Court File No.: CV-21-00673856-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT,*
R.S.C. 1985, c. C 36, AS AMENDED

AND IN THE MATTER OF LTL MANAGEMENT LLC

APPLICATION OF LTL MANAGEMENT LLC
UNDER SECTION 46 OF THE
COMPANIES' CREDITORS ARRANGEMENT ACT

WRITTEN SUBMISSIONS OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS
(returnable December 17, 2021)

MILLER THOMSON LLP
SCOTIA PLAZA
40 KING STREET WEST, SUITE 5800
P.O. BOX 1011
TORONTO, ON CANADA M5H 3S1

Jeffrey C. Carhart LSO #23645M
jcarhart@millerthomson.com
Asim Iqbal LSO#: 61884B
Email: aiqbal@millerthomson.com
Gavin Finlayson LSO#: 44126D
Email: gfinlayson@millerthomson.com
Monica Faheim LSO#: 82213R
Email: mfaheim@millerthomson.com

Canadian Counsel for the Official Committee of Talc Claimants

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B E T W E E N :

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PART I - OVERVIEW

1. These submissions are filed by the Official Committee of Talc Claimants (the **"Official Committee"**) in connection with the Application (the "**Debtor's Application**") of LTL Management LLC ("**LTL**" or the "**Debtor**") in its capacity as proposed foreign representative (in such capacity, the "**Foreign Representative**") pursuant to section 46 of the Companies' Creditors Arrangement Act, R.S.C. 1984 (the "**CCAA**") for, among other things, an initial recognition order (the **"Initial Recognition Order"**) and a supplemental order (the "**Supplemental Order**").

2. The purpose of these submissions is to:

(a) provide this Honourable Court with critical background and context about the highly contentious Chapter 11 Case that is pending in the United States with respect to the Debtor in this matter; and

(b) emphasize that in light of the pending Motion to Dismiss the Chapter 11 Case (as detailed below), the Committee respectfully requests this Honourable Court grant the requested form of endorsement attached as Schedule "A" to ensure the preservation of the status quo and coordination with the limited nature and language of the U.S. Preliminary Injunction (as described below) pending determination of the Motion to Dismiss.

3. This is not an ordinary, cross-border commercial insolvency where an insolvent debtor with assets, creditors, revenues, employees and operations in both the U.S. and Canada seeks to coordinate cross-border proceedings so that it may restructure its affairs in good faith and emerge from insolvency protection as a going concern better situated to address its economic challenges going forward.

4. The Debtor in this case is a strawman for the true architect and funder of these proceedings, Johnson & Johnson ("**J&J**"). The Debtor is not a named party in any Canadian talc litigation.[1] The Debtor is a special purpose vehicle which J&J incorporated two days before the Chapter 11 filing. It has a contrived existence. It has no operations,

[1] The Debtor has taken steps to try and insert itself as a defendant into some of the talc litigation on furtherance of J&Js aspirational scheme.

employees, or revenues from sales of goods or services -- in Canada or anywhere else. Its only Canadian assets are an undisclosed quantum of retainer funds held by its counsel.

5. The ostensible creditors of the Debtor (in fact, they are creditors of J&J) are thousands of real people who have died or are dying from ovarian cancer and mesothelioma caused by talc[2] products that were marketed and sold for decades by J&J and its extended empire of affiliated and related companies. Their claims are not for monies lent to the Debtor or services provided; their claims are for the worth of their destroyed lives.

6. The Debtor's Chapter 11 proceedings are abnormal, being singularly designed to insulate the highly solvent funder and architect of those proceedings, J&J, and its extended empire, from the full extent of their well -deserved liability by channelling all talc-related liabilities, including in connection with Canadian talc litigation, to the Debtor. That relief is aspirational and subject to serious foundational challenges to the legitimacy of both the corporate transaction that created the Debtor and the Chapter 11 Case itself.

7. The plaintiffs of the talc litigation (the "**Talc Claimants**") are the only, or virtually only, claimed creditors of the Debtor in the Chapter 11 Case and the proposed Canadian proceedings. Many of the Talc Claimants have commenced litigation against J&J and others, and obtained judgments.

8. While J&J, like tobacco companies and opiate companies before it, denies the scientific basis of liability for its dangerous products, J&J's own internal documents obtained in discovery show that for decades J&J knew that its products sometimes tested positive for

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[2] "Talc" is a naturally occurring mineral which has been identified as unsafe and as a potential cause of serious health issues, including ovarian cancer. See, for instance, the government of Canada website at this link.

carcinogens, expressed concerns with the issue, and failed to warn regulators and the public.[3] Health Canada has identified talc as unsafe for certain consumer usages and a potential cause of serious health issues, including ovarian cancer.

9. While J&J proudly states in its materials that it has succeeded in obtaining the reversal of many U.S. plaintiff verdicts on appeal, no appellate court has reversed a post-trial judgment against J&J on the grounds that J&J lacked a duty of care to those who obtained judgment. Moreover, in the *Ingham*[4] case, an appellate court affirmed a judgment against J&J and its affiliate adjudging them liable for a total of more than $2 billion in damages, including $1.6 billion in aggregate punitive damages in favor of 20 women who proved that their ovarian cancer was caused by J&J's talcum powder. The Supreme Court of the United States refused to consider an appeal from that verdict, upholding the appellate verdict confirming liability.[5]

10. In the United States, the Official Committee has filed foundational objections to the Chapter 11 Case, alleging bad faith by J&J, fraudulent transactions and other serious allegations the essence of which are that these proceedings are a sham filed to obtain a tactical advantage that does not serve a valid bankruptcy purpose. The Official Committee's motion to dismiss the Chapter 11 Case will be heard by the United States Bankruptcy Court in the State of New Jersey, USA on February 15, 2022 (the "**Motion to Dismiss**").

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[3] Initial Statement of the Official Committee dated November 19, 2021 at para 18 (the "**Initial Statement**"), Exhibit **A** to the Affidavit of Monica Faheim sworn December 16, 2021 ("**Faheim Affidavit**").

[4] *Ingham v. Johnson & Johnson*, 608 S.W.3d 663, 724(Mo. App. 2020), cert. denied 141 S. Ct. 2716; ("***Ingham v. Johnson & Johnson***").

[5] *Ingham v. Johnson & Johnson*; See https://www.supremecourt.gov/docket/docketfiles/html/public/20-1223.html, indicating the Supreme Court of the U.S's denial of the petition on June 1st, 2021.

11. If the Official Committee's Motion to Dismiss is successful, all of the Orders that the Debtor presently requests this Court to recognize in its application will have no further force and effect.

PART II - THE CONTEXT OF THE PROCEEDINGS

A. The Debtor

12. The Debtor is an indirect subsidiary of J&J.[6] The Johnson & Johnson Group of Companies includes approximately 250 subsidiary companies with operations in 60 countries and products sold across over 175 countries.[7]

13. The Debtor was incorporated on October 12, 2021, two days before filing its Chapter 11 Case.[8] It neither has operations nor employees, in Canada or anywhere else in the world.[9]

14. The Debtor is not a named defendant in any proceeding in Canada.[10] The Debtor is a product of a controversial and disputed corporate restructuring – known as the "Texas two-step".[11] The details of the various inter-company transactions undergone by the J&J are further detailed at paragraphs 17 to 21 of the Affidavit of John K. Jim, sworn December 16, 2021 (the "**Kim Affidavit**"). It is not only the Texas two-step itself that is controversial, but the manner in which J&J purports to have employed it in this case.

[6] Affidavit of John K. Kim, sworn December 16, 2021 at para 3 ("**Kim Affidavit**"), Tab 2 to the Application Record of LTL Management LLC dated December 16, 2021(the "**Debtor's Application Record**").

[7] Kim Affidavit at para 15, Tab 2 to the Debtor's Application Record

[8] Initial Statement at para 1, Exhibit **A** to the Faheim Affidavit.

[9] Notice of Motion of the Official Committee of Talc Claimants to Dismiss Debtor's Chapter 11 Case dated December 1, 2021 (the "**Notice of Motion to Dismiss**") at para 5, Exhibit **B** to the Faheim Affidavit.

[10] Kim Affidavit at para 45, Tab 2 to Debtor's Application Record.

[11] Initial Statement at para 28, Exhibit **A** to the Faheim Affidavit.

The Official Committee

15. The Official Committee was appointed in the Chapter 11 Case and represents the Talc Claimants. Today, there are more than 38,000 talc liability-related cases currently pending against J&J and its various related parties (not against the Debtor).[12]

16. On November 19, 2021 the Official Committee filed its Initial Statement in the Chapter 11 Case (the "**Initial Statement**")[13], wherein the Official Committee:

(a) introduces critical contextual background and facts in response to the materials filed by the Debtor;[14]

(b) asserts that the Chapter 11 Case is without a legitimate purpose and raises significant legal issues about the appropriateness of Chapter 11 as a forum to resolve the ongoing litigation (*i.e.*, the subject of the Motion to Dismiss);[15]

(c) describes the scientific research investigating and demonstrating the link between talcum powder and ovarian cancer, including the preliminary conclusion of Health Canada that there is a causal effect;[16]

(d) highlights the trend of successful plaintiffs' lawsuits against J&J after J&J was compelled to produce certain sensitive internal documents in discovery that demonstrated

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[12] Notice of Motion to Dismiss at p. 20, footnote 18, Exhibit **B** to Faheim Affidavit.
[13] Initial Statement, Exhibit **A** to the Faheim Affidavit.
[14] Initial Statement, Exhibit **A** to the Faheim Affidavit at paras 1-6.
[15] Initial Statement at para 7, Exhibit **A** to the Faheim Affidavit.
[16] Initial Statement at paras 9-14, Exhibit **A** to the Faheim Affidavit.

J&J's intentional failure to warn regulators and the public that it was aware that its products sometimes tested positive for carcinogens;[17] and

(e) explains how the "Texas two-step" transaction resulting in the creation of the Debtor violates Texas law and US bankruptcy law.[18]

17. A copy of the Initial Statement is attached as Exhibit "A" to the Affidavit of Monica Faheim sworn December 16, 2021 ("**Faheim Affidavit**"), filed by the Official Committee in this recognition proceeding. We respectfully encourage this Court to review the Initial Statement to better place this case in its context.

B. Corporate Structure and 2021 Corporate Restructuring

18. The Debtor's controversial "Texas two-step" corporate restructuring was implemented to further the goal of creating an insurmountable barrier between the tort claimants and J&J's assets that would be ordinarily available to satisfy the Talc Claims.[19] The essence of this restructuring transaction involved the manipulation of corporate vehicles under the laws of Texas, which permit, under certain circumstances, a "divisive merger".[20] Through this divisive merger, a company in which "**Old JJCI**" (the entity that was responsible for the Talc Claims) merged was itself separated into two entities, with its operating assets and business transferred to a "GoodCo" (referred to as "**New JJCI**"), and its talcum powder-related liabilities (and a handful of non-operating assets) were transferred to a "BadCo".[21] Badco is the Debtor.

[17] Initial Statement at para 18, Exhibit **A** to the Faheim Affidavit.
[18] Initial Statement at paras 25, 28-31, 39, Exhibit **A** to the Faheim Affidavit.
[19] Initial Statement at para 1 and 33, Exhibit **A** to the Faheim Affidavit.
[20] Initial Statement at para 1, Exhibit **A** to the Faheim Affidavit; Kim Affidavit at para 6.
[21] Notice of Motion to Dismiss at para 22, Exhibit **B** to the Faheim Affidavit.

19. The Debtor's parent company, J&J, is not a debtor in the Chapter 11 Case. Neither are any of J&J's Canadian subsidiaries. J&J however is the architect, funder and driver of these proceedings. That is why the affidavit evidence on behalf of the Debtor is provided someone who has been "seconded" to the Debtor by a subsidiary of J&J.[22]

20. The Official Committee asserts, among other things, that this transaction is a fraudulent conveyance and violates Texas law.[23] It also asserts that the Chapter 11 Case should be dismissed for bad faith as they were not filed for a valid bankruptcy purpose.[24]

21. In other words, the legitimacy of the very transaction creating the Debtor is under dispute at this time, as is the legitimacy of the Chapter 11 Case itself.

C. Procedural History

Commencement of US Chapter 11 Case

22. On October 14, 2021 (the "**Petition Date**"), two days after its coming into existence, the Debtor commenced the Chapter 11 Case by filing a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "**U.S. Bankruptcy Code**") with the United States Bankruptcy Court for the Western District of North Carolina (the "**North Carolina Bankruptcy Court**").[25]

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[22] Kim Affidavit at para 1, Tab 2 to the Debtor's Application Record.

[23] Initial Statement at paras 28-31, Exhibit **A** to the Faheim Affidavit; Notably, the North Carolina Bankruptcy Court, in deciding to transfer the case to New Jersey, held that the "texas two step" and its legitimacy in bankruptcy raises novel legal issues, "…especially considering that the "Texas Two Step" tactic is being employed by national corporations and impacts tens of thousands of future claimants…";Also see *Order Transferring Venue to the District of New Jersey* [N.C. Dkt. No. 416], at p. 11 ("**Venue Transfer Order**"), Exhibit "**C**" to the Faheim Affidavit.

First Day Orders

23. Prior to the appointment of the Official Committee, the North Carolina Bankruptcy Court made a number of first day orders ("**First Day Orders**") in relation to the Chapter 11 Case. The Debtor is not seeking the recognition of the First Day Orders at the return of its Application, which has resolved the matters set out in the Official Committee's Limited Objection (as detailed below).

The U.S. Preliminary Injunction

24. On October 20, 2021, the Debtor requested that the "automatic stay" imposed in favour of the Debtor under the US Bankruptcy Code upon the filing of the Chapter 11 Case be extended to Old JJCI, J&J, and "**Protected Parties**".[26] The North Carolina Bankruptcy Court declined to extend the stay in favour of the Protected Parties. The Court did however temporarily grant the Debtor's request to extend the automatic stay to and enjoin certain litigation against the Debtor and Old JJCI (which merged out of existence), and scheduled a further motion in respect of the request to extend the protection of the automatic stay.

25. On November 10, 2021, the North Carolina Bankruptcy Court granted an Order Granting the Debtor's Request for Preliminary Injunctive Relief (the "**U.S. Preliminary Injunction**") for a 60 day period (*i.e.*, until January 14, 2022), subject to further Order of a court.[27] On the same day, the North Carolina Bankruptcy Court transferred the Chapter

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[24] Notice of Motion to Dismiss at para 50, Exhibit **B** to the Faheim Affidavit.
[25] Kim Affidavit at para 1 and 3, Tab 2 to the Debtor's Application Record.
[26] Notice of Motion to Dismiss at para 25, Exhibit **B** to the Faheim Affidavit.
[27] Order Granting the Debtor's Request for Preliminary Injunctive Relief (the "**US Preliminary Injunction**"), at Exhibit **D** to the Faheim Affidavit.

11 Case to the United States Bankruptcy Court of the District of New Jersey (the "**New Jersey Bankruptcy Court**").[28] In granting the US Preliminary Injunction Order, the North Carolina Bankruptcy Court stated on the record that it was "influenced heavily by the fact that I'm . . . sending the case to another court," that "somebody else is going to have to wrestle with this question and I don't want to bind them any more than possible," and that "given that I am moving the case, the last thing I want to do is send it with it on fire to the, to the recipient court."[29]

26. Importantly, the U.S. Preliminary Injunction is, as the title suggests, preliminary in nature. It is not determinative of the ongoing issues related to the legitimacy of the Chapter 11 Case, and expressly provides that it "is not intended to bind a subsequent Presiding Court" Accordingly, the U.S. Preliminary Injunction is an interim order, which by its terms is set to expire on January 14, 2022 (unless extended by further court order).

Motion to Transfer Venues

27. On October 25, 2021 the Bankruptcy Administrator for the State of North Carolina moved to transfer the Chapter 11 Case to the New Jersey Bankruptcy Court, which the Debtor opposed.[30] The Bankruptcy Administrator was successful in its motion.[31]

28. In deciding to transfer the case, the North Carolina Bankruptcy Court commented (in relation to the Debtor's argument the case should remain in North Carolina since the Debtor has substantial assets in that jurisdiction) that "[t]he Debtor may have assets, but they were all created to effectuate a bankruptcy filing and have no other business

[28] Kim Affidavit at para 9, Tab 2 to the Debtor's Application Record.
[29] Initial Statement at footnote 70, citing Nov. 5, 2021 Hr'g Tr., 143:12–18.

purpose".[32] In its reasons, the North Carolina Bankruptcy Court also found that the Debtor was trying to "manufacture venue and attempt […] to outsmart the purpose of the [U.S. Bankruptcy Code]".[33]

Filing of Initial Statement and Limited Objection by Committee

29. On November 19, 2021, the Official Committee filed its Initial Statement in the Chapter 11 Case (the "**Initial Statement**").[34]

30. On December 8, 2021 the Official Committee filed a "Limited Objection and Reservation of Rights of the Official Committee of Talc Claimants to the Debtor's Motion for Authorization to Act as the Estate's Foreign Representative" (the "**Limited Objection**").[35]

31. The Limited Objection has since been resolved. On December 15, 2021, the New Jersey Bankruptcy Court appointed LTL as the foreign representative for the Chapter 11 Case.

Filing and Date of Motion to Dismiss

32. On December 1, 2021, the Official Committee in the Chapter 11 Case brought a motion to dismiss the Chapter 11 Case (the "**Motion to Dismiss**") for cause.[36]

33. The Motion to Dismiss, which is a critical aspect of these proceedings, is scheduled to be heard by the New Jersey Bankruptcy Court on February 15, 2022, and asserts, among

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[30] Venue Transfer Order, Exhibit **C** to the Faheim Affidavit.
[31] Venue Transfer Order, Exhibit **C** to the Faheim Affidavit.
[32] Venue Transfer Order, p. 9, Exhibit **C** to the Faheim Affidavit.
[33] Venue Transfer Order, p. 10, Exhibit **C** to the Faheim Affidavit.
[34] Initial Statement, Exhibit **A** to the Faheim Affidavit.
[35] Limited Objection and Reservation of Rights of the Official Committee of Talc Claimants to the Debtor's Motion for Authorization to Act as the Estate's Foreign Representative ("**Limited Objection**").

other things that the Chapter 11 Case was not filed in good faith because the petition was filed to obtain a tactical litigation advantage and does not serve a valid bankruptcy purpose.[37] As detailed in the Initial Statement, it is the Official Committee's position that the divisional merger was in essence a "fraudulent transfer", with all of the requisite elements of such under the applicable laws.[38]

D. Talc Litigation

U.S. Claims

34. The Chapter 11 Case was initiated as a result of thousands of talc-related personal injury lawsuits by tort claimants in the United States.[39] The subject of these lawsuits are allegations that JOHNSON'S® Baby Powder and Shower to Shower products contained asbestos and/or cause ovarian cancer and/or mesothelioma.[40] Today, there are more than 38,000 cases currently pending alleging that J&J's cosmetic talc-based products caused cancer.[41]

Canadian Claims

35. J&J Canada is not a defendant in any of the US talc litigation.[42]

36. Old JJCI, J&J Canada and other unrelated parties and insurers are all named co-defendants in some or all of the talc lawsuits commenced in Canada (the "**Canadian**

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[36] Notice of Motion to Dismiss, Exhibit **B** to the Faheim Affidavit.
[37] Notice of Motion to Dismiss at paras. 35, 38-39, and 40-42, Exhibit **B** to the Faheim Affidavit.
[38] Initial Statement at para 28-31, Exhibit **A** to the Faheim Affidavit.
[39] Kim Affidavit at para 5, Tab 2 to the Debtor's Application Record.
[40] Kim Affidavit at para 5, Tab 2 to the Debtor's Application Record.
[41] Notice of Motion to Dismiss at footnote 18, Exhibit **B** to the Faheim Affidavit.
[42] Kim Affidavit at para 35, Tab 2 to the Debtor's Application Record.

Actions”).[43] Bausch is a multi-national, specialty pharmaceutical and medical device company and is not an affiliate of the Johnson & Johnson Group of Companies; it is based on the Province of Quebec, and in 2013, was continued under the British Colombia *Business Corporations Act*.[44] A summary of the Canadian Actions can be found at paragraphs 40 to 44 of the Kim Affidavit.

PART III - CONCLUSION

37. The purpose of these submissions is to ensure that the Official Committee is afforded the opportunity to shed light on the state of affairs as it relates to the Chapter 11 Case and these proposed recognition proceedings. The ongoing case in the United States is a highly contentious, widely publicized, and truly novel one where there are significant issues to be determined in the coming months, including the legitimacy of the proceeding itself.

38. The Official Committee respectfully urges this Court to review the materials appended to the Faheim Affidavit, with particular emphasis on the Initial Statement at Exhibit **“A”** thereto, which provides the necessary context and background to these proceedings from the Official Committee’s point of view.

39. It bears repeating that the Official Committee’s Motion to Dismiss (which is scheduled to be heard on February 15, 2022) raises foundational objections to both the corporate transaction that created the Debtor and the legitimacy of the Chapter 11 Case. As such, the Committee respectfully requests that the form of endorsement attached as Schedule “A” be granted as part of the Court’s Endorsement to ensure the preservation of the status

[43] Kim Affidavit at para 40, Tab 2 to the Debtor’s Application Record.
[44] Kim Affidavit at para 41, Tab 2 to the Debtor’s Application Record.

quo and coordination with the limited nature and language of the U.S. Preliminary Injunction pending determination of the Motion to Dismiss.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 16th day of December, 2021.

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MILLER THOMSON LLP

Canadian Lawyers for the Official Committee of Talc Claimants

Schedule "A"

Additional Language to Court's Endorsement

1. This Initial Supplemental Order is made without prejudice to the Motion to Dismiss, filed by the Committee of Talc Claimants (the "**Official Committee**") in the US Bankruptcy Court for the District of New Jersey (the "**New Jersey Bankruptcy Court**") in the Debtor's bankruptcy proceedings commenced under Chapter 11 of Title 11 of the United States Code and scheduled to be heard on February 15, 2022 (the "**Motion to Dismiss**"). The granting of this Initial Supplemental Order should not be construed as a determination by this Court of any fact, matter or issue before the New Jersey Bankruptcy Court in the Motion to Dismiss.

2. In recognizing the US Preliminary Injunction pursuant to this Order, this Court has not made any findings or conclusions about (i) whether there are claims against any of the Protected Parties (as defined in the US Preliminary Injunction), other than the Debtor and Old JJCI (as defined in the US Preliminary Injunction), which should, or should not, be stayed or enjoined, and (ii) the right of any party to challenge on any basis the bankruptcy filing of the Debtor or the corporate transactions that created the Debtor.

3. In connection with the representations made by the Debtor at the hearing today about the interpretation of paragraph 6 of this Initial Supplemental Order, the Official Committee, or other interested party, may apply to this court for advice and direction on any matter in connection with this order, including whether any future order of the New Jersey Bankruptcy Court or the New Jersey District Court (in each case, the "**US Court**") modifying or extending the US Preliminary Injunction requires a further recognition order of this court to have force and effect in Canada. For greater certainty, any future request of the Debtor to seek recognition by this Court of an order of the US Court modifying or extending the US Preliminary Injunction shall be reviewed by this Court on a *de novo* basis.

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MILLER THOMSON LLP
Scotia Plaza
40 King Street West, Suite 5800
P.O. Box 1011
Toronto, ON Canada M5H 3S1

Jeffrey C. Carhart LSO #23645M
jcarhart@millerthomson.com
Asim Iqbal LSO#: 61884B
Email: aiqbal@millerthomson.com
Gavin Finlayson LSO#: 44126D
Email: gfinlayson@millerthomson.com
Monica Faheim LSO#: 82213R
Email: mfaheim@millerthomson.com

Canadian Counsel for the Official Committee of Talc Claimants