

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**FIRST SUPPLEMENTAL DECLARATION OF
GREGORY M. GORDON IN SUPPORT OF THE *EX PARTE*
APPLICATION OF THE DEBTOR FOR AN ORDER AUTHORIZING IT TO
RETAIN AND EMPLOY JONES DAY AS COUNSEL AS OF THE PETITION DATE**

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Gregory M. Gordon declares:

1. I am a partner with the law firm of Jones Day and am duly authorized to make this declaration on behalf of Jones Day. I make this declaration to supplement disclosures set forth in the *Ex Parte Application of the Debtor for an Order Authorizing It to Retain and Employ Jones Day as Counsel as of the Petition Date* [Dkt. 16] (the “Application”) and the *Declaration of Gregory M. Gordon* in support of the Application (the “Gordon Declaration”), which was attached to the Application as Exhibit C.² The facts set forth in this supplemental declaration are personally known to me and, if called as a witness, I could and would testify thereto.

¹ The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

² In addition, a supplemental declaration in support of the Application was filed on February 21, 2020 [Dkt. 166] at the request of the Bankruptcy Administrator for the Western District of North Carolina (the “Bankruptcy Administrator”) to clarify that Jones Day would waive any claim for fees and expenses in excess of DBMP LLC’s prepetition retainer, if any, that were incurred prior to the Petition Date.

2. On January 23, 2020, the above-captioned debtor and debtor in possession (the “Debtor”) filed the Application and the Gordon Declaration with the Court. By the Application, the Debtor sought authority to retain and employ Jones Day as counsel in this chapter 11 case (the “Chapter 11 Case”). On January 24, 2020, the Court entered an *ex parte* order [Dkt. 34] authorizing the retention of Jones Day as the Debtor’s counsel in the Chapter 11 Case as of the Petition Date. On March 17, 2020, the Court entered an amended order [Dkt. 201] authorizing the retention of Jones Day as the Debtor’s counsel in the Chapter 11 Case as of the Petition Date.

3. In connection with the Application, to check and clear potential conflicts of interest in the Chapter 11 Case, Jones Day researched its client database (the “Initial Conflicts Search”) to determine whether it had any relationships with the individuals or institutions set forth on Schedule 1 to the Gordon Declaration (the “Interested Parties”).

4. In the Gordon Declaration, I disclosed that although Jones Day represented or currently represents certain of the Interested Parties included in the Initial Conflicts Search, those representations were or are in matters unrelated to the Chapter 11 Case, and Jones Day did not represent any entity or individual in a matter in which such entity or individual is adverse to the Debtor.

Supplemental Disclosure

5. In the Gordon Declaration, I stated that I would, in accordance with Bankruptcy Rule 2014(a), supplement the information contained in that declaration with respect to, among other things, new relationships not set forth therein.

6. Jones Day has updated the examination of its relationships with interested parties in the Chapter 11 Case. In connection therewith, Jones Day researched its client database for the past two years (the “Supplemental Conflicts Search”) to determine whether:

- (a) since the completion of the Initial Conflicts Search, Jones Day has ceased providing client services to any entities (or their affiliates) previously disclosed as clients of Jones Day in the Gordon Declaration;
- (b) any information relating to Jones Day's relationship with any of the Interested Parties, or their affiliates, was inadvertently omitted from the Gordon Declaration;
- (c) since the completion of the Initial Conflicts Search, Jones Day has undertaken to provide client services to any of the Interested Parties that were not clients of Jones Day at the time of the Gordon Declaration; and
- (d) any entities not identified as Interested Parties, because such entities (i) were unknown to Jones Day at the time of the Gordon Declaration or (ii) have taken on a role in matters relating to the Chapter 11 Case since the date of the Gordon Declaration, are current or former clients of Jones Day.

7. A list of the additional entities included in the Supplemental Conflicts Search (collectively, the "Additional Parties") is set forth on Schedule 1 attached hereto.

Disinterestedness

8. To the extent that the Supplemental Conflict Search indicated that (a) the Gordon Declaration required updating or (b) Jones Day has been or currently is employed by any of the Additional Parties in matters unrelated to the Chapter 11 Case, the identities of those entities and the nature of, or change in, Jones Day's relationship to them, as of September 14, 2020, are set forth on Schedule 2 attached hereto ("Schedule 2").

9. To the best of my knowledge, information and belief, Jones Day represents no interest adverse to the Debtor, its estate, its creditors or the Bankruptcy Administrator, and Jones Day does not represent any other party with an actual or potential interest in the Chapter 11 Case or such party's respective attorneys or accountants, except as set forth in Schedule 2 and in the Gordon Declaration.

10. I believe that Jones Day continues to be a "disinterested person," as defined in section 101(14) of title 11 of the United States Code (the "Bankruptcy Code") and

required by section 327 of the Bankruptcy Code. The Debtor, however, is a complex entity with numerous creditors and other relationships, and I am unable to state with certainty whether every client representation or other connection has been disclosed. In this regard, if Jones Day discovers additional information that requires disclosure, it will file an additional supplemental disclosure with the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: February 8, 2021

/s/ Gregory M. Gordon
Gregory M. Gordon

SCHEDULE 1

DBMP LLC

New Parties in Interest as of September 14, 2020

Debtor's Retained Professionals

Berkeley Research Group LLC

Counsel to Members of Committee of Asbestos Personal Injury Claimants

Cohen, Placitella & Roth, P.C.
Cooney & Conway
Goldberg Persky White, P.C.
Kazan, McClain, Satterly & Greenwood PLC
Law Offices of Peter G. Angelos, P.C.
Maune Raichle Hartley French & Mudd, LLC
Shrader & Associates L.L.P.
SWMW Law, LLC
The Gori Law Firm
The Shepard Law Firm
Weitz & Luxenberg, P.C.

Professionals to the Committee of Asbestos Personal Injury Claimants

Caplin & Drysdale, Chartered
FTI Consulting, Inc.
Hamilton Stephens Steels + Martin PLLC
Legal Analysis Systems, Inc.
Robinson & Cole LLP
Winston & Strawn LLP

Future Claimants' Representative

Sander L. Esserman

Professionals to the Future Claimants' Representative

Ankura Consulting Group LLC
FTI Consulting, Inc.
Hull & Chandler, P.A.
Stutzman, Bromberg, Esserman & Plifka
Young Conaway Stargatt & Taylor LLP

Significant Co-Defendants in Asbestos-Related Litigation

Aldrich Pump LLC
Murray Boiler LLC

Bankruptcy Rule 2002 Appearances

Bergman Draper Oslund Udo
Cheryl L. Bergrud, Individually and as
Personal Representative for the Estate of
Peter L. Bergrud
Bestwall LLC
Brickman, LLC
Dean Omar Branham + Shirley, LLP

Bankruptcy Rule 2002 Appearances (Continued)

Delaware Claims Processing Facility
Essex Richards, P.A.
Estate of Ignacio Galaviz
Honeywell International, Inc.
Manville Personal Injury Settlement Trust
Maune Raichle Hartley French & Mudd LLC
Ron Maxum
Brenda Reimel
Richardson, Patrick, Westbrook & Brickman, LLC
Bryan K. Swiger, Administrator of the Estate of
Lyle E. Swiger
The Jaques Admiralty Law Firm, P.C
Wallace and Graham, P.A.¹

¹ Where the above-listed Bankruptcy Rule 2002 appearances were filed on behalf of identified clients, the clients are listed. Where the Bankruptcy Rule 2002 appearances were filed on behalf of unidentified clients, the filing counsel is listed, to the extent not otherwise listed herein.

SCHEDULE 2

SCHEDULE 2

FIRST SUPPLEMENTAL DISCLOSURE

IN RE DBMP LLC

**SCHEDULE OF POTENTIALLY INTERESTED PARTIES, AS OF SEPTEMBER 14, 2020,
THAT CURRENTLY EMPLOY OR HAVE FORMERLY EMPLOYED JONES DAY
IN MATTERS UNRELATED TO THE DEBTOR OR ITS CHAPTER 11 CASE**

INTERESTED PARTY	RELATIONSHIP TO THE DEBTOR	CLIENTS AND THEIR AFFILIATES
NEW PARTIES IN INTEREST¹		
<i>Aldrich Pump LLC</i>	Significant Co-Defendant in Asbestos-Related Litigation	<ul style="list-style-type: none"> • <i>Aldrich Pump LLC</i> is a current client and a co-debtor with <i>Murray Boiler LLC</i> in chapter 11 cases commenced on June 18, 2020 in which Jones Day serves as the debtors’ lead bankruptcy counsel; and • Parent company <i>Trane Technologies Plc</i> (f/k/a Ingersoll-Rand Plc) is a current client in matters unrelated to Aldrich Pump or Murray Boiler or their chapter 11 cases. • <i>See also</i> entries below for <i>Murray Boiler LLC</i> and Ingersoll-Rand Plc (n/k/a <i>Trane Technologies Plc</i>) regarding related disclosure.
Ankura Consulting Group LLC	Professional to the Future Claimants’ Representative	<ul style="list-style-type: none"> • Affiliate company Ankura Trust Company LLC is a co-trustee of current client <i>M & G USA Corporation, et al. Litigation Trust.</i>
<i>Berkeley Research Group LLC</i>	Debtor’s Retained Professional	<ul style="list-style-type: none"> • <i>Berkeley Research Group LLC</i> is a current client.
Law Offices of Peter G. Angelos, P.C.	Counsel to a Member of Committee of Asbestos Personal Injury Claimants	<ul style="list-style-type: none"> • Mr. Angelos is the owner of current clients <i>The Baltimore Orioles Baseball Club</i> and <i>Baltimore Orioles L.P.</i>

¹ The parties listed herein are parties in interest (or affiliated entities) who are current clients of Jones Day or were clients of Jones Day within the last two years. The names of current clients of Jones Day appear in bold and italics. The disclosure of stockholder interests or other affiliate relationships among potentially related entities reflects only information known to Jones Day through its conflict reporting system. Jones Day has not performed independent research to identify all stockholder interests or other affiliate relationships with respect to interested parties. Moreover, Jones Day has not disclosed representations of trade associations and similar industry or special interest organizations in which interested parties are members.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTOR	CLIENTS AND THEIR AFFILIATES
<i>Bestwall LLC</i>	Bankruptcy Rule 2002 Appearance	<ul style="list-style-type: none"> • <i>Bestwall LLC</i> is a current client; • Ultimate parent company <i>Koch Industries, Inc.</i> is: (a) a current client in matters unrelated to Bestwall or its chapter 11 case; (b) the owner of current client <i>Infor, Inc.</i>; and (c) a former equity holder of former client Truck-Lite Co. LLC (closed 2020); • Affiliate company <i>Georgia-Pacific LLC</i> is a current client in several matters with ultimate parent company <i>Koch Industries, Inc.</i> unrelated to Bestwall or its chapter 11 case; • Affiliate companies <i>Bittware, Inc., Guardian Industries, Guardian Europe Sàrl, Guardian Flachglas GmbH, Koch Biological Solutions LLC, Koch Fertilizer LLC, Koch Disruptive Technologies, Koch Minerals LLC, Koch Shipping Pte. Ltd., Koch Equity Development, Koch Companies Public Sector LLC, SRG Global, Inc., Molex Incorporated n/k/a Molex, LLC, Molex Elektronik GmbH, Invista International S.a.r.l., DSS Optical Solutions</i> and <i>Flint Hills Resources, L.P.</i> are current clients in matters unrelated to Bestwall or its chapter 11 case; and • Affiliate companies Koch AG & Energy Solutions, LLC, Koch Supply & Trading LLC, Molex Zetronic S.R.L., KCTG Japan Holdings Limited, Koch-Glitsch Italia S.R.L. and Molex Japan Co., Ltd. n/k/a Molex Japan LLC (all closed 2019); and Koch Biological Solutions and Koch Supply & Trading L.P. (both closed 2020) are former clients.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTOR	CLIENTS AND THEIR AFFILIATES
<i>FTI Consulting, Inc.</i>	Professional to the Committee of Asbestos Personal Injury Claimants and Professional to the Future Claimants' Representative	<ul style="list-style-type: none"> • <i>FTI Consulting, Inc.</i> is a current client; and • Affiliate company FTI Consulting LLP is: (a) the employer of an individual who is a former client (closed 2020); and (b) the employer of two individuals who are former clients in their capacity as administrators of Swordfish Shipco Limited (both closed 2018).
<i>Murray Boiler LLC</i>	Significant Co-Defendants in Asbestos-Related Litigation	<ul style="list-style-type: none"> • <i>Murray Boiler LLC</i> is a current client and a co-debtor with <i>Aldrich Pump LLC</i> in chapter 11 cases commenced on June 18, 2020 in which Jones Day serves as the debtors' lead bankruptcy counsel; and • Parent company <i>Trane Technologies Plc</i> (f/k/a Ingersoll-Rand Plc) is a current client in matters unrelated to Murray Boiler or Aldrich Pump or their chapter 11 cases. • See also entry above for <i>Aldrich Pump LLC</i>; and entry below for Ingersoll-Rand Plc (n/k/a <i>Trane Technologies Plc</i>) regarding related disclosure.
UPDATES TO PRIOR DISCLOSURE		
3M Company <i>PRIOR DISCLOSURE:</i> <ul style="list-style-type: none"> • 3M Company and affiliate company 3M Purification are former clients (both closed 2018); and • Affiliate company <i>3M France</i> is a current client. 	Significant Co-Defendant in Asbestos-Related Litigation	<ul style="list-style-type: none"> • Affiliate company <i>3M Media Company LLC</i> is a new client (opened 2020).

INTERESTED PARTY	RELATIONSHIP TO THE DEBTOR	CLIENTS AND THEIR AFFILIATES
<p>Bank of America, N.A. PRIOR DISCLOSURE:</p> <ul style="list-style-type: none"> • Bank of America, N.A. and affiliate companies Merrill Lynch International, Merrill Lynch International, London Branch, Bank of America, N.A. London, Bank of America Business Credit and Merrill Lynch Kingdom of Saudi Arabia Company are current clients; • Parent company Bank of America Corporation is: (a) a current client; (b) the employer of an individual who is a former client (closed 2019); and (c) a co-client in a current joint representation with affiliate company and current client Merrill Lynch Bank & Trust (Cayman) Limited and certain of its affiliate companies; • Affiliate company Bank of America Merrill Lynch International Designated Activity Company is a current co-client in a joint representation with current client Natixis; • Affiliate company Bank of America Merrill Lynch International Limited (n/k/a current client Bank of America Merrill Lynch International DAC) is a co-client in a current matter with current client Deutsche Bank AG New York; • Affiliate company Banc of America Strategic Investments Corporation is a minority joint venture partner in current client Visible Alpha LLC; 	<p>Depository and Disbursement Bank</p>	<ul style="list-style-type: none"> • Affiliate companies Bank of America Securities Europe S.A. and Bank of America Merrill Lynch International DAC – Milan Branch are new clients (both opened 2020); • Affiliate companies Merrill Lynch International, London Branch; Merrill Lynch Kingdom of Saudi Arabia Company; and Merrill Lynch Bank & Trust (Cayman) Limited are now former clients (all closed 2020); • The individual disclosed as a current client and a former employee and indemnitee of affiliate company Bank of America Merrill Lynch is now a former client (closed 2020); and • Affiliate company and current client Bank of America Merrill Lynch International Designated Activity Company is: (a) a former co-client with current client Natixis in a joint representation closed in 2020; and (b) a former co-client with current client Deutsche Bank AG New York in a matter closed in 2020.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTOR	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> Affiliate company Bank of America Merrill Lynch is: (a) a member, with current client Goldman Sachs International, of a former group representation of lenders closed in 2018; and (b) the indemnitor for and former employer of an individual who is a current client; Affiliate company Merrill Lynch, Pierce, Fenner & Smith Incorporated is: (a) a current client; and (b) a former co-client with current client Deutsche Bank AG New York in a matter closed in 2019; and Affiliate companies Bank of America Merrill Lynch International (closed 2018); and Merrill Lynch Capital Corporation (closed 2019) are former clients. 		
<p>General Electric Co. PRIOR DISCLOSURE:</p> <ul style="list-style-type: none"> General Electric Co. is: (a) a current client; (b) a co-client in a current matter with affiliate company and co-client GE Medical Systems Italia S.p.a.; and (c) a co-client in a current matter with affiliate company and co-client GE Energy Financial Services, Inc.; 	<p>Significant Co-Defendant in Asbestos-Related Litigation</p>	<ul style="list-style-type: none"> Affiliate companies GE Transportation Parts LLC; GE Lighting LLC; General Electric International, Inc.; GE Energy Products Finance SNC (all opened 2020); and GE Grid Solutions LLC (re-opened 2020) are new clients; and Affiliate companies GE Energy Financial Services, Inc. and GE Water & Process Technologies France (both closed 2019); and GE Digital LLC; GE Eoliennes SN, GE Medical Systems Italia S.p.A.; and GE Energy Management (all closed 2020) are now former clients.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTOR	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> • Affiliate companies <i>GE Power Services Belgium, S.A., GE Japan Corporation, GE Medical Systems Trade & Development (Shanghai) Co., Ltd., GE Power, GE Grid Australia Pty Ltd., GE IS&T S.A.S., GE Eoliennes SN, GE Energy Power Conversion Technology, Ltd., GE-Hitachi Nuclear Energy Americas LLC, GE Wind France S.A.S., Baker Hughes, A GE Company, GE Medical Systems Information Technologies, Inc., GE Healthcare Limited, GE Water & Process Technologies, ABB Industrial Solutions (France) S.A.S. (f/k/a GE Power Controls France), ABB Electrification Solutions SLU (f/k/a GE Power Controls Iberica), ABB Industrial Solutions (Klodzko) SP Z.o.o. (f/k/a GE Power Controls Polska SP Z.o.o.), GE Energy Management, GE Energy Power Conversion France S.A.S., GE Energy Connections, GE SCF S.C.A., GE Digital LLC, GE Aviation, GE Hydro France (a/k/a Alstom Hydro France) and GE Renewable Management S.A.S.</i> are current clients; • Affiliate company <i>GE Capital Corporation</i> and affiliated entity <i>General Electric Pension Trust</i> are co-clients in a current group representation of General Motors term lenders; • Affiliate company <i>GE Healthcare</i> is one of the owners of current client <i>Nihon Medi-Physics Co., Ltd.</i>; 		

INTERESTED PARTY	RELATIONSHIP TO THE DEBTOR	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> Affiliate company GE Ventures Ltd. is an investor in current client <i>Aver, Inc.</i>; Affiliate company GE Japan GK (n/k/a SMFL Capital Co., Ltd.) is a former client with current client <i>Sumitomo Mitsui Banking Corporation</i> in a matter closed in 2019; and Affiliate companies GE Water & Process Technologies México, and GE Oil & Gas (both closed 2018); and GE Grid Solutions, GE Oil & Gas Australia Pty Ltd., GE Capital Aviation Services, GE Electric Energy UK Limited, GE Capital Europe Ltd., Healthcare Financial Solutions LLC and GE Water & Process Technologies France (all closed 2019) are former clients. 		
<p>Ingersoll-Rand Plc <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <i>Ingersoll-Rand Plc</i> is a current client; and Affiliate company Ingersoll-Rand European Holding Company B.V. is a former client (closed 2018). 	<p>Significant Co-Defendant in Asbestos-Related Litigation</p>	<ul style="list-style-type: none"> Following a Reverse Morris Trust transaction in 2020, Ingersoll-Rand Plc changed its name and is now known as current client <i>Trane Technologies Plc.</i> <i>See also</i> entries above for <i>Aldrich Pump LLC</i> and <i>Murray Boiler LLC</i> regarding related disclosure.
<p><i>J.P. Morgan Chase</i> <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <i>JPMorgan Chase Bank, N.A.</i> is: (a) a current client; (b) a former co-client with affiliate company and current client <i>JPMorgan Securities LLC</i> in a group representation of rue21 term lenders closed in 2019; and (c) a co-client in current matters with affiliate company and current client <i>JPMorgan Private Bank</i>; 	<p>Depository and Disbursement Bank</p>	<ul style="list-style-type: none"> Affiliate company <i>JPMorgan Trust Company of Delaware</i> is a new client (opened 2020); Parent company <i>JPMorgan Chase & Co.</i> is: (a) a member of new client <i>Ad Hoc Intelsat Jackson Unsecured Noteholders Group</i> (opened 2020); and (b) the employer and indemnitor of an individual who is a new client (opened 2020);

INTERESTED PARTY	RELATIONSHIP TO THE DEBTOR	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> • Parent company JPMorgan Chase & Co. is: (a) a current client; and (b) a co-client in a current matter with current client The Bank of Nova Scotia; • Affiliate company JPMorgan Securities LLC is: (a) a current client; (b) a co-client in a current matter with current client Citigroup, Inc.; and (c) a former co-client with current client Deutsche Bank AG New York in a matter closed in 2019; • Affiliate company JPMorgan Securities Plc is: (a) a current client; and (b) a former co-client with current client UniCredit Bank AG in a matter closed in 2019; • Affiliate company Highbridge Capital Management LLC was a member of former client Ad Hoc Group of Savers LLC Term Loan Lenders (closed 2019); • Affiliated entities and current clients JPMorgan Chase Retirement Plan Brigade and JPMorgan Chase Retirement Plan Brigade Bank Loan; and JPMorgan Funds – Multi-Manager Alternatives Fund and JPMorgan Trust III – JPMorgan Multi-Manager Alternatives Fund are former co-clients in a group representation of Hexion noteholders closed in 2019; 		<ul style="list-style-type: none"> • Affiliate company JPMorgan Securities LLC is now a former co-client with current client Bank of America Corporation in a matter closed in 2020; • Affiliate company JPMorgan Securities Plc is now a former co-client with current client Intesa SanPaolo in a matter closed in 2019; and • Affiliated entities JPMorgan Chase Retirement Plan Brigade and JPMorgan Chase Retirement Plan Brigade Bank Loan are now former co-clients in a group representation of iHeart Communications’ former lenders and noteholders closed in 2020.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTOR	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> • Affiliated entity <i>JPMorgan Chase Retirement Plan Brigade</i> is: (a) a co-client in two current group representations of iHeart Communications, Inc. former lenders and noteholders; and (b) a former co-client in a group representation of Bon-Ton second lien noteholders closed in 2019; • Affiliated entity <i>JPMorgan Chase Retirement Plan Brigade Bank Loan</i> is: (a) a co-client in a current group representation of iHeart Communications, Inc. former lenders and noteholders; (b) a former co-client with affiliated entity JPMorgan Chase Retirement Plan and current client <i>Brigade Capital Management, L.P.</i> in a matter closed in 2018; and (c) a former co-client in a group representation of Preferred Proppants term lenders closed in 2019; and • Affiliate companies JPMorgan Grupo Financiero, S.A. de C.V., JPMorgan Chase, National Association, JPMorgan Business Credit Corporation; and JPMorgan (all closed 2018); and JPMorgan LLC (closed 2019) are former clients. 		

INTERESTED PARTY	RELATIONSHIP TO THE DEBTOR	CLIENTS AND THEIR AFFILIATES
<p><i>Union Carbide Corporation</i> <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> • <i>Union Carbide Corporation</i> and affiliate companies <i>Dow Corning Corporation</i> and <i>Dow AgroSciences LLC</i> are current clients; and • Affiliate company <i>The Dow Chemical Company</i> is: (a) a current client; and (b) a co-owner in a joint venture of current client <i>Sadara Chemical Company</i>. 	<p>Significant Co-Defendant in Asbestos-Related Litigation</p>	<ul style="list-style-type: none"> • Union Carbide Corporation is now a former client (closed 2020).
<p>PARTIES IN INTEREST (OR AFFILIATED ENTITIES) THAT WERE INADVERTENTLY OMITTED FROM PRIOR DISCLOSURE</p>		
<p>JM Manufacturing Company, Inc.</p>	<p>Significant Co-Defendant in Asbestos-Related Litigation</p>	<ul style="list-style-type: none"> • Affiliate company Hebei Quan'en High-Tech Piping Co., Ltd. was a current and now a former client (closed 2020).