

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

RED RIVER TALC LLC,¹

Debtor.

Chapter 11

Case No. 24-90505 (CML)

**Ref Docket Nos. 422, 425, 428, 430,
432, 433, 443, 445, 447, 448, 451, &
453**

CERTIFICATE OF SERVICE

I, PANAGIOTA MANATAKIS, hereby certify that:

1. I am employed as a Senior Case Manager by Epiq Corporate Restructuring, LLC, with their principal office located at 777 Third Avenue, New York, New York 10017. I am over the age of eighteen years and am not a party to the above-captioned action.
2. On November 7, 2024, I caused to be served the:
 - a. “Debtor's Objection to Motion to Reconsider and Vacate Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC as Claims, Noticing and Solicitation Agent,” dated November 6, 2024 [Docket No. 422], (the “Vacate Objection”),
 - b. “Debtor's Omnibus Objection to the Motions of the Coalition and United States Trustee to Dismiss the Chapter 11 Case,” dated November 6, 2024 [Docket No. 425], (the “Dismissal Objection”),
 - c. “Debtor’s Objection to Motion of the Coalition of Counsel for Justice for Talc Claimants for Entry of an Order Designating All Accepting Votes on the Prepackaged Plan of Reorganization of the Debtor,” dated November 6, 2024 [Docket No. 428], (the “Coalition Objection”),
 - d. “Debtor’s Objection to Motion of the Coalition of Counsel for Justice for Talc Claimants for Entry of an Order Reinstating Votes Improperly Modified by the Smith Law Firm PLLC,” dated November 6, 2024 [Docket No. 430], (the “Smith Objection”),
 - e. “Debtor’s Joint Objection to Motions of the Coalition of Counsel for Justice for Talc Claimants for (I) a Deadline for Filing Proofs of Claim and Related Relief and (II) an Estimation of Current Talc Claims for Voting Purposes and Related Relief,” dated November 6, 2024 [Docket No. 432], (the “Estimation Objection”),

¹ The last four digits of the Debtor’s taxpayer identification number are 8508. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

- f. “Supplemental Declaration of John K. Kim in Support of the Debtor’s Objections to the Coalition’s (I) Designation Motion, (II) Reinstatement Motion and (III) Estimation and Bar Date Motions,” dated November 6, 2024 [Docket No. 433], (the “Kim Declaration”),
- g. “Notice Regarding Proposed Final Order (I) Approving the Continued Use of the Debtor’s Bank Account and Business Forms; and (II) Authorizing the Debtor’s Bank to Charge Certain Fees and Other Amounts,” dated November 7, 2024 [Docket No. 443], (the “Bank Account Notice”),
- h. “Debtor’s Emergency Motion to Compel Beasley Allen and the Coalition of Counsel for Justice for Talc Claimants to Respond to Debtor’s First Set of Requests for Production of Documents,” dated November 7, 2024 [Docket No. 445], (the “Allen Motion”),
- i. “Debtor’s Objection to Brian A. Goldstein’s Motion to Quash Debtor’s Subpoena to Testify at a Deposition in a Bankruptcy Case,” dated November 7, 2024 [Docket No. 447], (the “Goldstein Objection”),
- j. “Debtor’s Emergency Motion to Schedule a Hearing on (I) Motion to Quash Debtor’s Subpoena to Testify at a Deposition in a Bankruptcy Case to Brian A. Goldstein (II) Emergency Motion of the Coalition of Counsel for Justice for Talc Claimants to Quash the Debtor’s Notice of Oral and Videotaped Deposition of Mark P. Robinson and (III) Debtor’s Emergency Motion to Compel Beasley Allen and the Coalition of Counsel for Justice for Talc Claimants to Respond to the Debtor’s First Set of Requests for Production of Documents,” dated November 7, 2024 [Docket No. 448], (the “Schedule Motion”)
- k. “Debtor’s Omnibus Objection to the Motions to Establish a Protocol for the Appointment of a Future Claims Representative,” dated November 7, 2024 [Docket No. 451], (the “Protocol Objection”), and
- l. “Debtor’s Motion Pursuant to Section 1102(a)(4) of the Bankruptcy Code to Modify Composition to Talc Claimants Committee,” dated November 7, 2024 [Docket No. 453], (the “Composition Motion”),

by causing true and correct copies of the:

- i. Vacate Objection, Dismissal Objection, Coalition Objection, Smith Objection, Estimation Objection, Kim Declaration, Bank Account Notice, Allen Motion, Goldstein Objection, Schedule Motion, Protocol Objection, and Composition Motion to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to those parties listed on the annexed Exhibit A and to 284 parties whose names and addresses are confidential and therefore not included,
- ii. Bank Account Notice to be enclosed securely in a postage pre-paid envelope and delivered via first class mail to the party listed on the annexed Exhibit B,

- iii. Vacate Objection, Dismissal Objection, Coalition Objection, Smith Objection, Estimation Objection, Kim Declaration, Bank Account Notice, Allen Motion, Goldstein Objection, Schedule Motion, Protocol Objection, and Composition Motion to be delivered via electronic mail to those parties listed on the annexed Exhibit C and to 246 parties whose names and addresses are confidential and therefore not included, and
 - iv. Bank Account Notice to be delivered via electronic mail to: *netra.kumar@bofa.com*.
3. All envelopes utilized in the service of the foregoing contained the following legend:
“LEGAL DOCUMENTS ENCLOSED. PLEASE DIRECT TO THE ATTENTION OF ADDRESSEE, PRESIDENT, OR LEGAL DEPARTMENT.”

/s/ Panagiota Manatakis
Panagiota Manatakis

EXHIBIT A

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Total Creditor count: 74

EXHIBIT B

RED RIVER TALC LLC, Case No. 24-90505 (CML)
First Class Mail Additional Service List

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