

LAW OFFICES

COHEN, PLACITELLA & ROTH

A PENNSYLVANIA PROFESSIONAL CORPORATION

127 MAPLE AVENUE

RED BANK, NEW JERSEY 07701

(732) 747-9003

FAX (732) 747-9004

www.cprlaw.com

PHILADELPHIA, PA
LEMOYNE, PA
BALA CYNWYD, PA
PITTSBURGH, PA
CHERRY HILL, NJ



CHRISTOPHER M. PLACITELLA
MANAGING NJ ATTORNEY
CERTIFIED CIVIL TRIAL ATTORNEY

January 6, 2022

VIA ELECTRONIC FILING

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

**Re: LTL Management LLC, Case No. 21-30589 (MBK)
Talc Claimant Committee**

Dear Judge Kaplan

Please accept this letter in lieu of a more formal response to the motion filed by the Debtor to disband the Talc Claimants Creditors' Committees. On behalf of my firm's mesothelioma and ovarian cancer clients I write in support of the United States Trustee's decision to create two tort claimant committees, one for mesothelioma claimants and one for ovarian cancer claimants. I also write to offer my assistance to the Court and the claimants in an effort to keep the lines of communication open and the case moving forward efficiently as possible.

I currently serve as the court appointed plaintiff's liaison counsel to Chief Judge Wolfson in the *Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation, MDL 2738*. I am also a member of the Asbestos Advisory Committee for all asbestos cases filed in the New Jersey State Court. My firm represents both mesothelioma and ovarian cancer claimants in the New Jersey Federal Court, in MDL 2738, and in the New Jersey State Courts. We also have the privilege of representing D'Angela McNeill who is the largest secured creditor of the debtor with a judgment against JJCI of \$71,000,000.

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My office previously offered two of its clients to the US Trustee in response to his call for tort claimant committee nominees: Mr. Joe McGovern, executor of the estate of his late wife Fern McGovern, who died of ovarian cancer, and Ms. Kimberly Naranjo, who currently suffers from mesothelioma. While neither were selected, neither I nor my clients feel aggrieved. To the contrary, the US Trustee's office spent a lot of time interviewing them as well as the many other potential members for the Committees, and ultimately made selections it earnestly believes are in the best interests of all concerned. Both my office and my clients accept those determinations and thank the entire US Trustee's office for the time and efforts they dedicated to the process.

As I am not representing a member on either committee, I write to speak on behalf of the lawyers whose clients were appointed to serve on the Committees and in turn will often serve as their representatives and proxies on the committees. I have known all of the lawyers currently so serving on both the mesothelioma and ovarian cancer tort claimants committees for many years. I can attest that they are amongst the best our Nation's bars have to offer in terms of knowledge, judgment, ethics, skill and passion for what they believe in. I am proud to know them as both as friends and colleagues. I believe they will serve this Court, the claimants and debtor's estate admirably and fulfill their obligations fully and faithfully.

Yet the passion, experience and abilities that drives this group of fine lawyers to zealously fight for just compensation for their clients, sometimes at great personal sacrifice, no doubt gives rise to differing perspectives on some issues in this proceeding and in turn coherent, but adverse positions between the camps of claimants. The history and circumstances of the mesothelioma and ovarian cancer litigations, as well as the diversity of claimants and claims between them, is responsible for differing points of view and the need to advocate for those differences when necessary.

As I am in a unique position of representing both mesothelioma and ovarian claimants and honored to serve in leadership positions in both litigations, I respectfully offer my assistance to the Court as a liaison between the two committees, the Court and the affected claimants in the event the Court believes that it would be helpful. As liaison in in the *Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation, MDL 2738* one of my roles is to answer questions from claimants and (more frequently) their counsel from around the country concerning issues affecting the claimants. As this is a case affecting tens of thousands of litigants represented by hundreds of law firms who want and need to understand what is happening both procedurally and substantively, there is a need for someone outside of the two committees who is available and knowledgeable concerning the issues affecting both the ovarian and mesothelioma claimants to provide impartial information. Another role is keeping the MDL court informed on the status and developments in external litigation that affects the MDL, as well participate in its outreach programs to collateral state court litigation programs. Perhaps my most important mission as liaison is its diplomacy function—that is, assisting the PSC and external plaintiff factions, committees or groups bridge their differences and find common ground where possible. Attached hereto is our original application that sets forth our experience and how we may be of help in more detail.

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In the event the Court decides to revert back to a single committee structure, we would formally apply to the Court for consideration and rely upon our original application to the US Trustee. As set forth in detail therein we respectfully submit that in a single committee structure it is essential to include attorneys that represent both mesothelioma and ovarian cancer claimants.

I thank the Court for its consideration as well as all of the lawyers in this proceeding for their consideration and continued professionalism.

Respectfully,

Christopher M. Placitella

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