

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

In re

DBMP LLC,<sup>1</sup>

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)

<sup>1</sup> 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,  
CERTAINTEED LLC, CERTAINTEED  
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”),<sup>2</sup> declares as follows:

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<sup>2</sup> 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.  
Zempure Americas, Inc.  
Zempure 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 McMahan  
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