

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

IN RE	§	
	§	
DOW CORNING CORPORATION	§	
	§	
Reorganized Debtor	§	CASE NO: 00-CV-00005-DT
	§	
	§	Hon.Denise page Hood
	§	
	§	
	§	

**MOTION FOR RELEASE OF CERTAIN EXHIBITS FILED BY THE FINANCE  
COMMITTEE AND THE CLAIMANTS' ADVISORY COMMITTEE AND DOW  
CORNING CORPORATION**

**I. INTRODUCTION**

The Finance Committee filed the Recommendation and Motion for Authorization to Make Second Priority Payments with this Court on December 30, 2016. It was attached by Exhibit B, the IA Report, but filed as "Restricted". It cannot be accessible through [www.pacer.gov](http://www.pacer.gov).

The Claimants' Advisory Committee filed the Response to the Finance Committee's Recommendation and Motion for Authorization to Make Second Priority Payments on February 10, 2017. It was attached by Exhibit 5(Summary of Monthly Department Reporting Issued by the SF-DCT), 6(Final Report of the Claims Administrator of the RSP), 7(the IA's DCT Liability Model June 2016 Data Extract), 8(Ankura Response to the CAC's Questions dated November 4, 2016) and 9(Declaration of Mark Peterson), but filed as "Restricted". Those cannot be accessible through [www.pacer.gov](http://www.pacer.gov). This Court issued the Order Sealing those Exhibits.

The Dow Corning Corporation and the Debtors' Representatives filed the Opposition to the Finance Committee's Recommendation and Motion for Authorization to Make Second Priority Payments on February 10, 2017. It was attached by Exhibits A (Settlement Facility-Dow Corning Trust Claims Processing Report for the Period Ending June 30, 2016) and B (Ankura Response to Questions for IA on Final Report), but filed as "Restricted". Those cannot be accessible through [www.pacer.gov](http://www.pacer.gov). This Court issued the Order Sealing those Exhibits.

## II. ARGUMENT

Whether the Second Priority Payments are made is important to the Korean Claimants because of the Motion for Recognition and Enforcement of Mediation pending the Court.

Yeon Ho Kim, for the Korean Claimants, asked for the release of their respected Exhibits to Mrs. Karima Maloney, the counsel of the Finance Committee, and Mrs. Dianna Pendleton-Dominguez, a counsel of the Claimants' Advisory Committee, and Mrs. Deborah Greenspan, the counsel of Dow Corning Corporation and the Debtors' Representatives.

Mrs. Karima Maloney replied that she would address to the Parties. She did not reply to the second request though. Neither Mrs. Dianna Pendleton-Dominguez nor Mrs. Deborah Greenspan replied to the Yeon Ho Kim's emails.

The Exhibits must be available for the interested parties, including the Korean Claimants, to submit their opinions to the Court before the hearing set on March 23, 2017. The availability of the whole Exhibits is a part of due process.

### III. CONCLUSION

Therefore, the Korean Claimants seek the Order that the Finance Committee release Exhibit B, and the Claimants' Advisory Committee release Exhibits 5,6,7,8 and 9, and Dow Corning Corporation and the Debtors' Representatives release Exhibits A, B to the Korean Claimants..

Date: February 28, 2017

Respectfully submitted,

(signed) Yeon Ho Kim

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For the Korean Claimants

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**PROPOSED ORDER OF THE KOREAN CLAIMANTS REQUESTING THE RELEASE  
OF CERTAIN EXHIBITS**

The Court has considered the Motion for Release Certain Exhibits of the Korean Claimants, and the Court finds and concludes that the Motion has merit and should be accepted without prejudice.

ACCORDINGLY, it is hereby ORDERED that the Finance Committee release its Exhibit B, and the Claimants' Advisory Committee release its Exhibits 5, 6, 7, 8 and 9, and Dow Corning Corporation and the Debtors' Representatives release their Exhibits A, B to the Korean Claimants without prejudice.

DATED: \_\_\_\_\_

\_\_\_\_\_

DENISE PAGE HOOD

United States District Court

**CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2017, this Motion has been electronically filed with the Clerk of Court using ECF system, and the same has been sent via e-mail to the following parties.

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(signed) Yeon Ho Kim