

**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)

DECLARATION OF ORDINARY COURSE PROFESSIONAL

Wollmuth Maher & Deutsch LLP

The undersigned hereby declares, under penalty of perjury, as follows:

1. I am a member, partner or similar representative of the following firm
(the “Firm”), which maintains offices at the address and phone number listed below:

Firm: Wollmuth Maher & Deutsch LLP

Address and Telephone Number: 500 Fifth Avenue, New York, New York 10110; (212) 382-3300

2. This Declaration is submitted in connection with an order of the United States Bankruptcy Court for the Southern District of Texas authorizing Red River Talc LLC (the “Debtor”) to retain certain professionals in the ordinary course of business during the pendency of the Debtor’s chapter 11 case [Dkt. 519] (the “Order”). On September 20, 2024 (the “Petition Date”), the Debtor commenced the above-captioned chapter 11 case. The Debtor has requested that the Firm provide professional services (or continue to provide such services) to the Debtor, and the Firm has agreed to provide such services, following the Petition Date. Accordingly, the Firm is submitting this Declaration pursuant to the Order.

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.

3. The Firm, through me, and other members, partners, associates or employees of the Firm, has provided, or plans to provide, the following services to the Debtor from and after the Petition Date: Legal services in connection with the case (and all related appeals and adversary proceedings thereto) pending in the United States Bankruptcy Court for the District of New Jersey styled *In re LTL Management LLC*, Case No. 23-12825 (the “LTL Case”).

4. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to this chapter 11 case, for persons that are parties-in-interest in the Debtor’s chapter 11 case. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtor, or other parties-in-interest in this chapter 11 case. The Firm does not perform services for any such person in connection with this chapter 11 case. In addition, the Firm does not have any relationship with any such person, such person’s attorneys, or such person’s accountants that would be adverse to the Debtor or its estate with respect to the matters on which the Firm is to be retained. The Firm also represents Pecos River Talc LLC, in connection with the LTL Case, as a result of the prepetition corporate restructuring completed on August 19, 2024 pursuant to which, among other things, LLT Management LLC ceased to exist and the Debtor and Pecos River Talc LLC were created. Prior to the Petition Date, the Firm provided legal services to LLT Management LLC in connection with the closed case (and all related appeals and adversary proceedings thereto) in the United States Bankruptcy Court for the District of New Jersey styled *In re LTL Management LLC*, Case No. 21-30589.

5. To the best of my knowledge, information and belief, formed after due inquiry, the Firm does not represent or hold an interest adverse to the Debtor or its estate with respect to the matter(s) on which the Firm is to be retained and employed.

6. The Firm believes that it is not owed any amount on account of services rendered and expenses incurred prior to the Petition Date in connection with the Firm's employment by the Debtor.

7. The Firm further states that it has not shared, has not agreed to share nor will agree to share, any compensation received in connection with this chapter 11 case with any party or person, although such compensation may be shared with any member or partner of, or any person employed by, the Firm.

8. As of the Petition Date, the Firm was not party to an agreement for indemnification with the Debtor.

9. If, at any time during its employment by the Debtor, the Firm discovers any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed on December 11, 2024.

By: /s/ Paul R. DeFilippo
Paul R. DeFilippo