

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Honorable Michael B. Kaplan

Ref. Docket No. 933

**RESERVATION OF RIGHTS
OF OFFICIAL COMMITTEE OF TALC CLAIMANTS II TO
DEBTOR'S MOTION FOR ENTRY OF AN ORDER EXTENDING THE PERIOD
WITHIN WHICH THE DEBTOR MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C.
§ 1452 AND RULE 9027 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

The Official Committee of Talc Claimants II (the "Mesothelioma Claimants' Committee")¹ of LTL Management LLC, the debtor and debtor-in-possession (the "Debtor") in the above-captioned case (the "Case"), respectfully submits this Reservation of Rights in connection with the *Debtor's Motion for Entry of an Order Extending the Period Within which the Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure* [Docket No. 933] (the "Motion") and respectfully states as follows:

RESERVATION OF RIGHTS²

The Mesothelioma Claimants' Committee does not object to the Debtor's initial request for an extension of the Removal Period through July 11, 2022 and takes no position at this time on whether any specific pending actions should be removed. However, the Mesothelioma Claimants' Committee does not consent to the extension of any applicable removal period for non-Debtors, and notes that the proposed order only extends the Debtor's Removal Period.

¹ On November 8, 2021, prior to transferring venue of the Case to this Court, the United States Bankruptcy Court for the Western District of North Carolina entered an order appointing the Official Committee of Talc Claimants (the "Original Committee") [Docket No. 355]. On December 23, 2021, the United States Trustee for Region 3 filed the *Notice of the United States Trustee's Filing of Reconstituted and Amended: (i) Notice of Appointment of Official Committee of Talc Claimants I; and (ii) Notice of Appointment of Official Committee of Talc Claimants II* [Docket No. 965], effectively dividing the membership of the Original Committee into two committees and appointing additional members to each such committee.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

The Mesothelioma Claimants' Committee expressly reserves all rights, arguments and objections, including the right to contest and be heard in connection with any (a) future request by the Debtor or its non-Debtor affiliates for a further extension of the Removal Period, (b) request to extend the removal period for non-Debtors, (c) action by the Debtor or any non-Debtor to remove any talc related litigation pursuant to 28 U.S.C. § 1452 and the Bankruptcy Rules, and (d) other action or proceeding in connection with this Motion.

Date: January 4, 2022

Respectfully submitted,

**SHERMAN, SILVERSTEIN,
KOHL, ROSE & PODOLSKY, P.A.**

By: /s/ Arthur J. Abramowitz

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