

The Settlement Facility also established bank accounts to enable distribution of allowed payments.

4. During the course of implementation of the Settlement Facility and its over 20 years of operations, certain data, information, and materials were provided to many of the persons and entities identified above so that they could fulfill their authorized functions. The distribution of data, information, and materials was also made to other personnel working with the above identified persons and entities.
5. The data, information, and materials maintained and provided by the Settlement Facility includes highly confidential and protected personal information of claimants including medical information and financial information as well as information about personnel, financial transactions, and reports prepared for internal operations.
6. The Settlement Facility is expected to terminate by the end of 2024.
7. It is appropriate and necessary at this time to establish the process to require that all vendors, consultants, employees, and various appointees, return or certify the appropriate destruction of any and all data, information, and materials provided to them by the Settlement Facility.

8. Those persons, employees, entities, consultants, and appointees that have *completed* their work under the Plan or for the Settlement Facility operations (as determined by the Finance Committee) shall be obligated to return to the Claims Administrator or certify the appropriate destruction of any and all Settlement Facility data, information, and materials by September 3, 2024. For purposes of this requirement, data, information, and materials shall include but not be limited to any and all reports, records, analyses, data provided by the Settlement Facility, databases, data compilations, summaries, including drafts, memoranda, internal working papers, communications of any type whether in paper or electronic format. Data, information, and materials shall not include any document, report, or information that is publicly available.
9. The Finance Committee shall notify all persons and entities affected by this Stipulation by express mail service, email and telephone communication. All affected persons and entities shall be provided with a copy of this Stipulation and Order and shall be required to acknowledge receipt. Any such persons or entities who fail to comply with the terms of this Stipulation and Order shall be subject to further appropriate action by the Court.

10. To the extent that any entity – such as a financial institution – is required by law or regulation to maintain certain files for a period of years that will extend beyond the closure of the Settlement Facility, such institution shall so advise the Finance Committee and shall provide confirmation of its procedures for the destruction of records.
11. All persons and entities that will continue to provide services to the Settlement Facility until the final termination of operations shall be permitted to retain all data, information, and materials necessary for the performance of their duties until their tasks are completed. Such persons and entities are: the remaining staff of the Settlement Facility, the Trustee and Trust personnel, the Paying Agent, a banking institution designated by the Finance Committee, the Independent Assessor, and the due diligence consultant – Claro/Stout. When the Finance Committee determines that the tasks of such persons and/or entities is complete, such persons and entities shall either return the data, information, and materials to the Claims Administrator or shall destroy such data, information, and materials using procedures specified by the Finance Committee.
12. The current members of the Court-appointed committees – Debtors’ Representatives and Claimants Advisory Committee – as well as the

current members of the Finance Committee and the Financial Advisor -
shall be authorized to retain all data, information, and materials until
further order of the Court.

So Ordered.

Date: July 24, 2024

S/DENISE PAGE HOOD
Hon. Denise Page Hood
United States District Judge

SO STIPULATED AND AGREED:

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