

**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)
RED RIVER TALC LLC, Plaintiff, v. THOSE PARTIES LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1-1000, Defendants.	Adv. Pro. No. 24-03194 (CML)

**DEBTOR’S DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED
IN THE RECORD ON APPEAL OF SECOND ORDER DETERMINING THAT
THE AUTOMATIC STAY APPLIES AND EXTENDS TO CERTAIN NON-DEBTORS**

(Related Adversary Proceeding Docket Nos. 113, 131)

Red River Talc LLC (the “Debtor” or the “Appellee”), debtor in the above-captioned chapter 11 case (the “Chapter 11 Case”) and plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”) pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) hereby submits its designation of additional items to be included in the record on appeal, in addition to the designations submitted by the Coalition of Counsel for Justice for Talc Claimants in its *Appellant’s Statement of Issues on Appeal and Designation of Items to be Included in the Record on Appeal* [Adv. Pro. Dkt. 131] in

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.

connection with the Coalition's appeal to the United States District Court for the Southern District of Texas from this Court's *Second Order Determining that the Automatic Stay Applies and Extends to Certain Non-Debtors* [Adv. Pro. Dkt. 113], entered on December 5, 2024.

Additional Items

1. The Debtor hereby designates the following additional items, together with all exhibits, attachments thereto and documents incorporated by reference therein:

	Main Chapter 11 Case Docket No.	Docket Entry Date	Docket Description
1.	601	11/20/2024	Notice of Hybrid Hearing Scheduled for November 26, 2024 at 10:00 a.m. (prevailing Central Time).
2.	635	11/22/2024	Sealed Document - 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.
3.	636	11/22/2024	Motion to Seal - Motion of Debtor for Entry of an Order Authorizing Filing Under Seal of Certain Confidential Information in 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.
4.	677	11/26/2024	Debtor's Notice of Opposition to Prospective Retention of Counsel by the Official Committee of Talc Claimants.
5.	805	12/18/2024	Application to Employ Brown Rudnick LLP as Co-Counsel for Official Committee of Talc Claimants.
6.	890	1/8/2025	Statement Reserving Rights regarding Debtor's Motion for Order Extending Removal Deadline.

	Main Chapter 11 Case Docket No.	Docket Entry Date	Docket Description
7.	892	1/8/2025	Order Granting Motion of Debtor for Entry of an Order Authorizing Filing Under Seal of Certain Confidential Information In 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.
8.	895	1/8/2025	Debtor's Omnibus Objection to the Official Committee of Talc Claimants Applications to Retain Certain Law Firms
9.	908	1/10/2025	Debtor's Emergency Motion for Entry of Amended Case Management Order.
10.	914	1/13/2025	Objection of the Coalition of Counsel for Justice for Talc Claimants to Debtor's Emergency Motion for Entry of Amended Case Management Order.
11.	915	1/13/2025	Certificate of No Objection with Respect to 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 Procedure.

	Adversary Proceeding No. 24-03194, Docket No.	Docket Entry Date	Docket Description
12.	86	11/26/2024	Motion to Seal - Motion for Entry of an Order Authorizing Redaction and Filing Under Seal of Certain Confidential Information Related to Debtor's Supplemental Brief in Further Support of Injunctive Relief and Related Declaration.
13.	131	1/2/2025	Appellant Designation of Contents For Inclusion in Record On Appeal.
14.	133	1/8/2025	Debtor's Opposition to Supplemental Brief Regarding Direct Claims Against Kenvue, Inc. by Certain New Jersey State Court Plaintiffs.

	Adversary Proceeding No. 24-03194, Docket No.	Docket Entry Date	Docket Description
15.	134	1/8/2025	Order Granting Motion for Entry of an Order Authorizing Redaction and Filing Under Seal of Certain confidential Information Related to Debtor's Reply in Support of Injunctive Relief and Related Declaration.
16.	138	1/13/2025	Order Granting Motion for Entry of an Order Authorizing Redaction and Filing Under Seal of Certain Confidential Information Related to Debtor's Brief in Support of Preserving Stay of Debtor Talc Claims Asserted Against Johnson & Johnson

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Dated: January 16, 2025
Houston, Texas

Respectfully submitted,

/s/ John F. Higgins

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PROPOSED ATTORNEYS FOR DEBTOR

Certificate of Service

I certify that on January 16, 2025, I caused a 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, and will be served as set forth in the Affidavit of Service to be filed by the Debtor's claims, noticing and solicitation agent.

/s/ John F. Higgins

John F. Higgins