## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:
<b>Settlement Facility Dow Corning Trust</b>

Case No. 00-CV-00005 Honorable Denise Page Hood

## DOW CORNING CORPORATION'S AND THE DEBTOR'S REPRESENTATIVES' MOTION TO STAY THE COURT'S RULING GRANTING THE FINANCE COMMITTEE'S MOTION FOR AUTHORIZATION TO MAKE SECOND PRIORITY PAYMENTS PENDING APPEAL

For the reasons set forth in the attached brief in support, Dow Corning Corporation and the Debtor's Representatives (hereinafter "Movants") respectfully move this Court pursuant to Fed. R. Civ. P. 62 for a stay of its Memorandum Opinion and Order Granting the Finance Committee's Motion for Authorization to Make Second Priority Payments ("SPP Ruling") pending appeal to the United States Court of Appeals for the Sixth Circuit ("Motion to Stay").

Pursuant to E.D. Mich. L.R. 7.1(a)(1), Movants sought concurrence in this Motion to Stay from the Finance Committee and the Claimants' Advisory Committee. The Finance Committee, the proponent of the Motion that resulted in the SPP Ruling, has advised that it will explain its position in a pleading to be filed with the Court. The Movants also sought, but did not receive, concurrence in this Motion to Stay from the Claimants' Advisory Committee.

January 25, 2018

Respectfully submitted,

/s/ Deborah E. Greenspan

Deborah E. Greenspan

**BLANK ROME LLP** 

Michigan Bar # P33632

1825 Eye Street, N.W.

Washington, D.C. 20006 Telephone: (202) 420-2200

Facsimile: (202) 420-2201

DGreenspan@blankrome.com

Debtor's Representative and Attorney

for Dow Corning Corporation