

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

RED RIVER TALC LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 24-90505 (CML)

**DECLARATION OF P. LEIGH O'DELL**

I, P. LEIGH O'DELL, ESQ., declare:

1. I make this declaration based on personal knowledge.
2. The link to "J&J's plan documents" referred to in BA00001026 (submitted by the Debtor to the Court on December 9, 2024 [Dkt. No. 729]) is no longer active.
3. From July 12, 2024, through the Voting Deadline, the link was available to Beasley Allen clients to gain access. Clicking on the link brought clients to the following documents related to the Red River Talc LLC Bankruptcy:
  - a. Notice of Plan Supplement and attached Annexes 1-6
  - b. Prepackaged Chapter 11 Plan of Reorganization of the Debtor Redline
  - c. Schedule 1 Debtor Corporate Parties Redline
  - d. Trust Distribution Procedures for Red River Talc Personal Injury Trust Redline
  - e. Red River Personal Injury Trust Agreement Redline
  - f. Solicitation Package Cover Letter
  - g. Disclosure Statement for Prepackaged Chapter 11 Plan of Reorganization of the Debtor

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<sup>1</sup> The last four digits of the Debtor's federal tax identification number are 8508. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

- h. Prepackaged Chapter 11 Plan of Reorganization of the Debtor
- i. Debtor Letter in Support of the Plan
- j. AHC Letter in Support of the Plan

Under 28 U.S.C. 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: December 23, 2024

/s/ P. Leigh O'Dell  
P. LEIGH O'DELL, ESQ.

Dated: December 23, 2024

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*Co-Counsel for Coalition of Counsel for  
Justice for Talc Claimants*

**CERTIFICATE OF SERVICE**

I certify that on December 24, 2024, I caused a true and correct 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.

/s/ Avi Moshenberg  
Avi Moshenberg