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John A. Morris

December 31, 2021

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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, New Jersey 08608

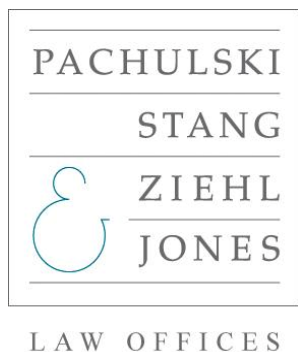
Re: LTL Management, LLC, Case No. 30589 (MBK)

Dear Judge Kaplan:

We represent Arnold & Itkin (“A&I”), a law firm representing over 7,000 talc personal injury claimants, and write to respectfully request that the Court address one additional issue during the conference scheduled for Monday, January 3, 2022 at 4:00 p.m. (the “Conference”).

As the Court is aware, on December 1, 2021, the Official Committee of Talc Claimants (the “TCC”) moved to dismiss the Debtor’s chapter 11 case. [Docket No. 632] (the “TCC’s MTD”). Shortly thereafter, A&I filed its own, independent motion to dismiss. [Docket No. 766] (“A&I’s MTD” and together with the TCC’s MTDs, the “Motions to Dismiss”). An evidentiary hearing on the Motions to Dismiss is scheduled to begin on February 15, 2022 (the “Hearing”).

The Debtor, the TCC, A&I, and certain other interested parties have met and conferred on the terms of a proposed Case Management Order and separate stipulation concerning experts and expert discovery to govern the Motions to Dismiss. While the parties have made considerable progress on these matters, one issue currently remains (A&I understands that the TCC has other concerns that it may seek to address), and that concerns A&I’s right to file a reply brief in further support of A&I’s MTD.



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Pursuant to Local Bankruptcy Rule 9013.2(a)(3) (“Local Rule 9013”), A&I has the right to file a reply brief with respect to A&I’s MTD at least four days prior to the Hearing (a “Reply”). In accordance with that right, and in the spirit of compromise, A&I sought the Debtor’s consent to file its Reply on January 15, 2022, weeks before it would otherwise be due.

Regrettably, the Debtor insists that A&I should be precluded from filing a Reply based on an earlier agreement that the Debtor reached with the TCC. A&I was not involved in any discussions concerning this purported agreement; is not a party to this purported agreement; and never would have consented to waive its right to file a Reply. As the movant, A&I should have the right to respond in accordance with the Local Rule.

A&I therefore respectfully asks the Court to confirm that, pursuant to Local Rule 9013, A&I shall be permitted to file a Reply on or before February 10, 2022.

We look forward to addressing this issue during the Conference and answering any questions the Court may have.

Very truly yours,

/s/ John A. Morris
John A. Morris

JAM

cc: Laura Davis Jones
Mark Rasmussen
Brian Glasser
Jeffrey Jonas
(all by email)