

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

In re:	:	Chapter 11
	:	
RED RIVER TALC LLC, ¹	:	Case No. 24-90505 (CML)
	:	
Debtor.	:	
	:	

**APPELLANT’S STATEMENT OF ISSUES ON APPEAL AND DESIGNATION OF
ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8009(a) of the Federal Rules of Bankruptcy Procedure, the Coalition of Counsel for Justice for Talc Claimants (“Coalition” or “Appellant”), by and through its undersigned counsel, respectfully submits the following statement of issues to be presented on appeal and designation of items for inclusion in the record on appeal in connection with Coalition’s appeal from the (i) the Order Denying Motions to Transfer Venue (the “Order”), entered October 10, 2024 [ECF No. 245] and (ii) the Order Denying Motion to Reconsider (“Reconsideration Order”), entered November 12, 2024 [ECF No. 510].

STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL²

1. Whether the Bankruptcy Court erred as a matter of law and/or abused its discretion in applying 28 U.S.C. § 1412 when it declined to transfer venue of the above-captioned chapter 11 case to the District of New Jersey, the location of the two bankruptcy cases of the Debtor’s predecessor entities.

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 Appellant reserves the right to restate or revise these issues on appeal.

DESIGNATION OF THE RECORD ON APPEAL³

The Coalition designates each of the following documents for inclusion in the record on appeal (including any exhibit, annex, appendix, or addendum thereto).

Documents Filed in Case No. 24-90505 (CML), *In re Red River Talc LLC*

Designation No.	Filing Date	Docket No.	Description
1.	9/20/2024	1	Chapter 11 Voluntary Petition
2.	9/20/2024	3	Debtor's Statement Regarding Filing of Chapter 11 Case
3.	9/20/2024	17	Declaration of John K. Kim in Support of Chapter 11 Case and Certain First Day Pleadings
4.	9/20/2024	19	Debtor's Emergency Ex Parte Application for Entry of an Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC, as Claims, Noticing and Solicitation Agent
5.	9/20/2024	23	Declaration of John Bittner in Support of First Day Pleadings
6.	9/20/2024	24	Chapter 11 Plan of Reorganization
7.	9/20/2024	25	Notice of Filing of Solicitation Versions of the Prepackaged Chapter 11 Plan of the Debtor and Related Disclosure Statement
8.	9/20/2024	26	Notice of Filing of Redlines of Amended Plan
9.	9/20/2024	27	Witness List filed by Red River Talc LLC
10.	9/21/2024	35	US Trustee's Notice of Motion to Transfer Venue and Request for Stay Pending Before the United States Bankruptcy Court for the District of New Jersey
11.	9/21/2024	39	Order Granting Debtor's Emergency Ex Parte Application for Entry of an Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC, as Claims, Noticing and Solicitation Agent

³ All items designated herein include all exhibits, schedules, attachments, and other documents included within each docket entry for such item. Appellants reserve the right to amend this designation.

12.	9/21/2024	40	Adversary Case 24-03194 – Complaint – <i>Debtor's Complaint for Declaratory and Injunctive Relief (I) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors, (II) Preliminary Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing</i> by Red River Talc LLC against Those Parties Listed on Appendix A to Complaint, John and Jane Does 1-1000
13.	9/21/2024	41	Statement of the Coalition of Counsel for Justice for Talc Claimants Regarding Chapter 11 Case
14.	9/21/2024	42	Declaration in Support of Statement Filed By Coalition of Counsel for Justice for Talc Claimants
15.	9/21/2024	43	Motion to Transfer Case To Another District. Filed by Creditor Coalition of Counsel for Justice for Talc Claimants.
16.	9/21/2024	44	Motion to Dismiss Case for Reasons Stated in Motion. Filed by Creditor Coalition of Counsel for Justice for Talc Claimants
17.	9/21/2024	45	Motion for Process to Appoint FCR Filed by Creditor Coalition of Counsel for Justice for Talc Claimants
18.	9/21/2024	46	Debtor's Motion for Entry of an Order Approving (I) Adequacy of Disclosure Statement, (II) Solicitation Packages and Procedures Employed for the Solicitation and Tabulation of Votes on the Debtor's Prepackaged Plan of Reorganization and (III) Notice of Non-Voting Status
19.	9/21/2024	47	Declaration of Stephenie Kjontvedt of Epiq Corporate Restructuring, LLC, Regarding the Solicitation and Tabulation of Ballots Cast on the Prepackaged Chapter 11 Plan of Reorganization of the Debtor
20.	9/21/2024	48	Declaration of Shannon R. Wheatman, PH.D. In Support of (I) Supplemental Notice Plan and (II) Report on Implementation of Supplemental Notice Plan
21.	9/22/2024	50	Agenda for Hearing on 9/23/2024

22.	9/22/2024	51	Amended Motion for Process to Appoint FCR Filed by Creditor Coalition of Counsel for Justice for Talc Claimants
23.	9/23/2024	59	First Motion Memorandum of Law in Opposition to Debtor's Motion Declaring Auto Stay Filed by Plaintiff Kevin Nesko
24.	9/23/2024	60	Certification of Charles Siegel in Opposition to Debtor's Motion
25.	9/23/2024	90	Courtroom Minutes. Time Hearing Held: 2:30 PM.
26.	9/24/2024	108	Notice of Orders Entered by the United States Bankruptcy Court for the District of New Jersey on Motions to Transfer Venue and to Stay Proceedings. Filed by US Trustee
27.	9/26/2024	139	Motion to Transfer Case To Another District filed by U.S. Trustee
28.	9/27/2024	159	Notice of Hybrid Status Conference Scheduled for September 30, 2024 at 1:30 p.m. (prevailing Central Time)
29.	9/30/2024	167	Courtroom Minutes. Time Hearing Held: 1:30 PM.
30.	10/1/2024	172	Notice Joinder of Claimants Represented by Barnes Law Group, LLC To Motion of the Coalition of Counsel for Justice for Talc Claimants to Transfer Venue (Dkt. No. 43)
31.	10/1/2024	173	Notice Joinder of Claimants Represented by Barnes Law Group, LLC to United States Trustee's Motion to Transfer Venue Pursuant to 28 U.S.C. 1412 (Dkt. No. 139)
32.	10/1/2024	174	Notice of Filing of List of Top 30 Law Firms with the Most Significant Representations of Parties with Ovarian and Gynecological-Cancer Talc Claims Against the Debtor.
33.	10/2/2024	182	Omnibus Objection of the Ad Hoc Committee of Supporting Counsel to (I) Motion of the Coalition of Counsel for Justice for Talc Claimants to Transfer Venue (Dkt. No. 43), (II) United States Trustees Motion to Transfer Venue Pursuant to 28 U.S.C. § 1412 (Dkt. No. 139), (iii) Joinder of Claimants Represented by Barnes Law Group, LLC to Motion of the Coalition of

			Counsel for Justice for Talc Claimants to Transfer Venue (Dkt. No. 172), and (IV) Joinder of Claimants Represented by Barnes Law Group, LLC to United States Trustees Motion to Transfer Venue Pursuant to 28 U.S.C. § 1412 (Dkt. No. 173)
34.	10/2/2024	183	Debtor's Opposition to the Motions to Transfer Venue
35.	10/2/2024	184	Declaration of John K. Kim In Support of the Debtor's Opposition to the Motions to Transfer Venue (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)
36.	10/2/2024	185	Notice of Hybrid Hearing Scheduled for October 10, 2024 at 9:00 a.m.
37.	10/2/2024	194	Response Joinder of the SLF Claimants to the Debtor's Objection to the Motions of the Coalition of Counsel for Justice for Talc Claimants and the United States Trustee to Transfer Venue
38.	10/4/2024	203	Notice of Debtor's Statement and Reservation of Rights with Respect to the Verified Statement filed Pursuant to Federal Rule of Bankruptcy Procedure 2019
39.	10/4/2024	212	Statement (Redacted) Verified Statement of Paul Hastings LLP and Parkins & Rubio LLP Pursuant to Bankruptcy Rule 2019
40.	10/7/2024	215	Coalition of Counsel for Justice for Talc Claimants' Reply in Support of Motion to Transfer Case
41.	10/8/2024	224	Exhibit List (Filed by U.S. Trustee)
42.	10/8/2024	226	Response to Debtor's Statement re: Coalition's Rule 2019 Statement. Filed by Coalition of Counsel for Justice for Talc Claimants
43.	10/8/2024	227	Notice of Virtual Status Conference Scheduled for October 8, 2024 at 2:30 p.m. (prevailing Central Time)
44.	10/8/2024	230	Courtroom Minutes. Time Hearing Held: 2:30 PM.
45.	10/8/2024	233	Witness List (Filed by Ad Hoc Group of Supporting Counsel)

46.	10/8/2024	234	Witness List, Exhibit List (Filed by Red River Talc LLC)
47.	10/8/2024	235	Exhibit List (Filed by Claimants Represented by the Smith Law Firm)
48.	10/9/2024	236	Agenda for Hearing on 10/10/2024
49.	10/9/2024	242	Statement (Redacted) Verified Statement of SLF Claimants Pursuant to Federal Rule of Bankruptcy Procedure 2019
50.	10/9/2024	243	Statement Redacted 2019 Statement Filed By Coalition of Counsel for Justice for Talc Claimants
51.	10/10/2024	245	Order Denying Motions To Transfer Venue
52.	10/10/2024	263	Courtroom Minutes. Time Hearing Held: 9:00 AM.
53.	10/13/2024	257	Motion for Ex Parte Relief Filed by Coalition of Counsel for Justice for Talc Claimants
54.	10/14/2024	260	Debtor's Preliminary Response to Objection of the Coalition of Counsel for Justice for Talc Claimants to Debtor's Emergency Ex Parte Application for Entry of an Order Authorizing the Employment and Retention of Epiq Corporate and Emergency Ex Parte Motion for the Entry of an Order Reconsidering and Vacating the Ex Parte Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC as Claims, Noticing and Solicitation Agent
55.	10/15/2024	264	Motion to Set Last Day to File Proofs of Claim Filed by Coalition of Counsel for Justice for Talc Claimants
56.	10/15/2024	265	Motion to Designate Votes Filed by Coalition of Counsel for Justice for Talc Claimants
57.	10/15/2024	266	Motion to Reinstate Votes Filed by Coalition of Counsel for Justice for Talc Claimants
58.	10/15/2024	267	Motion to Authorize Estimation and Procedures Filed by Coalition of Counsel for Justice for Talc Claimants

59.	10/15/2024	268	Objection to Disclosure Statement Filed by Coalition of Counsel for Justice for Talc Claimants
60.	10/20/2024	291	Agenda for Hearing on 10/21/2024
61.	10/20/2024	294	Debtor's Application for an Order Authorizing it to Retain and Employ Jones Day as Counsel as of the Petition Date
62.	10/20/2024	295	Statement Filed By Coalition of Counsel for Justice for Talc Claimants
63.	10/21/2024	298	Statement / Response Filed By Red River Talc LLC
64.	10/21/2024	299	US Trustee's Motion to Dismiss Case
65.	10/21/2024	300	US Trustee's Motion to Reconsider Epiq Retention Order
66.	10/21/2024	301	Motion for an Order Establishing a Protocol for the Appointment of a Future Claimants' Representative Filed by U.S. Trustee
67.	10/21/2024	302	Joinder of Claimants Represented by Barnes Law Group, LLC to Motion of the Coalition of Counsel for Justice For Talc Claimants to Dismiss the Chapter 11 Case Pursuant to 11 U.S.C. 1112 (B) (Dkt. No 44)
68.	10/21/2024	303	Joinder of Claimants Represented by Barnes Law Group, LLC to United States Trustee's Motion to Dismiss Case Under 11 U.S.C. 1112(B) (Dkt. No 299)
69.	10/21/2024	305	Debtor's Motion for Entry of an Order Confirming the Results of Voting on the Prepackaged Plan of Reorganization
70.	10/21/2024	306	Supplemental Declaration of John K. Kim in Support of the Debtor's Motion for Entry of an Order Confirming the Results of Voting on the Prepackaged Plan of Reorganization
71.	10/21/2024	307	Supplemental Declaration of Stephenie Kjontvedt of Epiq Corporation Restructuring, LLC Regarding the Solicitation and Tabulation of Ballots Cast on the Prepackaged Chapter 11 Plan of Reorganization of the Debtor

72.	10/21/2024	310	Courtroom Minutes. Time Hearing Held: 1:00 PM.
73.	10/22/2024	308	Joinder of Claimants Represented by Goldstein Greco, P.C. to Coalition of Counsel for Justice for Talc Claimants to Dismiss
74.	10/22/2024	309	Joinder of Claimants Represented by Goldstein Greco, P.C. to United States Trustees Motion to Dismiss
75.	10/22/2024	313	Notice of Appointment of Creditors' Committee
76.	10/23/2024	318	Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants Filed by Debtor Red River Talc LLC
77.	10/23/2024	319	Notice of Virtual Status Conference Scheduled for October 30, 2024 at 1:00 p.m.
78.	10/23/2024	321	Motion to Reconsider Order on Motion To Transfer Case, Order on Motion To Transfer Case). Filed by Creditor Coalition of Counsel for Justice for Talc Claimants (Attachments: # 1 Exhibit A)
79.	10/24/2024	327	Notice of Proposed Order Determining that the Automatic Stay Applies and Extends to Non-Debtors Filed by Coalition of Counsel for Justice for Talc Claimants
80.	10/25/2024	328	Debtor's Motion for Entry of an Order Permitting Clients of Morelli Law firm, PLLC to Change Their Votes Filed by Debtor Red River Talc LLC
81.	10/25/2024	330	Debtor's Objection to 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
82.	10/25/2024	331	Debtor's Schedules of Assets and Liabilities
83.	10/25/2024	332	Debtor's Statement of Financial Affairs
84.	10/28/2024	333	Reply by Coalition to Objections to Motion to Reconsider Venue Transfer
85.	10/29/2024	342	Agenda for Hearing on 10/30/2024

86.	10/29/2024	348	Notice of Proposed Agreed Case Management Order
87.	10/30/2024	352	Agreed Case Management Order
88.	10/30/2024	358	Joinder of the Ad Hoc Committee of Supporting Counsel to Debtor's Objection to 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
89.	10/31/2024	363	Notice of Hybrid Hearing Scheduled for November 12, 2024 at 1:00 P.M.
90.	11/1/2024	370	Amended Notice of Hybrid Hearing Scheduled for November 12, 2024 at 1:00 P.M.
91.	11/4/2024	375	Memorandum of Law Joining the US Trustee's Motion to Dismiss & Motion to Dismiss Filed by Coalition of Counsel for Justice for Talc Claimants
92.	11/4/2024	376	J&J Insurers Joinder to United States Trustees Motion to Dismiss Case
93.	11/4/2024	377	Statement Joinder of the Ad Hoc Committee of Supporting Counsel to Debtor's Motion for Entry of an Order Confirming the Results of Voting on the Prepackaged Plan of Reorganization Filed By The Travelers Indemnity Company, Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company)
94.	11/4/2024	378	Statement J&J Insurers' Joinder in United States Trustee's Motion to Dismiss Case Pursuant to 11 U.S.C. § 1112(B) Filed By The Travelers Indemnity Company, Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company)
95.	11/5/2024	388	Motion to Dismiss Case for Other Cause Filed by Interested Party Century Indemnity Company
96.	11/6/2024	395	US Trustee's Objection to Debtor's Motion for an Order Approving Disclosure Statement and Solicitation Procedures (ECF No. 46) and Motion for Entry of an Order Confirming the Results of Voting on the Prepackaged Plan of Reorganization (ECF No. 305)

97.	11/6/2024	396	US Trustee's Consolidated Reservation of Rights with Respect to the Coalition of Counsel for Justice for Talc Claimants Motion for Entry of an Order Establishing a Deadline for Filing Proofs of Claim (ECF No. 264) and Motion for Entry of an Order Authorizing an Estimation of Current Talc Claims for Voting Purposes
98.	11/6/2024	421	Objection of Coalition of Counsel for Justice for Talc Claimants to Debtor's motion for Entry of an Order Confirming the Results of Voting on Pre-Packaged Plan
99.	11/6/2024	422	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
100.	11/6/2024	423	Joinder of Beasley Allen to the Objection of the Coalition of Counsel for Justice for Talc Claimants to Debtor's Motion for Entry of an Order Confirming the Results of Voting on the Prepackaged Plan of Reorganization
101.	11/6/2024	424	Emergency Motion to Postpone November 7 Deposition Filed by Creditor Committee Official Committee of Talc Claimants
102.	11/6/2024	425	Debtor's Omnibus Objection to the Motions of the Coalition and United States Trustee to Dismiss the Chapter 11 Case
103.	11/6/2024	426	Omnibus Objection of the Ad Hoc Committee of Supporting Counsel to Motions to Dismiss
104.	11/6/2024	427	Omnibus Objection of the Ad Hoc Committee of Supporting Counsel to the Motions of the Coalition of Counsel for Justice for Talc Claimants (A) Designating Votes (Dkt. No. 265), (B) Reinstating Votes (Dkt. No. 266), and (C) Establishing Estimation Procedures and Scheduling Estimation Proceedings (Dkt. No. 267)
105.	11/6/2024	428	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

106.	11/6/2024	429	Joinder of the Ad Hoc Committee of Supporting Counsel to 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
107.	11/6/2024	430	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
108.	11/6/2024	431	Joinder of the Ad Hoc Committee of Supporting Counsel to Debtor's Objection to the Motion of the Coalition Establishing a Deadline for Filing Proofs of Claim and Related Relief
109.	11/6/2024	432	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
110.	11/6/2024	433	Supplemental Declaration of John K. Kim in Support of the Debtor's Objections to the Coalitions (I) Designation Motion, (II) Reinstatement Motion and (III) Estimation and Bar Date Motions
111.	11/6/2024	435	The SLF Claimants Corrected (i) Omnibus Objection to the Coalition Voting Pleadings and Cross-Motion under Rule 3018(a) (ii) Objection to the Motions to Dismiss, and (iii) Joinder to Certain of the Debtor's Pleadings, Including the Voting Results Motion
112.	11/7/2024	437	Coalition's Letter regarding Debtor's motion to Postpone the November 12, 2024 Hearing to November 14, 2024 and Reschedule the Deposition of Randi Ellis
113.	11/7/2024	442	Order on Emergency Motion of the Official Committee of TALC Claimants to Postpone the November 12, 2024 Hearing to November 14, 2024 and Reschedule the Deposition of Randi Ellis, Proposed FCR

114.	11/7/2024	451	Debtors Omnibus Objection to the Motions to Establish a Protocol for the Appointment of a Future Claims Representative
115.	11/7/2024	452	Insurers' (A) Objection to Approval of the Disclosure Statement and Solicitation Procedures, and (B) Preliminary Objection to Confirmation of the Plan Filed by Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company)
116.	11/7/2024	453	Debtor's Motion Pursuant to Section 1102(a)(4) of the Bankruptcy Code to Modify Composition to Talc Claimants Committee
117.	11/7/2024	454	Limited Joinder by Employers Insurance Company of Wausau and National Casualty Company to Insurers (A) Objection to Approval of the Disclosure Statement and Solicitation Procedures, and (B) Preliminary Objections to Confirmation of the Plan. Filed by Employers Insurance of Wausau, National Casualty Company
118.	11/7/2024	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
119.	11/7/2024	456	Objection to Motion to Appoint Randi Ellis as FCR Filed by Century Indemnity Company
120.	11/8/2024	458	Witness List (Filed by U.S. Trustee)
121.	11/8/2024	459	Joinder of Allstate Insurance Company to Insurers Objection to Approval of Disclosure Statement and Preliminary Objection to Confirmation of Plan
122.	11/8/2024	460	Witness List, Exhibit List (Filed by Red River Talc LLC)
123.	11/8/2024	462	Witness List, Exhibit List (Filed by Ad Hoc Committee of Supporting Counsel)
124.	11/8/2024	464	Exhibit List (Filed by Century Indemnity Company)
125.	11/8/2024	466	Witness List, Exhibit List (Filed by Tamara Newsome)

126.	11/8/2024	472	Exhibit List (Filed by Century Indemnity Company)
127.	11/8/2024	473	Exhibit List (Filed by Coalition of Counsel for Justice for Talc Claimants)
128.	11/9/2024	479	Response Of the Talc Committee to FCR Motions
129.	11/9/2024	480	Objection to Motion to Appoint Randi Ellis as FCR Filed By US Trustee
130.	11/9/2024	481	Exhibit A to U.S. Trustee Objection (480) – Sealed Document
131.	11/9/2024	482	Response of Tamara Newsome to Debtor's Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants
132.	11/9/2024	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
133.	484	484	Motion to Seal Certain Confidential Information in Objection Filed by Creditor Tamara Newsome
134.	11/11/2024	486	Debtor's Omnibus Reply in Support of its Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants
135.	11/11/2024	489	Witness List, Exhibit List (Filed by Red River Talc LLC)
136.	11/11/2024	490	Agenda for Hearing on 11/12/2024
137.	11/11/2024	492	Witness List (Filed by Coalition of Counsel for Justice for Talc Claimants)
138.	11/11/2024	493	Amended Witness List, Exhibit List (Filed by Tamara Newsome)
139.	11/12/2024	497	Amended Agenda for Hearing on 11/12/2024
140.	11/12/2024	498	Objection of US Trustee to Application to Retain Jones Day As Debtor's Counsel
141.	11/12/2024	501	Stipulation and Order Allowing NJ Coverage Action to Proceed
142.	11/12/2024	510	Order Denying Motion to Reconsider
143.	11/12/2024	512	Courtroom Minutes (11/12/2024 Hearing)

144.	11/12/2024	513	Coalition of Counsel for Justice for Talc Claimants' Joinder to the United States Trustee's Objection to the Debtor's Application for an Order Authorizing it to Retain and Employ Jones Day as Counsel as of the Petition Date and Reservation of Rights
145.	11/13/2024	523	Additional Attachments for November 12, 2024 Hearing (Filed by Coalition of Counsel for Justice for Talc Claimants)
146.	11/13/2024	529	Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants
147.	11/13/2024	530	Exhibits Filed Under Seal to the Amended Witness and Exhibit List for the Hearing on November 12, 2024 [Dkt. No. 492] (Filed Under Seal)
148.	11/13/2024	535	Motion to Seal filed by Coalition of Counsel for Justice for Talc Claimants
149.	11/15/2024	559	Objection Filed by Coalition of Counsel for Justice for Talc Claimants to Debtor's Motion to Authorize Change of Votes By Morelli Firm
150.	11/15/2024	560	Notice of Official Committee of Talc Claimant's Support for Amended Plan.
151.	11/14/2024	539	Application to Employ Bracewell LLP as as Counsel for Randi S. Ellis as The Future Claimants' Representative
152.	11/21/2024	613	Statement of the Official Committee of Talc Claimants in Support of the Debtor's Chapter 11 Case, Forthcoming Amended Plan and Plan Process
153.	11/22/2024	619	U.S. Trustees Omnibus Reply and Reservation of Rights to Objections to Motion to Dismiss
154.	11/22/2024	620	Amended Statement Redacted 2019 Statement Filed By Coalition of Counsel for Justice for Talc Claimants
155.	11/22/2024	621	Omnibus Reply in Support of Motions of the Coalition of Counsel for Justice for Talc Claimants to (A) Establish a Bar Date, and (B) Establish Estimation Procedures and Schedule Estimation Proceedings (Filed By Coalition of Counsel for Justice for Talc Claimants) (Filed Under Seal)

156.	11/22/2024	623	Reply in Support of Motion of the Coalition of Counsel for Justice for Talc Claimants to Dismiss the Chapter 11 Case (Filed Under Seal)
157.	11/22/2024	625	Reply in Support of Motions of the Coalition of Counsel for Justice for Talc Claimants to (A) Designate Votes, and (B) Reinstate Votes Improperly Modified by the Smith Law Firm (Filed Under Seal)
158.	11/22/2024	627	Reply in Support of Motion of the Coalition of Counsel for Justice for Talc Claimants to Vacate the Ex Parte Order Appointing Epiq Corporate Restructuring, LLC as Claims, Noticing and Solicitation Agent (Filed Under Seal)
159.	11/22/2024	631	Declaration re: of Sunni P. Beville in Support of Coalition of Counsel for Justice for Talc Claimants for the Replies Filed on November 22, 2024 (Filed Under Seal)
160.	11/22/2024	634	Debtor's Consolidated Reply In Support of Approval of Disclosure Statement, Solicitation Procedures and Tabulation of the Vote on the Debtor's Prepackaged Chapter 11 Plan of Reorganization
161.	11/23/2024	638	Application to Employ Econ One Research, Inc. as the Econometric Expert for Randi S. Ellis
162.	11/23/2024	642	Reply SLF Claimants' Preliminary Joinder and Reply in Support of Debtor's (i) Voting Results Motion and (ii) Disclosure Statement Motion
163.	11/25/2024	666	Notice of Appeal of FCR Order Filed by Century Indemnity Co. et al.
164.	11/26/2024	672	Notice of Appeal of Venue Orders Filed by Coalition of Counsel for Justice for Talc Claimants
165.	11/26/2024	673	Notice of Appeal of FCR Order Filed by Coalition of Counsel for Justice for Talc Claimants
166.	12/5/2024	705	Order Temporarily Abating Deadlines Related to Plan Confirmation
167.	12/6/2024	712	Objection to Confirmation of Plan Filed by Truck Insurance Exchange

168.	12/9/2024	722	Second Amended Chapter 11 Plan Filed by Red River Talc LLC
169.	12/9/2024	724	Notice of Filing of (I) Redline of the Second Amended Prepackaged Chapter 11 Plan of Reorganization of Red River Talc LLC and (II) Certain Exhibits Thereto

Admitted Exhibits

Designation No.	Trial Exhibit No.	Description
Debtor's Exhibits		
1.	1	Declaration of John K. Kim in Support of the Debtor's Opposition to the Motions to Transfer Venue (the " <u>Kim Declaration</u> ")
2.	2	Excerpt of the transcript of the January 24, 2019 hearing in <i>In re Bestwall LLC</i> , No. 17-31795 (LTB) [Dkt. 767] (Bankr. W.D.N.C. Jan. 24, 2019), attached as Exhibit A to the Kim Declaration
3.	3	Excerpt of the transcript of the November 22, 2016 hearing in <i>In re Kaiser Gypsum Co., Inc.</i> , No. 16-31602 (JCW) [Dkt. 261] (Bankr. W.D.N.C. Nov. 22, 2016), attached as Exhibit B to the Kim Declaration [Dkt. 184-2]
4.	4	Excerpt of the transcript of the September 6, 2023 hearing in <i>In re Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices, and Products Liability Litigation</i> , MDL No. 16-2738 (D. N.J. Sept. 6, 2023), attached as Exhibit C to the Kim Declaration
5.	5	List of Top 30 Law Firms with the Most Significant Representations of Parties with Ovarian and Gynecological-Cancer Talc Claims Against the Debtor
6.	6	List of Top 30 Law Firms with the Most Significant Representations of Parties with Ovarian and Gynecological-Cancer Talc Claims Against the Debtor
7.	7	Solicitation Versions of the Prepackaged Chapter 11 Plan
8.	8	Disclosure Statement for Prepackaged Chapter 11 Plan of Reorganization of the Debtor

Designation No.	Trial Exhibit No.	Description
9.	9	Transcript of the September 24, 2024 hearing in <i>In re LTL Mgmt. LLC</i> , No. 23-12825 (MBK) (Bankr. D.N.J. Sept. 24, 2024)
10.	10	Declaration of Stephenie Kjontvedt of Epiq Corporate Restructuring, LLC, Regarding the Solicitation and Tabulation of Ballots Cast on the Prepackaged Chapter 11 Plan of Reorganization of the Debtor
11.	11	Declaration of Shannon R. Wheatman, Ph.D., in Support of (I) Supplemental Notice Plan and (II) Report on Implementation of Supplemental Notice Plan
12.	12	Motion of the United States Trustee for an Order Pursuant to Fed. R. Bankr. P. 1014(b) Transferring Venue of Subsequently Filed Case to the District of New Jersey, <i>In re LTL Mgmt. LLC</i> , No. 23-12825 (MBK) (Bankr. D. N.J. Sept. 20, 2024)
13.	13	Declaration of John K. Kim in Support of Chapter 11 Case and Certain First Day Pleadings [Dkt. 17] (the “ <u>Kim First Day Declaration</u> ”)
14.	14	Confidential Memorandum of Understanding & Agreement Regarding Talc Bankruptcy Plan Support, attached as Annex A to the Kim First Day Declaration
15.	15	Agreement for Transfer of Assets and Bill of Sale, effective January 1, 1979, attached as Annex B to the Kim First Day Declaration
16.	16	Organizational Chart of Red River Talc LLC, attached as Annex D to the Kim First Day Declaration
17.	17	Amended and Restated Funding Agreement dated August 19, 2024, attached as Annex C to the Kim First Day Declaration
18.	18	Second Amended and Restated Indemnity Cost Funding Agreement dated September 19, 2024, attached as Annex E to the Kim First Day Declaration

Designation No.	Trial Exhibit No.	Description
19.	19	Second Amended and Restated Expense Funding Agreement dated September 19, 2024, attached as Annex G to the Kim First Day Declaration
20.	20	Response of Aylstock, Witkin, Kreis & Overholtz, PLLC to Order to Show Cause Why Venue Should Not Be Transferred to Another District and Joinder in Certain Related Filings, <i>In re LTL Mgmt. LLC</i> , No. 21-30589 [Dkt. 346] (Bankr. W.D.N.C. Nov. 5, 2021)
21.	21	Order of Motion to Transfer Venue, No <i>In re Barretts Minerals Inc.</i> , 23-90794 (Bankr. S.D. Tex. Dec. 7, 2023)
22.	22	State Bar of Texas Attorney Record of Randi S. Ellis found at https://www.texasbar.com/AM/Template.cfm?Section=Find_A_Lawyer&template=/Customsource/MemberDirectory/MemberDirectoryDetail.cfm&ContactID=367855
23.	23	Montgomery County Bar Association Record of Andy D. Birchfield Jr. found at https://mcbar.org/members/?id=64072058
24.	24	Turnaround Management Association Record of John D. Bittner found at https://my.turnaround.org/Directories/Members/MemberDetails?contactid=%7B7A6E5B57-E822-4C13-BBC0-A9A94B6F516C%7D
25.	25	Chart Showing State of Residence of Claimants With Non-Defective Votes Represented by Coalition Firms With Claims Filed in MDL
26.	26	Standing Against J&J's Abuse of Bankruptcy, Andrew Birchfield (Beasley Allen Law), dated October 23, 2023
27.	27	Joint Statement from Mike Papantonio (Levin Papantonio Rafferty) and Andy Birchfield (Beasley Allen Law Firm) on J&J's Third Bankruptcy Scheme, dated March 15, 2024
28.	28	Business Wire, More than 60 Law Firms Oppose J&J Prepack Bankruptcy Scheme, June 20, 2024
29.	29	Open Letter/Talc Litigation Update, Andrew Birchfield (Beasley Allen), dated August 23, 2024

Designation No.	Trial Exhibit No.	Description
Coalition's Exhibits		
30.	1	Order Transferring Case to the District of New Jersey
31.	2	Opinion Affirming Dismissal [<i>In re LTL Mgmt. Co, LLC</i> , Nos. 23-2971 and 23- 2972 (3d Cir. Jul. 25, 2024), Dkt. No. 107]
32.	3	Articles of Conversion (NC)
33.	4	Declaration of John K. Kim in Support of First- Day Pleadings (LTL 1.0)
34.	5	Certificate of Divisional Merger dated August 19, 2024
35.	6	Transcript from North Carolina Stay Hearing October 22, 2021
36.	7	MDL Transfer Order
37.	8	Johnson & Johnson Motion to Modify Stay in <i>Imerys</i> Case
38.	9	Red River First Day Hearing Transcript (Lopez) September 23, 2024
39.	10	Red River Venue Hearing Transcript (Kaplan) September 24, 2024
40.	11	Red River Status Conference Transcript September 30, 2024
41.	12	Declaration of John K. Kim in Support of Chapter 11 Case and Certain First Day Pleadings
42.	13	Red River Declaration – John Bittner
43.	14	Stephenie Kjontvedt Declaration Regarding Solicitation and Tabulation
44.	15	Memorandum of Understanding
45.	16	Transcript from North Carolina Venue Transfer Motion November 10, 2021
46.	17	OnderLaw LLC's Joinder to Motion to Transfer Venue
47.	18	Sealed Document Rule 2019 Statement Filed by Coalition of Counsel for Justice for Talc Claimants
48.	19	(Redacted) Verified Statement of Paul Hastings LLP and Parkins & Rubio LLP Pursuant to Bankruptcy Rule 2019 Filed By Ad Hoc Group of Supporting Counsel
49.	20	LTL 2.0 Hearing Transcript June 28, 2023 (PM Session)

Designation No.	Trial Exhibit No.	Description
50.	21	LTL 2.0 Hearing Transcript June 29, 2023 (AM Session)
51.	22	Joinder of the SLF Claimants to the Debtors Objection to the Motions of the Coalition of Counsel for Justice for Talc Claimants and the United States Trustee to Transfer Venue
52.	23	Declaration of John K. Kim in Support of the Debtor's Opposition to the Motions to Transfer Venue
53.	24	Debtor's Emergency Motion for an Order Declaring that the Automatic Stay Applies to Certain Actions
54.	25	Notice of Filing of Solicitation Versions of the Prepackaged Chapter 11 Plan of the Debtor and Related Disclosure Statement
55.	26	Debtor's Opposition to the Motions to Transfer Venue
56.	27	Omnibus Objection of the Ad Hoc Committee of Supporting Counsel to the Motions to Transfer Venue
57.	28	Order Granting Ad Hoc Counsel Fee Motion
58.	29	Beasley letter 9-24-24
59.	30	Parfitt 9-24-24 letter
60.	31	JJ Letter re BK Stay
61.	34	Pollack Letter to Shipp re Stay Answer
62.	35	O'Melveny Letter Response
63.	36	Fournier 9-27-24 letter
64.	37	2021 Funding Agreement
65.	38	2023 Funding Agreement
66.	39	Debtor Indemnity Cost Funding Agreement
67.	40	Debtor Expenses Funding Agreement
68.	41	Annex A to Adversary Complaint 24- 01394
69.	42	J&J Announces Plan by its Subsidiary LLT Management LLC to Resolve All Current and Future Ovarian Cancer Talc Claims Through a Consensual Prepackaged Reorganization
70.	43	Q3 2023 J&J Earnings Call on October 17, 2023
71.	44	J&J Motion to Substitute Party (Elmer)
72.	45	Informational Brief LTL 1.0

Designation No.	Trial Exhibit No.	Description
73.	46	Kim Declaration in Support of First Day Pleadings LTL 2.0
74.	47	Texas entity search LLT Mgmt
75.	48	Texas entity search Royalty A&M
76.	49	LTL 2.0 Disclosure Statement for Amended Plan
77.	50	LTL 2.0 Ellis Decl.
78.	51	RRT May 1, 2024 Disclosure Statement
79.	52	RRT May 1, 2024 Plan
80.	53	Paul Hasting LLP June 2024 Fee Statement (LTL 2.0)
81.	54	Paul Hasting LLP July 2024 Fee Statement (LTL 2.0)
United States Trustee's Exhibits		
82.	1	Red River Talc, LLC Voluntary Petition with Certification and Corporate Resolutions
83.	2	Declaration of John K. Kim in Support of Chapter 11 Case and Certain First Day Motions
84.	3	<i>In re LTL Management, LLC (LTL 1)</i> Order Transferring Case to District of NJ, 2021 WL 5343945
85.	4	U.S. Trustee's Motion to Transfer Venue filed in <i>LTL Management, LLC (LTL 2)</i> with Supporting Declarations and Exhibits
86.	5	Newark LTL 2 Venue Hearing Transcript
87.	6	Debtor's Statement Regarding filing of Chapter 11 Case
88.	7	In re: J&J Talcum Powder Marketing, Sales Practices, and Products Litigation, Transfer Order
89.	8	<i>In re LTL Mgmt, LLC</i> , 2024 U.S. App. LEXIS 18437 * (3rd Cir. 2024)
90.	9	<i>In re LTL Mgmt, LLC</i> , 652 B.R. 433 (Bankr. D.N.J. 2023)
91.	10	<i>In re LTL Mgmt., LLC</i> , 64 F.4th 84, 92 (3d Cir. 2023)
92.	11	Declaration of John K. Kim in Adversary
93.	12	Rule 2019 Statement from Ad Hoc Group of Supporting Counsel
94.	13	Rule 2019 Statement Filed by Coalition of Counsel for Justice for Talc Claimants
95.	14	Declaration of Lisman, Asst. Corporate Controller for J&J

Designation No.	Trial Exhibit No.	Description
96.	15	Declaration of John K. Kim in Support of First-Day Pleadings from <i>LTL 2</i>
97.	16	Declaration of John K. Kim in Support of First-Day Pleadings from <i>LTL 1</i>
98.	17	Petition from <i>LTL 1</i>
99.	18	Petition from <i>LTL 2</i>
100.	19	Debtor's statement re re-filing in <i>LTL 2</i>
101.	20	List of Top 30 Law Firms from Red River Talc LLC
102.	21	List of Top 30 Law Firms from <i>LTL 2</i>
103.	22	<i>LTL 1</i> NC hearing on 11/10/21
104.	23	Ad Hoc Supporting Statement from <i>LTL 2</i>
105.	24	Ad Hoc Supporting Statement from <i>LTL 2</i>
Ad Hoc Group of Supporting Counsel's Exhibits		
106.	1	Notice of Filing of List of Top 30 Law Firms With the Most Significant Representations of Parties With Ovarian and Gynecological-Cancer Talc Claims Against the Debtor
107.	2	Declaration of John K. Kim in Support of Chapter 11 Case and Certain First Day Pleadings
108.	3	Notice of Filing of Solicitation Versions of the Prepackaged Chapter 11 Plan of the Debtor and Related Disclosure Statement
109.	4	Notice of Filing of Solicitation Versions of the Prepackaged Chapter 11 Plan of the Debtor and Related Disclosure Statement
110.	5	Motion of the United States Trustee for an Order Pursuant to Fed. R. Bankr. P. 1014(b) Transferring Venue of Subsequently Filed Case to the District of New Jersey, In re <i>LTL Mgmt. LLC</i> , No.23-12825 (MBK) (Bankr. D.N.J. Sept. 20, 2024)
111.	6	Transcript of the September 24, 2024 hearing in <i>In re LTL Mgmt. LLC</i> , No. 23-12825 (MBK) (Bankr. D.N.J. Sept. 24, 2024)
112.	7	Notice of Orders Entered by United States Bankruptcy Court for the District of New Jersey on Motions to Transfer Venue and to Stay All Proceedings in Red River Talc, LLC, Bankr. S.D. Tex. Case No. 24-90505

Designation No.	Trial Exhibit No.	Description
113.	8	Declaration of Stephenie Kjontvedt of Epiq Corporate Restructuring, LLC, Regarding the Solicitation and Tabulation of Ballots Cast on the Prepackaged Chapter 11 Plan of Reorganization of the Debtor
114.	9	Verified Statement of Paul Hastings LLP and Parkins & Rubio LLP Pursuant to Bankruptcy Rule 2019

Hearing Transcripts

Docket No.	Date	Description
117	9/25/2024	Transcript of September 23, 2024 Hearing
195	10/3/2024	Transcript of September 30, 2024 Hearing
225	10/11/2024	Transcript of October 8, 2024 Hearing
284	10/18/2024	Transcript of October 10, 2024 Hearing
343	10/29/2024	Transcript of October 21, 2024 Hearing
365	10/30/2024	Transcript of October 30, 2024 Hearing
566	11/18/2024	Transcript of November 12, 2024 Hearing

CERTIFICATION PURSUANT TO BANKRUPTCY RULE 8009(B)

Pursuant to Bankruptcy Rule 8009(b), the Coalition hereby certifies that it is not ordering any transcripts not already available on the docket and designated above.

Dated: December 10, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the Debtor and all parties receiving electronic notice under the Court's CM/ECF system.

/s/ Nicholas R. Lawson

Nicholas R. Lawson