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

IN RE:

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

DOW CORNING CORPORATION.

Hon. Denise Page Hood

REORGANIZED DEBTOR

AGREED ORDER GRANTING EXTENSION OF TIME TO FILE RESPONSES TO MOTION OF [CLAIMANT NAME REDACTED] TO TOLL THE SIX MONTH DEADLINE FOR CURING RUPTURE DEFICIENCIES, RESPONSE OF CLAIMANTS' ADVISORY COMMITTEE TO MOTION OF ICLAIMANT'S NAME REDACTED TO TOLL THE SIX MONTH DEADLINE FOR CURING RUPTURE DEFICIENCIES AND MOTION OF CLAIMANTS' ADVISORY COMMITTEE TO TOLL THE CURE DEADLINE FOR ALL REQUESTS FOR RE-REVIEW THAT ARE PENDING MORE THAN 21 DAYS, AND RESPONSE OF CLAIMANTS' ADVISORY COMMITTEE TO MOTION TO DEEM PRE-1971 SILICONE GEL BREAST IMPLANTS AS DOW AND MOTION OF THE CLAIMANTS' ADVISORY COMMITTEE TO AMEND ANNEX A TO THE SETTLEMENT FACILITY AND FUND DISTRIBUTION AGREEMENT TO ADOPT AN ADDITIONAL PROOF OF MANUFACTURER PROTOCOL

On February 15, 2005 the Court approved an Agreed Order to extend to March 4, 2005 the deadline for the Debtor's Representatives and the Claimants' Advisory Committee to file a joint response to the MOTION OF [CLAIMANT NAME REDACTED] TO TOLL THE SIX MONTH DEADLINE FOR CURING RUPTURE DEFICIENCIES and to the RESPONSE OF CLAIMANTS' ADVISORY COMMITTEE TO MOTION OF [CLAIMANT NAME REDACTED] TO TOLL THE SIX MONTH DEADLINE FOR CURING RUPTURE DEFICIENCIES AND MOTION OF CLAIMANTS' ADVISORY COMMITTEE TO TOLL THE CURE DEADLINE FOR ALL REQUESTS FOR RE-REVIEW THAT ARE PENDING MORE THAN 21 DAYS. The parties have now been served with another Motion in connection with the tolling issue and the response to that Motion is due on March 18. Further, the Debtor's Representatives have also been served with the RESPONSE OF CLAIMANTS' ADVISORY COMMITTEE TO MOTION TO DEEM PRE-1971 SILICONE GEL BREAST IMPLANTS AS DOW AND MOTION OF CLAIMANTS' ADVISORY COMMITTEE TO AMEND ANNEX A TO THE SETTLEMENT FACILITY AND FUND DISTRIBUTION AGREEMENT TO ADOPT AN ADDITIONAL PROOF OF MANUFACTURER PROTOCOL, about which the parties are continuing to hold discussions.

Accordingly, the Debtor's Representatives, the Claimants' Advisory Committee, and counsel of record Leslie Bryan have agreed to an extension for filing with the Court the Dow Corning Corporation Responses to the above-named, tolling-related Motions and Response. Since it makes sense to file responses to all the tolling-related motions

together, the parties have agreed to extend the deadline to **March 18, 2005**. Further, because the parties continue to have discussions regarding the other pending Motion filed by the Claimants' Advisory Committee, the Debtor's Representatives and the Claimants' Advisory Committee have agreed to extend the response deadline for that Motion to **March 18, 2005**. The new agreed response filing date of March 18, 2005 is the date any response to the new tolling-related Motion (filed February 25, 2005) is due under the *STIPULATION AND ORDER ESTABLISHING PROCEDURES FOR RESOLUTION OF DISPUTES REGARDING INTERPRETATION OF THE AMENDED JOINT PLAN* approved by the Court on June 10, 2004. Hearings on the Claimants' Advisory Committee's Motion to amend Annex A, the Motion to toll the six-month deadline For curing rupture deficiencies, and other pending motions are scheduled for April 7, 2005 pursuant to the Court's February 10, 2005 Notice of Motion Hearing.

This Court hereby ORDERS that the filing extension shall be granted.

Date:	MAR	04	2005	

DENISE PAGE HOOD United States District Judge

So Stipulated:

FOR DOW CORNING CORPORATION

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