

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

F I L E D
JUN 30 2005
CLERK'S OFFICE
DETROIT

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

**AGREED ORDER EXTENDING DEADLINES RE
SUBSTANTIAL CONTRIBUTION APPLICATIONS**

On October 6, 2004, the Court entered the *Agreed Order Establishing Procedures and Deadline Of January 3, 2005 For The Submission Of Certain Tort-Related Substantial Contribution Claims Pursuant To Section 9.02 Of Annex A To The Settlement Facility And Fund Distribution Agreement*. In response to the *Agreed Order*, seven (7) motions for substantial contribution pursuant to Section 9.02 of Annex A were filed with the Court by the following persons / entities:

1. Ernest H. Hornsby and Farmer, Price, Hornsby & Weatherford, LLP
2. Kilpatrick Stockton LLP
3. Lief, Cabraser, Heimann & Bernstein, LLP
4. Plan Subcommittee (Tommy Jacks, Ralph Knowles and Sybil Goldrich)
5. TMJ Steering Committee on behalf of Keating, Muething and Klekamp, P.L.L.
6. Waite, Schneider, Bayless & Chesley, L.P.A.
7. Charles M. Wolfson, Esq.

(collectively, "the Applications or Applicants"). On June 16, 2005, Plan Subcommittee member Sybil Goldrich filed a Motion To Supplement and Amend The Application of the Plan Subcommittee of the Tort Claimants' Committee For A Substantial Contribution Payment ("the Supplemental Motion").

R E C E I V E D
JUN 28 2005
CLERK'S OFFICE
U.S. DISTRICT COURT

Comments and objections to the Applications were timely filed by 1) Dow Corning and the Debtor's Representatives and 2) the Claimants' Advisory Committee (collectively "the parties") on June 20, 2005 pursuant to the deadlines set forth in the *Agreed Order Extending The Deadline For Comments and Objections To The Motions For Substantial Contribution Claims By Sixty (60) Days, Or Until June 20, 2005*, dated April 8, 2005. The April 8, 2005 *Agreed Order* provides that the Applicants have until July 6, 2005 to file a Reply to the Comments and Objections. The Applicants have requested, and the parties have agreed to, an extension to file a Reply until September 6, 2005. In addition, the parties and Applicants agree to extend the deadline to submit Comments and Objections to the Supplemental Motion until August 2, 2005.

The parties represent to the Court that (1) they have consulted with all of the Applicants, the Shareholders and the Finance Committee about extending the deadlines as set forth above, and (2) each of the parties, the Applicants, the Shareholders and the Finance Committee has agreed to the requested extensions. Therefore, the parties submit this proposed *Agreed Order* for the Court's review and approval.

It is therefore ORDERED that the deadline for comments and objections to the Supplemental Motion shall be extended until **AUGUST 2, 2005** and the deadline for the Reply briefs shall be extended until **SEPTEMBER 6, 2005**.

Dated: **JUN 30 2005**



Denise Page Hood
United States District Judge

So Stipulated:

FOR DOW CORNING CORPORATION

FOR THE CLAIMANTS' ADVISORY
COMMITTEE

Deborah Greenspan /

Deborah E. Greenspan, Esq. *by DPD*
Dickstein, Shapiro, Morin & Oshinsky LLP
2101 L Street N.W.
Washington DC 20037-1526
Tel: 202-861-9100

Dianna Pendleton-Dominguez

Dianna Pendleton-Dominguez, Esq.
401 North Main Street
St. Marys, Ohio 45885
Tel: 281-703-0998