

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

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

**MOTION FOR JOINDER AND HOLDING JOINT HEARING WITH THE KOREAN
CLAIMANTS' MOTION FOR RECOGNITION AND ENFORCEMENT OF
SETTLEMENT AGREEMENT FILED ON DECEMBER 15, 2016**

Yeon Ho Kim was ordered and served to appear in this Court on March 22, 2018 to show cause why he should not be sanctioned, held in contempt and otherwise required to respond as a result of conduct of his law office related to the claim funds distributed by the SFDCT for the 88 Claimants.

Yeon Ho Kim filed the Cross Motion for an order to show cause why the Finance Committee should not be sanctioned, held in contempt and otherwise required to pay five million dollars to Yeon Ho Kim, the representative of the Korean Claimants.

Before the Motion and the Cross Motion were filed, Yeon Ho Kim for the Korean Claimants had filed the Motion for recognition and enforcement of the settlement agreement entered into with the Finance Committee on December 14, 2016 [*Doc.No:1271*] with this Court.

The Finance Committee filed its Response. Dow Corning Corporation, Debtors' Representatives and the Claimants' Advisory Committee filed their Opposition. Yeon Ho Kim filed the Reply to the Response of the Finance Committee and the Opposition of Dow Corning Corporation, Debtors' Representatives and the Claimants' Advisory Committee.

The Finance Committee's Motion and the Yeon Ho Kim's Cross Motion are related to the Korean Claimants' Motion for recognition and enforcement of the settlement agreement.

The Finance Committee's Motion and the Korean Claimants' Motion for recognition and enforcement of the settlement agreement are relevant.

The reason is that the settlement agreement, if the Motion is granted by this Court, relieves Yeon Ho Kim's obligations to provide updated address information to the Finance Committee and the SFDCT, and to show cause why he should not be sanctioned, held in contempt and otherwise required to respond as a result of the conduct of his law office related to claim funds distributed by the SFDCT for the 88 Claimants.

In addition, Yeon Ho Kim is preparing for filing a lawsuit against the Finance Committee with the Korean Court if the Motion for recognition and enforcement of the settlement agreement is not ruled by this Court in a timely manner.

Therefore, Yeon Ho Kim requests the Court to joinder the Finance Committee's Motion to show cause why Yeon Ho Kim should not be sanctioned, held in contempt and otherwise required to respond as a result of the conduct of his law office related claim funds distributed by the SFDCT for the 88 Claimants with the Yeon Ho Kim' Motion for the Korean Claimants for recognition and enforcement of the settlement agreement filed on December 14, 2016.

[Doc.No:1271]

Furthermore, Yeon Ho Kim requests the Court to hold the hearing for the Motion for recognition and enforcement of the settlement agreement, if the Motion for Joinder is granted, on March 22, 2018 that the Finance Committee's Motion to show cause with respect to Yeon Ho Kim was set for hearing.

Date: January 30, 2018

Respectfully submitted,

(signed) Yeon Ho Kim

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CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2018, this Motion has been electronically filed with the Clerk of Court using ECF system, and the same has been notified to all of the relevant parties of record.

Dated: January 30, 2018

Signed by Yeon Ho Kim