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UNITED STATES BANKRUPTCY COURT			
DISTRICT OF NEW JERSEY			
Caption in Compliance with D.N.J. LBR 9004-1(b)		
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ATTORNEYS FOR DEBTOR			
In Re:		Case No.:	21-30589 (MBK)
		Chapter:	11
LTL MANAGEMENT LLC, ¹		inapier.	11
Debtor.		Judge:	Hon. Michael B. Kaplan
		C	1

SECOND SUPPLEMENTAL CERTIFICATION OF JOHN R. CASTELLANO IN SUPPORT OF APPLICATION FOR RETENTION OF ALIXPARTNERS, LLP AS FINANCIAL ADVISOR FOR THE DEBTOR EFFECTIVE AS OF THE PETITION DATE

I, JOHN R. CASTELLANO, being of full age, certify as follows:

1. I am a managing director of AlixPartners, LLP ("<u>AlixPartners</u>").

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

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2. Except as otherwise noted, I have personal knowledge of the matters set forth herein and,

if called as a witness, would testify competently thereto.

3. I submit this supplemental certification in the case of the above-captioned debtor (the

"Debtor") to supplement the disclosures set forth in my original declaration dated November 24, 2021 [ECF

No. 551] (the "Original Declaration")² and my First Supplemental Declaration dated December 10, 2021

[ECF No. 783].

4. Unless otherwise noted, references to AP in this paragraph 4 collectively refer to AlixPartners, AP Holdings and each of their respective subsidiaries. AlixPartners would like to disclose the following:

- Archer & Greiner, P.C., a notice of appearance party in this bankruptcy matter, is a lessor, adverse litigation party, opposing counsel and professional to current and former AP clients in matters unrelated to the Debtor.
- Ballard Spahr LLP, a notice of appearance party in this bankruptcy matter, is a lessor, adverse litigation party, litigation party, opposing counsel and professional to current and former AP clients in matters unrelated to the Debtor.
- Borg Warner Morse Tec, Inc., a significant co-defendant to the Debtor in talc-related litigation, and affiliates ("<u>BorgWarner</u>") are adverse litigation parties to a former AP client in matters unrelated to the Debtor. BorgWarner is a current AP client in matters unrelated to the Debtor. BorgWarner is a current AP employee.
- Cohen, Placitella & Roth, P.C., a notice of appearance party in this bankruptcy matter, is a professional to a former AP client in matters unrelated to the Debtor.
- Cole Schotz P.C. ("<u>Cole Schotz</u>"), a notice of appearance party in this bankruptcy matter, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor. Cole Schotz was a member of the UCC represented by AP in The NORDAM Group, Inc., a former bankruptcy matter unrelated to the Debtor.
- Crowell & Moring LLP ("<u>Crowell & Moring</u>"), a notice of appearance party in this bankruptcy matter, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor. Crowell & Moring is a current and former AP client in matters unrelated to the Debtor.

² Capitalized terms used herein but not defined shall have the meaning given to such terms in the Original Declaration.

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- Dana Companies, LLC, a significant co-defendant to the Debtor in talc-related litigation, and affiliates ("<u>Dana</u>") are adverse litigation parties to a current AP client in matters unrelated to the Debtor.
- Duane Morris LLP ("<u>Duane Morris</u>"), a notice of appearance party in this bankruptcy matter, is a professional, adverse litigation party and counsel to current and former AP clients in matters unrelated to the Debtor. Duane Morris is a former AP client in matters unrelated to the Debtor.
- Eli Lilly and Company, a significant co-defendant to the Debtor in talc-related litigation, is an affiliate to a former AP client in matters unrelated to the Debtor.
- Greenbaum, Rowe, Smith & Davis LLP, a notice of appearance party in this bankruptcy matter, is a current legal services provider to AP.
- Greenberg Traurig, LLP ("<u>Greenberg Traurig</u>"), a notice of appearance party in this bankruptcy matter, is an adverse litigation party, lessor, professional, counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Greenberg Traurig is a current and former AP client in matters unrelated to the Debtor. Greenberg Traurig is a current legal services provider to AP.
- Katten Muchin Rosenman LLP ("<u>Katten Muchin</u>"), a notice of appearance party in this bankruptcy matter, is a litigation party, professional and counsel to current and former AP clients in matters unrelated to the Debtor. Katten Muchin is a current and former AP client in matters unrelated to the Debtor.
- Latham & Watkins LLP ("<u>Latham</u>"), a notice of appearance party in this bankruptcy matter, is a lessor, counsel, professional and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Latham is a former AP client in matters unrelated to the Debtor. Latham is a former AP client in matters unrelated to the Debtor. Latham is a former AP employee. Latham provides legal services to AP.
- Lifescan, a non-debtor affiliate to the Debtor, is a former AP client in matters unrelated to the Debtor.
- Offit Kurman, P.A., a notice of appearance party in this bankruptcy matter, is an adverse litigation party and opposing counsel to current AP clients in matters unrelated to the Debtor.
- Pryor Cashman LLP ("<u>Pryor Cashman</u>"), a notice of appearance party in this bankruptcy matter, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor. Pryor Cashman is a current AP client in matters unrelated to the Debtor. Pryor Cashman is a member of the UCC represented by AP in CBL & Associates Properties, a bankruptcy matter unrelated to the Debtor.
- Reed Smith LLP ("<u>Reed Smith</u>"), a notice of appearance party in this bankruptcy matter, is an adverse litigation party, professional, litigation party, opposing counsel and counsel to current and former AP clients in matters unrelated to the Debtor. Reed Smith is a current and former AP client in matters unrelated to the Debtor. Reed Smith is a former legal services provider to AP.
- Rio Tinto America Inc., a party in interest and material potentially indemnified party to the Debtor, and affiliates ("<u>Rio Tinto</u>") are current AP clients in matters unrelated to the Debtor.

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- Ross Feller Casey, LLP, a notice of appearance party in this bankruptcy matter, is an adverse litigation party to a current AP client in matters unrelated to the Debtor.
- Saiber LLC, a notice of appearance party in this bankruptcy matter, is an adverse litigation party and professional to former AP clients in matters unrelated to the Debtor.
- Vinson & Elkins LLP ("<u>Vinson & Elkins</u>"), a notice of appearance party in this bankruptcy matter, is an adverse litigation party, professional, lienholder, opposing counsel and counsel to current and former AP clients in matters unrelated to the Debtor. Vinson & Elkins is a current and former AP client in matters unrelated to the Debtor.

I certify under penalty of perjury that the above information is true.

Date: 10-Jan-2022

John R. Castellano