

# EXHIBIT B

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

IN RE:	§	CASE NO. 00-CV-00005-DT
	§	(Settlement Facility Matters)
DOW CORNING	§	
CORPORATION,	§	
	§	
REORGANIZED DEBTOR	§	Hon. Denise Page Hood

**FINANCE COMMITTEE'S MOTION FOR ENTRY OF AN ORDER TO  
SHOW CAUSE WITH RESPECT TO YEON HO KIM**

SMYSER KAPLAN & VESELKA, L.L.P.

BANK OF AMERICA CENTER  
700 LOUISIANA SUITE 2300 HOUSTON, TEXAS 77002  
TELEPHONE 713.221.2300 FACSIMILE 713.221.2320

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(713) 221-2382

Author's E-mail Address:  
kmaloney@skv.com

December 20, 2017

Via Fed-ex and Electronic Mail

Mr. Kim Yeon-Ho Intl Law Offices  
Ste 4105 Korea World Trade Ctr Bldg  
151-1 Samsung-Dong Kangnam-Ku  
Seoul  
Republic of Korea  
yhkimlaw@unitel.co.kr

**FINAL REQUEST FOR UPDATED ADDRESSES OR RETURN OF FUNDS**

Dear Mr. Kim:

I represent the Finance Committee of the Settlement Facility-Dow Corning Trust ("SF-DCT"). Correspondence mailed by the SF-DCT to the 148 Claimants on the attached list regarding the breast implant claim payments referenced above was returned undeliverable, with no available forwarding addresses. At the time of the claim payments, you were the attorney of record for the 148 Claimants. The SF-DCT sent you written requests for updated addresses for the Claimants. Address update/correction forms for the Claimants meeting SF-DCT requirements have not been received.

The SF-DCT has confirmed that the claim payment checks on the attached list have all been cashed. Therefore, it is reasonable to assume that current address information for the Claimants is available. You have not provided this information, despite the SF-DCT's requests.

On June 8, 2017, you indicated in correspondence with SF-DCT that you will not provide updated address information for the Claimants on the attached list because the Claimants do not wish to receive mail from the SF-DCT. On June 21, 2017, the SF-DCT responded to you in a letter that outlined the SF-DCT's requirement of valid address information for each Claimant. Without valid address information for each Claimant, the SF-DCT has no confirmation that the claims payments were in fact distributed to the Claimants.

As previously stated in correspondence to you, pursuant to the Settlement Facility and Fund Distribution Agreement Article X Section 10.09, "all funds in the Settlement Facility are in the custody of the Court until the funds have actually been paid to and received by the Claimant (or a legally authorized recipient)." If you have been unable to locate a Claimant to distribute the claim payment, **you are required to return the funds intended for the Claimant.**

Mr. Kim Yeon-Ho Intl Law Offices  
December 20, 2017  
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Please return the funds directly to:

SF-DCT  
Quality Management Department  
P.O. Box 52429  
Houston, Texas 77052

Should your office wish to recover fees and expenses in the absence of a Claimant or her legal heir, you may do so by returning the funds and applying for attorney's fees and expenses through the Lien Resolution Procedures.

Please be aware that if updated address information for the 148 Claimants is not received, or the claim payments intended for the 148 Claimants are not returned in full within fifteen days (15) days of the date of this letter, the Finance Committee of the SF-DCT will seek from the U.S. District Court for the Eastern District of Michigan an order to show cause why your firm should not be held in contempt or otherwise sanctioned for failure to return the funds or verify that the funds have been distributed to the Claimant (or a legally authorized representative). I have reserved time for a Show Cause hearing, should the Court grant our motion, before Chief Judge Denise Page Hood on January 31, 2018 at 2:00 p.m., in Detroit, Michigan.

The claims on the attached list are on HOLD and any applicable future claim payments, including Premium Payments, will not be made until the updated address information for the Claimants has been received.

Any questions regarding this matter may be directed to me at [kmaloney@skv.com](mailto:kmaloney@skv.com) or (713) 221-2382.

Sincerely,



Karima G. Maloney  
Attorney for the Finance Committee, SF-DCT

KGM:ma  
Encl.

Claimant	SID	Claim Payments	Payment Date	Payment Amount
[REDACTED]	0735310	Disease	12/18/2014	\$3,500
[REDACTED]	0735315	Disease	1/15/2015	\$3,500
[REDACTED]	1035526	Disease	12/18/2014	\$3,500
[REDACTED]	1035531	Disease	12/18/2014	\$3,500
[REDACTED]	1035532	Disease	12/18/2014	\$3,500
[REDACTED]	1035535	Disease	11/24/2014	\$3,500
[REDACTED]	1035553	Explant	10/23/2014	\$3,000
[REDACTED]	1035568	Disease	12/18/2014	\$3,500
[REDACTED]	1035573	Disease	12/18/2014	\$3,500
[REDACTED]	1035591	Disease	11/24/2014	\$3,500
[REDACTED]	1035597	Disease	10/23/2014	\$6,000
[REDACTED]	1035599	Disease	11/24/2014	\$3,500
[REDACTED]	1035613	Disease	12/18/2014	\$3,500
[REDACTED]	1035614	Disease	11/24/2014	\$3,500
[REDACTED]	1035619	Disease	12/18/2014	\$3,500
[REDACTED]	1035668	Disease	10/23/2014	\$3,500
[REDACTED]	1035678	Disease	12/18/2014	\$3,500
[REDACTED]	1035679	Disease	11/24/2014	\$3,500
[REDACTED]	1035750	Disease	10/23/2014	\$3,500
[REDACTED]	1035776	Disease	10/23/2014	\$3,500
[REDACTED]	1035798	Disease	12/18/2014	\$3,500
[REDACTED]	1035815	Disease	11/24/2014	\$3,500
[REDACTED]	1035817	Disease	11/24/2015	\$7,000
[REDACTED]	1035851	Disease	12/18/2014	\$3,500
[REDACTED]	1035862	Disease	12/18/2014	\$3,500
[REDACTED]	1035866	Disease	12/18/2014	\$3,500
[REDACTED]	1035869	Disease	12/18/2014	\$3,500
[REDACTED]	1035882	Disease	11/24/2015	\$3,500
[REDACTED]	1035884	Disease	12/18/2014	\$3,500
[REDACTED]	1035887	Disease	12/18/2014	\$3,500
[REDACTED]	1035964	Disease	12/18/2014	\$3,500
[REDACTED]	1035975	Disease	12/18/2014	\$3,500
[REDACTED]	1036020	Disease	12/18/2014	\$3,500
[REDACTED]	1036033	Disease	10/23/2014	\$3,500
[REDACTED]	1036044	Disease	12/18/2014	\$3,500
[REDACTED]	1036062	Disease	12/18/2014	\$3,500
[REDACTED]	1036086	Disease	12/18/2014	\$3,500
[REDACTED]	1036087	Disease	12/18/2014	\$3,500
[REDACTED]	1036157	Disease	12/18/2014	\$3,500
[REDACTED]	1036176	Disease	12/18/2014	\$3,500
[REDACTED]	1036232	Disease	12/18/2014	\$3,500
[REDACTED]	1036246	Disease	12/18/2014	\$3,500
[REDACTED]	1036250	Disease	10/23/2014	\$3,500
[REDACTED]	1036263	Disease	10/23/2014	\$3,500
[REDACTED]	1036265	Disease	12/18/2014	\$3,500

[REDACTED]	1036272	Disease	12/18/2014	\$3,500
[REDACTED]	1036288	Disease	10/23/2014	\$3,500
[REDACTED]	1036308	Disease	12/18/2014	\$3,500
[REDACTED]	1036309	Disease	12/18/2014	\$3,500
[REDACTED]	1036313	Disease	12/18/2014	\$3,500
[REDACTED]	1036360	Disease	12/18/2014	\$3,500
[REDACTED]	1036364	Disease	11/24/2014	\$3,500
[REDACTED]	1036415	Disease	10/23/2014	\$3,500
[REDACTED]	1036421	Disease	12/18/2014	\$3,500
[REDACTED]	1036431	Disease	12/18/2014	\$3,500
[REDACTED]	1036446	Disease	11/24/2014	\$3,500
[REDACTED]	1036449	Disease	10/23/2014	\$3,500
[REDACTED]	1036465	Disease	12/18/2014	\$3,500
[REDACTED]	1036469	Disease	12/18/2014	\$3,500
[REDACTED]	1036492	Disease	12/18/2014	\$3,500
[REDACTED]	1036577	Disease	12/18/2014	\$3,500
[REDACTED]	1036594	Disease	12/18/2014	\$3,500
[REDACTED]	1036614	Disease	12/18/2014	\$3,500
[REDACTED]	1036627	Disease	11/24/2014	\$3,500
[REDACTED]	1036653	Disease	10/23/2014	\$3,500
[REDACTED]	1036662	Disease	11/24/2014	\$3,500
[REDACTED]	1036679	Disease	12/18/2014	\$3,500
[REDACTED]	1036706	Disease	12/18/2014	\$3,500
[REDACTED]	1036713	Disease	11/24/2014	\$3,500
[REDACTED]	1036735	Disease	12/18/2014	\$3,500
[REDACTED]	1036742	Disease	11/24/2014	\$3,500
[REDACTED]	1036776	Disease	12/18/2014	\$3,500
[REDACTED]	1036870	Disease	10/23/2014	\$3,500
[REDACTED]	1036901	Disease	12/18/2014	\$3,500
[REDACTED]	1036908	Disease	12/18/2014	\$3,500
[REDACTED]	1036916	Disease	12/18/2014	\$3,500
[REDACTED]	1036927	Disease	10/23/2014	\$3,500
[REDACTED]	1036938	Disease	10/23/2014	\$3,500
[REDACTED]	1036993	Disease	12/18/2014	\$3,500
[REDACTED]	1037035	Disease	12/18/2014	\$3,500
[REDACTED]	1037058	Disease	11/24/2016	\$3,500
[REDACTED]	1037060	Disease	2/27/2015	\$10,000
[REDACTED]	1037079	Disease	12/18/2014	\$3,500
[REDACTED]	1037087	Disease	12/18/2014	\$3,500
[REDACTED]	1037093	Disease	12/18/2014	\$3,500
[REDACTED]	1038450	Disease	11/24/2016	\$3,500
[REDACTED]	1038478	Disease	12/18/2014	\$3,500
[REDACTED]	1038481	Disease	12/18/2014	\$3,500
[REDACTED]	1038484	Disease	12/18/2014	\$3,500
[REDACTED]	1695533	Disease	10/23/2014	\$3,500
[REDACTED]	2746180	Disease	12/18/2014	\$3,500
[REDACTED]	2783097	Disease	2/27/2015	\$3,500

[REDACTED]	2783160	Disease	2/27/2015	\$3,500
[REDACTED]	2783311	Disease	2/27/2015	\$3,500
[REDACTED]	2783386	Disease	2/27/2015	\$3,500
[REDACTED]	2783475	Disease	2/27/2015	\$3,500
[REDACTED]	2783499	Disease	2/27/2015	\$3,500
[REDACTED]	2783559	Disease	2/27/2015	\$3,500
[REDACTED]	2783563	Disease	2/27/2015	\$3,500
[REDACTED]	2783611	Disease	2/27/2015	\$3,500
[REDACTED]	2783642	Disease	2/27/2015	\$3,500
[REDACTED]	2787316	Disease	2/27/2015	\$3,500
[REDACTED]	6459176	Disease	12/18/2014	\$3,500
[REDACTED]	6459549	Disease	12/18/2014	\$3,500
[REDACTED]	6459701	Disease	11/24/2014	\$3,500
[REDACTED]	6459778	Disease	10/23/2014	\$3,500
[REDACTED]	6460367	Disease	12/18/2014	\$3,500
[REDACTED]	6460444	Disease	12/18/2014	\$3,500
[REDACTED]	6460632	Disease	12/18/2014	\$3,500
[REDACTED]	6461229	Disease	10/23/2014	\$3,500
[REDACTED]	6461317	Disease	12/18/2014	\$3,500
[REDACTED]	6461540	Disease	12/18/2014	\$3,500
[REDACTED]	6461579	Disease	10/23/2019	\$3,500
[REDACTED]	6461967	Disease	12/18/2014	\$3,500
[REDACTED]	6462214	Disease	12/18/2014	\$3,500
[REDACTED]	6473444	Rupture	11/24/2014	\$7,000
[REDACTED]	6473706	Disease	12/18/2014	\$3,500
[REDACTED]	6473709	Disease	12/18/2014	\$3,500
[REDACTED]	6474340	Disease	12/18/2014	\$3,500
[REDACTED]	6474551	Disease	12/18/2014	\$3,500
[REDACTED]	6474567	Disease	12/18/2014	\$3,500
[REDACTED]	6474668	Disease	12/18/2014	\$3,500
[REDACTED]	1035686	Disease	12/16/2016	\$6,000
[REDACTED]	1035805	Disease	12/16/2016	\$6,000
[REDACTED]	1035806	Disease	12/16/2016	\$6,000
[REDACTED]	1035871	Disease	12/16/2016	\$6,000
[REDACTED]	1035888	Disease	12/16/2016	\$6,000
[REDACTED]	1035902	Disease	12/16/2016	\$6,000
[REDACTED]	1036283	Disease	12/16/2016	\$6,000
[REDACTED]	1036314	Disease	12/16/2016	\$6,000
[REDACTED]	1036361	Disease	12/16/2016	\$6,000
[REDACTED]	1036464	Disease	12/16/2016	\$6,000
[REDACTED]	1036709	Disease	12/16/2016	\$6,000
[REDACTED]	1037123	Disease	12/16/2016	\$6,000
[REDACTED]	1035583	Disease	12/16/2016	\$6,000
[REDACTED]	1035671	Disease	12/16/2016	\$6,000
[REDACTED]	2783392	Disease	12/16/2016	\$6,000
[REDACTED]	2783395	Disease	12/16/2016	\$6,000
[REDACTED]	1036287	Explant	8/13/2009	\$3,000

[REDACTED]	1036287	Disease	12/18/2014	\$3,500
[REDACTED]	1036303	Explant	6/17/2009	\$3,000
[REDACTED]	1036303	Rupture	6/17/2009	\$7,000
[REDACTED]	1036303	Disease	12/18/2014	\$3,500
[REDACTED]	1036472	Explant	8/13/2009	\$3,000
[REDACTED]	1036472	Disease	12/18/2014	\$3,500
[REDACTED]	1038480	Explant	3/30/2010	\$3,000
[REDACTED]	1038480	Disease	12/18/2014	\$3,500
[REDACTED]	2783202	Rupture	7/13/2009	\$7,000
[REDACTED]	2783202	Explant	8/30/2010	\$3,000
[REDACTED]	2783202	Disease	2/27/2015	\$3,500
[REDACTED]	2783569	Explant	12/16/2010	\$3,000
[REDACTED]	2783569	Disease	2/27/2015	\$3,500
[REDACTED]	6459155	Explant	6/17/2009	\$3,000
[REDACTED]	6459155	Rupture	6/17/2009	\$7,000
[REDACTED]	6459155	Disease	10/23/2014	\$3,500
[REDACTED]	6461865	Explant	8/13/2009	\$3,000
[REDACTED]	6461865	Disease	12/18/2014	\$3,500
[REDACTED]	6474810	Explant	4/27/2015	\$3,000
[REDACTED]	6474810	Disease	4/27/2015	\$3,500
[REDACTED]	6491601	Explant	1/30/2015	\$3,000
[REDACTED]	6491601	Disease	12/18/2014	\$3,500