

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

IN RE:

DOW CORNING CORPORATION,

REORGANIZED DEBTOR

**CASE NO. 00-CV-00005-DT
(Settlement Facility Matters)**

Hon. Denise Page Hood

**NOTICE OF PROPOSED ORDER ESTABLISHING
GUIDELINES FOR DISTRIBUTIONS FROM THE CLASS 7
SILICONE MATERIAL CLAIMANTS' FUND**

You are receiving this notice because you submitted a Class 7 Silicone Material Claimants' Fund claim ("Class 7 Claim") to the Settlement Facility-Dow Corning Trust ("SF-DCT"). The Claimants' Advisory Committee, Dow Corning Corporation, and the Debtor's Representatives (the "Parties") have submitted a proposed *Consent Order to Establish Guidelines for Distributions from the Class 7 Silicone Material Claimants' Fund* ("Proposed Consent Order"). The Proposed Consent Order outlines the procedures for the treatment and final resolution of all Class 7 Claims, the distribution of funds to eligible Class 7 Claimants, and the closing of the Class 7 Silicone Material Claimants' Fund ("Class 7 Fund"). **PLEASE REVIEW THIS NOTICE BECAUSE YOUR CLASS 7 CLAIM MAY BE AFFECTED BY THE PROPOSED CONSENT ORDER.**

Background

The Dow Corning Amended Joint Plan of Reorganization ("Plan") created a subfund out of which all Class 7 Claims are to be paid. The SF-DCT has issued payments to certain Class 7 Claimants – specifically, the claimants who requested Expedited Release or Foreign Gel Payments or who accepted the Cash-Out Offer Payment for a Disease claim. The SF-DCT has not issued payments to claimants with an approved Disease claim or to claimants who may be eligible for payment but who have not provided the SF-DCT with appropriate information to issue payment. The SF-DCT has identified certain Class 7 Claims as "Disputed Marshaling Claims" – which means that they are claims that potentially failed to satisfy the "marshaling requirement" in Class 7. These Disputed Marshaling

Claims have not been processed pending further interpretation of the marshaling requirement.

The Proposed Consent Order sets forth the interpretation of the marshaling requirement and also establishes protocols to address outstanding issues and claims and further provides for the establishment of the “Class 7 Reserve Account” that will be used to pay all remaining Class 7 Claims.

Summary of Provisions of Proposed Consent Order

The Proposed Consent Order provides for the final resolution of all Class 7 Claims. Claims are subject to different procedures depending on their category. This Proposed Consent Order does not change the status of previously processed claims and payments by the SF-DCT in Class 7 except for the Disputed Marshaling Claims discussed below. Following is a general description of the categories of claims:

Category 1 consists of pending Disease claims that have been processed but not paid. Under the Proposed Consent Order, these claims will be paid after the Class 7 Reserve Account is created.

Category 2 consists of claims that have been processed, paid, and permanently closed. These claims do not require any further treatment, and the Proposed Consent Order does not provide any further action with respect to those paid claims. That is, under the Proposed Consent Order, those claimants who have already received payment will not receive any additional payments.

Categories 3 through 5 consist of claims that have been processed but not paid because of a deficiency that prevents the SF-DCT from issuing the payment. Under the Proposed Consent Order, these claims would be deemed closed and not entitled to any payment unless the claimant cures the deficiency within a specified period of time.

Categories 6, 7.b, 7.c, 8, and 9 consist of claims that have been denied as ineligible. The Proposed Consent Order does not provide for any further action with respect to these claims. These claims are denied and not eligible for any payment from the Class 7 Fund.

Category 7.a consists of claims that will be denied unless the claimant cures the deficiency in their claim within 90 days after the Proposed Consent Order becomes

final. If the claimant does not respond by the deadline, the claim will be deemed abandoned and closed.

Category 10 consists of claims that are not eligible for payment because the claimants received payments from other settlements that must be offset from any payment from Class 7. For all claims in this category, the offset exceeds the value of any payment from Class 7. The Proposed Consent Order provides that the SF-DCT will notify these claimants that the claim is denied and not eligible for payment.

Disputed Marshaling Claims: The Proposed Consent Order further interprets the marshaling requirement applicable to Class 7 Claims and, as a result, certain Disputed Marshaling Claims – claims that previously had been identified as potentially ineligible due to a failure to satisfy the marshaling requirement – will be eligible to be processed and paid if approved in accordance with the requirements governing Class 7 Claims. These claims are called “Eligible Disputed Marshaling Claims.” Certain Disputed Marshaling Claims will not be eligible and these claims will be denied.

Class 7 Reserve Account: The Proposed Consent Order directs the SF-DCT to establish a Class 7 Reserve Account that would be used to pay the previously processed but unpaid Disease claims, any eligible processed claims that are unpaid due to deficiencies, and the Eligible Disputed Marshaling Claims.

How to Get a Copy of the Proposed Consent Order

You may review the entire Proposed Consent Order by going to the SF-DCT website at www.sfdct.com and selecting the News link for the Proposed Consent Order. Or, you can request a copy of the Proposed Consent Order by e-mailing info@sfdct.com or calling the SF-DCT at 866-874-6099.

How to Get Information About the Treatment of Your Claim

You can determine the status of your claim and the way in which your claim would be treated under the Proposed Consent Order by going to the SF-DCT website at www.sfdct.com, selecting the Class 7 Claims tab from the Homepage, and entering your SID number where indicated. Alternatively, you may contact the SF-DCT at info@sfdct.com or 866-874-6099.

What Happens Next/What to Do if You Object to the Proposed Consent Order

OBJECTIONS TO THE PROPOSED CONSENT ORDER MUST BE FILED WITH THE COURT BY JULY 27, 2015. To file an objection, you must send it to the United States District Court, Eastern District of Michigan, Southern Division at the following address:

Theodore Levin U.S. Courthouse
United States District Court
Office of the Clerk
231 W. Lafayette Blvd.
5th Floor
Detroit, MI 48226

Your objection must reference Judge Denise Page Hood, the case number 00-CV-00005-DT and the proposed *Consent Order to Establish Guidelines for Distributions from the Class 7 Silicone Material Claimants' Fund*.

Additional information about the United States District Court, Eastern District of Michigan can be found by going to its website at www.mied.uscourts.gov or by calling 313-234-5005.

Objections must explain in detail the basis of the objection and the legal support for the objection. The Parties will likely oppose any objection. If you file an objection, you will receive additional information regarding further proceedings related to the objection. If no timely objections are filed, the Parties will request entry of the Proposed Consent Order and the Proposed Consent Order will become effective immediately upon its entry. If objections are filed, the entry of a final Consent Order and payments from the Class 7 Reserve Account will be delayed.

Dated: June 12, 2015