

JONES DAY

2727 NORTH HARWOOD STREET • DALLAS, TEXAS 75201.1515
TELEPHONE: +1.214.220.3939 • FACSIMILE: +1.214.969.5100

DIRECT NUMBER: (214) 969-3759
GMGORDON@JONESDAY.COM

December 29, 2021

The Honorable Michael B. Kaplan
United States Bankruptcy Court, District of New Jersey
Clarkson S. Fisher US Courthouse
402 East State Street, Courtroom #8
Trenton, NJ 08608

Re: LTL Management LLC, Case No. 21-30589 (MBK)

Dear Judge Kaplan:

This responds to Arnold & Itkin LLP's request for an adjournment of the January 11, 2022 hearing on the motion of the United States Trustee for the appointment of an examiner. The Debtor respectfully submits that an adjournment is not warranted. The examiner motion can be decided now and should be denied without delay.

As will be described more fully in its objection to the examiner motion, the appointment of an examiner is neither necessary nor appropriate. The asserted rationale for an examiner—to discover facts surrounding the prepetition corporate restructuring that are allegedly relevant to the pending motions to dismiss—is unfounded. The Debtor disclosed the salient facts regarding that restructuring in its first day filings, and the restructuring was the subject of extensive discovery in connection with the Debtor's requests regarding the automatic stay and the issuance of a preliminary injunction. Further, although duplicative, the Talc Claimants' Committee (the "TCC") and other parties have been and are engaged in extensive discovery regarding the restructuring and other issues in connection with the pending motions to dismiss. And that discovery is incremental to the myriad other discovery the TCC is seeking in furtherance of its announced quest to object to virtually every aspect of this case. For these reasons and others, the appointment of an examiner would be duplicative and wasteful and would only delay the case.

Because there is no need for the appointment of an examiner, there is likewise no need or reason to adjourn the hearing on the examiner motion.

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Thank you for your consideration of this letter.

Respectfully submitted,

/s/ Gregory M. Gordon/JNL

Gregory M. Gordon