

EXHIBIT 1

DRAFT

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (“Memorandum”) entered into on _____ between Yeon-Ho Kim (“Kim”) and the Finance Committee of the Settlement Facility – Dow Corning Trust (“SF-DCT”) (collectively, “the Parties”) is made pursuant to a negotiated resolution of claims that have been filed by Kim with the SF-DCT and which are listed on Exhibit B to this Memorandum (the “Korean Claims”).

- A. The Parties have agreed to resolve the Korean Claims pursuant to which, and subject to the terms of the Release attached as Exhibit A to this Memorandum and all of which Release terms are incorporated herein by reference, the SF-DCT will pay to Kim the sum of five million dollars U.S. (\$5,000,000) (the “Korean Claims Payment”) to resolve the Korean Claims which are listed on Exhibit B.
- B. Kim has represented that he is authorized to accept the Korean Claims Payment on behalf of the Korean Claimants and that the Release attached as Exhibit A is fully binding on the Exhibit B claimants, and that he is authorized to execute the Release on behalf of the Exhibit B claimants.

- C. The Parties agree that distribution of the Korean Claims Payment to the Exhibit B claimants, as well as the distribution of attorneys' fees and expenses due to Kim or others, will be Kim's responsibility and will be undertaken by Kim pursuant to Korean law. The Parties further agree that the SF-DCT will have no responsibility or liability to any person or entity with respect to the distribution of the Korean Claims Payment.
- D. The SF-DCT agrees that the Korean Claims Payment does not include any Common Benefit funds authorized by the United States District Court for the Eastern District of Michigan, Northern Division, to be paid to Kim.
- E. Kim agrees for himself and the Korean Claimants that he will take whatever steps are necessary to dismiss any pending actions or appeals, and that he will file in the Courts of the United States and Korea any pleadings or other documents that are necessary to effectuate the purposes of this Memorandum.

Yeon-Ho Kim, for himself and
all Exhibit B claimants

Ann Phillips, for the
Finance Committee

EXHIBIT A

SETTLEMENT FACILITY – DOW CORNING TRUST RELEASE FOR KOREAN CLAIMANTS REPRESENTED BY YEON-HO KIM AND SETTLED PURSUANT TO THE MEMORANDUM OF UNDERSTANDING DATED _____ BETWEEN YEON-HO KIM AND THE SETTLEMENT FACILITY – DOW CORNING TRUST

1. Recitals

- A. On May 15, 1995, Dow Corning Corporation filed a petition for reorganization under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of Michigan, Northern Division (references to Dow Corning include the Reorganized Debtor). Thereafter, an Amended Joint Plan of Reorganization of Dow Corning Corporation dated as of February 4, 1999, as further amended, modified or supplemented from time to time (the "Plan"), in case number 95-20512 was Confirmed pursuant to the Bankruptcy Code. As part of the Confirmation Order, the Settlement Facility – Dow Corning Trust ("SF-DCT") was established on March 27, 2001 to administer the financial operations required under the Reorganized Plan. Among the Plan documents is the Settlement Facility Agreement that describes the procedures for paying claims.
- B. On April 2, 2004, an Order was entered establishing June 1, 2004 as the "Effective Date" of the Plan. It was further ordered that the SF-DCT, as of the Effective Date, was authorized to make payments to allowed claimants and such other payments as were authorized pursuant to the

Plan and/or the Settlement Facility Agreement. The payment described in this Release is made pursuant to the Settlement Facility Agreement.

- C. Yeon-Ho Kim ("Kim") represents and agrees that he is an attorney admitted to practice in Korea. He also warrants that he represents the SF-DCT claimants with unsettled claims attached as Exhibit B (hereinafter, "Exhibit B Claimants") to the Memorandum of Understanding dated _____ between Kim and the SF-DCT Finance Committee. Kim further represents that pursuant to Korean law, he is authorized to accept the payment described below on behalf of the Exhibit Claimants and, further, that he is authorized to execute this Release on their behalf and that such execution will irrevocably bind the Exhibit B claimants to the terms of this Release.
- D. Kim and the SF-DCT Finance Committee agree that this Release or covenant not to claim or sue releases any and all Exhibit B Claimants including, but not limited to personal injury and wrongful death claims filed with the SF-DCT pursuant to the Settlement Facility Agreement by Kim on behalf of the Exhibit B claimants.
- E. The "Korean Claims Payment" for all claims subject to this Release is five million US dollars (\$5,000,000).

2. RELEASE

- A. Kim accepts receipt of the Korean Claims Payment on behalf of all Exhibit B claimants as full settlement of all of the claims filed with the SF-DCT by the Exhibit B claimants. Kim understands that there will be no further payments of any kind by the SF-DCT to Exhibit B claimants. Kim further releases the spouses, heirs, representatives, successors or assigns of all Exhibit B claimants, known or unknown. Kim understands that this release extends to all rights

of the Exhibit B claimants against the SF-DCT whether based in tort, contract, fraud or any other legal or equitable theory, whether possessed by Exhibit B claimants now or in the future.

- B. In accepting the Korean Claims Payment, Kim agrees that it is his responsibility to divide the Korean Claims Payment among the Exhibit B claimants and further, it is his responsibility to collect any and all legal fees and/or expenses owed to him or any other party by the Exhibit B claimants. The Korean Claims Payment, Kim agrees, includes all such legal fees and expenses.
- C. Kim declares and represents that no promise or inducement other than the payment of the Korean Claims Payment has been made to him or the Exhibit B claimants in connection with this Release, and that this Release contains the entire agreement between Kim on behalf of himself, his law firm, and the Exhibit B claimants. Kim further declares and represents that the terms of this Release are not a mere recital but are contractual and are to be interpreted, construed and enforced under the Plan and the laws of the State of New York. Kim also declares and represents that all disputes relating to or arising under this Release shall be heard by the United States District Court for the Eastern District of Michigan, Northern Division, and specifically, before the Honorable Denise Page Hood.
- D. Kim declares, represents and agrees that for himself and the Exhibit A claimants, and as further consideration of the Settlement Payment, he will take whatever steps are necessary to dismiss any pending actions or appeals, and that he will file in the Courts of the United States and Korea any pleadings or other documents that are necessary to effectuate the purposes of this Release.
- E. Kim declares and represents for himself and the Exhibit B claimants that this Release has been entered into in good faith and that he will cooperate with the SF-DCT and the SF-DCT Finance

Committee in any proceedings to determine the good faith of this Release. Kim further declares and represents for himself and the Exhibit B claimants that no change or alteration of the language of this Release is effective unless expressly agreed to and acknowledged in writing by both the SF-DCT Finance Committee and Kim.

F. In addition to the foregoing, pursuant to Section 6.05 of the [Settlement Fund Agreement], the acceptance by Kim for himself and the Exhibit A claimants of the Korean Claims Payment shall be deemed to serve as additional documentation of the Release of the SF-DCT and the SF-DCT Finance Committee, and the Released Parties, as specified in Section 8.3 of the Amended Joint Plan of Reorganization referenced in Paragraph 1. A. above

Yeon-Ho Kim, on behalf of himself
And all Exhibit A claimants

Date

Ann Phillips, for the Finance Committee

Date

EXHIBIT B

Korean Claimants

EXHIBIT B

SID	Claimant Name
0612132	HELEN HAN
0700007	SUK-CHOON LEE
0700028	SURK-RANG PARK
0701186	SUNG-OUK HWANG
0707047	JAE-HYANG SOE
0712002	KYUNG-SOOK KIM
0717380	WHA-SOON WHANG
0735310	SOON-YAE KANG
0735312	MIN-HAE WOO
0735315	PAN JA PARK
1006340	JU-YOUN PARK
1035526	MYUNG-HEE PARK
1035527	JAN-OK HONG
1035528	CHON-WHA KIM
1035529	YOUNG-LIM KIM
1035530	CHUN-DUK SON
1035531	MYUNG-HEE BYUN
1035532	YOUNG-JOO CHOI
1035533	SOON-NYE KIM
1035534	SUN-NAM NAMKUNG
1035535	JEONG-AE LEE
1035536	KWI-SOOK YOON
1035537	JUEL-JA KIM
1035538	SUN-HWA YOU
1035539	HYUN-SOOK KIM
1035540	BO-HUN AN
1035541	EUN-SOOK HWANG
1035543	HAE-JA CHAE
1035544	HEA-SUN KWON
1035545	JANG-OK LEE
1035546	GONG-NYU KIM
1035547	HAE-SOON LEE
1035548	JUNG-HEE BANG
1035549	YONG-HYUN JUN
1035550	WON-JA PARK
1035552	CHAN-KYUNG PARK
1035553	KUM SUNWOO
1035554	HYUN-JU KIM
1035555	HAE-RAN LEE
1035556	MYEONG-SOOK YANG
1035559	KEE-YOUL KWAK
1035560	JUNG-NAM KU
1035561	SOON-SUK LEE
1035562	KYONG-OK LEE

1035563 JUNG-OK CHOI
1035564 EUN-IN JANG
1035565 SUN-JUK WON
1035566 YOUN-LAN PARK
1035567 MI-HYE KIM
1035568 EUN-YOUNG LEE
1035569 BONG-SUN KIM
1035572 EUN-SUK LEE
1035573 INN-HONG KIM
1035574 MYON-HEE KIM
1035575 JIN-HEE PARK
1035576 SUN-OK KIM
1035577 GI-SUK LEE
1035578 KYUNG-AE LEE
1035579 EUN-JI KIM
1035580 NAM-SUK LEE
1035581 HEE-YOUNG LEE
1035582 HWA-SOOK YOU
1035583 KWANG-IL LEE
1035584 CHONG-SOOK PARK
1035585 YOUNG-YIM TAK
1035586 KYUNG-HEE KANG
1035587 JUNG-JA KIM
1035588 SUN-JA JUNG
1035589 EUN-HEE KIM
1035590 POK-KYONG LEE
1035591 YOUNG-JA JANG
1035592 MI-AE CHANG
1035593 SOON-DUK LEE
1035594 JIN-HANG LEE
1035595 HYOUNG-SUK YU
1035597 SUN-MI KIM
1035598 OH-SOOK KWON
1035599 JONG-AE SUH
1035600 KYUNG-JA SHIN
1035603 BOUNG-YEAN LEE
1035604 YOUNG-JOO YI
1035605 SOON-JA PARK
1035606 JONG-IM KIM
1035609 IN-WHA SONG
1035610 HAK-YEON KIM
1035611 OK-HWA KIM
1035612 OK-HEE WOEN
1035613 MYUNG-SOOK KUG
1035614 YEA-SUEN LEE
1035615 SEON-JA HONG
1035616 YI-SOOK JUNG
1035617 SUK-SUNG CHO

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1035620 IN-JEA LIM
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1035626 JUN-KU PAK
1035627 YOUN-BOK LEE
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1035632 YOUNG-AE KIM
1035633 JYUNG-RYUEL YU
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1035643 KU-SAM JUNG
1035645 SUN-EY KIM
1035646 SOON-LEE SU
1035647 SUN-HEE SUL
1035648 KYOUNG-SOON PARK
1035649 MYEON-HEE DO
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1035651 BOK-JA KIM
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1035656 MUN-KYUNG OHM
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1035659 MI-JUNG RYOO
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1035664 MI-HAE KWACK
1035665 JUNG-SOON LEE
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1035679 HYUCK-SOON KWON
1035680 HYANG-SIK KIM
1035681 KYOUNG-SOON SU
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1035686 KI-JOO KWAK
1035687 SOON-OK CHOI
1035688 HAE-KYUNG CHO
1035689 SUN-OK PARK
1035690 SUNG-SUK KIM
1035692 MI-KYOUNG PAEK
1035693 YOON YANG
1035694 MYUNG-NA CHO
1035695 KUNG-HEE KIM
1035696 MI-KYUNG KIM
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1035703 KI-NAM CHO
1035704 GAE-SUNG KIM
1035705 KYOUNG-HE CHOI
1035708 JUNG-SOOK KIM
1035709 JE-SOON LEE
1035710 SOON-OK PARK
1035711 YOUNG-SOON YOUN
1035712 KYUNG-JA PARK
1035713 JUNG-SIM KIM
1035714 DUCK-IM LEE
1035715 GYEONG-SOOK YOON
1035716 BOK-RYE LEE
1035717 SUN-HI KIM
1035718 KYUNG-KUM LEE
1035719 MI-JA KIM
1035720 KAB-SOUK SON
1035721 SOON-OCK KIM
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1035724 SUN-JUNG KIM
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1035965 HYUN-JOO KIM
1035966 YONG-KYU BAE
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1035968 KYUNG-YUL LEE
1035969 KYUNG-HEE PARK
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1035975 KWUI-DONG CHOI
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1035977 SUN-YOUNG YOON
1035978 HAE-SON LEE
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1035984 JUNG-RE IM
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1035987 HWA-SOON PARK
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1036162 BONG-HEE BAE
1036163 BU-YOUNG KIM
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1036232 SUN-HOWA KANG
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1036320 IN-OK NO
1036321 DUCK-HEE KIM
1036322 JONG-IM KIM
1036323 MYUNG-HEE KIM
1036324 KYU-HEE KU
1036325 MYUNG-SUK LEE
1036326 YOUNG-SUK LEE
1036327 HEE-JA KIM
1036328 HYON-JOO KIM
1036331 EUN-DUK KIM
1036332 KI-SOON CHOI
1036333 AE-SOOK PARK
1036335 IN-KYUNG JUN
1036336 YUN-SUK KIM
1036337 CHAE-HYON YIM
1036338 HEA-SOON KIM
1036339 BOK-HI KOWN
1036340 CHUN-SIM LIM
1036341 EUN-SOOK BANG
1036342 SENG-HI PARK
1036343 SOO-IM IM
1036344 HEA-SOOK HAN
1036345 KEUN-HEE KIM
1036346 YOUN-OK LEE
1036348 YOUNG-AE LEE
1036349 JONG-HEE KIM
1036350 OK-HEE PARK
1036351 KYUNG-JA SONG
1036352 YOUNG-CHOON PARK
1036353 KYONG-MI JANG

1036354 SUL-HEE PARK
1036356 OH-SOON CHO
1036357 JEE-HYE BANG
1036359 SEOUNG-WOO LEE
1036360 KUM-SUK RU
1036361 JONG-HI PARK
1036362 SUK-KYEONG JUNG
1036363 GEA-SOON KIM
1036364 YONG-WOOK CHANG
1036365 HWA-JA KWON
1036366 KYUNG-JIN PARK
1036367 KOING-JA PARK
1036368 SOON-HEE KIM
1036369 JUNG-WOO PARK
1036370 AE-RAN LEE
1036394 JEONG-SOOK LEE
1036395 MI-WHA KIM
1036396 JUNG-NAM PARK
1036397 JONG-DUK LEE
1036398 SOO-JA LEE
1036401 YOUN-MI SHIN
1036403 WON-HEE CHO
1036404 YEON-HWA HONG
1036405 MYEONG-SOOK KIM
1036406 JIN-KYOUNG KIM
1036411 BOK-NAM CHUNG
1036412 YOUN-HEUNG PARK
1036413 SUK-JA PARK
1036415 O KIM
1036417 SUN-HONG KO
1036420 JOO-HYUN LEE
1036421 YOUNG-JA KIM
1036422 IN-JA CHO
1036423 OCK-KYOUNG KIM
1036424 JUM-SOON KIM
1036425 EUN-SUK SHIN
1036426 GYEONG-SOON CHOI
1036427 YEOUNG-RAN YONG
1036428 HEE-JONG KIM
1036430 JAE-IN HAN
1036431 JUNG-WOO LEE
1036432 SOOK-HEE CHA
1036433 HI-LYE CHE
1036434 BOO-WOL LEE
1036435 FAR-SOON LEE
1036436 HOUN-JOUNG NO
1036437 JUNG-HEA KIM
1036438 YOUNG-HWA KIM

1036440 BOK-SOON LEE
1036441 HAE-KYUNG YOON
1036442 KUM-SUN CHO
1036443 SOON-ROUN KIM
1036444 KWI-IM HAN
1036445 JANG-RIM CHANG
1036446 MUN-YOUNG YOO
1036448 JOUNG-AIE YOO
1036449 HYE-SUK KANG
1036450 YOUNG-YE KIM
1036452 HOA-SOOK CHOI
1036453 EUN-SOOK KIM
1036456 KUM-SOOK KANG
1036458 EUI-JA CHOI
1036460 JUNG-HYUN OH
1036461 DUK-SIM JUNG
1036462 JUNG-MI CHO
1036463 YOUNG-JA SHIN
1036464 MAN-OK KIM
1036465 BOCK-JA LEE
1036467 KWUM-JA KWON
1036468 NAN-NIM KO
1036469 YOUNG-YIM JHO
1036472 YOUNG-DOO KIM
1036473 SU-YOUNG NA
1036476 HYUN-YANG KIM
1036477 NAM-YEON LEE
1036478 JIN-SUN WOO
1036479 OK-HEE KIM
1036480 CHUN-OK YOU
1036481 JI-OG KIM
1036483 MOON-SOON CHO
1036484 JIN LEE
1036486 KYUNG-JA CHO
1036487 TAE-SUN KIM
1036489 SUN-HEE HONG
1036490 JUNG-FA CHOI
1036491 YOUNG-OK KANG
1036492 JU-EUN LEE
1036493 YWON-SOON PARK
1036494 YUNG-SUK SEO
1036495 JONG-HYE KIM
1036496 NAM-SUK HAN
1036497 SUN-HWA HWANG
1036498 SUN-JA HWANG
1036499 IN-HWA YU
1036500 IN-SOOK RYU
1036501 EUN-HEE KONG

1036502 JONG-SOON YOON
1036503 MI-HEE YANG
1036505 SOON-JA SU
1036506 SUNG-MEE KIM
1036509 JUNG-IM SHIN
1036510 YEO-AE HONG
1036511 BYUNG-SOON KWAK
1036577 EUN-JA CHOI
1036578 OK-HI KANG
1036579 YOUNG-HWA CHOI
1036580 YOUN-JU KIM
1036581 KUM-SOON CHO
1036582 YANG-JA KANG
1036583 KYUNG-HEE KIM
1036584 SOON-LEE HONG
1036585 YOUNG-HEE LIM
1036586 KUI-JA PARK
1036587 SU-NAM HONG
1036588 HYO-SUN KIM
1036589 GILL-SOOK KIM
1036590 YEAN-SOON KANG
1036591 IN-HO SIN
1036592 MI-JA LEE
1036594 SOOK-JA KU
1036595 MOON-HEE KANG
1036597 YOUNG-SOOK OH
1036598 SOOK-GEUN SOE
1036600 KEONG-SUK CHANG
1036602 YANG-EH KANG
1036603 KYOUNG-SOON KIM
1036605 HAE-OK CHO
1036606 KYUNG-JA KIM
1036607 YUNG-SIN YU
1036609 SOON-HEE PARK
1036610 JUNG-JOONG KIM
1036611 JUNG-SUK CHOI
1036613 IN-SOON KIM
1036614 OK-HEE LEE
1036615 EUN-KYUNG KIM
1036616 KYOUNG-YOUN KIM
1036617 KWANG-SOOK HUR
1036619 YOUNG-SUK LEE
1036621 HYUN-NAM LEE
1036622 ME-YUN JO
1036623 CHANG-SOON LEE
1036624 DONG-CHUN KIM
1036625 JUNG-MI PARK
1036627 HEE-HYON JOUNG

1036629 SUNG-JA KIM
1036631 HYE-SOOK CHO
1036633 SUNG-JOO SONG
1036634 SHIN-AH KIM
1036635 YOUNG-RAE SIM
1036636 HONG-SOO BYUN
1036637 JUNG-JAE CHEON
1036638 YUN-SUK HONG
1036639 JEE-HYUN JEONG
1036641 HYE-KYEONG KIM
1036642 SUCK-HI KANG
1036643 WE-KYUN YOON
1036644 HONG-JA JUN
1036645 MI-CHONG KIM
1036646 HONG-JA SONG
1036647 YOUNG-SOO KIM
1036650 MUN-EUN PARK
1036651 SOON-DUK KIM
1036653 SOO-HEE LIM
1036654 SEOUNG-SUN KIM
1036657 AE-YOUNG LIM
1036659 MI-OK JANG
1036661 SOON-NAM LEE
1036662 JUNG-SOO KIM
1036663 OK-SOON CHUNG
1036664 HAE-SOOK KWAN
1036665 SUNG-EA JUNG
1036666 ME-AE JUNG
1036667 SOON-AE KANG
1036669 HYUN-SOON KIM
1036672 OH-SOON JUNG
1036673 MI-RA DOH
1036674 HYEONG-SUK KIM
1036675 MYEONG-SUN JO
1036676 YOUNG-JA KIM
1036677 SON-CHA YI
1036678 OK-SOON LEE
1036679 EAN-JUNG KIM
1036681 SOON-OK PARK
1036683 YOUNG-YOUB CHOI
1036684 JOUNG-HWA TAE
1036685 SOON-YU SON
1036686 MYOUNG-AE YOU
1036687 MYEONG-SOON MIN
1036689 HEA-JA SON
1036690 JUNG-SOON KIM
1036691 SUN-JOO KANG
1036692 MI-RANG KANG

1036695 YOUN-JIN KIM
1036696 SUON-OK KIM
1036697 EUN-SIL CHUN
1036698 HOY-SOOK KIM
1036699 HANG-RAN JANG
1036701 OCK-NAM WHANG
1036702 HYE-SOOK MOON
1036703 YANG-ME NAMGUNG
1036704 HYUN-BOK SHIN
1036705 KWI-SOON PARK
1036706 MI-SOON PARK
1036708 JOUNG-ONE MOON
1036709 YOUNG-SOON CHUNG
1036712 JEONG-RAN KANG
1036713 HWA-SOON PARK
1036714 CHUN-JA KIM
1036715 JUM-OCK O
1036716 SANG-OCK LEE
1036717 KYUNG-SOON KIM
1036718 SUNG-SOOK CHO
1036719 MYOUNG-EL CHO
1036721 DUCK-SOOL LEE
1036723 KYUNG-LAN KIM
1036725 EUN-JU HONG
1036727 SUN-HEE LIM
1036728 SUN-HEE YOUN
1036729 YOUNG-JU BAG
1036730 HAE-WOOK HAN
1036731 YOUNG-HEE WON
1036735 KYEONG-HEE MUN
1036738 KEUM-JA KIM
1036739 SOON-AH SEO
1036742 CHUN-JA LEE
1036770 IN-SUK KIM
1036771 SOO-KYOUNG KIM
1036773 TAE-OK YON
1036775 MIN-HAE KIM
1036776 JUNG-REA HER
1036777 MYUNG-HO YUM
1036779 HANG-JA KO
1036780 JUNG-SOOK LEE
1036835 HI-YOUNG KIM
1036836 MI-SUK LEE
1036837 KYUNG-HEE PARK
1036838 JUNG-SUN WOO
1036842 HYUN-HEE LIM
1036843 JU-MI CHO
1036844 SANG-KYUNG LEE

1036845 YONG-JA PARK
1036846 JEONG-JA SON
1036847 CHUNG-AE CHANG
1036848 NOCK-JOO LEE
1036849 JI-HEE KIM
1036852 ME-JA LEE
1036853 CHUNG-CHI KIM
1036856 YOUNG-SOOK LEE
1036857 YOUN-OCK PARK
1036858 HYO-SUK YU
1036859 HEA-SOON KIM
1036860 JUM-IN PARK
1036862 YOUNG-BOK JUN
1036863 BYUNG-SOOK KIM
1036864 YANG-SOOK LEE
1036865 JAE-ON LEE
1036866 SOON-REA PARK
1036867 MYUNG-SOOK WOO
1036868 KWANG-SOO KIM
1036869 SOON-IL NA
1036870 MAL-RYEO YOO
1036871 YOUNG-JIN SONG
1036872 YOUNG-SOON LEE
1036888 HYUN-SOOK LEE
1036889 JAE-SIN PARK
1036890 KYUNG-AE BYUN
1036892 OG-WHA O
1036893 KYONG-MI SIN
1036894 YOUNG-SOON CHUNG
1036896 SHIN-HE JOUNG
1036897 JUNG-IM KANG
1036898 SOON-HE CHOI
1036899 CHUN-JA NA
1036900 YUN-SOOK LEE
1036901 YOUNG-HEE EUN
1036902 CHANG-HWA JOUNG
1036904 MI-KYOUNG CHOI
1036905 SEON-MEE PARK
1036906 YOUNG-SOOK JUNG
1036907 IN-JA KIM
1036908 MI-NONG LEE
1036909 KYEONG-DEOG LEE
1036910 WOO-YOUNG JANG
1036911 IN-JU CHU
1036914 SUN-JA SHIN
1036916 I-EUNG PARK
1036917 DAE-SOON KIM
1036918 SUNG-NIM KIM

1036919 HYUN-LIM LIM
1036921 HYE-JUNG PARK
1036922 JUNG-AI LEE
1036923 EUN-SUK SONG
1036924 AE-SOOK KIM
1036926 YIE-SON BARK
1036927 JUNG-SOON CHOI
1036928 SEONG-EUN OH
1036929 IN-SUK KANG
1036931 SUN-SOON LIM
1036932 SOON-NAM KIM
1036934 AE-KYOUNG LEE
1036935 BYUNG-SOON KANG
1036937 JONG-IM PARK
1036938 YOUNG-AE MOON
1036968 JUNG-SOON SOE
1036969 YOUNG-SOON GO
1036970 DUK-HEE CHOI
1036973 YOON-OK CHANG
1036974 CHUNG-HA YANG
1036975 GYO-HOEM BAEG
1036976 EUN-JOO KIM
1036977 LIM-JA LEE
1036978 JUNG-SOON LEE
1036979 SOON-YE KANG
1036980 JEONG-JA HUE
1036981 YEONG-JA PARK
1036982 JUNG-JA OH
1036983 MIN-JA KIM
1036984 CHEONG-JA SON
1036986 HAE-SOON SU
1036987 CHAN-HEE CHANG
1036990 YEON-SOOK HWANG
1036993 HEE-LIM RYU
1036994 EUN-SOOK KIM
1036995 TAE-SOON LEE
1036996 YOUNG-JA HER
1036997 HWA-JA LEE
1036998 OK-HEE JWA
1036999 EUN-HUI CHOI
1037000 YOUNG-CHEON HER
1037001 SOON-HEE KIM
1037002 JAE-YOUN JUNG
1037004 SOON-IM YUN
1037006 SOO-BOK BYUN
1037007 DUK-HEE KIM
1037008 LAN-HEE HWANG
1037010 SOO-BONG YOANG

1037011 SAM-CHUN JANG
1037012 JOUNG-O KIM
1037014 EUN-MI KIM
1037015 SUK-IN AN
1037016 SOOK-HYUN MO
1037017 SUNG-SUN KIM
1037020 YOUNG-JA LEE
1037022 KOUNG-SOOK LEE
1037028 JOUNG-HWAN LIM
1037029 SOO-YOUNG HWANG
1037031 GUN-OK PARK
1037032 HAE-KYUNG LEE
1037034 SUG-JAL LEE
1037035 SOON-OUK LEE
1037036 SOON-YUN BAE
1037038 OK-JA KANG
1037039 GAI-GA KIM
1037040 NAM-RYE LEE
1037041 SU-JA HUA
1037042 DONG-SIN SHIN
1037045 OK-SOON CHOUNG
1037046 HYO-SOOK JEOUNG
1037048 CHUNG-KYU PARK
1037049 KAB-SOON KIM
1037050 MU-SOON PARK
1037051 EUN-SIL LEE
1037052 DONG-MI LEE
1037053 YOUNG-SOON SUNG
1037055 JI-HAYNG SON
1037058 JOO-HYUNG BANG
1037059 HEA-SUN YOUN
1037060 YOUNG-JU KIM
1037061 CHA-SOOK CHUNG
1037063 JUNG-SOOK KIM
1037065 YOUNG-DUK BEUN
1037066 HAE-SOOK SIM
1037067 HE-YOUNG PARK
1037068 HAE-SONG KIM
1037069 HYANG-MI KIM
1037072 JIN-MUK JOO
1037073 SOE-BOON KWON
1037074 EUN-YOUNG PARK
1037075 CHUL-SOON SONG
1037076 KYONG-AE YOO
1037077 HYANG-MI BARK
1037078 ME-HE KIM
1037079 GOUNG-SOOK SUNG
1037081 HAW-YEAN LEE

1037082 AEI-JUNG PARK
1037083 SUN-SOON RHO
1037084 YOUNG-SUK HER
1037085 JIN-SOOK LEE
1037087 SOOK-RYE LEE
1037088 JUM-OK HWANG
1037089 DONG-HOA YOO
1037090 MI-EE YU
1037091 MOUNG-HEE BEA
1037092 SUN-NAM NAM
1037093 SUNG-HEE PARK
1037094 IN-SOOK CHOI
1037095 YOUNG-SANG YOON
1037096 JI-HEA KIM
1037099 SOON-SOO KIM
1037100 MYNG-HOA KIM
1037101 HAE-JUNG CHANG
1037102 PIL-NAM GWAK
1037103 MI-OK SONG
1037104 JUM-OK KIM
1037105 YOUN-SOOK SIM
1037106 CHU-YOUNG CHOI
1037108 MI-GYEONG KIM
1037109 HEA-SOOK HONG
1037112 IN-SOOK LEE
1037113 SUN-IM JANG
1037115 SUN-KUM CHO
1037116 YOUNG-AE KIM
1037118 HAE-JIN LEE
1037121 HEA-KYUNG KIM
1037122 TAE-SOOK KWON
1037123 MI-KYUNG LEE
1037124 SUN LEE
1037125 MI-SUNG CHOI
1037126 KEI-HWA CHUONG
1038246 JUM-SOON KIM
1038389 YOUNG-AI KIM
1038390 HEA-YOUNG SEO
1038391 YUN-HI KIM
1038392 YOUNG-AI YU
1038393 CHIN-SUK JUGAN
1038394 SO-YEON HAN
1038395 HYUN-SOOK MA
1038438 YOUNG-MIN BANG
1038439 WORL-SUN LEE
1038440 EUN-MEE LEE
1038443 JONG-SOOK KO
1038444 JOUNG-HEE KIM

1038445 YOUNG-SEON IM
1038446 YOUNG-YEI HAM
1038447 MAL-JA CHO
1038450 GYUONG-MI LEE
1038452 SUNG-JA SUNG
1038455 HAE-JUNG YOU
1038457 CHONG-HEE PARK
1038458 SOON-HEE JUNG
1038459 KYUNG-AE KANG
1038460 EUN-SUN KIM
1038461 JONG-MI CHOI
1038462 YANG-JA GWON
1038463 DO-HEE LEE
1038464 SAM-WOL YOO
1038465 MI-OK KIM
1038466 KYOUNG-SOOK LEE
1038467 KYUNG-HWI HWANG
1038468 SUNG-LYUE JIN
1038469 SEUNG-EUN LEE
1038471 SOO-JUNG LEE
1038472 JONG-SUK SON
1038474 YOUN-SHIM LI
1038478 SOON-JA SOE
1038480 JOO-YEON LEE
1038481 YUN-RYE LEE
1038483 HELLEN LEE
1038484 GWANG-HEE SONG
1105329 HEUNG-SOOK JO
1209470 HYE-KYUNG HONG
1233103 CHUNG SOOK KIM
1233112 SOOK JA NAM
1233139 SO JA JANG
1233155 SAM SUN LEE
1233164 BONG-YOUNG KIM
1233181 KIL JA JO
1233190 KIL JA GWAK
1233199 GYUNG HWA KANG
1233201 JIN SOOK GANG
1233202 SUNG JA BAIK
1233203 HYUN JA YANG
1233204 HWA-JA LEE
1233205 MEE-HYO LIM
1233206 MYUNG-SOON KIM
1233207 JUNG HEE KIM
1295206 HOA KIM
1376363 SEOUNG-HEE PARK
1376369 BYOUNG-EUN CHO
1695533 JUNG-OH SUN

2745843 MYUNG-SOOK HYUN
2745844 JI-SOOK SONG
2745845 JAE-WHA KIM
2745846 HYANG-MI SHIN
2745847 JUNG-SOOK MO
2745848 SUN-NAM HWANG
2745849 MI-SOON CHOI
2745850 AE-SOOK LIM
2745851 MYUNG-SOOK KIM
2745852 HYUN-MI JO
2745853 MYOUNG-OK KIM
2745854 CHUN-JA LEE
2745855 SON-JA PARK
2745856 HYO-NYU KIM
2745857 OK-SU KIM
2745858 YOUNG-JA KIM
2745859 YOUNG-JI KIM
2745860 YEON-YAE KIM
2745861 BOK-DUK PARK
2745862 JIN-HEE KANG
2745864 KYUNG-JA KIM
2745865 MEE-HYO LEE
2745866 MYUNG-SOON KIM
2745867 KIL-JA HA
2745868 MI-YOUNG LEE
2745869 KYUNG-SOON LEE
2745870 SIN-YOUNG KIM
2745871 YUN-MI JO
2745872 YOUNG-AE KIM
2745873 HYO-SOON JUN
2745874 GIL-YOUNG KIM
2745875 KYUNG-MI AN
2745876 SOON-MI PARK
2745877 MOON-SOOK CHA
2745878 EUN-JOO KIM
2745879 JUNG-JA KIM
2745880 JIN-SOOK KIM
2745881 JAE-HEE KIM
2745882 KYUNG-MI ROH
2745883 MIN-JOO LEE
2745884 KYUNG-SOOK PARK
2745885 EUN-SOOK MIN
2745886 KEUM-SOON CHOI
2745887 SOOK-YOUNG KIM
2745888 GANG-JA KIM
2745889 SU-YUN SUNG
2745890 HYUN-MI KO
2745891 SOON-NAM KONG

2745892 MAL-SOON LEE
2745893 MI-KYUNG KANG
2745894 MYUNG-HEE YUN
2745895 SOON-JA SONG
2745896 NA-YOUNG KIM
2745897 GOOK-HEE LEE
2745898 MYUNG-RAN O
2745899 MI-AE MYUNG
2745900 KEUM-RAN KIM
2745901 KYUNG-EUN KIM
2745902 EUN-HEE YUN
2745903 BOK-SOON SEO
2745904 EUN-JOO BAEK
2745905 SOO-IM PARK
2745906 KYUNG-EUN LEE
2745907 MOON-JA PARK
2745908 YOUNG-SOON SON
2745909 MIN-JUNG PARK
2745910 JAE-KYUNG KIM
2745911 SOON-DUK MA
2745912 MYUNG-RYE YON
2745913 YOUU-SOON LEE
2745914 SOON-BOK SHIN
2745915 SOON-HO KIM
2745916 SOON-YUN LEE
2745917 BOON-HA CHOI
2745918 MYUNG-JA CHOI
2745919 KYUNG-SOON HONG
2745920 EUN-BOON YOU
2745921 SUNG-JA BAK
2745922 CHIL-SUNG LEE
2745923 KI-JA LEE
2745924 HYUN-SOOK JANG
2745925 IN-SOOK JUNG
2745926 SUK-SOON PARK
2745927 IN-SUK JANG
2745928 OK-SOON KIM
2745929 CHUNG-SOOK KIM
2745930 OCK-SOON LEE
2745931 CHUNG-JA KIM
2745932 IN-WOO CHO
2745933 HWAL-RAN SONG
2745934 SUNG-HEE MUN
2745935 NAM-KYUNG KIM
2745936 HAE-KYUNG KIM
2745937 SUK-HWA SONG
2745938 OK-JA PARK
2745939 HONG-JEON WI

2745940 HYO-SOOK KIM
2745941 KYUNG-SOON GA
2745942 BOK-JA HWANG
2745943 SOO-MI BANG
2745944 SUN-MI LEE
2745945 SUNG-JOO PARK
2745946 KYUNG-JA TAG
2745947 BOK-SOON KIM
2745948 KYUNG-JA LEE
2745949 YOUNG-JOO YANG
2745950 MI-JA PARK
2745951 KYUNG-MI KIM
2745953 YOUNG-JA CHOI
2745954 GIL-JA LEE
2745955 MI-HYUN PARK
2745956 DAE-SOON KIM
2745957 MYUNG-JOO O
2745958 WON-SOOK YANG
2745959 BOK-SOON KU
2745960 MYUNG-HEE HEO
2745961 SUNG-MI GIL
2745962 HYUI-JUNG AN
2745963 KYUNG-MI KIM
2745964 MI-RA JO
2745965 NAN-YOUNG KIM
2745966 KYUNG-JA ROH
2745967 KYUNG-NAM KIM
2745968 SUNG-MI KO
2745969 MYUNG-SOOK SEO
2745970 YOUNG-MI NAM
2745971 EUN-SOOK KU
2745972 MI-HEE PARK
2745973 KWANG-SOOK KIM
2745974 KEUM-SOOK CHOI
2745975 SUK-HEE SON
2745976 HA-SOOK SEO
2745977 NAN-HEE SHIN
2745978 MI-JA JUN
2745979 KEUM-YOUNG KIM
2745980 EUN-SOOK JUNG
2745981 GUN-JA YU
2745982 EUN-SOOK KIM
2745983 KYUNG-AE LIM
2745984 BOK-JA PARK
2745985 SOON-YOUNG KIM
2745986 YOUNG-HEE KIM
2745987 JU-YOUNG ROH
2745988 MI-SUN PARK

2745989 MOON-SOOK PARK
2745990 YOUNG-MI SONG
2745991 JUNG-JA SON
2745992 KYUNG-SOOK SEO
2745993 JUNG-SOOK KONG
2745994 YU-MI BAE
2745995 DUK-SOON SHIN
2745996 MYNG-JAE CHOI
2745997 KYOUNG-SOON JANG
2745998 SUN-YOUNG KANG
2745999 YOUNG-WHA WOO
2746000 KYUNG-MI PARK
2746001 MI-SUN KU
2746002 JI-YUN KANG
2746003 KEUN-HWA KWAK
2746004 SUNG-SOOK AN
2746005 NAM-SOOK LEE
2746006 JUNG-JA KO
2746007 MI-SOON KWAK
2746008 EUN-MI JOO
2746009 EUN-KYUNG SON
2746010 KEUM-OK LEE
2746011 SOON-HEE SUN
2746012 HYO-SOOK BAE
2746013 JUNG-EUN SEO
2746014 YEON-OCK O
2746015 YOUNG-AE CHOI
2746016 SOON-JA NAM
2746017 YUN-MI KIM
2746018 EUN-SIL KIM
2746019 SOON-YOUNG JO
2746020 YOUNG-SOOK YUN
2746022 HYUN-YOUNG CHOI
2746023 KEUM-HEE BAE
2746024 MIN-MAE KAUG
2746025 SUN-KYUNG KIM
2746026 SOON-HEA CHOO
2746027 JI-HAE NO
2746028 SOOK-HEE LEE
2746029 JI-HYUN SON
2746030 SUN-MI CHOI
2746031 EUN-SIL YUN
2746032 KEUM-SOON KIM
2746033 HYUN-JUNG ROH
2746034 RO-SOOK PARK
2746035 JUNG-MI BAE
2746036 KEUM-JA JUNG
2746037 HYANG-JIN KIM

2746038 CHOON-WHA KIM
2746039 MIN-JA PARK
2746040 HYUN-NAM KIM
2746041 JAE-SOON KIM
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2746055 MIN-JUNG SIM
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2746062 KYUNG-AE HA
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2746076 SUNG-ME LEE
2746077 YOUNG-OK SIM
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2746128 HYUN-NAM PARK
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2746151 SUN-HWA BONG
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2746159 MOON-SOOK CHOI
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2746323 JUM-SU PARK
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2746326 SOON-OK GI

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2746328 MI-YOUNG NA
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6474700 YOUNG-SOON PARK
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6474791 SO-YUEN IM
6474795 HYANG-NAN KYEON
6474797 NAM-SU SEOL
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6474906 SOOK-HEE CHONG
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6474942 SUNG-SHIN PAIK
6474948 DONG-HE CHOI
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6474963 KUM-JA LEE
6474970 SEUNG-JA PARK
6474977 JUNG-SIM PARK

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6475043 MIN-SOON LEE
6475044 HAE-RAN MO
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6475119 HYEN-HEE PARK
6477856 DEOK-HEE JEONG
6477885 JUM-SOOK OH
6477921 WON-RAN YOUN
6478078 YOUNG-OK KIM
6478281 HEE-JAE MIN
6478295 KEUN-SOOK HAM
6478297 CHOON-SIM KIM
6478303 DAR-SOON PARK
6478304 HYE-WON LEE
6478312 BOCK-NAM YOO
6491286 OK-HEE PARK
6491597 KYUNG-SOOK CHOI
6491598 MYUNG-SOON CHOI
6491599 SA-LA CHUNG
6491601 YOUNG-HA LEE
6491602 YUN-JA LEE

EXHIBIT 2

제목 POM and Disease Claims
보낸날짜 2009/08/14 (05:01:28) [본문크기 4.1K]
보낸이 daustern@claimsres.com
받는이 yhkimlaw@unitel.co.kr (yhkimlaw@unitel.co.kr)
참조인 ebearicks@sfdct.com (ebearicks@sfdct.com) swashington@sfdct.com (swashington@sfdct.com) kalexander@sfdct.com (kalexander@sfdct.com)

First, with respect to the disease claims and a settlement of all of them at once, I have spoken to the CAC but not Dow Corning and it will be a while before I can reach the appropriate people because of vacation schedules.

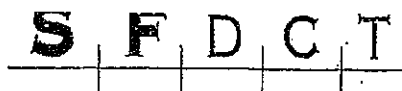
With respect to the POM claims you sent, a few observations: We have performed a POM review on 1,815 claims you have submitted. Of these, 1,488 (82%) were based on affirmative statements, a hugely greater number than any other group of claims submitted to us. Nonetheless, we have approved POM for 1,762 of the claims, an approval rate of 97% or approximately 8% higher than the average POM approval rate for all claims submitted to the Facility. (By the way, 274 of the 1,762 approved claims do not have a Claim Form and we will need such a form before a further review of these claims.) For your records, we show you have also submitted 1,504 Disease Claim Forms, 1,504 Rupture Forms, and 498 Explant Forms.

In addition to the 1,762 approved POM claims, there are 66 additional claims pending translation.

We have approved all but 53 of the affirmative statement basis POMs -- after spending one year reviewing them. These 53 claims had certain inconsistencies in the claim files. We did not "take back" the "acceptable" POM determination but we did write to you and request additional information before proceeding with their further review (i.e., Disease review). We need further explanation for these claims -- and don't forget, we need Claim Forms for 274 of the POM approved claims noted above.

EXHIBIT 3

Houston, Texas 77052



866.874.6099

SETTLEMENT FACILITY
DOW CORNING TRUST

August 22, 2011

SENT VIA Electronic mail and Regular mail

yhkimlaw@unitel.co.kr

Yeon-Ho Kim
Yeon-Ho Kim Intl Law Office
Suite 4105, Trade Tower
159 Samsung-dong, Kangnam-ku
Seoul 135-729 Korea

Dear Mr. Kim,

In response to your December 18th e-mail to David Austern, and to bring this matter to closure, the following describes the present position of the SF-DCT with respect to claimants represented by your office.

The explanations you previously provided to us confirm that the Affirmative Statements you provided to establish proof of Dow Corning as the manufacturer of your clients' implants do not meet the standards set by the Dow Corning Plan for proof of Dow Corning implants.

Several years ago following much consideration, the SF-DCT agreed to accept affirmative statements for almost 1400 of your claimants, because of your statements that medical records were routinely destroyed in Korea after a ten year period. As a result, you were notified that certain affirmative statements submitted as proof of manufacturer were acceptable. However, we are now aware that Korean physicians signed affirmative statements prepared by you without any basis for concluding that Dow Corning products were, in fact, used for those patients' implants.

While you have provided explanations as to how you determined your clients had Dow Corning implants, your explanations are, in our judgment, unreliable. For instance, you have provided "claimant recollection" to establish the existence of a Dow Corning implant, but such recollections do not meet the Dow Corning Plan criteria for proof of manufacture. More troubling still is your explanation for the destruction of Korean medical records – an explanation that appears to be false – based on your own admission.

We can no longer accept your statements that all Korean medical records were destroyed after a ten year period.

Note also that for claimants who have yet to file a claim form, no Affirmative Statements will be accepted as proof of manufacture. Of the 1742 claimants who filed claim forms, any claimant previously paid based solely on an Affirmative Statement is not eligible for further benefits, including Premium Payments. A list of those claimants will be sent by the Quality Management Department shortly. Claims where, a determination has/will be made that documents have been altered will be removed from processing.


Claimants in Class 7, who were implanted outside the date range, do not meet the minimum standards for an eligible Class 7 claim and are therefore not eligible for a review.

As an alternative, for those claimants on the attached list the Plan allows for a Limited Proof of Manufacturer Expedited Payment Option. Some claimants may be eligible to participate in the Class 6.2.3 Payment Option which provides for a \$600.00 payment for limited proof of manufacture.

Any such settling claimants are required to submit the 6.2.3 Payment Option Form containing a signed statement attesting to their use of a Dow Corning Breast Implant.

In fairness to you and your clients, please be informed that we intend to consult either with Korean attorneys or with Korean government officials concerning the miss-statements you have made to the SF-DCT, as well as your submission of certain medical records which, as you know, we now have proof that the records were altered.

Sincerely,



Ann M. Phillips
Claims Administrator
SF-DCT

Attachments

SID	Claimant	Class
0700028	SURK-RANG PARK	6.2
0735315	PAN JA PARK	6.2
1035531	MYUNG-HEE BYUN	6.2
1035532	YOUNG-JOO CHOI	6.2
1035535	JEONG-AE LEE	6.2
1035536	KWI-SOOK YOON	6.2
1035543	HAE-JA CHAE	6.2
1035544	HEA-SUN KWON	6.2
1035545	JANG-OK LEE	6.2
1035548	JUNG-HEE BANG	6.2
1035550	WON-JA PARK	6.2
1035553	KUM SUNWOO	6.2
1035556	MYEONG-SOOK YANG	6.2
1035568	EUN-YOUNG LEE	6.2
1035570	JUNG-SUN SUH	6.2
1035572	EUN-SUK LEE	6.2
1035573	INN-HONG KIM	6.2
1035575	JIN-HEE PARK	6.2
1035581	HEE-YOUNG LEE	6.2
1035583	KWANG-IL LEE	6.2
1035584	CHONG-SOOK PARK	6.2
1035589	EUN-HEE KIM	6.2
1035590	POK-KYONG LEE	6.2
1035591	YOUNG-JA JANG	6.2
1035592	MI-AE CHANG	6.2
1035594	JIN-HANG LEE	6.2
1035595	HYOUNG-SUK YU	6.2
1035599	JONG-AE SUH	6.2
1035600	KYUNG-JA SHIN	6.2
1035603	BOUNG-YEAN LEE	6.2
1035610	HAK-YEON KIM	6.2
1035613	MYUNG-SOOK KUG	6.2
1035614	YEA-SUEN LEE	6.2
1035616	YI-SOOK JUNG	6.2
1035619	HEY-WON CHUN	6.2
1035627	YOUN-BOK LEE	6.2
1035635	SUK-SUN CHUNG	6.2
1035636	YOUNG-OK PARK	6.2
1035640	MYUNG-SOOK SUH	6.2
1035641	CHUN-JA SIM	6.2
1035642	MIN-JA SIM	6.2
1035643	KU-SAM JUNG	6.2
1035645	SUN-EY KIM	6.2
1035646	SOON-LEE SU	6.2
1035647	SUN-HEE SUL	6.2
1035648	KYOUNG-SOON PARK	6.2
1035649	MYEON-HEE DO	6.2
1035665	JUNG-SOON LEE	6.2
1035668	YANG-JA LEE	6.2
1035671	HYE-SOOK KANG	6.2
1035672	JANG-AE CHAE	6.2

SID	Claimant	Class
1035675	TAE-YON KIM	6.2
1035679	HYUCK-SOON KWON	6.2
1035684	SOOK-KUNG SUL	6.2
1035686	KI-JOO.KWAK	6.2
1035687	SOON-OK CHOI	6.2
1035688	HAE-KYUNG CHO	6.2
1035689	SUN-OK PARK	6.2
1035699	KWI-OCK LEE	6.2
1035703	KI-NAM CHO	6.2
1035704	GAE-SUNG KIM	6.2
1035705	KYOUNG-HE CHOI	6.2
1035709	JE-SOON LEE	6.2
1035712	KYUNG-JA PARK	6.2
1035715	GYEONG-SOOK YOON	6.2
1035716	BOK-RYE LEE	6.2
1035724	SUN-JUNG KIM	6.2
1035726	HEY-JIN YOON	6.2
1035727	YOUNG-JA LEE	6.2
1035730	SOON-AE LEE	6.2
1035733	HAN-YOUNG SHIN	6.2
1035734	SUNG-SOOK PYEON	6.2
1035735	HAE-SOON KIM	6.2
1035736	JUNG-HEE KIM	6.2
1035741	KYUNG-JA LEE	6.2
1035746	YOUNG-MOON KIM	6.2
1035750	YONG-SOOK JEON	6.2
1035753	KYUNG-MI KIM	6.2
1035757	YOUN-HEE LEE	6.2
1035765	MAL-YUN YOON	6.2
1035766	BOK-HEE JUNG	6.2
1035769	KYUNG-IM KIM	6.2
1035772	SOON-DUK SONG	6.2
1035774	KUM-SHIM KIM	6.2
1035775	JONG-SHIM KIM	6.2
1035779	BOK-HOO KANG	6.2
1035782	YOUNG-AE SHIN	6.2
1035789	HAE-SOON JUNG	6.2
1035791	JEONG-IM YOON	6.2
1035792	JUNG-JA KIM	6.2
1035794	HAE-KYUNG KIM	6.2
1035798	JUNG-JOO BYUN	6.2
1035800	WON-KYUNG SUNG	6.2
1035802	YOUNG-JU YOUN	6.2
1035805	MEE-HYANG PARK	6.2
1035806	KYUNG-HEE PARK	6.2
1035807	JUNG-HEE LEE	6.2
1035808	SOON-KUM CHUN	6.2
1035815	SAN-RE I	6.2
1035818	JAI-WHA KIM	6.2
1035836	HYO-JA KIM	6.2
1035844	SO-HEE LEE	6.2

SID	Claimant	Class
1035851	YOUNG-JA LEE	6.2
1035852	DONG-HEE PARK	6.2
1035862	IN-SUK NO	6.2
1035866	WHA-ZA SON	6.2
1035868	EUN-SOON LEE	6.2
1035870	OK-JA JEON	6.2
1035871	YOUNG-SOOK LEE	6.2
1035873	SOON-JA KWYUN	6.2
1035875	KYUNG-RAN KANG	6.2
1035878	YUN-MI IM	6.2
1035882	HEUN-SEUN KIM	6.2
1035883	SON-TAI SEO	6.2
1035884	HAN-OK KIM	6.2
1035886	SOON-JA LEE	6.2
1035887	CHOON-SOO KIM	6.2
1035888	GYI-JA CHUNG	6.2
1035892	HANG-JA KIM	6.2
1035902	MI-SUK PARK	6.2
1035903	SOOK-HEE SEO	6.2
1035910	IN-SOOK KIM	6.2
1035914	SO-GYEM YOON	6.2
1035916	OYN-HE HWANG	6.2
1035936	SANG-SIN SON	6.2
1035939	YOUNG-HEE YOU	6.2
1035940	JE-SOOK LEE	6.2
1035943	YOUNG-ZA WI	6.2
1035944	SOON-OK CHO	6.2
1035950	KUM-OK KWON	6.2
1035951	MI-KYUNG LEE	6.2
1035958	YUN-JA KIM	6.2
1035964	YOUNG-AE LEE	6.2
1035966	YONG-KYU BAE	6.2
1035972	MI-RIM HAN	6.2
1035975	KWUI-DONG CHOI	6.2
1035976	AH-JA KIM	6.2
1035977	SUN-YOUNG YOON	6.2
1035978	HAE-SON LEE	6.2
1035987	HWA-SOON PARK	6.2
1035990	SOOK-HEE HER	6.2
1035992	HYE-JA KIM	6.2
1035997	YOUNG-JA RHO	6.2
1035998	CHUN-MAE PARK	6.2
1035999	MIN-JA SONG	6.2
1036007	JIN-SUK KIM	6.2
1036008	YONG-HEE KWON	6.2
1036013	YOUNG-MIE LEE	6.2
1036015	CHANG-SOOK KIM	6.2
1036016	MI-YEON KIM	6.2
1036020	YEONG-HEUI KIM	6.2
1036033	SUN-KYUNG KIM	6.2
1036038	KYUNG-HEE KIM	6.2

SID	Claimant	Class
1036039	SONG-HEE CHUNG	6.2
1036051	NO-HYANG PARK	6.2
1036058	HYUN-SOOK CHOI	6.2
1036059	MYOUNG-JA YANG	6.2
1036062	KYOUNG-JA PARK	6.2
1036069	SOOK-JA JUNG	6.2
1036073	MYOUNG-SOOK KIM	6.2
1036077	YOUNG-SOOK JO	6.2
1036082	JAM-YER CHOI	6.2
1036086	MYUNG-SOOK JEON	6.2
1036155	MYUNG-OK KIM	6.2
1036157	SEO-KOUNG PARK	6.2
1036158	SANG-HEE CHUN	6.2
1036170	YOUNG-SOOK CHO	6.2
1036176	SANG-IM KANG	6.2
1036178	EUN-SIL BAE	6.2
1036185	DONG-SOON SONG	6.2
1036212	MI-EUN LEE	6.2
1036215	YOUNG-SOOK KWON	6.2
1036217	MI-SUN CHOI	6.2
1036223	YOUNG-SOO LEE	6.2
1036224	GUM-NAN PARK	6.2
1036226	SUN-KYUNG KIM	6.2
1036232	SUN-HOWA KANG	6.2
1036239	WHA-SHIN LEE	6.2
1036240	HYUN-HEE CHO	6.2
1036243	YEUN-KEE LEE	6.2
1036246	KOUNG-SUK KANG	6.2
1036250	HI-SEON KWON	6.2
1036252	YOUNG-SUK JANG	6.2
1036254	SUN-AI KIM	6.2
1036263	SUK CHOI	6.2
1036265	MI-HAE PARK	6.2
1036272	YOUNG-LAE KANG	6.2
1036273	SOOK-HYUN BAEK	6.2
1036277	TER-LEE LEE	6.2
1036283	MI-RAN JUNG	6.2
1036284	MI-ZA SOE	6.2
1036288	SO-JA PARK	6.2
1036290	HYUN-DUK KIM	6.2
1036293	MI-RYUNG LEE	6.2
1036294	OK-SOON KOH	6.2
1036296	JONG-SEOP SEO	6.2
1036297	JEONG-RAN CHI	6.2
1036301	JUNG SHIN	6.2
1036304	KI-JA KIM	6.2
1036308	YOUNG-SOOL SONG	6.2
1036309	JUNG-HI SHIN	6.2
1036314	JEA-SUG GO	6.2
1036315	MOUNG-JA KIM	6.2
1036324	KYU-HEE KU	6.2

SID	Claimant	Class
1036581	KUM-SOON CHO	6.2
1036582	YANG-JA KANG	6.2
1036584	SOON-LEE HONG	6.2
1036586	KUI-JA PARK	6.2
1036587	SU-NAM HONG	6.2
1036588	HYO-SUN KIM	6.2
1036591	IN-HO SIN	6.2
1036594	SOOK-JA KU	6.2
1036598	SOOK-GEUN SOE	6.2
1036600	KEONG-SUK CHANG	6.2
1036602	YANG-EH KANG	6.2
1036603	KYOUNG-SOON KIM	6.2
1036605	HAE-OK CHO	6.2
1036607	YUNG-SIN YU	6.2
1036614	OK-HEE LEE	6.2
1036615	EUN-KYUNG KIM	6.2
1036619	YOUNG-SUK LEE	6.2
1036624	DONG-CHUN KIM	6.2
1036625	JUNG-MI PARK	6.2
1036627	HEE-HYON JOUNG	6.2
1036633	SUNG-JOO SONG	6.2
1036643	WE-KYUN YOON	6.2
1036650	MUN-EUN PARK	6.2
1036653	SOO-HEE LIM	6.2
1036659	MI-OK JANG	6.2
1036662	JUNG-SOO KIM	6.2
1036663	OK-SOON CHUNG	6.2
1036664	HAE-SOOK KWAN	6.2
1036666	ME-AE JUNG	6.2
1036667	SOON-AE KANG	6.2
1036669	HYUN-SOON KIM	6.2
1036672	OH-SOON JUNG	6.2
1036676	YOUNG-JA KIM	6.2
1036678	OK-SOON LEE	6.2
1036679	EAN-JUNG KIM	6.2
1036686	MYOUNG-AE YOU	6.2
1036687	MYEONG-SOON MIN	6.2
1036689	HEA-JA SON	6.2
1036690	JUNG-SOON KIM	6.2
1036698	HOY-SOOK KIM	6.2
1036699	HANG-RAN JANG	6.2
1036702	HYE-SOOK MOON	6.2
1036704	HYUN-BOK SHIN	6.2
1036706	MI-SOON PARK	6.2
1036708	JOUNG-ONE MOON	6.2
1036709	YOUNG-SOON CHUNG	6.2
1036713	HWA-SOON PARK	6.2
1036716	SANG-OCK LEE	6.2
1036717	KYUNG-SOON KIM	6.2
1036718	SUNG-SOOK CHO	6.2
1036721	DUCK-SOOL LEE	6.2

SID	Claimant	Class
1036723	KYUNG-LAN KIM	6.2
1036728	SUN-HEE YOUN	6.2
1036729	YOUNG-JU BAG	6.2
1036735	KYEONG-HEE MUN	6.2
1036742	CHUN-JA LEE	6.2
1036771	SOO-KYOUNG KIM	6.2
1036776	JUNG-REA HER	6.2
1036779	HANG-JA KO	6.2
1036836	MI-SUK LEE	6.2
1036838	JUNG-SUN WOO	6.2
1036845	YONG-JA PARK	6.2
1036846	JEONG-JA SON	6.2
1036848	NOCK-JOO LEE	6.2
1036853	CHUNG-CHI KIM	6.2
1036858	HYO-SUK YU	6.2
1036859	HEA-SOON KIM	6.2
1036860	JUM-IN PARK	6.2
1036863	BYUNG-SOOK KIM	6.2
1036864	YANG-SOOK LEE	6.2
1036867	MYUNG-SOOK WOO	6.2
1036868	KWANG-SOO KIM	6.2
1036870	MAL-RYEO YOO	6.2
1036871	YOUNG-JIN SONG	6.2
1036888	HYUN-SOOK LEE	6.2
1036892	OG-WHA O	6.2
1036894	YOUNG-SOON CHUNG	6.2
1036899	CHUN-JA NA	6.2
1036901	YOUNG-HEE EUN	6.2
1036902	CHANG-HWA JOUNG	6.2
1036905	SEON-MEE PARK	6.2
1036907	IN-JA KIM	6.2
1036908	MI-NONG LEE	6.2
1036911	IN-JU CHU	6.2
1036916	I-EUNG PARK	6.2
1036918	SUNG-NIM KIM	6.2
1036919	HYUN-LIM LIM	6.2
1036927	JUNG-SOON CHOI	6.2
1036929	IN-SUK KANG	6.2
1036934	AE-KYOUNG LEE	6.2
1036935	BYUNG-SOON KANG	6.2
1036937	JONG-IM PARK	6.2
1036938	YOUNG-AE MOON	6.2
1036969	YOUNG-SOON GO	6.2
1036974	CHUNG-HA YANG	6.2
1036976	EUN-JOO KIM	6.2
1036980	JEONG-JA HUE	6.2
1036981	YEONG-JA PARK	6.2
1036982	JUNG-JA OH	6.2
1036984	CHEONG-JA SON	6.2
1036986	HAE-SOON SU	6.2
1036993	HEE-LIM RYU	6.2

SID	Claimant	Class
1036997	HWA-JA LEE	6.2
1037002	JAE-YOUN JUNG	6.2
1037004	SOON-IM YUN	6.2
1037010	SOO-BONG YOANG	6.2
1037011	SAM-CHUN JANG	6.2
1037016	SOOK-HYUN MO	6.2
1037020	YOUNG-JA LEE	6.2
1037022	KOUNG-SOOK LEE	6.2
1037028	JOUNG-HWAN LIM	6.2
1037034	SUG-JAL LEE	6.2
1037035	SOON-OUK LEE	6.2
1037036	SOON-YUN BAE	6.2
1037042	DONG-SIN SHIN	6.2
1037046	HYD-SOOK JEOUNG	6.2
1037049	KAB-SOON KIM	6.2
1037051	EUN-SIL LEE	6.2
1037053	YOUNG-SOON SUNG	6.2
1037055	JI-HAYNG SON	6.2
1037058	JOO-HYUNG BANG	6.2
1037059	HEA-SUN YOUN	6.2
1037065	YOUNG-DUK BEUN	6.2
1037069	HYANG-MI KIM	6.2
1037073	SOE-BOON KWON	6.2
1037074	EUN-YOUNG PARK	6.2
1037075	CHUL-SOON SONG	6.2
1037078	ME-HE KIM	6.2
1037079	GOUNG-SOOK SUNG	6.2
1037085	JIN-SOOK LEE	6.2
1037087	SOOK-RYE LEE	6.2
1037088	JUM-OK HWANG	6.2
1037089	DONG-HOA YOO	6.2
1037093	SUNG-HEE PARK	6.2
1037094	IN-SOOK CHOI	6.2
1037096	JI-HEA KIM	6.2
1037101	HAE-JUNG CHANG	6.2
1037103	MI-OK SONG	6.2
1037106	CHU-YOUNG CHOI	6.2
1037108	MI-GYEONG KIM	6.2
1037118	HAE-JIN LEE	6.2
1037123	MI-KYUNG LEE	6.2
1037126	KEI-HWA CHUONG	6.2
1038246	JUM-SOON KIM	6.2
1038391	YUN-HI KIM	6.2
1038392	YOUNG-AI YU	6.2
1038394	SO-YEON HAN	6.2
1038395	HYUN-SOOK MA	6.2
1038439	WORL-SUN LEE	6.2
1038440	EUN-MEE LEE	6.2
1038443	JONG-SOOK KO	6.2
1038450	GYUONG-MI LEE	6.2
1038452	SUNG-JA SUNG	6.2

SID	Claimant	Class
1038455	HAE-JUNG YOU	6.2
1038458	SOON-HEE JUNG	6.2
1038463	DO-HEE LEE	6.2
1038464	SAM-WOL YOO	6.2
1038465	MI-OK KIM	6.2
1038467	KYUNG-HWI HWANG	6.2
1038469	SEUNG-EUN LEE	6.2
1038472	JONG-SUK SON	6.2
1038474	YOUN-SHIM LI	6.2
1038478	SOON-JA SOE	6.2
1038481	YUN-RYE LEE	6.2
1038484	GWANG-HEE SONG	6.2
1695533	JUNG-OH SUN	6.2
2746164	KUM-HEE SONG	6.2
2746180	BAK-YOUNG KIM	6.2
6441636	KAN-NAN CHOI	6.2
6441946	SO-JUNG LEEM	6.2
6442122	YE-JA LEE	6.2
6442159	MYUNG-EUI HYUN	6.2
6442206	MI-WHAN HAN	6.2
6442221	JUM-WOO PARK	6.2
6442224	YOUNG-JA SHU	6.2
6442771	YUNG-SOOK YANG	6.2
6442779	MYONG-SUK LEE	6.2
6442788	MYU-SOON LEE	6.2
6442793	ME-SUN LEE	6.2
6458925	EUN-BOUNG LIM	6.2
6459146	KUM-JA KIM	6.2
6459169	SOON-IL LIM	6.2
6459172	MI-JA HER	6.2
6459176	MYONG-SUN LEE	6.2
6459456	YOUNG-SUG YOU	6.2
6459549	SAM-DUK PARK	6.2
6459692	BOCK-SOON KIM	6.2
6459701	JAE-SIM HWYANG	6.2
6459730	YOUNG-JA LIM	6.2
6459778	TAE-SUL LEE	6.2
6459793	YOUNG-SOON YOU	6.2
6459982	JIN-YOUNG JUNG	6.2
6459992	HYANG-OK PARK	6.2
6459997	MYONG-RYE CHAE	6.2
6460135	SOON-OCK LIM	6.2
6460153	JUNG-BOON SEO	6.2
6460275	SOON-CHO LEE	6.2
6460319	SOON-HEE SIM	6.2
6460359	MOON-SUN CHO	6.2
6460389	EUN-HEE AN	6.2
6460434	CHUN-WOUL LEE	6.2
6460444	JEA-SOOK HAN	6.2
6460448	JI-HEUN SONG	6.2
6460465	MYUNG-NIM PARK	6.2

SID	Claimant	Class
6460477	JOUNG-MOU LEE	6.2
6460482	SOON-JA PARK	6.2
6460489	HYANG-HEE JU	6.2
6460499	NAM-ZOO SON	6.2
6460502	SUNG-JI KIM	6.2
6460566	JI-YOUN NAM	6.2
6460602	HYE-JA KIM	6.2
6460615	SOON-YOUNG SONG	6.2
6460622	YUN-SEON CHUNG	6.2
6460624	KUM-JA PARK	6.2
6460625	JUNG-JA OH	6.2
6460632	EI-NAM LIM	6.2
6460634	SAE-HEE MOON	6.2
6460637	MI-HEE YUM	6.2
6460638	YOUNG-U CHOUNG	6.2
6460674	HI-A KWON	6.2
6460694	OCK-SUN YOU	6.2
6460742	GYUN-RAE BAE	6.2
6460798	YOUNG-SOO AN	6.2
6460807	BONG-PIL SUE	6.2
6460840	DO-HWA CHANG	6.2
6460926	JOUNG-SOOK LEE	6.2
6460971	YONG-SOOK JUNG	6.2
6461069	YOUNG-GAE KIM	6.2
6461201	YOUNG-SOOK KWON	6.2
6461267	KYONG-YOUNG YU	6.2
6461278	JAE-WANG KIM	6.2
6461317	BOK-HYANG YOON	6.2
6461318	HOA-SOOK YOON	6.2
6461336	SUN-YOUNG PARK	6.2
6461367	DEOG-YEOB KIM	6.2
6461374	JEOUM-HEE LEE	6.2
6461432	HYUN-JA LEE	6.2
6461523	BOK-RYE JOUNG	6.2
6461538	JUNG-AE SUH	6.2
6461540	YOUNG-SOO KIM	6.2
6461548	HAE-JA PARK	6.2
6461549	JUNG-NAM JUNG	6.2
6461557	KYUNG-HWA YANG	6.2
6461579	HEON-SOON LEE	6.2
6461650	JUNG-SOON LEE	6.2
6461680	SOOK-HYUN KIM	6.2
6461799	YUN-SOOK YOUN	6.2
6461836	JA-YON LEE	6.2
6461875	MI-SOOK KIM	6.2
6461934	MEE-SOOK SONG	6.2
6461967	PIL-ZA KIM	6.2
6462039	DONG-SOON LEE	6.2
6462214	HYE-JA LEE	6.2
6462260	YEON-SUK LEE	6.2
6462271	JUNG-AE KANG	6.2

SID	Claimant	Class
6462287	SOON-JA PARK	6.2
6462312	MIN-JUNG BANG	6.2
6462313	GUNG-SUG YOON	6.2
6462371	HWAJA KIM	6.2
6462427	IN-SOOK LEE	6.2
6462435	KYUNG-JA HAN	6.2
6463393	MOOK-SEOK CHOI	6.2
6463426	SANG-SOON KIM	6.2
6463662	YUN-JUNG CHOI	6.2
6463676	YOEUNG-HYE NO	6.2
6463891	AE-KYOUNG WON	6.2
6463905	SO-YOUNG PARK	6.2
6463939	DUCK-SOO LEE	6.2
6464059	WON-HEA OH	6.2
6473442	HONG-JA CHOI	6.2
6473444	HEE-KYOUNG JUNG	6.2
6473505	JUNG-HEE GO	6.2
6473582	KIL-SOON KIM	6.2
6473611	HEA-YUNG CHO	6.2
6473706	KYE-SOON KIM	6.2
6473709	JONG-SOOK CHOI	6.2
6473763	HA-SOOK SONG	6.2
6473818	ME-JOUNG PARK	6.2
6473833	SAM-REI KO	6.2
6473844	YEOUN-HEE KIM	6.2
6473853	YOUNG-SOOK LEE	6.2
6473926	YONG-JA MO	6.2
6473971	CHAN-SUN PARK	6.2
6473988	HYE-YOUNG JUNG	6.2
6474003	SOON-YOUNG PARK	6.2
6474075	HYEON-SUG JEON	6.2
6474114	MYUNG-SOON KIM	6.2
6474116	HANG-SUK YOUN	6.2
6474234	WOUJ-SOON HAN	6.2
6474235	EUN-JA HWANG	6.2
6474250	BOK-SOON KIM	6.2
6474256	KYUNG-HEE JUN	6.2
6474262	MYONG-JOO KIM	6.2
6474340	HANG-NAM KIM	6.2
6474351	HEE-JIN HONG	6.2
6474379	IN-SOO CHOI	6.2
6474381	SUN-JA KIM	6.2
6474500	KYONG-OK AN	6.2
6474535	JUNG-HYUN IM	6.2
6474551	HWANG-JA LEE	6.2
6474567	CHANG-HEE LEE	6.2
6474575	EUN-YOUNG KIM	6.2
6474590	SOOK-HYUN SUK	6.2
6474591	KWANG-SOON KIM	6.2
6474658	JIN-SOON CHOI	6.2
6474668	JUNG-RAN YANG	6.2

SID	Claimant	Class
6474700	YOUNG-SOON PARK	6.2
6474739	CHONG-SOON KIM	6.2
6474761	SEUNG-AE LEE	6.2
6474764	JONG-KWI LEE	6.2
6474766	NA-YOUNG KIM	6.2
6474795	HYANG-NAN KYEON	6.2
6474810	OK-LE KO	6.2
6474811	OCK-JU WHANG	6.2
6474918	SOOK-HEE SHIN	6.2
6474923	SOON-KYO AHN	6.2
6474948	DONG-HE CHOI	6.2
6474962	JUNG-SOON KWON	6.2
6474993	OCK-HEE PARK	6.2
6475043	MIN-SOON LEE	6.2
6475056	YOUNG-HEE KIM	6.2
6475057	YOUNG-SOON YOUN	6.2
6475059	BYUNG-OK LEE	6.2
6475074	MI-SUN KIM	6.2
6475119	HYEN-HEE PARK	6.2
6477856	DEOK-HEE JEONG	6.2
6477921	WON-RAN YOUN	6.2
6478281	HEE-JAE MIN	6.2
6478295	KEUN-SOOK HAM	6.2
6478297	CHOON-SIM KIM	6.2
6478304	HYE-WON LEE	6.2
6478312	BOCK-NAM YOO	6.2
6491598	MYUNG-SOON CHOI	6.2
6491599	SA-LA CHUNG	6.2
6491601	YOUNG-HA LEE	6.2
6491602	YUN-JA LEE	6.2
1035533	SOON-NYE KIM	6.2
1035694	MYUNG-NA CHO	6.2
1035702	KYE-EUN KIM	6.2
1036044	YOUNG-SUK PAK	6.2
1036163	BU-YOUNG KIM	6.2
1036335	IN-KYUNG JUN	6.2
1036360	KUM-SUK RU	6.2
1036437	JUNG-HEA KIM	6.2
1036597	YOUNG-SOOK OH	6.2
6175059	GWI-BOON HA	6.2
6459979	HAE-JA LEE	6.2
6460463	KI-RYON LEE	6.2
6460822	JONG-YOUP KIM	6.2
6462145	JAE-JUNG SHIM	6.2
6474136	CHUN-JA PARK	6.2

EXHIBIT 4

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

DOW CORNING CORPORATION,
REORGANIZED DEBTOR

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CASE NO. 00-CV-00005-DPH
(Settlement Facility Matters)

Hon. Denise Page Hood

**DECLARATION OF ANN M. PHILLIPS REGARDING
SUGGESTION OF MOOTNESS OF KOREAN MOTIONS**

I, Ann M. Phillips, declare as follows based upon my recollection and review of certain documents:

1. I am the Claims Administrator for the Settlement Facility-Dow Corning Trust ("SF-DCT").
2. As Claims Administrator, I have knowledge of past and present Claims Administrator decisions, including procedures implemented to process the Settling Breast Implant Claims in accordance with the terms of the Settlement Facility and Fund Distribution Agreement ("SFA") and the Claims Resolution Procedures ("Annex A to the SFA").

"Motion for Re-Categorization"

3. In May 2014, Yeon Ho Kim submitted a request to the Claims Administrator, as a member of the Finance Committee, to re-categorize Korea as a Category 2 country. *See* Declaration of Ann M. Phillips, Appendix B (stating in e-mail to Mr. Kim that his request for re-categorization has been reviewed by the Finance Committee).
4. In December 2014, I informed the Court that, pursuant to Section 6.05(h)(ii) of Annex A to the SFA, the Finance Committee granted the request to re-

categorize Korea as a Category 2 country. *See* Declaration of Ann M. Phillips, Appendices A, B.

“Motion for Reversal”

5. I have reviewed the letter filed by Mr. Kim on March 21, 2014 (“Letter”) and the appeal filed by Mr. Kim, styled as a *Motion for Reversal of Decision of SFDCT regarding Korean Claimants* (“Motion for Reversal”).
6. In the Motion for Reversal Mr. Kim requests the Court lift the various safeguards the Claims Administrator put in place to assure an acceptable level of reliability and quality control of claims filed by Mr. Kim. These safeguards are outlined in an August 22, 2011 letter to Mr. Kim, which is attached as Exhibit J to the Motion for Reversal.
7. The Claims Administrator instituted these safeguards and the “hold” on Mr. Kim’s claims consistent with its authority and obligations under the Amended Joint Plan of Reorganization (“Plan”).
8. After putting the claims on hold, the Finance Committee and the SF-DCT engaged in an in-depth review and investigation of a sample of the Korean claims.
9. Based on that review and investigation, the SF-DCT and the Finance Committee determined to lift the “hold” previously placed by the Quality Management Department on Mr. Kim’s claims that rely on Affirmative Statements as Proof of Manufacturer and that – consistent with the obligations of the Plan – the SF-DCT could review claims individually to determine whether they satisfy the Claims Resolution Procedures.
10. The SF-DCT continues to process claims and examine the validity of the claims filed by Mr. Kim on an individual claim basis.
11. On January 17, 2014, I informed Mr. Kim through e-mail that the SF-DCT is “withdraw[ing] the exclusion previously imposed on [his] claims” and that “[the SF-DCT] will review and process [his] claims consistent with the Plan of Reorganization.” *See* Declaration of Ann M. Phillips, Appendix C.
12. Mr. Kim responded to my January 17, 2014 e-mail by stating that all “of the Korean Claimants will appreciate [the SF-DCT’s] decision on withdrawal

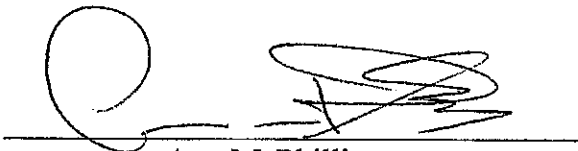
from the exclusion of processing.” See Declaration of Ann M. Phillips, Appendix C.

13. The SF-DCT continues to “hold” claims submitted by Mr. Kim only if the claim’s specific, individual circumstances warrant a fraud “hold.”

“Motion to Hire QMD”

14. Mr. Kim has filed numerous claims with the SF-DCT on behalf of clients that request a disease award (“Disease Claims”).
15. As of December 31, 2014, Mr. Kim has successfully obtained awards for approximately 860 Disease Claims.
16. Every award Mr. Kim obtained for a Disease Claim has been based on a Qualified Medical Doctor (“QMD”) statement from a physician in Korea.
17. The SF-DCT independently confirmed that the physicians providing the QMD statements for Mr. Kim’s Disease Claims met the requirements of a QMD as specified in Schedule II of Annex A to the SFA.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 23 day of April 2015.


Ann M. Phillips