

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS, and
SANDER L. ESSERMAN, in his capacity as
Legal Representative for Future Asbestos
Claimants,

Plaintiffs,

v.

DBMP LLC and CERTAINTEED LLC,

Defendants.

Adv. Pro. No. 21-03023 (JCW)

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS, and
SANDER L. ESSERMAN, in his capacity as
Legal Representative for Future Asbestos
Claimants, each on behalf of the estate of
DBMP LLC,

Plaintiffs,

v.

CERTAINTEED LLC, CERTAINTEED
HOLDING CORPORATION, and
SAINT-GOBAIN CORPORATION,

Defendants.

Adv. Pro. No. 22-03000 (JCW)

¹ The last four digits of the Debtor's taxpayer identification number are 8817. The Debtor's address is 20 Moores Road, Malvern, Pennsylvania 19335.

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS, on behalf of
the estate of DBMP LLC, and SANDER L.
ESSERMAN, in his capacity as Legal
Representative for Future Asbestos
Claimants, each on behalf of the estate of
DBMP LLC

Plaintiff,

v.

Adv. Pro. No. 22-03001 (JCW)

COMPAGNIE DE SAINT-GOBAIN S.A.,
SAINT-GOBAIN CORPORATION,
SAINT-GOBAIN DELAWARE CORPORATION,
CERTAINTED LLC, CERTAINTED
HOLDING CORPORATION, JOSEPH BONDI,
SEAN KNAPP, LAWRENCE RAYBURN,
MICHAEL STARCZEWSKI, VINCENT
DINENNA, ROBERT PANARO, DONALD
MELROY, PIERRE-ANDRÉ DE CHALENDAR,
BENOIT BAZIN, ANTOINE VIGNIAL, HUBERT
REICHARDT, DANIEL BIARNEIX, SREEDHAR
NATARAJAN, GUILLAUME TEXIER, THOMAS
KINISKY, CAROL GRAY, JOHN SWEENEY,
ERIC PLACIDET, MARK RAYFIELD, and
KEITH CAMPBELL,

Defendants.

DECLARATION OF DISINTERESTEDNESS OF FORREST D. BRIDGES

Forrest D. Bridges, pursuant to the *Order Appointing Discovery Referee and Establishing Protocol for Resolution of Crime-Fraud/Waiver Motion* [Dkt. 2290; Adv. Pro. No. 21-3023, Dkt. 200; Adv. Pro. No. 22-3000, Dkt. 171; Adv. Pro. No. 22-3001, Dkt. 145] (the “Discovery Referee Order”),² declares as follows:

² Capitalized terms used herein but not otherwise defined have the meanings given to them in the Discovery Referee Order.

1. My name is Forrest D. Bridges, and I have been appointed as the Discovery Referee as set forth in the Discovery Referee Order. *See* Discovery Referee Order ¶ 2. My office address is Suite 200, Mason Square, 201 South Washington Street, Shelby, North Carolina 28150.

2. The scope of my appointment is set forth in the Discovery Referee Order. *See id.* at ¶¶ 2-13. For the avoidance of doubt, I am not conducting a mediation, but rather a neutral evaluation and recommendation to be submitted to the Court regarding the matters set forth in the Discovery Referee Order.

3. Pursuant to the Discovery Referee Order, I shall seek compensation for reasonable fees and expenses by submission of periodic invoices with reasonable supporting detail to the Notice Parties. *See id.* at ¶¶ 4-5. Further, I may employ staff and professionals to assist my efforts (legal, paraprofessional, and administrative), which costs may be billed with my other expenses as the Discovery Referee. *See id.* at ¶ 4. Such employment may include one or more research assistants and a document review service for review of voluminous documents. My hourly rate shall be \$400 and the hourly rate of my research assistant, Adam Steele, shall be \$150.

4. On January 13, 2023, I was provided two lists of potentially interested parties (the “Interested Parties”) in the above-captioned chapter 11 case, the Adversary Proceedings, and other related matters in United States Bankruptcy Court for the District of Delaware by the Parties. These lists of the Interested Parties are attached hereto collectively as Exhibit A. I also have reviewed various documents from these matters, as provided by the Court, for the procedural context. To the extent that information was available, I undertook a detailed, good faith search to determine and to disclose, as set forth herein, whether I have any connections with any of the Interested Parties.

5. I have no connections with any of the Interested Parties that would pose any actual conflict of interest. As disclosed previously to the Parties, I own relatively small numbers (250 or less) of shares in 3M Company, JP Morgan Chase, Bank of America, and MetLife and have personal homeowners and automobile insurance coverage with Travelers Insurance Company. I also have known Judge Whitley, who is presiding over the chapter 11 case, for a number of years.

6. Except as set forth herein, I (a) have no connection with the Debtor, its affiliates, its creditors, the Bankruptcy Administrator for the Western District of North Carolina (the “Bankruptcy Administrator”), the judges for the United States Bankruptcy Court for the Western District of North Carolina, any person employed in the office of the Bankruptcy Administrator or any other party with an actual or potential interest in the above-captioned chapter 11 case and the Adversary Proceedings or their respective attorneys or accountants; (b) am not a creditor, equity security holder, or insider of the Debtor; (c) am not, nor have been within two years of the commencement of the chapter 11 case, a director, officer, or employee of the Debtor; and (d) neither hold nor represent an interest materially adverse to the Debtor or its estate.

7. Accordingly, to the best of my knowledge, information and belief, I am a “disinterested person” as such term is defined by section 101(14) of the Bankruptcy Code.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 23, 2023
Shelby, North Carolina

s/ Forrest D. Bridges
Forrest D. Bridges
Suite 200, Mason Square
201 South Washington Street
Shelby, North Carolina 28150

EXHIBIT A

DBMP LLC

CUMULATIVE LIST OF INTERESTED PARTIES

Debtor

DBMP LLC

Direct Equity Owner of Debtor

CertainTeed Holding Corporation

Debtor's Direct Non-Debtor Subsidiary

Millwork & Panel LLC

Other Non-Debtor Affiliates

Bayside Port Corporation, Inc.
Bird Incorporated
Carborundum Ceramic Holdings, Inc.
Carborundum Ventures, Inc.
CertainTeed Canada, Inc.
CertainTeed Ceilings Corporation
CertainTeed Gypsum and Ceiling Mfg.,
Inc.
CertainTeed Gypsum Mfg, Inc.
CertainTeed Gypsum NC, Inc.
CertainTeed Gypsum West Virginia, Inc.
CertainTeed Gypsum, Inc.
CertainTeed Holding Corporation
CertainTeed LLC
CertainTeed Gypsum and Ceilings USA,
Inc.
Compagnie de Saint-Gobain
CT Solar Fund I LLC
CTKC Corporation
Fluorocarbon Components, Inc.
Grindwell Norton Ltd.
GS II, Inc.
HCS Corporation
Level Solar Fund IV LLC
MAG-ISOVER K.K.
New West Gypsum Recycling, Inc.
Norton Foreign Affiliates Holding
Corporation
OFI GP Inc.

OFI L.P.
Ottawa Fibre GP Inc
Ottawa Fibre L.P.
P.T. Saint-Gobain Abrasives Indonesia
Phoenix Coating Resources, Inc.
Redcliff Fibre L.P.
Sage Electrochromics, Inc.
Saint-Gobain (SEA) PTE, Ltd
Saint-Gobain Abrasives, Inc.
Saint-Gobain Abrasives. Ltd.
Saint-Gobain Abrasivos S.A. de C.V.
Saint-Gobain Adfors America, Inc.
Saint-Gobain Advanced Ceramics, LLC
Saint-Gobain Building Distribution Ltd.
Saint-Gobain Canada, Inc.
Saint-Gobain Ceramic Materials Pvt. Ltd.
Saint-Gobain Ceramics & Plastics, Inc.
Saint-Gobain Corporation
Saint-Gobain Corporation Foundation
Saint-Gobain Delaware Corporation
Saint-Gobain Finance Corporation
Saint-Gobain Glass Corporation
Saint-Gobain HyComp LLC
Saint-Gobain India Foundation
Saint-Gobain India Pvt. Ltd.
Saint-Gobain Insurance Ltd.
Saint-Gobain Interior Building Distribution
Company
Saint-Gobain KK
Saint-Gobain Materiaux de
Construction S.A.S.
Saint-Gobain Merit, S.De R.L. De C.V.
Saint-Gobain Performance Plastics
(Hangzhou) Co., Ltd.
Saint-Gobain Performance Plastics
Corporation
Saint-Gobain Receivables Corporation
Saint-Gobain Research India Pvt. Ltd.
Saint-Gobain Shared Services Corporation
Saint-Gobain Solar Gard Australia Pty.
Ltd.
Saint-Gobain Solar Gard, LLC

Saint-Gobain TM KK
Sepco Corporation
Societe de Participations Financieres et
Industrielles
The Grid Company GP, Inc.
The Grid Company Limited Partnership
The Grid Company, LLC
Tillsonburg Fibre L.P.
Vertec SAS
Vetrotech Saint-Gobain North America,
Inc.
VIB L.P.
Western Mining and Minerals, Inc.
Zenpure Americas, Inc.
Zenpure Corporation
Z-Tech, LLC

Managers and Officers of the Debtor

D. Lawrence Rayburn
Donald J. Melroy
Joseph N. Bondi
Michael T. Starczewski
Robert J. Panaro
Sean R. Knapp
Vincent F. DiNenna, III

Major Current Business Affiliations of Debtor's Managers

Millwork & Panel LLC
Pennsylvania Association of Notaries
Royersford Outreach (d/b/a Open
Door Ministries)
Tampa Chapter of the American
Constitution Society
Vinyl Siding Institute

Depository and Disbursement Banks

Bank of America, N.A.
J.P. Morgan Chase

Parties to Material Contracts, Unexpired Leases and License Agreements with the Debtor

CertainTeed LLC
CT Corp.
PACE Claim Services
PrincetonClaims Services
Saint-Gobain Corporation
Saint-Gobain Shared Services Corporation

Significant Co-Defendants in Asbestos-Related Litigation

3M Company
A.O. Smith Corporation
Carborundum Company
CBS Corporation
Crane Company
Foster Wheeler Energy Corporation
General Electric Company
Honeywell International Inc.
Industrial Holdings Inc.
Ingersoll Rand Company
JM Manufacturing Company Inc.
Metropolitan Life Insurance Company
Union Carbide Corporation
Westinghouse Electric Corporation

Debtor's Retained Professionals and Claims Agent

Bates White LLC
Epiq Corporate Restructuring, LLC
Jones Day
Robinson, Bradshaw & Hinson, P.A.
Schiff Hardin LLP

Debtor's Significant Ordinary Course Professionals, Consultants and Service Providers

Caruso Smith Edell Picini P.C.
Cetrulo LLP
Darger Errante Yavitz & Blau LLP
DeHay & Elliston LLP
Dentons LLP

Deutsch Kerrigan LLP
Foley & Lardner LLP
Gordon Thomas Honeywell LLP
Harvey Kruse
Hawkins & Parnell
Heyl Royster
Kalinowski & Chaplinsky
Maron & Marvel
Miles & Stockbridge
Paine Tarwater Bickers & Tillman LLP
Polsinelli LLP
Swartz Campbell LLC
Vorys Sater Seymour & Pease LLP
Wilbraham Lawler & Buba
Wilson Elser Moskowitz Edelman &
Dicker LLP

**Known Professionals for Certain
Non-Debtor Parties in Interest**

Goodwin Procter LLP

Major Suppliers of Goods and Services

CertainTeed LLC
Saint-Gobain Corporation
Saint-Gobain Shared Services Corporation

**Law Firms with the Most Significant
Representation of Asbestos Claimants**

Baron & Budd, PC
Belluck & Fox, LLP
Brookman, Rosenberg, Brown & Sandler
Cooney & Conway, LLC
Early Lucarelli Sweeney
Flint Law Firm
George & Farinas, LLP
Goldberg, Persky & White, P.C.
Goldenberg Heller Antognoli &
Rowland, PC
The Gori Law Firm
James F. Humphreys & Associates L.C.
Kazan, McClain, Satterley &
Greenwood PLC
Kelley & Ferraro, LLP
Law Offices of Peter G. Angelos, PC

Maune Raichle Hartley French
& Mudd, LLC
Motley Rice, LLC
O'Brien Law Firm, PC
Richardson, Patrick, Westbrook
& Brickman, LLC
Shrader & Associates, L.P.
Simmons Hanly Conroy LLC
SWMW Law, LLC
The Ferraro Law Firm
The Law Offices of Peter T. Nicholl
Weitz & Luxenberg, PC
Wilentz, Goldman & Spitzer

**Ad Hoc Committee of Asbestos Personal
Injury Claimants**

Cooney & Conway, LLC
George & Farinas, LLP
Goldberg, Persky & White, P.C.
The Gori Law Firm
Kazan, McClain, Satterley & Greenwood
Kelley & Ferraro, LLP
Law Offices of Peter G. Angelos, PC
Motley Rice, LLC
O'Brien Law Firm, PC
Simmons Hanly Conroy LLC
Weitz & Luxenberg, PC

Major Sureties

Travelers Casualty and Surety Company
of America

**Employees of the Bankruptcy
Administrator's Office for the Western
District of North Carolina**

Alexandria Kenny
Anne Whitley
David Shepherd
Katrina Adams
Sarah Scholz
Shelley K. Abel

**Bankruptcy Judges for the Western
District of North Carolina**

Judge George Hodges (Charlotte)

Judge J. Craig Whitley (Charlotte)

Judge Laura T. Beyer (Charlotte)

DBMP LLC

New Parties in Interest as of September 14, 2020

Debtor's Retained Professionals and Claims Agent

Berkeley Research Group LLC

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

Winstron & 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

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.

DBMP LLC

New Parties in Interest as of July 26, 2021

Debtor's Retained Professionals

Donlin, Recano and Company, Inc.

Debtor's Significant Ordinary Course Professionals, Consultants and Service Providers

Hunter & Cole
Kean Miller LLP

Professionals to the Future Claimants' Representative

Alexander Ricks PLLC

Other Interested Parties

United States

Bankruptcy Rule 2002 Appearances

Bailey Cowan Heckaman PLLC
Bevan and Associates LPA, Inc.
Brayton Purcell LLP
Flint Law Firm, LLC
Francisco Galaviz
Keller, Fishback and Jackson LLP
Motley Rice LLC
Nass Cancelliere
Nemeroff Law Firm, PC
Rebecca S. Vinocur, P.A.
Reynolds Frizzell LLP
Simmons Hanly Conroy
The Lanier Law Firm
Thornton Law Firm, LLP
Wallace & Graham, P.A.
Waters & Kraus, LLP

DBMP LLC

New Parties in Interest as of April 11, 2022

**Debtor's Significant Ordinary Course
Professionals, Consultants and Service
Providers**

Husch Blackwell LLP
Richards, Layton & Finger, P.A.

Asbestos-Related Trusts

Armstrong World Industries Asbestos Personal Injury Settlement Trust;
Babcock & Wilcox Company Asbestos Personal Injury Settlement Trust
Celotex Asbestos Settlement Trust
DII Industries, LLC Asbestos PI Trust
Federal Mogul U.S. Asbestos Personal Injury Trust
Flintkote Asbestos Trust
Owens Corning Fibreboard Asbestos Personal Injury Trust
Pittsburgh Corning Corporation Asbestos PI Trust
United States Gypsum Asbestos Personal Injury Settlement Trust
WRG Asbestos PI Trust

Bankruptcy Rule 2002 Appearances

Coalition for Litigation Justice, Inc.
Joseph W. Grier, III

Defendants in Adversary Proceedings

Antoine Vignial
Benoit Bazin
Carol Gray
Daniel Biarneix
Eric Placidet
Guillaume Texier
Hubert Reichardt
John Sweeney
Keith Campbell
Mark Rayfield
Pierre-André de Chalendar
Sreedhar Natarajan
Thomas Kinisky

DBMP LLC

New Parties in Interest as of January 10, 2023

**Debtor's Significant Ordinary Course
Professionals, Consultants and Service
Providers**

Cordes Law, PLLC
Germer PLLC
Haynsworth Sinkler Boyd, P.A.
Paine Tarwater Bickers, LLP

Counsel to Manville Trust and Delaware Matching Claimants

Ballard Spahr LLP
Sullivan Hazeltine Allinson LLC
Hogan McDaniel
Waldrep Wall Babcock & Bailey PLLC
Impresa Legal Group
Berman Law PC
Brown Kiely, LLP
Coady Law Firm
Cooper, Hart, Leggievo & Whitehead, PLLC
Deaton Law Firm
DOBS Legal LLP (George & Farinas, LLP & George & Sipes, LLP)
Foster & Sear LLP
Hisey, Mulderig & Friend, PLLC
Hoffman Law Firm & Brown Kiely, LLP
Hossley Embry, LLP
Hotze Runkle, PLLC
Koonz McKenney Johnson & DePaolis, LLP
Madeksho Law Firm
Michie Hamlett PLLC
Michie Hamlett Lowry Rasmussen & Tweel LLC
Patten Wornom Hatten & Diamonstein
Provost Umphrey Law Firm L.L.P.
Robert Peirce & Associates, PC
Robins Cloud, LLP
Rogers, Patrick, Westbrook & Brickman, LLC
Shein Law Center, Ltd.
Shepard Law
Simon Greenstone Panatier, PC
Stephen L. Shackelford, PLLC
The Early Law Firm, L.L.C./The Law Office of John F. Venable, PA
The Lipman Law Firm
The Nemeroff Law Firm
The Williams Law Firm, P.A.

Williams Hart Boundas Easterby, LLP
Worthington & Caron, PC

Paddock-Related Parties and Their Counsel

A.M. Saccullo Legal, LLC
Campbell and Levine, LLC
Caplin & Drysdale, Chartered
Chipman Brown Cicero & Cole
James L. Patton, Jr.
KCIC
Latham & Watkins LLP
Owens-Illinois Asbestos Personal Injury Trust
Owens-Illinois Asbestos Trust Advisory Committee
Paddock Enterprises, LLC
Potter Anderson & Corroon LLP
Richards, Layton & Finger, P.A.
Swartz Campbell LLC
Young Conaway Stargatt & Taylor, LLP

**Bankruptcy Judges for the District of Delaware
and Employees of the Office of the United States Trustee**

Ashely M. Chan
Benjamin Hackman
Brendan L. Shannon
Christine Green
Craig T. Goldblatt
Denis Cooke
Diane Giordano
Dion Wynn
Edith A. Serrano
Hannah M. McCollum
Holly Dice
J. Kate Stickles
James R. O'Malley
Jane Leamy
John T. Dorsey
Joseph Cudia
Joseph McMahon
Juliet Sarkessian
Karen B. Owens
Lauren Attix
Laurie Selber Silverstein
Linda Casey
Linda Richenderfer
Mary F. Walrath
Michael Panacio

Nyanquoi Jones
Ramona Harris
Richard Schepacarter
Rosa Sierra-Fox
Shakima L. Dortch
Timothy J. Fox, Jr.

Counsel to Defendants in Adversary Proceedings

Blanco Tackabery & Matamoros, P.A.
Hughes Hubbard & Reed, LLP