

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

In re:

RED RIVER TALC, LLC,

Debtor.¹

)
) Chapter 11
)

) Case No. 24-90505 (CML)
)
)

**TRAVELERS' WITNESS AND EXHIBIT LIST FOR
FEBRUARY 18-28, 2025 CONSOLIDATED HEARING**

Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company) and The Travelers Indemnity Company (together, "Travelers") provide this Witness and Exhibit List for the February 18-28, 2025 consolidated hearing (the "Consolidated Hearing"). Travelers and/or one or more additional insurer(s) may call one or more of the following witnesses to testify at the Consolidated Hearing.

WITNESSES

1. David Babbe (retired, UCLA School of Law);
2. Randi Ellis (Future Claimants' Representative);
3. Scott Erikson (The Travelers Indemnity Company);
4. Emily Goswami (Roux Associates, Inc.);
5. Dr. William A. Powley (Formidable Partners);
6. Adam Pulaski (Pulaski Kherkher, PLLC);
7. Marc Scarcella (Roux Associates, Inc.);
8. Any witness called or listed by any other party in interest; and

¹ The last four digits of the Debtor's taxpayer identification number is 8508. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

9. Impeachment witnesses, as necessary.

EXHIBITS

Travelers and/or one or more additional insurer(s) may offer into evidence any of the exhibits listed on the joint exhibit list submitted by the parties and any of the exhibits listed on Exhibit A attached hereto, as well as any other document filed with the Court or necessary to rebut the testimony of any witness offered by any other party in interest or any exhibit designated by any other party in interest.

Respectfully submitted this 14th day of February, 2025.

GRAY REED

By: /s/ Jason S. Brookner
Jason S. Brookner
Texas Bar No. 24033684
Lydia R. Webb
Texas Bar No. 24083758
1300 Post Oak Blvd., Suite 2000
Houston, Texas 77056
Telephone: (713) 986-7000
Facsimile: (713) 986-7100
Email: jbrookner@grayreed.com
lwebb@grayreed.com

- and -

SIMPSON THACHER & BARTLETT LLP

Lynn K. Neuner (admitted *pro hac vice*)
William T. Russell, Jr. (admitted *pro hac vice*)
David R. Zylberberg (admitted *pro hac vice*)
425 Lexington Avenue
New York, New York 10016
Telephone: (212) 455-2000
Facsimile: (212) 455-2502
Email: lneuner@stblaw.com
wrussell@stblaw.com
david.zylberberg@stblaw.com

**COUNSEL TO TRAVELERS CASUALTY AND
SURETY COMPANY (F/K/A THE AETNA
CASUALTY AND SURETY COMPANY) AND
THE TRAVELERS INDEMNITY COMPANY**

Certificate of Service

I hereby certify that on February 14, 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 on all parties registered to receive electronic service in this Bankruptcy Case.

/s/Jason S. Brookner

Jason S. Brookner

Exhibit A

In Re: Red River Talc, LLC

Travelers' Trial Exhibit List

No.	Date	Beg Bates	End Bates	Description
1	1/7/2025	N/A	N/A	In re Red River Talc LLC, Case No. 24-90505 (CML), Expert Report of David Babbe
2	1/7/2025	N/A	N/A	In re Red River Talc LLC, Case No. 24-90505 (CML), Expert Report of Marc Scarcella
3	1/7/2025	N/A	N/A	In re Red River Talc LLC, Case No. 24-90505 (CML), Expert Report of William Powley
4	9/13/2021	N/A	N/A	<i>In re Imerys Talc America, Inc.</i> , Case No. 19-10289 (LSS), Expert Report of Charles H. Mullin
5	9/16/2021	N/A	N/A	<i>In re Imerys Talc America, Inc. et al.</i> , Case No. 19-10289 (LSS), J&J and JJCI's Omnibus Reply In Support of their Motion For Entry of An Order Designating Votes to Accept The Ninth Amended Joint Chapter 11 Plan of Reorganization and its Debtor Affiliates Under Chapter 11 of The Bankruptcy Code, Doc. No. 4102
6	10/14/2021	N/A	N/A	<i>In re LTL Management LLC</i> , Case No. 21-30589 (JCW), Declaration of John K. Kim In Support Of First Day Pleadings, Doc. No. 5
7	2/15/2022	N/A	N/A	<i>In re LTL Management, LLC</i> , Case No. 21-30589 (MBK), Travelers' Motion for Relief from the Automatic Stay, Doc. No. 1488
8	3/16/2022	N/A	N/A	<i>In re LTL Management, LLC</i> , Case No. 21-30589 (MBK), LTL Objection to Insurers' Motions for Relief from the Automatic Stay, Doc. No. 1739
9	3/29/2022	N/A	N/A	<i>In re LTL Management, LLC</i> , Case No. 21-30589 (MBK), Travelers' Motion to Compel Participation in Mediation, Doc. No. 1900
10	7/15/2022	N/A	N/A	<i>In re LTL Management, LLC</i> , Case No. 21-30589 (MBK), Limited Objection and ROR of Travelers, Doc. No. 2720
11	7/22/2022	N/A	N/A	<i>In re LTL Management, LLC</i> , Case No. 21-30589 (MBK), Debtor Reply in Support of Estimation, Doc. No. 2769
12	7/28/2022	N/A	N/A	<i>In re LTL Management, LLC</i> , Case No. 21-30589 (MBK), July 28, 2022 Hearing Transcript
13	8/9/2022	N/A	N/A	<i>In re LTL Management, LLC</i> , Case No. 21-30589 (MBK), Limited Objection and ROR of Certain Insurers to the Appointment of Kenneth R. Feinberg as Expert, Doc. No 2846
14	8/11/2022	N/A	N/A	Johnson & Johnson, August 11, 2022 Press Release
15	6/16/2023	N/A	N/A	<i>In re LTL Management, LLC</i> , Case No. 23-12825 (MBK), First Supplemental Verified Statement of Paul Hastings LLP, Cole Schotz P.C. and Parkins & Rubio LLP Pursuant to Bankruptcy Rule 2019, Doc. No. 807
16	6/27/2023	N/A	N/A	<i>In re LTL Management LLC</i> , Case No. 23-12825 (MBK), June 27, 2023 Transcript of Day 1 - Motion to Dismiss, Direct Examination by Declaration of Richard Dickinson
17	5/1/2024	N/A	N/A	May 1, 2024 Transcript - Johnson & Johnson Announces Plan by Its Subsidiary, LLT Management Conference Call
18	7/13/2024	N/A	N/A	<i>In re Imerys Talc America, Inc. et al.</i> , Case No. 19-10289 (LSS), Joint Motion of the Imerys Debtors and the Cyprus Debtor for an Order (I) Approving the Settlement Agreement Between the Imerys Debtors, the Cyprus Debtor, Johnson & Johnson, and the Other Parties Thereto, and (II) Approving the Sale of Certain Rights, Doc No. 6376
19	10/25/2024	N/A	N/A	<i>In re Cyprus Mines Corporation</i> , Case No. 21-10398 (LSS), Disclosure Statement for the First Amended Plan of Reorganization of Cyprus Mines Corporation Under Chapter 11 of the Bankruptcy Code, Doc. No. 2616

*In Re: Red River Talc, LLC***Travelers' Trial Exhibit List**

No.	Date	Beg Bates	End Bates	Description
20	10/25/2024	N/A	N/A	<i>In re Imerys Talc America, Inc. et al.</i> , Case No. 19-10289 (LSS), Disclosure Statement for Second Joint Plan of Reorganization of Imerys Talc America, Inc. and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code, Doc No. 6695
21	11/5/2024	N/A	N/A	<i>In re Imerys Talc America, Inc. et al.</i> , Case No. 19-10289 (LSS), Exhibit 1 - Combined Solicitation Procedures, Doc. No. 6730-1
22	11/21/2024	N/A	N/A	OnderLaw Declaration (Onder Depo. Ex. 3)
23	12/10/2024	N/A	N/A	<i>In re Red River Talc LLC</i> , Case No. 24-90505 (CML), Declaration of Benedict P. Morelli, Doc. No. 734