

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOTHERN DIVISION**

IN RE:	§	CASE NO: 00-CV-00005-DT
	§	(Settlement Facility Matters)
DOW CORNING CORPORATION	§	
	§	
Reorganized Debtor	§	
	§	
	§	Hon.Judge Denise Page Hood

**MOTION FOR EXPEDITED RELIEF ON KOREAN CLAIMANTS' MOTION TO
STAY THE COURT'S ORDER 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
(ECF No.1796)**

The Korean claimants filed Motion to Stay this Court's Order Granting Motion of Dow Corning Corporation, the Debtor's Representatives and the Finance Committee 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 (ECF No.1796), pending appeal in the United States Court of Appeals for the Sixth Circuit (Case No.25-1004), on February 2, 2025. (ECF No.1834)

The Korean claimants filed *Revised* Motion to Stay on February 13, 2025. (ECF No.1836)

The Movants filed Response to the Korean claimants' Motion to Stay on February 26, 2025. (ECF No.1840)

The Korean claimants filed Reply to the Response on March 3, 2025. (ECF No.1844)

Therefore, briefings by the parties of the Motion have been finished.

The Movants are hurriedly closing including the Settlement Facility and will definitely finish all of tasks aimed by the Movants' Motion to Terminate before issuance of the Sixth Circuit's decision on the Korean claimants' appeal from this Court's Order.

If this Court does not issue a decision on the Korean claimants' Motion to Stay in a timely manner, a Motion to Stay itself becomes useless court-proceeding.

For the foregoing reason, The Korean claimants urgently request this Court to issue Expedited Relief on the Korean claimants' Motion to Stay.

Date: March 14, 2024

Respectfully submitted,

(signed) Yeon-Ho Kim
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CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2024, this motion has been electronically filed with the Clerk of Court using ECF system, and the same has been notified to all of the relevant parties of record.

Dated: March 14, 2024

Signed by Yeon-Ho Kim