

**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. 485, 486, 489 & 490

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 11, 2024, I caused to be served the:
 - a. “Red River Talc LLC, Johnson & Johnson, and James Murdica’s Joint Objection to the Emergency Motion of the Coalition of Counsel for Justice for Talc Claimants to Compel Discovery and Request for Guidance on Certain Discovery Issues,” dated November 10, 2024 [Docket No. 485], (the “Objection”),
 - b. “Debtor’s Omnibus Reply in Support of its Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants,” dated November 11, 2024 [Docket No. 486], (the “Reply”),
 - c. “Debtor’s Supplemental Witness and Exhibit List for Hearing on November 12, 2024,” dated November 11, 2024 [Docket No. 489], (the “List”),
 - d. *slipsheet* “Debtor’s Supplemental Witness and Exhibit List for Hearing on November 12, 2024,” *related to Docket No. 489*, a copy of which is annexed hereto as Exhibit A, (the “Slipsheet List”), and
 - e. “Agenda for Matters Set for Hybrid Hearing on November 12, 2024 at 1:00 p.m. (Prevailing Central Time),” dated November 11, 2024 [Docket No. 490], (the “Agenda”),

by causing true and correct copies of the:

- i. Objection, Reply, Slipsheet List, and Agenda to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to those parties listed on the annexed Exhibit B and to 283 parties whose names and addresses are confidential and therefore not included,

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.

- ii. Objection, Reply, List, and Agenda 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
 - iii. Reply to be delivered via electronic mail to: *linda.richenderfer@usdoj.gov*.
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

**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)

**DEBTOR'S SUPPLEMENTAL WITNESS AND
EXHIBIT LIST FOR HEARING ON NOVEMBER 12, 2024**

[Related to Docket No. 460]

The above-captioned debtor (the “Debtor”) files its Supplemental Witness and Exhibit List² for the hearing to be held on November 12, 2024, at 1:00 p.m. (prevailing Central Time) (the “Hearing”) before the Honorable Judge Christopher M. Lopez, United States Bankruptcy Judge, Courtroom 401, 515 Rusk Street, Houston, Texas 77002 as follows:

WITNESSES

The Debtor may call the following witnesses at the Hearing:

1. Randi S. Ellis;
2. Any witness called by any other party;
3. Impeachment witnesses as necessary;
4. Any witness necessary to rebut testimony of a witness called or designated by any party.

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.

² Supplemental items appear in bold.

EXHIBITS

With respect to the *Motion of the Coalition of Counsel for Justice for Talc Claimants Pursuant to Bankruptcy Rules 9023 and 9024 to Alter or Reconsider the Order Denying Motions to Transfer Venue* [Dkt. 321] (the “Motion to Reconsider”), the Debtor incorporates by reference and relies on the Debtor’s witness and exhibit list [Dkt. 324], which was submitted in connection with the hearing on the venue transfer motions [Dkts. 43, 139].

EXHIBIT NO.	DESCRIPTION	MARK	OFFER	OBJECTION	ADMIT	W/D	DISPOSITION
1.	<i>Declaration of Randi S. Ellis</i> , attached as Exhibit A to the <i>Debtor’s Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants</i> [Dkt. 318] (the “ <u>FCR Motion</u> ”) [Dkt. 318-1]						
2.	The Prepetition FCR Agreement, attached as Exhibit B to the FCR Motion [Dkt. 318-2]						
3.	Excerpt of December 30, 2021, hearing transcript in <u>In re LTL Mgmt. LLC</u> , No. 21-30598 (MBK) (Bankr. D.N.J. Dec. 30, 2021), attached as Exhibit A to the <i>Debtor’s Omnibus Objection to the Motions to Establish a Protocol for the Appointment of a Future Claims Representative</i> [Dkt. 451] (the “ <u>FCR Procedures Omnibus Objection</u> ”) [Dkt. 451-1]						
4.	Excerpt of March 8, 2022 hearing transcript in <u>In re LTL Mgmt. LLC</u> , No. 21-30589 (MBK) (Bankr. D.N.J. Mar. 8, 2022), attached as Exhibit B to the FCR Procedures Omnibus Objection [Dkt. 451-2]						
5.	Excerpt of May 9, 2023, hearing transcript in <u>In re LTL Mgmt. LLC</u> , No. 23-12825 (MBK) (Bankr. D.N.J. May 9, 2023), attached as Exhibit C to the FCR Procedures Omnibus Objection [Dkt. 451-3]						

EXHIBIT NO.	DESCRIPTION	MARK	OFFER	OBJECTION	ADMIT	W/D	DISPOSITION
6.	Excerpt of March 8, 2019, hearing transcript in <u>In re Maremont Corp.</u> , No. 19-10118 (KJC) (Bankr. D.N.J. Mar. 8, 2019), attached as Exhibit D to the FCR Procedures Omnibus Objection [Dkt. 451-4]						
7.	Beasley Allen Master Ballot, attached as Exhibit A to the <i>Debtor's Emergency Motion to Compel Coalition Law Firms to Produce Documents in Response to Debtor's Requests For Production Regarding The Firms' Authority To Cast Votes</i> [Dkt. 368] (the " <u>Motion to Compel</u> ") [Dkt. 368-1]						
8.	Debtor's First Set of Requests for Production of Documents to Beasley Allen Law Firm, attached as Exhibit B to the Motion to Compel [Dkt. 368-2]						
9.	Beasley Allen's Responses and Objections to the Debtor's First Set of Requests for Production of Documents to Beasley Allen Law Firm, attached as Exhibit C to the Motion to Compel [Dkt. 368-3]						
10.	Ballots Attached as Exhibits to Sworn Declarations, attached as Exhibit D to the Motion to Compel [Dkt. 368-4]						
11.	Excerpts of the April 17, 2023 Deposition of Andy Birchfield in <u>In re LTL Mgmt.</u>, No. 23-12825-MBK (Bankr. D.N.J.), attached as Exhibit 3 to the <i>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</i> [Dkt. 445] (the "<u>Motion to Compel Beasley Allen and Coalition</u>") [Dkt. 445-3]						
12.	Exhibit concerning Beasley Allen Claimant, attached as Exhibit 4 to the Motion to Compel Beasley Allen and Coalition [Dkt. 445-4]						
13.	Exhibit concerning Beasley Allen Claimant, attached as Exhibit 5 to the Motion to Compel Beasley Allen and Coalition [Dkt. 445-5]						

EXHIBIT NO.	DESCRIPTION	MARK	OFFER	OBJECTION	ADMIT	W/D	DISPOSITION
14.	Exhibit concerning Beasley Allen Claimant, attached as Exhibit 6 to the Motion to Compel Beasley Allen and Coalition [Dkt. 445-6]						
15.	Declaration of Claimant, attached as Exhibit 7 to the Motion to Compel Beasley Allen and Coalition [Dkt. 445-7]						
16.	Declaration of Claimant, attached as Exhibit 8 to the Motion to Compel Beasley Allen and Coalition [Dkt. 445-8]						
17.	Declaration of Claimant, attached as Exhibit 9 to the Motion to Compel Beasley Allen and Coalition [Dkt. 445-9]						
18.	Excerpts of the April 17, 2023 Deposition of David Molton in <u>In re LTL Mgmt.</u> , No. 23-12825-MBK (Bankr. D.N.J.), attached as Exhibit 10 to the Motion to Compel Beasley Allen and Coalition [Dkt. 445-10]						
19.	Excerpts of the Transcript of the October 21, 2024 hearing, attached as Exhibit 11 to the Motion to Compel Beasley Allen and Coalition [Dkt. 445-11]						
20.	The Coalition of Counsel for Justice for Talc Claimants' Responses and Objections, attached as Exhibit 12 to the Motion to Compel Beasley Allen and Coalition [Dkt. 445-12]						
	Any document, pleading, exhibits, transcripts, orders or other documents filed in the above-captioned bankruptcy case						
	Any exhibit necessary for impeachment and/or rebuttal purposes						
	Any exhibit identified or offered by any other party						

RESERVATION OF RIGHTS

The Debtor reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this list prior to the Hearing.

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Dated: November 11, 2024
Houston, Texas

Respectfully submitted,

/s/ John F. Higgins

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Megan Young-John (TX 24088700)
James A. Keefe (TX 24122842)
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PROPOSED ATTORNEYS FOR DEBTOR

Certificate of Service

I certify that on November 11, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtor's claims, noticing and solicitation agent.

/s/ John F. Higgins

John F. Higgins

DEBTOR'S EXHIBIT 11

Red River Talc LLC
DEBTOR'S SUPPLEMENTAL
WITNESS AND EXHIBIT LIST FOR
HEARING ON NOVEMBER 12, 2024
[Docket No. 489]

The remaining attachments to the Supplemental Witness and Exhibit List (the “Exhibits”) have been excluded from service due to the size of the document.

The Exhibits are available for review and can be downloaded free of charge at the website of the Noticing Agent, Epiq Corporate Restructuring, LLC (“Epiq”) at <https://dm.epiq11.com/case/rri/dockets>. The Exhibits are located within Docket No. 489.

You may also request a copy of the Exhibits by contacting Epiq directly at (646) 282-2400 or email at RedRiverInfo@epiqglobal.com.

EXHIBIT B

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Total Creditor count: 76

EXHIBIT C

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