

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

<p>In re</p> <p>DBMP LLC,<sup>1</sup></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>

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<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,

Plaintiffs,

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.

***EX PARTE* APPLICATION OF THE  
DISCOVERY REFEREE FOR AN ORDER AUTHORIZING HIM TO  
RETAIN AND EMPLOY AMANDA MELTON CARTER 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”),<sup>1</sup> hereby applies to the Court for the entry of an order authorizing him to retain and employ Amanda Melton Carter as an additional research

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

assistant in 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 in the Adversary Proceedings. The Discovery Referee Order 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.*

3. On March 6, 2023, the Discovery Referee filed the *Ex Parte Application for an Order Authorizing Him to Retain and Employ Adam Steele as Research Assistant* [Dkt. 2336; Adv. Pro. No. 21-3023, Dkt. 203; Adv. Pro. No. 22-3000, Dkt. 175; Adv. Pro. No. 22-3001, Dkt. 149] and on the same day the Court entered orders [Dkt. 2337; Adv. Pro. No. 21-3023, Dkt. 204; Adv. Pro. No. 22-3000, Dkt. 176; Adv. Pro. No. 22-3001, Dkt. 150] approving the application.

### **Jurisdiction**

4. 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**

5. 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 Amanda Melton Carter as an additional research assistant in connection with the matters set forth in the Discovery Referee Order.

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

### **Argument**

#### ***Ms. Carter’s Qualifications***

7. Amanda Melton Carter is an attorney in active and good standing of the Bar for the State of North Carolina, where she has been licensed to practice since 2006. Ms. Carter has practiced transactional law in private firms and has served in legal education as a professor since 2010. Her course topics include legal research and writing, and she currently serves as an adjunct for the University of North Carolina at Charlotte.

***Scope of Proposed Retention***

8. Ms. Carter shall serve as an additional research assistant to the Discovery Referee in connection with the matters set forth in the Discovery Referee Order. Her 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. Due to the extent of the ongoing *in camera* review of voluminous documents and related activities, Ms. Carter will work concurrently with Mr. Steele to assist the Discovery Referee.

***Compensation***

9. Pursuant to the Discovery Referee Order, Ms. Carter's services shall be billed to the Debtor by the Discovery Referee as an expense. *See* Discovery Referee Order ¶¶ 4-5. Her hourly rate shall be \$150 and she shall provide an accounting of her hours to the Discovery Referee (to provide in turn to the Notice Parties).

10. Ms. Carter understands that the fees for her 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***

11. The Declaration, incorporated herein by reference, discloses Ms. Carter'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 Ms. Carter's reasonable inquiry, and except as set forth therein and in this Application, the Discovery Referee believes that Ms. Carter: (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**

12. 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.

13. 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).<sup>2</sup>

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<sup>2</sup> 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;

14. Consistent with Bankruptcy Rule 2014(a),<sup>3</sup> the above-described facts in this Application and the Declaration set forth: (a) the specific facts showing the necessity for Ms. Carter's employment; (b) the reasons for the Discovery Referee's selection of Ms. Carter; (c) the professional services proposed to be provided by Ms. Carter; (d) the arrangement between the Discovery Referee and Ms. Carter with respect to Ms. Carter's compensation; and (e) to the best of the Discovery Referee's knowledge, the extent of Ms. Carter's connections, if any, to certain parties in interest in these matters. Accordingly, Ms. Carter's retention by the Discovery Referee should be approved.

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

### Notice

16. 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

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(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).

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

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).

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.

**No Prior Request**

17. 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: August 23, 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,<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)

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<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, 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)

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.

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.

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

**ORDER AUTHORIZING DISCOVERY REFEREE TO RETAIN  
AND EMPLOY AMANDA MELTON CARTER 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 Amanda Melton Carter as Research Assistant* (the “Application”),<sup>1</sup> 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) Ms. Carter 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 Amanda Melton Carter as his research assistant in connection with the matters set forth in the Discovery Referee Order.
3. Ms. Carter is authorized to render the professional services to the Discovery Referee, as set forth in the Application and the Declaration.

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Application.

4. Ms. Carter shall be compensated for her 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 Ms. Carter'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 Amanda Melton Carter

**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  
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Claimants,

Plaintiffs,

v.

DBMP LLC and CERTAINTEED LLC,

Defendants.

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

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CERTAINTEED LLC, CERTAINTEED  
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Defendants.

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

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<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.

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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  
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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 AMANDA MELTON CARTER**

Amanda Melton Carter, 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:

1. My name is Amanda Melton Carter, and I have been retained by the Discovery Referee as an additional research assistant pursuant to the Discovery Referee Order.

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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.



See Discovery Referee Order ¶ 4. My address is 200 Mason Square, 201 South Washington Street, Shelby, North Carolina 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 2006. I have practiced transactional law in private firms and have served in legal education as a professor since 2010. My course topics include legal research and writing, and I currently serve as an adjunct for the University of North Carolina at Charlotte.

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 Amanda Melton Carter as Research Assistant*.

3. My services as an additional 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). Due to the extent of the ongoing *in camera* review of voluminous documents and related activities, I will work concurrently with Mr. Adam Steele who was previously retained by the Discovery Referee as a research assistant.

4. On June 12, 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. Further, 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: August 23 2023  
Harrisburg, North Carolina

/s/ Amanda Melton Carter  
Amanda Melton Carter  
Suite 200, Mason Square  
201 South Washington Street  
Shelby, N.C. 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