

**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**

**MOTION TO STRIKE, WITHDRAW, OR OTHERWISE REMOVE  
DOCKETED REPLY TO RESPONSE (ECF NO. 1809)**

Dow Silicones Corporation (“Dow Silicones”), the Debtor’s Representatives (the “DRs”), and the Finance Committee (the “FC”) (collectively, “Movants”) hereby request that the Court remove ECF No. 1809 from the docket.

On December 9, 2024, Movants filed their Reply to the Claimants’ Advisory Committee’s Response to the Motion for 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 (“Reply”). Pursuant to discussions at the December 11, 2024 Hearing before this Court, the parties agreed to meet and confer to discuss necessary redactions to the Reply to protect privacy interests. The parties have worked together as instructed by this Court and the Movants have filed a Motion to Seal which includes a redacted version of the Reply (ECF No. 1815).

ECF No 1809 is in every respect identical to ECF No. 1815 but Movants have redacted certain material that is subject to protected privacy interests such that the public filing of the material is likely to prejudice those interests. Pursuant to the Court's ECF Rules and the Court's practice in the above-captioned matter, and to preserve clarity, Movants respectfully request that ECF No. 1809 be removed or otherwise stricken from the docket.

Dated: December 21, 2024

Respectfully submitted,

/s/ Karima Maloney

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*Debtor's Representative and Attorney  
for Dow Silicones Corporation*

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 21, 2024, I electronically filed the foregoing document with the Clerk of the Court using the ECF System which will send notification of such filing to all registered counsel in this case.

Dated: December 21, 2024

*/s/ Deborah E. Greenspan*

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