

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**In re:**

**SETTLEMENT FACILITY DOW  
CORNING TRUST**



**Case No. 00-CV-00005  
(Settlement Facility Matters)**

**Hon. Denise Page Hood**

**RESPONSE OF DOW SILICONES CORPORATION, THE DEBTOR'S  
REPRESENTATIVES, THE CLAIMANTS' ADVISORY COMMITTEE AND  
THE FINANCE COMMITTEE TO MOTION TO STAY THE COURT'S ORDER  
REGARDING MOTIONS FILED BY THE KOREAN CLAIMANTS**

For the reasons set forth in the attached memorandum, Dow Silicones Corporation (“Dow Silicones”)<sup>1</sup>, the Debtor’s Representatives (the “DRs”), the Claimants’ Advisory Committee (the “CAC”), and the Finance Committee (the “FC”) (collectively, “Respondents”) hereby oppose the Motion to Stay the Court’s Order Regarding Motions Filed by the Korean Claimants (ECF No. 1783) (“Motion to Stay”) and respectfully submit that the Motion to Stay should be denied.

Dated: September 9, 2024

Respectfully submitted,

/s/ Karima Maloney

Karima Maloney  
Steptoe LLP  
717 Texas Avenue  
Suite 2800

/s/ Deborah E. Greenspan

Deborah E. Greenspan  
BLANK ROME LLP  
Michigan Bar # P33632  
1825 Eye Street, N.W.

---

<sup>1</sup> Dow Corning Corporation changed its name to Dow Silicones Corporation on February 1, 2018.

Houston, TX 77002  
Telephone: (713) 221-2382  
KMaloney@steptoe.com  
*Counsel for the Finance Committee*

/s/ Ernest H. Hornsby  
Ernest H. Hornsby  
FARMER PRICE LLP  
100 Adris Place  
Dothan, AL 36303  
Telephone: (334) 793-2424  
Ernie@farmerprice.com  
*Claimants' Advisory Committee*

Washington, DC 20006  
Telephone: (202) 420-2200  
Facsimile: (202) 420-2201  
Deborah.Greenspan@blankrome.com  
*Debtor's Representative and Attorney  
for Dow Silicones Corporation*

/s/ Dianna L. Pendleton-Dominguez  
Dianna L. Pendleton-Dominguez  
LAW OFFICE OF  
DIANNA PENDLETON  
401 N. Main Street  
St. Marys, OH 45885  
Telephone: (419) 394-0717  
DPend440@aol.com  
*Claimants' Advisory Committee*