

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

In re:

RED RIVER TALC LLC,

Debtor.¹

Chapter 11

Case No. 24-90505 (CML)

**CENTURY'S AND CERTAIN OTHER INSURERS'
DESIGNATION OF RECORD ON APPEAL**

Appellants Century Indemnity Company (as successor to CCI Insurance Company, as successor to Insurance Company of North America), Federal Insurance Company, Oakwood Insurance Company (as successor to Central National Insurance Company of Omaha, but only for policies issued through Cravens, Dargan & Company, Pacific Coast) and ACE Property and Casualty Insurance Company (f/k/a CIGNA Property & Casualty Insurance Company), Great Northern Insurance Company, Pacific Employers Insurance Company, and Westchester Fire Insurance Company (collectively, the “Insurers”), hereby designate the following items to be included in the record on appeal from the Bankruptcy Court’s *Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* (Dkt. No. 529), entered on November 13, 2024.

Designation No.	Filing Date	Docket No.	Title
1.	9/20/24	24	Chapter 11 Plan of Reorganization Filed by Red River Talc LLC
2.	9/21/24	45	Motion for Process to Appoint FCR Filed by Creditor Coalition of Counsel for Justice for Talc Claimants
3.	9/22/24	51	Amended Motion for Process to Appoint FCR Filed by Creditor

¹ The last four digits of the Debtor’s taxpayer identification number are 8508. The Debtor’s service address in this chapter 11 case is 501 George Street, New Brunswick, New Jersey 08933.

Designation No.	Filing Date	Docket No.	Title
			Coalition of Counsel for Justice for Talc Claimants
4.	10/21/24	301	Motion for an Order Establishing a Protocol for the Appointment of a Future Claimants' Representative Filed by U.S. Trustee
5.	10/23/24	318	Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants Filed by Debtor Red River Talc LLC (including Dkt. Nos. 318-1, 318-2, and 318-3)
6.	11/07/24	451	Debtor's Omnibus Objection to the Motions to Establish a Protocol for the Appointment of a Future Claims Representative (including Dkt. Nos. 451-1, 451-2, 451-3, and 451-4)
7.	11/7/24	455	Joinder of the Ad Hoc Committee of Supporting Counsel to Debtor's Omnibus Objection to the Motion to Establish a Protocol for the Appointment of a Future Claims Representative
8.	11/7/24	456	Objection to Motion to Appoint Randi Ellis as FCR filed by Century Indemnity Company and other insurers
9.	11/8/24	458	U.S. Trustee's Witness and Exhibit List in Connection with Hearings on November 12, 2024
10.	11/8/24	460	Debtor's Witness and Exhibit List for Hearing on November 12, 2024
11.	11/8/24	462	Ad Hoc Committee of Supporting Counsel's Witness and Exhibit List for Hearing Scheduled for November 12, 2024, at 1:00 PM (Prevailing Central Time)
12.	11/8/24	464	Century's and Certain Other Insurers' Witness and Exhibit List for Hearing on November 12, 2024
13.	11/8/24	466	Witness and Exhibit List of Claimant Tamara Newsome for Hearing on November 12, 2024 (including Dkt. No. 466-1)

Designation No.	Filing Date	Docket No.	Title
14.	11/8/24	472	Corrected Century's and Certain Other Insurers' Witness and Exhibit List for Hearing on November 12, 2024
15.	11/8/24	473	Witness and Exhibit List of the Coalition of Counsel for Justice For Talc Claimants for Hearing on November 12, 2024
16.	11/9/24	479	Response Of the Talc Committee to FCR Motions
17.	11/9/24	480	U.S. Trustee's Objection to Debtor's Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants
18.	11/9/24	481	Sealed Document Exhibit A to Objection filed by UST at ECF No. 480 – Confidential Transcript of Deposition of Randi S. Ellis
19.	11/09/24	482	Response of Tamara Newsome to Debtor's Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants (including Dkt. Nos. 482-1, 482-2, 482-3, and 482-4)
20.	11/09/24	483	Coalition of Counsel for Justice for Talc Claimants (I) Objection to the Debtor's Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants [DKT. NO. 318] and (II) Reply on Further Support of its Amended Motion to Establish an FCR Protocol [DKT. NO. 51]
21.	11/11/24	486	Debtor's Omnibus Reply in Support of its Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants
22.	11/11/24	489	Debtor's Supplemental Witness and Exhibit List for Hearing on November 12, 2024 (including all exhibits thereto)
23.	11/11/24	492	Amended Witness and Exhibit List of the Coalition of Counsel for Justice for Talc Claimants for Hearing on November 12, 2024

Designation No.	Filing Date	Docket No.	Title
24.	11/11/24	493	Amended Witness and Exhibit List of Claimant Tamara Newsome for Hearing on November 12, 2024
25.	11/12/24	512	Courtroom Minutes. Time Hearing Held: 1:00 PM. Appearances: PLEASE SEE ATTACHED. (Related documents: 301 Generic Motion, 318 Generic Motion, 321 Motion to Reconsider, 368 Emergency Motion, 445 Emergency Motion). Evidentiary Hearing held. Motion on (Related Docs.: 301) Denied. Court to issue an Order. Motion (Related Docs.: 318) Granted. Order Signed. Motion on (Related Docs.: 321) Denied. Order Signed. Motions on (Related Docs.: 368 and 445) Partially Granted. Orders Signed. (zac4) (Entered: 11/12/2024)
26.	11/13/24	529	Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants
27.	11/13/24	530	Exhibits Filed Under Seal to the Amended Exhibit List for the Hearing on November 12, 2024 [Dkt. No. 492] filed by the Coalition of Counsel for Justice for Talc Claimants
28.	11/13/24	535	Motion of the Coalition of Counsel for Justice for Talc Claimants to File Certain Exhibits Related to the November 12, 2024 Hearing Under Seal [DKT. NO. 51,321,483,492 & 530] Filed by Creditor Coalition of Counsel for Justice for Talc Claimants
29.	11/18/24	566	Transcript regarding hearing held on 11/12/2024
30.	11/20/24	586	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Century Indemnity Company. This is to order a transcript of Motion hearing on November 12, 2024 before Judge Christopher Lopez.

Designation No.	Filing Date	Docket No.	Title
31.	11/25/24	666	Notice of Appeal by Century Indemnity Company and Other Insurers
32.	11/26/24	673	Notice of Appeal by the Coalition of Counsel for Justice for Talc Claimants

Certification Pursuant to Bankruptcy Rule 8009(b)

The Insurers certify that they have ordered a copy of the transcript of the November 12, 2024 hearing at which, among other things, argument was heard and the Court issued an oral ruling regarding the appointment of Ms. Ellis as the legal representative for future talc claimants (*see* Dkt. No. 586). A copy of the transcript is also on file with the bankruptcy clerk (*see* Dkt. No. 566).

Reservation of Rights

This Designation of the Record on Appeal is without waiver of any arguments on appeal and the Insurers expressly reserve the right to modify, restate, or supplement the designations above to the fullest extent permitted by the Bankruptcy Code and Rules.

DATED: December 9, 2024

Respectfully submitted,

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