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EXHIBIT

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exhibitsticker.com

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February 14, 2019

Via Certified U.S. Mail - 9314 8699 0430 0055 7733 80

Mr. Peter E. Tangredi
Tangredi Lebson, LLP
202 Mamaroneck Avenue, Suite 500
White Plains, NY 10601

	Claimant	SID	Payment Type	Payment Amount	Payment Date
1	[REDACTED]	0935359	Rupture Partial Premium Payment	\$2,500	9/16/2014

FINAL REQUEST FOR RETURN OF FUNDS OR PROOF OF DISTRIBUTION

Dear Mr. Tangredi:

I represent the Finance Committee of the Settlement Facility-Dow Corning Trust (“SF-DCT”). Correspondence mailed to the Claimant by the SF-DCT regarding the breast implant claim payment referenced above was returned undeliverable, with no available forwarding address. At the time of the claim payment, you were Claimant’s attorney of record. The SF-DCT has sent you correspondence requesting an updated address for Claimant and evidence that the claim payment was distributed to the Claimant or her legally authorized estate representative. The SF-DCT has not received any of the requested information.

The SF-DCT has confirmed that the claim payment check mailed to you for distribution to the Claimant has been cashed. Therefore, it is reasonable to assume that the current address information and proof of distribution of the funds to the Claimant are available to you. However, you have failed to provide this information in response to requests from the SF-DCT. Accordingly, in the absence of confirmation that the claim payment was distributed to [REDACTED] (or a legally authorized estate representative), the SF-DCT has sent you written requests for return of the funds. You have failed to return the payment referenced above.

As previously stated in correspondence to the firm, 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 the Claimant to distribute the claim payment, **you are required to return the funds intended for the Claimant.**

Mr. Peter E. Tangredi
Tangredi Lebson, LLP
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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 an updated address of the Claimant and proof of distribution to the estate representative are not received or the claim payment is not returned in full within ten days (10) 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 you/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. The Finance Committee of the SF-DCT has reserved time for show cause hearings, should the Court grant our motion, before Chief Judge Denise Page Hood on March 21, 2019 at 9:30 a.m. in Detroit, Michigan.

The claim referenced above is on HOLD and any applicable future claim payments, including Premium Payments, will not be made until the funds described herein have been returned or proof of distribution to the Claimant has been provided with updated address information.

Any questions regarding this matter may be directed to me at (713) 221-2300 or kmaloney@skv.com.

Sincerely,



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

KGM:ma