

# EXHIBIT

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

**In re:**

**SETTLEMENT FACILITY DOW  
CORNING TRUST**

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

**Hon. Denise Page Hood**

**DECLARATION OF NANCY M. BLOUNT  
IN SUPPORT OF THE REPLY OF DOW SILICONES CORPORATION, THE  
DEBTOR'S REPRESENTATIVES, AND THE FINANCE COMMITTEE TO THE  
RESPONSE OF THE CLAIMANTS' ADVISORY COMMITTEE TO THE  
MOTION TO TERMINATE FUNDING PURSUANT TO SECTION 2.01(C) OF  
THE FUNDING PAYMENT AGREEMENT AND TO TERMINATE THE  
SETTLEMENT FACILITY PURSUANT TO SECTION 10.03 OF THE  
SETTLEMENT FACILITY AND FUND DISTRIBUTION AGREEMENT**

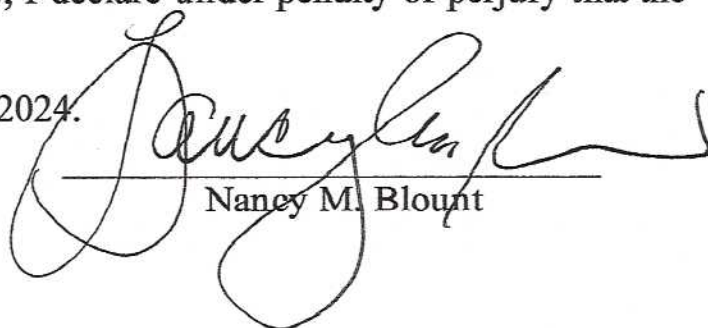
I, Nancy M. Blount, declare as follows based upon my recollection and review of certain data and documents:

1. I am the Special Master for Closing for the Settlement Facility-Dow Corning Trust ("Settlement Facility" or "SF-DCT").
2. As Special Master I am responsible for the oversight and management of the administrative procedures for closing, disposition of files and information; assisting the Parties, Finance Committee ("FC"), and the Court with assuring the identification and completion of all necessary functions; managing the vendors and arranging for orderly termination; managing the computer systems including appropriate use, disposition, maintenance; budgets, coordination of financial relationships and functions; IT and data management; managing the conclusion of employment for the staff as the functions conclude; participating as a member of the Finance Committee and carrying out the functions of the Finance Committee; and any other tasks that the Court may direct.

3. I have reviewed and am familiar with the Motion to Terminate Funding Pursuant to Section 2.01(c) of the Funding Payment Agreement and to Terminate the Settlement Facility Pursuant to Section 10.03 of the Settlement Facility and Fund Distribution Agreement (“Motion to Terminate”) and the Response of the Claimants’ Advisory Committee to the Motion to Terminate Funding Pursuant to Section 2.01(c) of the Funding Payment Agreement and to Terminate the Settlement Facility Pursuant to Section 10.03 of the Settlement Facility and Fund Distribution Agreement (“Response”).
4. The FC, the Debtor’s Representatives (“DRs”), and the Claimants’ Advisory Committee (“CAC”) have been preparing for the termination of the Settlement Facility since 2016 and have reported jointly to the Court that the Settlement Facility operations would terminate no later than the end of 2024.
5. At the status conference held in March 2024, the Court asked the parties, including the CAC, to provide a schedule for filing a motion to terminate and suggested that the Court could be available to hear the motion in December 2024.
6. At the status conference held on June 27, 2024, the CAC advised the Court (in response to the Court’s question) that they would not contest any motion to terminate by the end of 2024.
7. In a meeting held among the FC, the DRs, and the CAC on December 6, 2024, the CAC, for the first time, advised that there was another – undisclosed – ‘issue’ that they had submitted to the Court and that their joinder in the Motion to Terminate would be affected by that issue. The CAC represented that the ‘issue’ involved only the CAC.
8. The CAC did not advise the DRs or the FC that they had prepared the Response and certainly never during the many months during which the parties discussed the termination motion ever suggest that they would not agree to termination at the end of 2024 as had been represented to the Court. The CAC did not inform the DRs or the FC of their Response before it was filed, and did not seek concurrence in their position.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9<sup>th</sup> day of December 2024.

  
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Nancy M. Blount