

Case Nos.: 21-2665, 22-1750, 22-1753, 22-1771, 22-2167

United States Court of Appeals for the Sixth Circuit

In re: SETTLEMENT FACILITY DOW CORNING TRUST

Debtor

KOREAN CLAIMANTS

Interested Parties - Appellant

v.

DOW SILICONES CORPORATION; DEBTOR'S REPRESENTATIVES;

CLAIMANTS' ADVISORY COMMITTEE; FINANCE COMMITTEE

Interested Parties - Appellees

MOTION FOR EXPEDITED HEARING

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I. GROUNDS FOR RELIEF

With respect to Case Nos.: *21-2665, 22-1750, 22-1753, 22-1771, 22-2167*, the Appellees filed the Counsel Unavailability Forms for oral argument respectively.

The Cases of Nos.: *21-2665, 22-1750, 22-1753, 22-1771, 22-2167* are appeals by the Korean Claimants (“the Appellant”) from the U.S. District Court of Eastern District of Michigan. The issues of the Cases were inter-related regarding the unlawful requirement of the Claimants’ address update/confirmation, arbitrarily imposed from the SF-DCT supervised by the District Court, and the Premium Payments denied by the SF-DCT on the basis of the lack of the Claimants’ address confirmation, and the 405 Korean Claimants’ late-filings of the Claims with the SF-DCT beyond their control, and the District Court’s denial of the Motions for Stay pending appeal and reconsideration of the Orders.

The Appellees’ Responses to the Cases were consummated so that no further opportunity for their response would be necessary except the Case No.: *22-2167* where their filing is due on February 8, 2023, whose issue is the repetition of the issue of the Case No.: *22-1753* regarding the Closing Order 5 by the District Court.

Under Federal Rules of Appellate Procedure 27(a)(1), an application for a

relief should be made by motion.

II. REQUESTED RELIEF

For the forgoing reason, the Appellant, who has been denied a payment over four years (2018-2023) with no interest incurred under the Plan and desperately needs a quick resolution on payments from the SF-DCT, respectfully request this honorable Court to hold a hearing for the final resolution **as soon as possible**.

Date: January 15, 2023

Respectfully submitted,



(signed by) Yeon-Ho Kim
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CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2023, I have electronically filed the above document with the Clerk of Court by ECF system that will notify to all relevant parties in the record.

A handwritten signature in black ink, appearing to read 'Yeon-Ho Kim', with a long horizontal flourish extending to the right.

Date: January 15, 2023

Signed by Yeon-Ho Kim