

**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**

**MOTION OF DOW SILICONES CORPORATION, THE DEBTOR'S  
REPRESENTATIVES, AND THE FINANCE COMMITTEE FOR EXPANSION  
OF PAGE LIMITS RELATED TO THEIR REPLY 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**

Pursuant to Local Rule 7.1(d)(3)(A), Dow Silicones Corporation<sup>1</sup> (“Dow Silicones”), the Debtor’s Representatives (the “DRs”), and the Finance Committee (the “FC”) (collectively, “Movants”) respectfully request the Court’s approval to file a Reply to the Response of the Claimants’ Advisory Committee 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 (“Response”) in excess of seven (7) pages. The Movants request permission to file a reply of 15 pages in order to

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

thoroughly reply to the Response which incorporates proposals and requests that are outside the scope of the original Motion to Terminate and in this respect is both a new motion and a response. The proposed expansion of pages will allow the Movants to address comprehensively the new proposals in the Response and to provide background information, further reasoning for an order that the funding obligations are terminated pursuant to Section 2.01(c) of the Funding Payment Agreement and authorizing the wind down and future termination of the Settlement Facility Pursuant to Section 10.03 of the Settlement Facility and Fund Distribution Agreement.

Dated: December 9, 2024

Respectfully submitted,

/s/ Karima Maloney

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 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 9, 2024

/s/ Deborah E. Greenspan

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