

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

<hr/>	
In re:	:
	: Chapter 11
	:
RED RIVER TALC LLC, ¹	: Case No. 24-90505 (CML)
	:
Debtor.	:
<hr/>	
	:
RED RIVER TALC LLC,	:
	:
Plaintiff,	:
	:
v.	: Adv. Pro. No. 24-03194 (CML)
	:
THOSE PARTIES LISTED ON	:
APPENDIX A TO COMPLAINT	:
and JOHN AND JANE DOES 1-1000,	:
	:
Defendants.	:
<hr/>	

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 *Second Order Determining that the Automatic Stay Applies and Extends to Certain Non-Debtors*, entered December 5, 2024 [ECF No. 113, Adv. Pro. No. 24-03194 (CML)] (“Second Stay 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.

STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL²

1. Did the Court err and/or abuse its discretion by construing and applying 11 U.S.C. § 362(a)(1), § 362(a)(3), § 362(a)(6), and/or § 105(a) to stay tens of thousands of litigations asserting direct claims against hundreds of non-debtor parties, including purported affiliates of the Debtor and unaffiliated retailers (the “Protected Parties”) under controlling appellate authority, and on the facts here, where, among other things, the Debtor made no showing and the Court made no findings upon which to conclude that the claims against the Protected Parties, if not stayed, would (a) result in any impact on the debtor’s estate or (b) with the potential exception of one, are property of the estate?

2. Did the Court err in concluding that subject matter jurisdiction exists to authorize the Court to issue a stay or preliminary injunction enjoining litigations by tens of thousands of non-debtors against hundreds of non-debtors on the facts here where the litigations, if not stayed, would not (a) impact the debtor’s estate, (b) deplete any insurance coverage available to the debtor, (c) involve any absolute indemnification obligations or (d) implicate *res judicata*, collateral estoppel and record taint principles?

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).

² Appellant reserves the right to restate or revise these issues on appeal. The issues in this appeal (docketed in the District Court as Case No. 24 Civ. 5074) include the same issues presented in the appeal as set forth in Docket No. 78 in Case No. 24-03194, which was docketed in the District Court as Case No. 24 Civ. 4450.

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.

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
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 by Red River Talc LLC against Those Parties Listed</i>

			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
170.	12/9/2024	731	Debtor's Motion for Entry of an Order Permitting Clients of Summers & Johnson, P.C. to Change Their Votes
171.	12/10/2024	734	Declaration of Benedict P. Morelli in Support of the Debtors Motion for Entry Of An Order Permitting Clients Of Morelli Law Firm, PPLC To Change Their Votes

172.	12/10/2024	736	Courtroom Minutes from December 10, 2024 Hearing
173.	12/17/2024	804	Courtroom Minutes from December 17, 2024 Hearing
174.	12/18/2024	817	Debtor's Motion for Entry of an Order Extending the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedures
175.	12/20/2024	838	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2024
176.	12/20/2024	840	Letter Brief re Preliminary Injunction filed by Claimants Represented by Barnes Law Group, LLC
177.	12/26/2024	856	Debtor's Motion for an Order (I) Authorizing it to (A) Commence and Fund Certain Limited Claims Processing Services, (B) Commence Lien Resolution Process and (C) Retain ARCHER Systems, LLC and (II) Granting Related Relief
178.	12/27/2024	857	Debtor's Motion for an Order Authorizing it to (I) Assume the Reimbursement Agreement with Ad Hoc Committee of Supporting Counsel and (II) Satisfy its Obligation Thereunder and Granting Related Relief
179.	12/27/2024	858	Courtroom Minutes for December 27, 2024 Hearing
180.	12/30/2024	856	Coalition of Counsel for Justice for Talc Claimants' Limited Objection and Reservation of Rights in Connection with the Debtor's Motion for Entry of an Order Permitting Clients of Summers & Johnson, P.C. to Change Their Votes

Documents Filed in Adv. Pro. 24-03194 (CML) (*Red River Talc LLC vs. Those Parties Listed on Appendix A to Complaint, et al.*)

Designation No.	Filing Date	Docket No.	Description
1.	9/21/2024	1	Debtor's Complaint for Declaratory and Injunctive Relief (I) Declaring That the Automatic Stay Applies to Certain Actions

Designation No.	Filing Date	Docket No.	Description
			Against Non-Debtors or, (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing
2.	9/21/2024	2	Debtor's Emergency Motion for an Order (I) Declaring That the Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing
3.	9/21/2024	3	Declaration of John K. Kim in Support of Debtor's Complaint for Declaratory and Injunctive Relief and Related Motions
4.	9/21/2024	4	Sealed Document - Declaration of John K. Kim in Support of Debtor's Complaint for Declaratory and Injunctive Relief and Related Motion
5.	9/21/2024	6	Declaration of Adam Lisman In Support of Debtor's Complaint for Declaratory and Injunctive Relief and Related Motion
6.	9/21/2024	7	Debtor's Motion for Approval of Service Procedures for Summons, Complaint, and Other Pleadings
7.	9/21/2024	8	Notice of Telephonic and Video Conference Hearing on Certain Emergency Motions
8.	9/22/2024	9	Agenda for Hearing on 9/23/2024
9.	9/23/2024	10	Objection of Coalition to Emergency Motion.
10.	9/23/2024	11	Declaration in Support of Coalition Objection
11.	9/23/2024	15	Memorandum of Law in Opposition to Debtor's Motion Declaring Stay Filed by Plaintiff Kevin Nesko
12.	9/23/2024	16	Certification of Charles Siegel in Opposition to Debtor's Motion Declaring Stay Filed by Plaintiff Kevin Nesko

Designation No.	Filing Date	Docket No.	Description
13.	9/23/2024	17	Temporary Order (A) Declaring that the Automatic Stay Applies to Certain Claims and Causes of Action Asserted Against Certain Non-Debtors and (B) Extending the Automatic Stay to Certain Non-Debtors
14.	10/7/2024	26	Stipulation and Order Extending Time to Appeal
15.	10/7/2024	27	Stipulation and Order Extending Time to Appeal
16.	10/9/2024	28	Stipulation By coalition of Counsel for Justice to Talc Claimants and Debtor
17.	10/15/2024	33	Notice of Hybrid Hearing Scheduled for October 21, 2024 at 1:00 p.m. (prevailing Central Time)
18.	10/17/2024	37	Witness List, Exhibit List Filed By Red River Talc LLC
19.	10/17/2024	38	Sealed Document - Debtor's Witness and Exhibit List for Hearing on October 21, 2024
20.	10/18/2024	41	Joint Witness List, Exhibit List for October 21, 2024 Hearing
21.	10/18/2024	42	Travelers Reservation of Rights Regarding Debtor's Emergency Motion for (I) An Order (A) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (B) Preliminarily Enjoining Such Actions and (II) A Temporary Restraining Order Pending A Final Hearing
22.	10/20/2024	43	Agenda for Hearing on 10/21/2024
23.	10/20/2024	44	Statement Filed By Coalition of Counsel for Justice to Talc Claimants
24.	10/21/2024	47	Notice of Revised Form of Proposed Temporary Restraining Order.
25.	10/21/2024	48	Courtroom Minutes. The Court supplements the October 21, 2024 ruling to state that the stay also extends to any action by Johnson &

Designation No.	Filing Date	Docket No.	Description
			Johnson or any other entity to disqualify any counsel in any case. Further Hearing scheduled for 12/2/2024 at 01:00 PM at Houston, Courtroom 401 (CML).
26.	10/24/2024	55	Notice of Letter Regarding Automatic Stay. Filed by Red River Talc LLC
27.	10/24/2024	56	Notice of Letter with Proposed Order. Filed by Coalition of Counsel for Justice to Talc Claimants
28.	10/24/2024	57	Order Determining that the Automatic Stay Applies and Extends to Certain Non-Debtors
29.	11/6/2024	65	Order Approving Service Procedures for Summons, Complaint and Other Pleadings
30.	11/6/2024	66	Order Granting Debtor's Motion for Entry of an Order Authorizing Filing Under Seal Certain Confidential Exhibits Related to Debtor's Complaint for Injunctive Relief and Related Motion
31.	11/07/2024	70	Notice of Appeal Filed By Coalition of Counsel for Justice to Talc Claimants
32.	11/13/2024	74	Election to Appeal to District Court
33.	11/13/2024	75	Clerk's Notice of Filing an Appeal.
34.	11/21/2024	78	Statement of Issues on Appeal, Appellant Designation of Contents for Inclusion in Record on Appeal
35.	11/22/2024	80	Notice of Hearing Scheduled for December 2, 2024 at 1:00 p.m. (CT)
36.	11/26/2024	81	Plaintiff's Exhibit List. Filed by Kevin Nesko
37.	11/26/2024	82	Debtors (I) Supplemental Brief in Further Support of Motion for an Order (A) Declaring that the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors and (B) Preliminarily Enjoining Such Actions and (II) Reply to Related Objections

Designation No.	Filing Date	Docket No.	Description
38.	11/26/2024	83	Sealed Document - Debtors (I) Supplemental Brief in Further Support of Motion for an Order (A) Declaring that the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors and (B) Preliminarily Enjoining Such Actions and (II) Reply to Related Objections
39.	11/26/2024	84	Second Declaration of John K. Kim in Support of Debtors Complaint for Declaratory and Injunctive Relief and Related Motion
40.	11/26/2024	85	Sealed Document - Second Declaration of John K. Kim in Support of Debtors Complaint for Declaratory and Injunctive Relief and Related Motion
41.	11/27/2024	87	Witness List, Exhibit List Filed By Red River Talc LLC
42.	11/27/2024	88	Sealed Document - Debtors' Witness and Exhibit List for Hearing on December 2, 2024
43.	11/27/2024	89	Agenda for Hearing on 12/2/2024
44.	11/27/2024	90	Witness List, Exhibit List Filed By Coalition of Counsel for Justice to Talc Claimants
45.	11/27/2024	91	Sealed Document Witness and Exhibit List of the Coalition of Counsel for Justice for Talc Claimants for Hearing on December 2, 2024
46.	11/29/2024	93	Witness List, Exhibit List Filed By Tamara Newsome
47.	11/29/2024	94	Joinder of Beasley Allen to the Objection of the Coalition of Counsel for Justice for Talc Claimants to Debtor's Emergency Motion for (I) an Order (A) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (B) Preliminarily Enjoining Such Actions and (II) a Temporary Restraining Order Pending a Final Hearing (Filed By Tamara Newsome)
48.	11/29/2024	96	Exhibit List Filed by Brandi Carl

Designation No.	Filing Date	Docket No.	Description
49.	11/29/2024	97	Joinder of Golomb Legal, P.C. to the Objection of the Coalition of Counsel for Justice for Talc Claimants to Debtor's Emergency Motion
50.	11/29/2024	98	Witness List, Exhibit List Filed By Coalition of Counsel for Justice to Talc Claimants
51.	11/29/2024	99	Sealed Document Amended Witness and Exhibit List of the Coalition of Counsel for Justice for Talc Claimants for Hearing on December 2, 2024
52.	12/2/2024	102	Amended Notice of Witness and Exhibit List of Plaintiff Kevin Nesko
53.	12/2/2024	105	Courtroom Minutes for December 2, 2024 Hearing
54.	12/3/2024	108	Notice of Corrected Revised List of Protected Parties
55.	12/5/2024	113	Second Order Determining that the Automatic Stay Applies and Extends to Certain Non-Debtors
56.	12/5/2024	114	Appellee Designation of Contents for Inclusion in Record of Appeal
57.	12/19/2024	117	Notice of Appeal
58.	12/19/2024	118	Election to Appeal to District Court
59.	12/20/2024	119	Letter Brief re Preliminary Injunction Filed By Claimants Represented By Barnes Law Group, LLC
60.	12/20/2024	120	Supplemental Brief Filed By Coalition of Counsel for Justice to Talc Claimants
61.	12/20/2024	121	Brief Filed By Red River Talc LLC
62.	12/20/2024	122	Sealed Document - Debtor's Brief In Support of Preserving Stay of Debtor Talc Claims Asserted against Johnson & Johnson
63.	12/30/2024	129	Supplemental Brief Filed By Kevin Nesko

Admitted Exhibits ⁴

Designation No.	Trial Exhibit No.	Description
Debtor's Exhibits		
1.	1	Declaration of John K. Kim in Support of Debtor's Complaint for Declaratory and Injunctive Relief and Related Motion (the " <u>Kim PI Declaration</u> ")
2.	2	Class Action Complaint filed in <i>Love, D.D.S. v. LLT Mgmt. LLC</i> , No. 3:24-cv06320-MAS-RLS (D.N.J. May 22, 2024), attached as Exhibit 1 to the Kim PI Declaration
3.	3	<i>Plaintiff's Class Action Complaint and Jury Demand filed in Bynum v. LLT Management LLC</i> , No. 3:24 cv-07065- MAS-RLS (D.N.J June 17, 2024), attached as Exhibit 2 to the Kim PI Declaration
4.	4	1981 Annual Report of Johnson & Johnson, dated March 18, 1982, attached as Exhibit 3 to the Kim PI Declaration
5.	5	Minutes of a Regular Meeting of Board of Directors of Johnson & Johnson, dated December 12, 1978, attached as Exhibit 4 to the Kim PI Declaration
6.	6	Agreement for Transfer of Assets and Bill of Sale by and between J&J and Johnson & Johnson Baby Products Company, dated January 1, 1979, attached as Exhibit 5 to the Kim PI Declaration
7.	7	Johnson & Johnson Baby Products Company Action Authorized by Unanimous Consent of Shareholder in Lieu of a Special Meeting of Shareholder, dated July 12, 1981, attached as Exhibit 6 to the Kim PI Declaration
8.	8	Agreement for Transfer of Assets and Bill of Sale by and between Johnson & Johnson Baby Products Company and Johnson & Johnson Dental Products Company, dated January 3, 1988, attached as Exhibit 7 to the Kim PI Declaration

⁴ These exhibits were admitted in connection with the first Stay Order entered in Adv. Pro. No. 24-03194 (Docket No. 57). No additional exhibits were entered in connection with the Second Stay Order.

Designation No.	Trial Exhibit No.	Description
9.	9	Certificate of Amendment to the Certificate of Incorporation of Johnson & Johnson Consumer Products, Inc., dated July 1, 1997, attached as Exhibit 8 to the Kim PI Declaration
10.	10	Certificate of Merger of McNeil Consumer Products Company Into Personal Products Company, dated November 2, 1998, attached as Exhibit 9 to the Kim PI Declaration
11.	11	Excerpts from the Certificate of Merger of Neutrogena, LLC, Johnson & Johnson Consumer Companies, LLC, and Johnson & Johnson Sales and Logistics Company, LLC With and Into McNeil-PPC, Inc., dated June 15, 2015, attached as Exhibit 10 to the Kim PI Declaration
12.	12	Certificate of Merger of Johnson & Johnson Consumer Companies, Inc. With and Into Johnson & Johnson Consumer Companies, LLC, dated June 23, 2015, attached as Exhibit 11 to the Kim PI Declaration
13.	13	Internal Personal Products Company letter, dated October 31, 1977, attached as Exhibit 12 to the Kim PI Declaration
14.	14	Excerpts from the 1976 Annual Report of J&J, dated January 2, 1977, attached as Exhibit 13 to the Kim PI Declaration
15.	15	Excerpts from the 1977 Annual Report of J&J, dated January 1, 1978, attached as Exhibit 14 to the Kim PI Declaration
16.	16	Excerpts from the 1979 Annual Report of J&J, dated December 30, 1979, attached as Exhibit 15 to the Kim PI Declaration
17.	17	Excerpts from Personal Product Company's financial statements for the year ended December 31, 1978, attached as Exhibit 16 to the Kim PI Declaration
18.	18	Excerpts from the 1985 annual report of J&J, attached as Exhibit 17 to the Kim PI Declaration
19.	19	Johnson & Johnson 1986 Annual Report, attached as Exhibit 18 to the Kim PI Declaration
20.	20	(Filed Under Seal) Excerpts from the Indemnification Agreement by and between Bausch Health Companies (formerly Valeant Pharmaceutical International, Inc.) and its

Designation No.	Trial Exhibit No.	Description
		affiliates and Johnson & Johnson Consumer Companies, Inc. and its affiliates, attached as Exhibit 19 to the Kim PI Declaration
21.	21	Excerpts from the transcript of the hearing held on November 5, 2021 before the United States Bankruptcy Court for the Western District of North Carolina in <i>LTL Mgmt. LLC v. Those Parties Listed on Appendix A to Complaint (In re LTL Mgmt. LLC)</i> , Adv. Pro. No. 21-03032 (JCW) (Bankr. W.D.N.C. Nov. 5, 2021), attached as Exhibit 20 to the Kim PI Declaration
22..	22	J&J Medical Safety Standard, dated January 1, 2014, attached as Exhibit 21 to the Kim PI Declaration
23.	23	Excerpts from the deposition testimony of Dr. Joanne Waldstreicher in <i>Ingham v. Johnson & Johnson</i> , No. 1522-CC10417, Circuit Court of the City of St. Louis, State of Missouri (Apr. 19, 2017), attached as Exhibit 22A to the Kim PI Declaration
24.	24	Excerpts from the deposition testimony of Dr. Joanne Waldstreicher in <i>Leavitt v. Johnson & Johnson</i> , RGI7882401, Superior Court of California, County of Alameda (Sept. 14, 2018), attached as Exhibit 22B to the Kim PI Declaration
25.	25	Excerpts from the deposition testimony of Dr. Susan Nicholson from <i>Prudencio v. Johnson & Johnson</i> , RG20061303, Superior Court of the State of California, County of Alameda (June 4, 2021), attached as Exhibit 23 to the Kim PI Declaration
26.	26	Second Amended Master Long Form Complaint and Jury Demand filed in <i>In re Johnson & Johnson Talcum Powder Prod. Mktg., Sales Pracs., & Prod. Liab. Litig.</i> , No. 3:16-md-02738-FLW-LHG (D.N.J. Dec. 12, 2020), attached as Exhibit 24 to the Kim PI Declaration
27.	27	Excerpts from the transcript of the hearing held on October 28, 2021 in <i>Hood v. Acme</i> , No. 2020-CP10-03946, County of

Designation No.	Trial Exhibit No.	Description
		Charleston for the State of South Carolina (Oct. 28, 2021), attached as Exhibit 25 to the Kim PI Declaration
28.	28	Evidence summary of the Debtor's insurance coverage pursuant to FRE 1006, attached as Exhibit 26 to the Kim PI Declaration
29.	29	(Filed Under Seal) Aetna Insurance Agreement number 38 XN 07 SCA, attached as Exhibit 27 to the Kim PI Declaration
30.	30	(Filed Under Seal) Home Insurance Company insurance agreement number HEC 4764031, attached as Exhibit 28 to the Kim PI Declaration
31.	31	(Filed Under Seal) Aetna Insurance Agreement, Aetna Primary 38 PK 15 SCA, attached as Exhibit 29 to the Kim PI Declaration
32.	32	(Filed Under Seal) Aetna Insurance Agreement number 38 AL 12880 SR(Y)_1- 1-1967 to 1-1-1970, attached as Exhibit 30 to the Kim PI Declaration
33.	33	Letter of Agreement and Continuing Commodity Guaranty between Johnson & Johnson Baby Products Company and Safeway Stores, Incorporated, dated March 20, 1989, attached as Exhibit 31 to the Kim PI Declaration
34.	34	Master Advertising Agreement by and between H-E-B, LP and Johnson & Johnson Consumer Inc., effective as of July 20, 2020, attached as Exhibit 32 to the Kim PI Declaration
35.	35	Letter agreement between LLT Management LLC and Ralphs Grocery Company, dated May 7, 2024, attached as Exhibit 33 to the Kim PI Declaration
36.	36	Letter agreement between LTL Management LLC and Publix Super Markets, Inc., dated November 3, 2023, attached as Exhibit 34 to the Kim PI Declaration
37.	37	Letter agreement between Johnson & Johnson Consumer Companies, Inc. and Safeway, Inc., dated May 13, 2019, attached as Exhibit 35 to the Kim PI Declaration

Designation No.	Trial Exhibit No.	Description
38.	38	Letter agreement between Johnson & Johnson Consumer Inc. and Albertsons Companies, Inc., dated October 8, 2018, attached as Exhibit 36 to the Kim PI Declaration
39.	39	(Filed Under Seal) Asset Purchase Agreement by and between Johnson & Johnson Consumer Companies, Inc. and Pharma Tech. Industries, dated April 4, 2005, attached as Exhibit 37 to the Kim PI Declaration
40.	40	J&J press release, dated November 12, 2021, attached as Exhibit 38 to the Kim PI Declaration
41.	41	Excerpts from the transcript of the hearing held on April 29, 2022 in <i>HONX, Inc. v. Those Parties Listed in Appendix A (In re HONX, Inc.)</i> , Adv. Pro. No. 22-03129, (Bankr. S.D. Tex.), attached as Exhibit 39 to the Kim PI Declaration
42.	42	Declaration of Adam Lisman in Support of Debtor's Complaint for Declaratory and Injunctive Relief and Related Motion
43.	43	Declaration of John K. Kim in Support of Chapter 11 Case and Certain First Day Pleadings (the "Kim First Day Declaration")
44.	44	Confidential Memorandum of Understanding & Agreement Regarding Talc Bankruptcy Plan Support, attached as Annex A to the Kim First Day Declaration
45.	45	Agreement for Transfer of Assets and Bill of Sale, effective January 1, 1979, attached as Annex B to the Kim First Day Declaration
46.	46	Amended and Restated Funding Agreement dated August 19, 2024, attached as Annex C to the Kim First Day Declaration
47.	47	Organizational Chart of Red River Talc LLC, attached as Annex D to the Kim First Day Declaration
48.	48	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
49.	49	Second Amended and Restated Expense Funding Agreement dated September 19, 2024, attached as Annex G to the Kim First Day Declaration
Coalition's Exhibits		
50.	1	Johnson & Johnson ("J&J") Press Release dated May 1, 2024 announcing plan
51.	2	Testimony of J&J corporate representative Dr. John Hopkins
52.	3	Testimony of J&J corporate representative Dr. John Hopkins
53.	4	J&J March 11, 2019 letter to Congress
54.	5	Alex Gorsky video statement
55.	6	Alex Gorsky on CNBC's "Mad Money"
56.	7	2018 Health Canada Assessment
57.	8	2021 Health Canada Assessment
58.	9	Testimony of John Kim, LTL Chief Legal Officer, February 16, 2022 Hearing Tr.
59.	10	Carcinogenicity of talc and acrylonitrile, <i>Lancet Oncology</i> (online), July 5, 2024
60.	11	<i>Questions & Answer and Press Release, Talc and Acrylonitrile</i> , July 5, 2024
61.	12	Testimony of J&J corporate representative Dr. John Hopkins
62.	13	Declaration of John Kim
63.	14	Testimony of J&J corporate representative Dr. John Hopkins
64.	15	Ankur Banerjee and Diana Jones, <i>J&J to end global sales of talc-based baby powder</i> , REUTERS, August 12, 2022
65.	16	Hearing Transcript from June 28, 2023 Hearing in LTL 2.0 Main Case (excerpt of testimony of James Murdica)
66.	17	J&J Form 8-K, October 19, 2021
67.	18	Debtor's Omnibus Reply in Support of Preliminary Injunction

Designation No.	Trial Exhibit No.	Description
68.	19	Memorandum Opinion in LTL Mgmt. v. Those Parties Listed on Appendix A (In re LTL Mgmt. LLC), Ad. Pro. 21-03032
69.	20	Order of Dismissal
70.	21	Debtor's Omnibus Objection to Motions to Dismiss Chapter 11 Case
71.	22	Debtor's Reply in Support of Motion to (i) Extend and Modify the Preliminary Injunction Order and (ii) for Confirmation that Successor Liability Actions Are Subject to the Automatic Stay
72.	23	J&J Form 8-K, dated November 15, 2021
73.	24	J&J Press Release, dated November 12, 2021, announcing its intent to separate the company's consumer health business
74.	25	Kenvue Form 10-Q, dated August 2, 2023
75.	26	Kenvue Form 10-K, dated March 1, 2024
76.	27	2023 Funding Agreement dated April 4, 2023
77.	28	Order Dismissing Debtor's Chapter 11 Case
78.	29	Chapter 11 Petition
79.	30	Debtor's Statement Regarding Refiling of Chapter 11 Case
80.	31	Declaration of John K. Kim in Support of First Day Pleadings
81.	32	Debtor's Motion for an Order (i) Declaring that the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (ii) Preliminarily Enjoining Such Actions, and (iii) Granting a Temporary Restraining Order Ex Parte Pending a Hearing on a Preliminary Injunction
82.	33	Hearing Transcript from June 28, 2023 Hearing in LTL 2.0 Main Case (excerpt of testimony of James Murdica)
83.	34	Memorandum Opinion Granting Preliminary Injunction
84.	35	Order Extending the Preliminary Injunction
85.	36	Memorandum Opinion Granting Motions to Dismiss
86.	37	Opinion Affirming Dismissal
87.	38	Transcript, Q3 2023 J&J Earnings Call, October 17, 2023

Designation No.	Trial Exhibit No.	Description
88.	39	“Johnson & Johnson Considers Ditching Texas Two-Step for Third Talc Bankruptcy,” <i>Wall Street Journal</i> , October 20, 2023
89.	40	LTL Articles of Conversion to a Foreign Entity, dated December 29, 2023
90.	41	Application for Reservation of an Entity Name, dated December 19, 2023
91.	42	Transcript, Johnson & Johnson Enterprise Business Review, dated December 5, 2023
92.	43	“Johnson & Johnson to Pay \$700 Million to Settle Baby Powder Probe,” <i>Wall Street Journal</i> , dated January 23, 2024
93.	44	May 1, 2024 Conference Call, J&J announces plan by its subsidiary LLT Management
94.	45	Defendants Johnson & Johnson and LTL Management LLC’s Motion for an Order to Show Cause Why Andy Birchfield and Beasley Allen Should Not Be Disqualified from this Litigation or Removed from the Plaintiffs’ Steering Committee, <i>In re Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation</i> , NJDC 16-md-02738-MAS-RLS (the “ <u>Talc MDL</u> ”)
95.	46	Centralized Multi-County Litigation (Talc-Based Powder Litigation) pending in Superior Court of New Jersey Law Division: Atlantic County, Case No. 300 (“ <u>Talc MCL</u> ”), Decision Dated July 19, 2024
96.	47	July 19, 2024 text order entered in Talc MDL
97.	48	MDL Special Master Order No. 25 (Addressing Three Motions to Quash and/or for Protective Order)
98.	49	“J&J Allies with Mass-Tort Specialists to Seal \$8 Billion Talc Settlement,” <i>Wall Street Journal</i> , dated July 23, 2024
99.	50	MDL Statistics Report - Distribution of Pending MDL Dockets by District, United States Panel on Multidistrict Litigation, dated August 1, 2024
100.	51	Order Continuing Trial in <i>Emerson v. Johnson & Johnson</i> , No. 9334, Control No. 24027134, Court of Common Pleas of Philadelphia County, First Judicial District of Pennsylvania, entered Aug. 9, 2024

Designation No.	Trial Exhibit No.	Description
101.	52	Plaintiff's Amended Master Long Form Complaint and Jury Demand
102.	53	Plaintiff's Second Amended Master Long Form Complaint and Jury Demand
103.	54	Living Plaintiff Amended Complaint
104.	55	Deceased Plaintiff Amended Complaint
105.	56	Complaint in <i>Bynum, et al. v. LLT Mgmt. LLC, et al.</i> , NJDC Case No. 24-cv-07065
106.	57	Complaint in <i>Love, et al. v. LLT Mgmt. LLC, et al.</i> , NJDC Case No. 24-cv-06320
107.	58	Intentionally Omitted
108.	59	Update on Plan Certification Timeline, dated August 23, 2024
109.	60	<i>Elmer v. Johnson & Johnson</i> , Motion to Substitute Party
110.	61	New Jersey Certificate of Merger, dated August 19, 2024
111.	62	Texas Certificate of Divisional Merger of J&J HOLDCO (NA) LLC, dated August 19, 2024
112.	63	Texas Certificate of Merger, dated August 19, 2024
113.	64	Transcript, Q2 2024 J&J Earnings Call, July 17, 2024
114.	65	"J&J Gets Plaintiff Backing for \$6.5 Billion Baby Powder Accord" <i>Bloomberg</i> , August 12, 2024
115.	66	"Johnson & Johnson Wins Over Longtime Holdout for Talc Settlement" <i>Wall Street Journal</i> , dated September 4, 2024
116.	67	Debtor's Motion for an Order: (I) Authorizing It to File a List of the Top Law Firms with Talc Cases Against the Debtor in Lieu of the List of the 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Talc Claimants; and (III) Approving the Form and Manner of Notice of Commencement of this Case
117.	68	Debtor's Motion for an Order: (I) Authorizing It to File a List of the Top Law Firms with Talc Cases Against the Debtor in Lieu of the List of the 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Talc Claimants; and (III) Approving the Form and Manner of Notice of Commencement of this Case

Designation No.	Trial Exhibit No.	Description
118.	69	Order (I) Authorizing It to File a List of the Top Law Firms with Talc Cases Against the Debtor in Lieu of the List of the 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Talc Claimants; and (III) Approving the Form and Manner of Notice of Commencement of this Case
119.	70	Order: (I) Authorizing It to File a List of the Top Law Firms with Talc Cases Against the Debtor in Lieu of the List of the 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Talc Claimants; and (III) Approving the Form and Manner of Notice of Commencement of this Case
120.	71	Schedules of Assets and Liabilities for LTL Management LLC
121.	72	Schedules of Assets and Liabilities for LTL Management LLC
122.	73	Notice of Defendant J&J's Second Motion to Disqualify Beasley Allen
123.	74	Salcedo: Verdict Form & Jury Instructions

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
691	12/3/2024	Transcript of November 26, 2024 Hearing

Adv. Pro. 110	12/4/2024	Transcript of December 2, 2024 Hearing
751	12/12/2024	Transcript of December 10, 2024 Hearing
874	12/31/2024	Transcript of December 27, 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: January 2, 2025

LAWSON & MOSHENBERG PLLC

/s/ Nicholas R. Lawson
 Nicholas R. Lawson
 Texas Bar No. 24083367
 Avi Moshenberg
 Texas Bar No. 24083532
 801 Travis Street
 Suite 2101 #838
 Houston, TX 77002
 Tel: (832) 280-5670
 Nick.Lawson@lmbusinesslaw.com
 Avi.Moshenberg@lmbusinesslaw.com

OTTERBOURG P.C.

Melanie L. Cyganowski (*pro hac vice*)
 Adam C. Silverstein (*pro hac vice*)
 Sunni P. Beville (*pro hac vice*)
 David A. Castleman (*pro hac vice*)
 230 Park Avenue
 New York, New York 10169-0075
 Tel: (212) 661-9100
 mycyanowski@otterbourg.com
 asilverstein@otterbourg.com
 sbeville@otterbourg.com
 dcastleman@otterbourg.com

BAILEY & GLASSER LLP

Brian A. Glasser (*pro hac vice*)
 Thomas B. Bennett (*pro hac vice*)
 David L. Selby II (*pro hac vice*)
 Jonathan Gold (*pro hac vice*)
 1055 Thomas Jefferson Street, NW, Suite 540
 Washington, DC 20007
 Tel: (202) 463-2101
 bglasser@baileyglasser.com
 tbennett@baileyglasser.com
 dselby@baileyglasser.com
 jgold@baileyglasser.com
 cjoshi@baileyglasser.com

Katherine E Charonko

BAILEY & GLASSER LLP
209 Capitol Street
Charleston WV 25301
Tel: (304) 345-6555
Fax: (304) 342-1110
kcharonko@baileyglasser.com

Elizabeth L. Stryker
BAILEY & GLASSER LLP
94 Long Street
Suite 200
Westover WV 26501
Tel: (304) 594-0087
estryker@baileyglasser.com

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

CERTIFICATE OF SERVICE

I hereby certify that on January 2, 2025, 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