

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE SETTLEMENT FACILITY MATTERS:	§ §	CASE NO. 00-CV-00005
DOW CORNING CORPORATION,	§ §	Hon. Denise Page Hood
REORGANIZED DEBTOR	§	

**STIPULATED VOLUNTARILY DISMISSAL OF THE APRIL 5, 2007 ORDER TO
SHOW CAUSE WITHOUT PREJUDICE**

On April 5, 2007, based on a report from the Settlement Facility-Dow Corning Trust (“SF-DCT”), the Court issued an Order to Show Cause against The O’Quinn Law Firm and a predecessor firm, O’Quinn & Laminack (collectively “the O’Quinn Firms”). (*See* Dkt. 508.) The Order required the law firms to show cause why they should not be held in contempt for violating the terms of the Amended Joint Plan of Reorganization¹ as it pertains to the calculation of allowable interest expenses. (*See id.*) The O’Quinn Firms filed a response to the Order to Show Cause, with exhibits, setting out their position that they did not violate the terms of the Amended Joint Plan of Reorganization. (*See* Dkt. 512). The SF-DCT filed a response to the O’Quinn Firms’ position. (*See* Dkt 520). Agreed stipulation of facts were filed by the O’Quinn Firms and the SF-DCT in October 2009. (*See* Dkt. 706).

SF-DCT no longer wishes to pursue the Order. Accordingly, SF-DCT and the O’Quinn Law Firms hereby stipulate that the April 5, 2007 Order to Show Cause should be dismissed without prejudice to re-filing and jointly move for dismissal of the April 5, 2007 Order to Show

¹ The Amended Joint Plan of Reorganization was further clarified by an Agreed Order Adopting Additional Q&A Pursuant to Article IX of Annex A, The Claims Resolution Procedures. (*See* Dkt. 231 (clarifying the extent to which allowable attorney’s fees and expenses could be charged by the law firms as part of SF-DCT settlements and finding that law firms cannot charge interest on either a loan or on expenses advanced to the claimant).)

Cause pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Each party is to bear its own costs.

Dated: July 14, 2016

THE O'QUINN LAW FIRM

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/s/ Michael J. Lowenberg

/s/ Edward B. Adams, Jr.

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*Counsel for Settlement Facility-Dow Corning
Trust*

CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2016, I electronically filed the foregoing Stipulated Voluntary Dismissal of the April 5, 2007 Order to Show Cause Without Prejudice (and proposed order regarding same) with the Clerk of Court using the ECF system.

/s/ Edward B. Adams, Jr.

Edward B. Adams, Jr.

*Attorney for Settlement Facility-Dow
Corning Trust*