

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

<p>In re</p> <p>DBMP LLC,¹</p> <p style="text-align: center;">Debtor.</p>	<p>Chapter 11</p> <p>Case No. 20-30080 (JCW)</p>
<p>OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS, and SANDER L. ESSERMAN, in his capacity as Legal Representative for Future Asbestos Claimants,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>DBMP LLC and CERTAINTEED LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Pro. No. 21-03023 (JCW)</p>
<p>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,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>CERTAINTEED LLC, CERTAINTEED HOLDING CORPORATION, and SAINT-GOBAIN CORPORATION,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Pro. No. 22-03000 (JCW)</p>

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,

Plaintiffs,

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.

***EX PARTE* APPLICATION OF THE
DISCOVERY REFEREE FOR AN ORDER AUTHORIZING HIM TO
RETAIN AND EMPLOY ADAM STEELE AS RESEARCH ASSISTANT**

Forrest D. Bridges, as the Discovery Referee appointed 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”),¹ hereby applies to the Court for the entry of an order authorizing him to retain and employ Adam Steele as his research assistant in

¹ Capitalized terms used herein but not otherwise defined have the meanings given to them in the Discovery Referee Order.

connection with the matters set forth in the Discovery Referee Order. In support of this Application, the Discovery Referee respectfully represents as follows:

Background

1. On February 15 and 16, 2023, the Court entered the Discovery Referee Order in the above-captioned chapter 11 case and the Adversary Proceedings, which appointed the Discovery Referee to prepare one or more Reports and Recommendations to the Court concerning resolution of the Crime-Fraud/Waiver Motion, as more fully described therein. *See* Discovery Referee Order ¶ 2.

2. The Discovery Referee Order provides that the Discovery Referee's reasonable fees and expenses shall be paid by the Debtor's estate and that the Discovery Referee may engage staff and professionals to assist his efforts (legal, paraprofessional, and administrative), which costs may be billed with the other expenses of the Discovery Referee. *See id.* at ¶ 4. Further, the Discovery Referee Order provides that "[i]f the Discovery Referee retains professional staff and/or firm(s) to assist him, (a) such retention shall be subject to court approval under the standards applicable to estate [professionals] under section 327(a) of the Bankruptcy Code, including the disclosures contemplated by Bankruptcy Rule 2014(a); and (b) and the fees of such staff and/or firm(s) shall be subject to the reasonableness requirements of section 330(a) of the Bankruptcy Code." *Id.*

Jurisdiction

3. This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

4. Pursuant to section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2014-1 of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the “Local Bankruptcy Rules”), the Discovery Referee hereby seeks the entry of an order, substantially in the form attached hereto as Exhibit A, authorizing him to retain and employ Adam Steele as his research assistant in connection with the matters set forth in the Discovery Referee Order.

5. In support of this Application, the Discovery Referee submits, and incorporates herein by reference, the *Declaration of Disinterestedness of Adam Steele* (the “Declaration”), a copy of which is attached hereto as Exhibit B.

Argument

Mr. Steele’s Qualifications

6. Adam Steele is a lawyer and a member in good standing of the Bar for the State of North Carolina. Mr. Steele has been licensed to practice law in North Carolina since 2014. Mr. Steele previously served, among other roles, as a member and then supervisor of the North Carolina Judicial Branch’s Judicial Fellowship program. In this role, Mr. Steele provided the undersigned with research assistance in complex civil matters. Mr. Steele is currently employed by the North Carolina State Board of Elections as an associate general counsel.

Scope of Proposed Retention

7. Mr. Steele shall serve as a research assistant to the Discovery Referee in connection with the matters set forth in the Discovery Referee Order. His services as a research assistant shall include providing analysis and review of documents subject to claims of privilege,

as well as applicable case law, and such other services consistent with the Discovery Referee Order that may be requested by the Discovery Referee.

Compensation

8. Pursuant to the Discovery Referee Order, Mr. Steele's services shall be billed to the Debtor by the Discovery Referee as an expense. See Discovery Referee Order ¶¶ 4-5. His hourly rate shall be \$150 and he shall provide an accounting of his hours to the Discovery Referee (to provide in turn to the Notice Parties).

9. Mr. Steele understands that the fees for his services shall be subject to the reasonableness requirements of section 330(a) of the Bankruptcy Code as set forth in the Discovery Referee Order.

Disclosure Concerning Disinterestedness

10. The Declaration, incorporated herein by reference, discloses Mr. Steele's connections to the Debtor and parties in interest in the above-captioned chapter 11 case and the Adversary Proceedings. In reliance on the Declaration and upon Mr. Steele's reasonable inquiry, and except as set forth therein and in this Application, the Discovery Referee believes that Mr. Steele: (a) has 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) is not a creditor, equity security holder, or insider of the Debtor; (c) is not, nor has been within two years of the commencement of the chapter 11 case, a director, officer, or employee of the Debtor; and (d) neither holds nor represents an interest materially adverse to the Debtor or its estate.

Legal Basis for Relief Requested

11. Section 105(a) of the Bankruptcy Code provides that the Court may “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].” 11 U.S.C. § 105(a). This section thus grants bankruptcy courts broad authority and discretion to enforce the provisions of the Bankruptcy Code either under specific statutes or under equitable common law principles. Relief here is appropriate to implement the terms of the Discovery Referee Order, which states at paragraph 4:

If the Discovery Referee retains professional staff and/or firm(s) to assist him, (a) such retention shall be subject to court approval under the standards applicable to estate [professionals] under section 327(a) of the Bankruptcy Code, including the disclosures contemplated by Bankruptcy Rule 2014(a); and (b) and the fees of such staff and/or firm(s) shall be subject to the reasonableness requirements of section 330(a) of the Bankruptcy Code.

12. Under section 327(a) of the Bankruptcy Code, a debtor in possession is authorized to employ professional persons “that do not hold or represent an interest adverse to the estate, and that are disinterested persons, to represent or assist the [debtor in possession] in carrying out [its] duties under this title.” 11 U.S.C. § 327(a).²

13. Consistent with Bankruptcy Rule 2014(a),³ the above-described facts in this Application and the Declaration set forth: (a) the specific facts showing the necessity for

² Section 101(14) of the Bankruptcy Code defines the phrase “disinterested person” as:
a person that —

(A) is not a creditor, an equity security holder, or an insider;

(B) is not and was not, within 2 years before the date of the filing of the petition, a director, officer, or employee of the debtor; and

(C) does not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the debtor, or for any other reason.

11 U.S.C. § 101(14).

³ Bankruptcy Rule 2014(a) provides that an application seeking the employment of professional persons pursuant to section 327 of the Bankruptcy Code:

Mr. Steele's employment; (b) the reasons for the Discovery Referee's selection of Mr. Steele; (c) the professional services proposed to be provided by Mr. Steele; (d) the arrangement between the Discovery Referee and Mr. Steele with respect to Mr. Steele's compensation; and (e) to the best of the Discovery Referee's knowledge, the extent of Mr. Steele's connections, if any, to certain parties in interest in these matters. Accordingly, Mr. Steele's retention by the Discovery Referee should be approved.

14. Each of the Parties has indicated that it has no objection to the relief requested herein.

Notice

15. Pursuant to Local Bankruptcy Rule 9013-1(f), the Discovery Referee seeks approval of this Application on an *ex parte* basis. Nevertheless, the Discovery Referee has caused a copy of this Application to be served on: (a) the Bankruptcy Administrator; (b) counsel to the Official Committee of Personal Injury Claimants of DBMP LLC; (c) counsel to the Future Claimants' Representative; and (d) counsel to the Defendants. The Discovery Referee submits that, in light of the *ex parte* nature of the relief requested, no other or further notice need be provided.

shall state the specific facts showing the necessity for the employment, the name of the person to be employed, the reasons for the selection, the professional services to be rendered, any proposed arrangement for compensation, and, to the best of the applicant's knowledge, all of the person's connections with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee. The application shall be accompanied by a verified statement of the person to be employed setting forth the person's connections with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.

Fed. R. Bankr. P. 2014(a).

No Prior Request

16. No prior request for the relief sought in this Application has been made to this or any other Court in connection with this case.

WHEREFORE, the Discovery Referee respectfully requests that the Court:
(a) enter an order, substantially in the form attached hereto as Exhibit A, granting the relief requested herein; and (b) grant such other and further relief to the Discovery Referee as the Court may deem just and proper.

Dated: March 6, 2023
Shelby, North Carolina

Respectfully submitted,

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

EXHIBIT A

Proposed Order

**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)

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, and
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Legal Representative for Future Asbestos
Claimants, each on behalf of the estate of
DBMP LLC,

Plaintiffs,

v.

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

Defendants.

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

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
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Plaintiffs,

v.

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.

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

**ORDER AUTHORIZING DISCOVERY REFEREE TO
RETAIN AND EMPLOY ADAM STEELE AS RESEARCH ASSISTANT**

This matter coming before the Court on the *Ex Parte Application of the Discovery Referee for an Order Authorizing Him to Retain and Employ Adam Steele as Research Assistant* (the “Application”),² filed by the Discovery Referee; the Court having reviewed the Application and the Declaration; the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409, (c) this is a core proceeding pursuant to 28 U.S.C. § 157(d)(2), (d) notice of the Application was sufficient under the circumstances, (e) Mr. Steele does not hold or represent any interest materially adverse to the Debtor’s estate and is a “disinterested person,” as defined in section 101(14) of the Bankruptcy Code and as required by the terms of the Discovery Referee Order incorporating the standards of section 327 of the Bankruptcy Code, and (f) the Application and all related exhibits fully comply with the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules; and the Court having determined that the legal and factual bases set forth in the Application and the Declaration establish just case for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED;
2. The Discovery Referee is authorized to retain and employ Adam Steele as his research assistant in connection with the matters set forth in the Discovery Referee Order.
3. Mr. Steele is authorized to render the professional services to the Discovery Referee, as set forth in the Application and the Declaration.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Application.

4. Mr. Steele shall be compensated for his services as set forth in the Application and the Declaration, and in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, the Discovery Referee Order, and any other applicable orders or procedures of this Court. Consistent with the Discovery Referee Order, the Discovery Referee may seek compensation for Mr. Steele's services by the presentment of an invoice, with reasonable supporting detail, to the Notice Parties.

5. This Order shall be immediately effective and enforceable upon its entry.

6. Pursuant to Local Rule 9013-1(f), any party shall be entitled to a hearing or request that the Court reconsider the entry of this Order by filing a motion for reconsideration within 14 days of service of this Order.

7. The Discovery Referee is authorized and empowered to take all actions necessary to implement the relief granted in this Order in accordance with the Application.

8. This Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

This Order has been signed electronically.
The Judge's signature and Court's seal appear
at the top of the Order.

United States Bankruptcy Court

EXHIBIT B

Declaration of Disinterestedness Adam Steele

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

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v.

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

Defendants.

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

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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
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NATARAJAN, GUILLAUME TEXIER, THOMAS
KINISKY, CAROL GRAY, JOHN SWEENEY,
ERIC PLACIDET, MARK RAYFIELD, and
KEITH CAMPBELL,

Defendants.

DECLARATION OF DISINTERESTEDNESS OF ADAM STEELE

Adam Steele, 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”),¹ declares as follows:

1. My name is Adam Steele, and I have been retained by the Discovery Referee as a research assistant pursuant to the Discovery Referee Order. *See* Discovery Referee

¹ Capitalized terms used herein but not otherwise defined have the meanings given to them in the Discovery Referee Order.

Order ¶ 4. My address is Suite 200, Mason Square, 201 South Washington Street, Shelby, NC 28150. I am a lawyer and a member in good standing of the Bar for the State of North Carolina. I have been licensed to practice law in North Carolina since 2014. I previously served, among other roles, as a member and then supervisor of the North Carolina Judicial Branch's Judicial Fellowship program. I am currently employed by the North Carolina State Board of Elections as an associate general counsel.

2. I make this Declaration in support of the *Ex Parte Application of the Discovery Referee for an Order Authorizing Him to Retain and Employ Adam Steele as Research Assistant*.

3. My services as a research assistant to the Discovery Referee will include providing analysis and review of documents subject to claims of privilege, as well as applicable case law, and such other services consistent with the Discovery Referee Order that may be requested by the Discovery Referee. Pursuant to the Discovery Referee Order, my services will be billed to the Debtor by the Discovery Referee as an expense. *See id.* at ¶¶ 4-5. My hourly rate will be \$150, and I will provide an accounting of my hours to the Discovery Referee (to provide in turn to the Notice Parties).

4. On January 26, 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 that were previously provided to the Discovery Referee on January 13, 2023 by the Parties. These lists of the Interested Parties are attached hereto collectively as Annex 1. I also have reviewed various documents from these matters regarding 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, including by reviewing my personal financial holdings, my employment history, and my history of representations.

5. I have no connections with any of the Interested Parties that would pose any actual conflict of interest. I have credit card accounts with JP Morgan Chase and Bank of America, N.A. and dental insurance through MetLife. In addition, I recently had a roof replacement in January 2023 and the contractor installed CertainTeed shingles, which came with a warranty. 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.

6. 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: March 6, 2023
Holly Springs, North Carolina

/s/ Adam Steele
Adam Steele
Suite 200, Mason Square
201 South Washington Street
Shelby, NC 28150

ANNEX 1

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
Madedsho 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