Super. Ct., County of Alameda, Trial Transcript Apr. 30, 2019*	Exhibit P1 A6 to Dkt. No. 874
18	<i>[Redacted]</i> v. <i>[Redacted]</i> CA Super. Ct., County of Alameda, Trial Transcript May 1, 2019*	Exhibit P1 A-7 to Dkt. No. 874
19	<i>Order Granting in Part Defendant A. Teichert &amp; Son, Inc. dba Teichert Construction's Motion for Sanctions</i> (CA Super. Ct., County of Alameda, May 14, 2019)*	Exhibit P1 A-8 to Dkt. No. 874
20	Plaintiff No. 2 Dep. Tr., Nov. 21, 2008*	Exhibit P2 A-1 to Dkt. No. 874
21	Plaintiff No. 2 Short Form Complaint*	Exhibit P2 A-2 to Dkt. No. 874
22	Verdict Sheet <i>[Redacted]</i> v. <i>[Redacted]</i> (Baltimore City Cir. Ct.)*	Exhibit P2 A-3 to Dkt. No. 874
23	Plaintiffs' Opposition to Motion of Defendant CertainTeed Corporation for Sanctions, <i>[Redacted]</i> v. <i>[Redacted]</i> (Baltimore City Cir. Ct.)*	Exhibit P2 A-4 to Dkt. No. 874
24	Plaintiff's Answers to Standard Asbestos Case Interrogatories, Set One, Dec. 29, 2005*	Exhibit P4 A-1 to Dkt. No. 874
25	Deposition of Plaintiff No. 4 (Mar. 29, 2006), at 127:12-128:1; 131:20-24*	Exhibit P4 A-2 to Dkt. No. 874
26	<i>Complaint for Personal Injury – Asbestos, [Plaintiff 4] v. Asbestos Defendants</i> (CA Super. Ct., Cty. of San Francisco, Dec. 12, 2005)*	Exhibit P4 A-3 to Dkt. No. 874
27	Pre-Trial Interrogatories Produced to Plaintiff by Defendant CertainTeed Corporation, Mar. 27, 2006*	Exhibit P4 A-4 to Dkt. No. 874
28	Supplemental Amended Response to Standard Asbestos Case Interrogatories, Apr. 18, 2006*	Exhibit P4 A-5 to Dkt. No. 874
29	Deposition of Plaintiff No. 4 (Mar. 30, 2006), at 295:20-320:15*	Exhibit P4 A-6 to Dkt. No. 874
30	Trust Claim Form (Babcock & Wilcox Co. Asbestos Personal Injury Trust), dated Nov. 7, 2006; Trust Claim Form (Owens Corning/Fibreboard Asbestos Personal Injury Trust), dated Dec. 16, 2008); Trust Claim Form (Eagle-Picher Industries, Inc. Personal Injury Settlement Trust), dated Nov. 7, 2006*	Exhibit P4 A-7 to Dkt. No. 874

Ex. No.	Description	Dkt. No.
31	<i>[Plaintiff 4] v. Asbestos Defendants (BHC), et al., Order Denying Defendant CertainTeed Corporation's Motion for Summary Judgment and for Summary Adjudication on the First and Second Causes of Action and on Punitive Damages, and Granting Summary Adjudication on the Third Cause of Action</i> (CA Super. Ct., Cty. of San Francisco, Jul. 20, 2006)*	Exhibit P4 A-8 to Dkt. No. 874
32	<i>Jurors Award \$3.4 Million in Colon Cancer Case, HARRISMARTIN'S ASBESTOS PUBLICATION</i> , Jun. 21, 2005*	Exhibit P4 A-9 to Dkt. No. 874
33	Deposition of Plaintiff No. 5 (Dec. 16, 2009)*	Exhibit P5 A-1 to Dkt. No. 874
34	Plaintiff No. 5 Complaint, Oct. 8, 2009*	Exhibit P5 A-2 to Dkt. No. 874
35	Plaintiff No. 5 Settlement Letter, Oct. 14, 2010*	Exhibit P5 A-3 to Dkt. No. 874
36	Plaintiff No. 5 Answer to Interrogatories and Response to Request for Production, Nov. 6, 2009*	Exhibit P5 A-4 to Dkt. No. 874
37	<i>Complaint, [Redacted] v. Alta Building Material Co. et al</i> , CA Super Ct., County of Alameda, Mar. 13 2009*	Exhibit P6 A-1 to Dkt. No. 874
38	Plaintiff No. 6 Settlement Letter, Sept. 14, 2009*	Exhibit P6 A-2 to Dkt. No. 874
39	Direct Deposition of Plaintiff No. 6 (Apr. 20, 2009)*	Exhibit P6 A-3 to Dkt. No. 874
40	Deposition of Plaintiff No. 6, Vol. 1 (Apr. 20, 2009), at 47:3-48:7*	Exhibit P6 A-4 to Dkt. No. 874
41	Deposition of Plaintiff No. 6, Vol. 6 (Apr. 25, 2009)*	Exhibit P6 A-5 to Dkt. No. 874
42	Plaintiff No. 6 Motion to Compel*	Exhibit P6 A-6 to Dkt. No. 874
43	Plaintiffs Second Supplemental Answers to Standard Interrogatories Propounded by Defendants, CA Super Ct., County of Alameda, Apr. 20, 2010*	Exhibit P7 A-1 to Dkt. No. 874
44	<i>Complaint, [Redacted] v. Alta Building Material Co. et al</i> , CA Super Ct., County of Alameda, Dec. 4, 2009*	Exhibit P7 A-2 to Dkt. No. 874
45	Plaintiff's Response to Defendant CertainTeed Corp.'s Special Interrogatories, Set One, CA Super Ct., County of Alameda, Feb. 24, 2010*	Exhibit P7 A-3 to Dkt. No. 874
46	Plaintiff No. 7 Settlement Letter dated May 25, 2010*	Exhibit P7 A-4 to Dkt. No. 874
47	Plaintiff No. 7 Dep. Tr. Feb. 2, 2010*	Exhibit P7 A-5 to Dkt. No. 874
48	Plaintiff No. 7 Dep. Tr. Feb. 16, 2010*	Exhibit P7 A-6 to Dkt. No. 874
49	Plaintiff No. 7 Dep. Tr. Feb. 17, 2010*	Exhibit P7 A-7 to Dkt. No. 874

Ex. No.	Description	Dkt. No.
50	Plaintiff No. 7 Dep. Tr. Feb. 22, 2010*	Exhibit P7 A-8 to Dkt. No. 874
51	Plaintiff No. 7 Dep. Tr. Feb. 3, 2010*	Exhibit P7 A-9 to Dkt. No. 874
52	Plaintiff's Answers to Defendants' Consolidated Interrogatories, Oct. 13, 2009*	Exhibit P8 A-1 to Dkt. No. 874
53	Plaintiff No. 8 Dep. Tr., Oct. 29, 2010*	Exhibit P8 A-2 to Dkt. No. 874
54	Proposed Defense Counsel Questionnaire attached to <i>The Official Committee of Asbestos Personal Injury Claimants' Conditional Motion Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure for an Order Directing the Submission of Information by Debtor's Defense Counsel*</i>	Exhibit B to Dkt. No. 904
55	<i>Order Establishing Certain Notice, Case Management and Administrative Procedures</i>	Dkt. No. 27
56	<i>Hr. 'g Tr.</i> , Jan. 27, 2020	Dkt. No. 74
57	<i>In re Bestwall, LLC</i> , Case No. 1:21-mc-00141 (D. Del. Jun. 17, 2021), <i>Order Granting Motion for Clarification</i>	<i>In re Bestwall, LLC</i> , Case No. 1:21-mc-00141 (D. Del. Jun. 17, 2021), Dkt. No. 33
58	<i>In re Bestwall, LLC</i> , Case No. 1:21-mc-00141 (D. Del. Jul. 16, 2021), <i>Order Denying Bestwall LLC's Motion to Amend Prior Order to Approve Revised Subpoena for Asbestos Trust Date</i>	<i>In re Bestwall, LLC</i> , Case No. 1:21-mc-00141 (D. Del. Jul. 16, 2021), Dkt. No. 45
59	<i>In re Bestwall LLC</i> , No. 17-31795, <i>Hr'g Tr.</i> , Oct. 22, 2020	
60	<i>In re Bestwall LLC</i> , No. 17-31795, <i>Hr'g Tr.</i> , Aug. 31, 2021	
61	<i>In re Kaiser Gypsum Corp., Inc.</i> , Case No. 16-31602, <i>Hr'g Tr.</i> , Aug. 13, 2020	
62	Trust Distribution Procedures - <i>In re Kaiser Gypsum Company, Inc.</i> , Case No. 16-31602 (W.D.N.C.)	
63	Trust Distribution Procedures - <i>In re Armstrong World Industries, Inc.</i> , Case No. 00-4471 (Bankr. D. Del.)	
64	Trust Distribution Procedures - <i>In re Babcock &amp; Wilcox Co.</i> , Case No. 00-10992 to 00-10994 (Bankr. E.D. La.)	
65	Trust Distribution Procedures - <i>In re Celotex Corp.</i> , Case No. 90-10016-8B1, 90-10017-8B1 (Bankr. M.D. Fla.)	
66	Trust Distribution Procedures - <i>In re Mid-Valley, Inc.</i> , Case No. 03-35592 (Bankr. W.D.Pa.)	
67	Trust Distribution Procedures - <i>In re Federal-Mogul Global Inc.</i> , Case No. 01-10578 (Bankr. D. Del.)	



Ex. No.	Description	Dkt. No.
68	Trust Distribution Procedures - <i>In re Flintkote Co.</i> , Case No. 04-11300 (Bankr. D. Del.)	
69	Trust Distribution Procedures - <i>In re Johns-Manville Corp.</i> , Case No. 82-11656 (S.D.N.Y. 1985)	
70	Trust Distribution Procedures - <i>In re Owens Corning</i> , Case No. 00-3837 (Bankr. D. Del.)	
71	Trust Distribution Procedures - <i>In re Pittsburgh Corning Corp.</i> , Case No. 00-22876 (Bankr. W.D.Pa.)	
72	Trust Distribution Procedures - <i>In re W.R. Grace &amp; Co.</i> , Case No. 01-01139 (Bankr. D. Del.)	
73	<i>Declaration of Mark A. Peterson in support of DCQ Motion</i>	Dkt. No. 905
74	<i>Declaration of Michael T. Starczewski</i> (Aug. 19, 2020)	Exhibit E to Dkt. No. 417
75	<i>Declaration of Charles E. Bates, PhD</i> (Aug. 19, 2020) (Also an exhibit for the PIQ hearing)	Exhibit C to Dkt. No. 417
76	<i>Hr'g Tr.</i> , Oct. 14, 2021	Dkt. No. 1155
77	Expert Report of John L. Henshaw re Plaintiff No. 5, Dec. 1, 2010 at 9, Produced at DBMP-BR_0163436	
78	Deposition of John E. Craighead, MD dated Nov. 6, 2009, Produced at DBMP-BR_0035140	

\*The exhibit is not for the truth of the matter asserted.

**Committee's Final Exhibit List for Hearing on PIQ Motion, In re DBMP LLC**

Note: The list does not include deposition designations, which have already been disclosed.

Ex. No.	Description	Dkt. No.
1	<i>Hr. 'g Tr., In re Specialty Prod. Holding Co.</i> , No. 10-11780 (Bankr. D. Del. Jan. 23, 2012) (excerpts)	
2	Charles E. Bates, Ph.D. <i>Dep. Tr.</i> , Apr. 16, 2021	
3	<i>In re Bestwall LLC</i> , Case No. 17-31795 (Bankr. W.D.N.C. Nov. 2, 2017), <i>Informational Brief of Bestwall LLC</i>	<i>In re Bestwall LLC</i> , Case No. 17-31795 (Bankr. W.D.N.C. Nov. 2, 2017), Dkt. No. 12
4	<i>In re Specialty Prods. Holding Corp.</i> , Case No. 10-11780 (Bankr. D. Del. Oct. 11, 2010) <i>Motion of the Debtors Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure for an Order Directing Submission of Information by Current Asbestos Claimants</i>	<i>In re Specialty Prods. Holding Corp.</i> , Case No. 10-11780 (Bankr. D. Del. Oct. 11, 2010), Dkt. No. 436
5	<i>Hr. 'g Tr., In re Specialty Prod. Holding Co.</i> , No. 10-11780 (Bankr. D. Del. Jul. 25, 2011)	
6	<i>In re Specialty Prods. Holding Corp.</i> , No. 10-11780 (Bankr. D. Del. Oct. 7, 2011), <i>Memorandum Opinion</i>	<i>In re Specialty Prods. Holding Corp.</i> , No. 10-11780 (Bankr. D. Del. Oct. 7, 2011), Dkt. No. 1737
7	<i>In re Specialty Products Holding Corp.</i> , Case No. 10-11780 (Bankr. D. Del. Dec. 16, 2011), <i>Debtors' Motion to Compel Mesothelioma Claimants to Cure Deficiencies in Personal Injury Questionnaires</i>	<i>In re Specialty Products Holding Corp.</i> , Case No. 10-11780 (Bankr. D. Del. Dec. 16, 2011), Dkt. No. 1917
8	<i>In re Garlock Sealing Techs., LLC</i> , No. 10-31607 (Bankr. W.D.N.C. Jan. 5, 2011), <i>Motion of the Debtors for an Order Pursuant to Rule 2004 Directing Submission of Information by Current Asbestos Mesothelioma Claimants</i>	<i>In re Garlock Sealing Techs., LLC</i> , No. 10-31607 (Bankr. W.D.N.C. Jan. 5, 2011), Dkt. No. 1006
9	<i>In re Garlock Sealing Techs., LLC</i> , No. 10-31607 (Bankr. W.D.N.C. Mar. 4, 2011), <i>Order Denying Motion for Production of Information from Counsel Representing Garlock Claimants</i>	<i>In re Garlock Sealing Techs., LLC</i> , No. 10-31607 (Bankr. W.D.N.C. Mar. 4, 2011), Dkt. No. 1201
10	<i>In re Garlock Sealing Tech.</i> , Case No. 10-31607 (Bankr. W.D.N.C. Jun. 29, 2012), <i>Order Authorizing Debtors to Issue Supplemental Settlement Payment Questionnaire and Governing the Confidentiality of Information Provided in Responses</i>	<i>In re Garlock Sealing Tech.</i> , Case No. 10-31607 (Bankr. W.D.N.C. Jun. 29, 2012), Dkt. No. 2338
11	<i>Informational Brief of DBMP LLC</i>	Dkt. No. 22
12	<i>Declaration of Robert J. Panaro in Support of First Day Pleadings</i>	Dkt. No. 24

Ex. No.	Description	Dkt. No.
13	<i>Affidavit of Service filed by Debtor DBMP LLC</i>	Dkt. No. 423
14	<i>Hr. 'g Tr., In re Specialty Prod. Holding Co., No. 10-11780 (Bankr. D. Del. Nov. 15, 2010)</i>	
15	Order (I) Authorizing the Debtor to File a List of the Top Law Firms with Asbestos Cases Against the Debtor in Lieu of the List of 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Asbestos Claimants; and (III) Approving the Form and Manner of Notice of Commencement of This Case	Dkt. No. 63

**EXHIBIT C**

**FCR'S EXHIBIT LIST**

**FCR's Final Exhibit List for Hearing on Trust Discovery Motion, In re DBMP LLC**

This list not include deposition designations, which have already been separately disclosed.

<b>Ex. No.</b>	<b>Description</b>	<b>Docket No.</b>	<b>Debtor Objection(s)</b>	<b>FCR's Response</b>
FCR -1	DBMP LLC's Responses and Objections to the Official Committee of Asbestos Personal Injury Claimants' and Future Claimants' Representative's Second Requests for Discovery Pursuant to Federal Rules of Bankruptcy Procedure 7026, 7033, 7034, 7036, and 9014 (May 5, 2020)	870-1		
FCR-2	Letter from Valerie E. Ross to Sharon M. Zieg (April 14, 2021)	870-2		

**FCR's Final Exhibit List for Hearing on PIQ Motion, In re DBMP LLC**

This list not include deposition designations, which have already been separately disclosed.

<b>Ex. No.</b>	<b>Description</b>	<b>Docket No.</b>	<b>Debtor Objection(s)</b>	<b>FCR's Response</b>
FCR-3	April 16, 2021 Deposition Transcript of Charles E. Bates	869-1		
FCR-4	June 2, 2021 Deposition Transcript of Amiel Gross	869-2		
FCR-5	April 30, 2021 Deposition Transcript of Michael Starczewski	869-3		

**EXHIBIT D**

**NON-PARTY OBJECTORS' EXHIBIT LIST**

1. Excerpts from Bestwall LLC's *Motion to Amend Prior Orders to Approve Revised Subpoena for Asbestos Trust Data*, filed by Bestwall LLC on June 29, 2021 in *In re: Bestwall LLC*, No. 21-mc-00141-CFC (D. Del.).

2. Errata Sheet corresponding to the August 16, 2021 deposition of Jared S. Garelick (served on the Debtor on August 25, 2021).

3. Errata Sheet corresponding to the August 16, 2021 deposition of Richard Winner (served on the Debtor on August 25, 2021).