

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

In re:

RED RIVER TALC LLC,

Debtor.<sup>1</sup>

Chapter 11

Case No. 24-90505 (CML)

**CENTURY'S AND CERTAIN OTHER INSURERS'  
STATEMENT OF ISSUES 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 submit their statement of the issues to be presented 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.

1. Did the Bankruptcy Court err in appointing Ms. Ellis as the legal representative for future talc claimants pursuant to 11 U.S.C. § 524(g)(4)(B)(i)? (Suggested answer: Yes.)

2. Did the Bankruptcy Court err by finding that Ms. Ellis met the

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<sup>1</sup> 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.

requirements that a legal representative for future claimants under 11 U.S.C. § 524(g)(4)(B)(i) be independent, able to provide undivided loyalty to future claimants, and able to effectively advocate for future claimants' best interests, given all the factual circumstances of Ms. Ellis' prepetition relationship with Debtor and J&J, including (without limitation) her prepetition contract with Debtor, Debtor's prepetition payments to Ms. Ellis, Debtor's ability to terminate Ms. Ellis' prepetition contract on short notice for any reason, and Debtor's promises to Ms. Ellis of lucrative post-petition and post-confirmation employment? (Suggested answer: Yes.)

The Insurers reserve the right to modify, restate, or supplement the foregoing issues to the fullest extent permitted by the Bankruptcy Code and Rules.

DATED: December 9, 2024

Respectfully submitted,

/s/ Mark D. Plevin

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*Insurance Company), Great Northern Insurance Company, Pacific Employers Insurance Company, and Westchester Fire Insurance Company*