

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

IMERYYS TALC AMERICA, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-10289 (LSS)

Jointly Administered

Hearing Date: March 20, 2019 at 2:00 p.m. (ET)

Objection Deadline: March 13, 2019 at 4:00 p.m. (ET)

**APPLICATION FOR ORDER AUTHORIZING THE
PROPOSED FUTURE CLAIMANTS' REPRESENTATIVE TO RETAIN
AND EMPLOY ANKURA CONSULTING GROUP, LLC
AS CONSULTANTS, NUNC PRO TUNC TO THE PETITION DATE**

James L. Patton, Jr., as the proposed legal representative (the "Future Claimants' Representative") for persons who have not yet asserted a talc-related personal injury claim against the above-captioned debtors and debtors-in-possession (the "Debtors") in the above-captioned chapter 11 cases (these "Chapter 11 Cases") but may in the future assert such a claim (the "Future Claimants"), submits this application (the "Ankura Application") for entry of an order, pursuant to sections 105(a), 524(g), and 1103 of title 11 of the United States Code (the "Bankruptcy Code"), and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and substantially in the form attached hereto as Exhibit C (the "Proposed Order"), authorizing the Future Claimants' Representative to retain and employ Ankura Consulting Group, LLC ("Ankura") as claims evaluation and financial valuation consultants, *nunc pro tunc* to the Petition Date. In support of this Ankura Application, the Future Claimants' Representative relies upon the Declaration of Thomas Vasquez, Ph.D. (the "Vasquez Declaration"), attached hereto as Exhibit A, and represents as follows:

¹ The Debtors in these cases, together with the last four digits of each Debtor's federal taxpayer identification number, are: Imerys Talc America, Inc. (6358), Imerys Talc Vermont, Inc. (9050) and Imerys Talc Canada Inc. (6748). The Debtors' address is 100 Mansell Court East, Suite 300, Roswell, Georgia 30076.

BACKGROUND

1. On February 13, 2019 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware. The Debtors continue in possession of their properties and continue to operate as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. No party has requested the appointment of a trustee or examiner in these cases, and no statutory committee has been appointed.

3. On February 27, 2019, the Debtors submitted to this Court a motion for entry of an order appointing James L. Patton, Jr. as the Future Claimants’ Representative in these Chapter 11 Cases, *nunc pro tunc* to the Petition Date [Docket No. 100] (the “FCR Appointment Motion”).

4. Contingent upon the Court entering an order appointing Mr. Patton as the Future Claimants’ Representative, *nunc pro tunc* to the Petition Date, Mr. Patton seeks to retain Ankura as claims evaluation and financial valuation consultants, *nunc pro tunc* to the Petition Date.

JURISDICTION

5. The Court has jurisdiction over this Ankura Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

6. The statutory bases for the relief requested herein are sections 105(a), 524(g), and 1103 of the Bankruptcy Code, as complemented by Bankruptcy Rule 2014.

RELIEF REQUESTED

7. By this Ankura Application, the Future Claimants’ Representative respectfully requests that the Court enter the Proposed Order authorizing him to retain and employ Ankura as

claims evaluation and financial valuation consultants in connection with these cases, *nunc pro tunc* to the Petition Date.

ANKURA'S QUALIFICATIONS

8. Ankura is well suited to act as a claims evaluation and financial valuation consultant. Ankura is a business advisory and expert services firm, headquartered in Washington, D.C. The professionals at Ankura include those who were formerly affiliated with Analysis, Research, and Planning Corporation, also known as ARPC. In April 2016, ARPC merged into Ankura. Prior to its merger, ARPC had provided law firms, corporations, governments, and non-profit groups with advisory services relating to economic, financial, statistical, business-analytics and operational expertise for more than 40 years. For purposes of this Ankura Application, we refer to the professionals who were formerly with ARPC and are now with Ankura as "Ankura Professionals."

9. As set forth in the Vasquez Declaration, Ankura Professionals have been engaged in many of the largest personal injury and property damages cases in U.S. history over the past several decades. During this period, Ankura Professionals were retained in litigation arising from asbestos, breast implants, Albuterol asthma medication, the Dalkon Shield IUD, the Love Canal waste site, the Three Mile Island nuclear incident, and numerous superfund sites. During the course of these various retentions, Ankura professionals have assisted in the development of reorganization plans and have been retained as expert witnesses for the quantification of liability in bankruptcy cases. Ankura Professionals have provided claims evaluation and consulting services for future claimants' representatives in numerous other matters.

10. Prior to the Petition Date, the Debtors engaged Mr. Patton to act as a pre-petition legal representative for future claimants for the purpose of representing the interests of

individuals who may in the future assert talc-related demands against the Debtors. In connection with his pre-petition representation of Future Claimants, Mr. Patton engaged (i) the law firm of Young Conaway Stargatt & Taylor, LLP (“Young Conaway”) to act as his counsel and (ii) Ankura to act as his claims evaluation and financial valuation advisor. During the course of its pre-petition engagement, Ankura developed an understanding of the Debtors and their history, business, claims posture, finances, assets and liabilities. Ankura has assisted the Future Claimants’ Representative in his efforts since the Petition Date and, accordingly, the Future Claimants’ Representative believes it appropriate that Ankura’s retention be approved *nunc pro tunc* to the Petition Date.

11. Based on Ankura’s significant experience in this field and its familiarity with personal injury liability issues in general and the Debtors’ talc-related liability issues in particular, Mr. Patton is confident that Ankura’s retention as claims evaluation and financial valuation consultants to the Future Claimants’ Representative is in the best interest of the Debtors’ estates and their creditors and is also in the best interest of the Future Claimants.

SERVICES TO BE PROVIDED BY ANKURA

12. The Future Claimants’ Representative anticipates that Ankura will render consulting services to the Future Claimants’ Representative as needed throughout the course of these cases, including but not limited to the following services, which Ankura also provided in connection with its pre-petition role as claims advisor:

- a. estimating the number and value of present and future talc personal injury claims;
- b. developing claims procedures to be used in the development of financial models of payments and assets of a claims resolution trust;
- c. analyzing and responding to issues relating to draft trust distribution procedures;

- d. analyzing and responding to issues relating to providing notice to personal injury claimants and reviewing such notice procedures; and
- e. analyzing and advising on financial matters, such as valuation of the Debtors;
- f. analyzing insurance coverage and related issues;
- g. providing expert testimony and reports related to the foregoing and assisting the Future Claimants' Representative in preparing and evaluating reports and testimony by other experts and consultants; and
- h. providing such other consulting services as may be requested by the Future Claimants' Representative.

ANKURA'S COMPENSATION

13. Ankura has agreed to accept as compensation for its services in these cases such sums as may be allowed by this Court in accordance with law, based upon the services rendered, the results achieved, the difficulties encountered, the complexities involved, and other appropriate factors. Ankura understands that its fees and expenses in this proceeding will be subject to the requirements of sections 330 and 331 of the Bankruptcy Code, as well as the rules of the Court and any order entered by this Court establishing procedures for interim compensation and reimbursement of expenses of professionals. The Future Claimants' Representative shall not be personally responsible for providing compensation or expense reimbursements to Ankura under any circumstance.

14. Ankura intends to apply for compensation for professional services rendered in accordance with its normal billing practices, subject to allowance by the Court in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the local rules of the Court, and any applicable orders. The hourly rates for Ankura professionals are \$550–\$750 for Senior Managing Directors, \$450–\$550 for Managing Directors, \$350–\$450 Senior Directors, \$275–\$350 Directors, and \$150–\$275 for Senior Associates and Associates. Expenses

for travel and consumables are billed at cost to the client. Charges are not accumulated or billed to the client for non-professional or clerical staff. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions.

15. In addition, also subject to allowance by the Court in accordance with applicable law, Ankura shall bill the Debtors for reimbursement of all of its reasonable and necessary out-of-pocket expenses incurred in connection with its employment.

16. As described in the FCR Appointment Motion, the Debtors provided to Ankura a retainer of \$150,000 to pay the pre-petition fees and expenses Ankura incurred while conducting due diligence of the Debtors, their talc-related personal injury claims, and financial posture. After reconciling, the balance of the retainer remaining is \$150,000 as of the Petition Date. Attached hereto as Exhibit B is a summary of Ankura's pre-petition invoices and payments.

DISCLOSURE CONCERNING CONFLICTS

17. Ankura has informed the Future Claimants' Representative that, except as described in the Vasquez Declaration, Ankura is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code. Moreover, the retention and employment of Ankura is necessary and in the best interests of the Futures Claimants, the Debtors and their estates and other creditors.

18. As set forth in the Vasquez Declaration, Ankura has not shared or agreed to share any of its compensation with any other person, other than a professional or employee of Ankura, as permitted by section 504 of the Bankruptcy Code.

NOTICE

19. Notice of this YCST Application will be provided to (a) the Office of the United States Trustee for the District of Delaware; (b) the United States Attorney for the District of

Delaware; (c) the Internal Revenue Service; (d) the firms listed on the Debtors' consolidated list of the thirty law firms with the most significant representations of parties asserting talc claims against the Debtors; (e) the creditors listed on the Debtors' consolidated list of thirty creditors holding the largest unsecured claims (excluding talc claims); (f) counsel to the prepetition representative for future talc claimants; and (g) those parties that have requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested herein, the Future Claimants' Representative submits that no other or further notice need be provided.

PRIOR REQUEST FOR RELIEF

20. No previous application for the relief sought in this Ankura Application has been made to this or any other court.

WHEREFORE, the Future Claimants' Representative respectfully requests entry of the Proposed Order granting the relief requested herein and such further and other relief as is just and proper.

Dated: February 27, 2019

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Edwin J. Harron

Robert S. Brady (No. 2847)
Edwin J. Harron (No. 3396)
Sharon M. Zieg (No. 4196)
Sara Beth A.R. Kohut (No. 4137)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
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*Proposed Counsel to the Proposed
Future Claimants' Representative*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

IMERYS TALC AMERICA, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-10289 (LSS)

Jointly Administered

Hearing Date: March 20, 2019 at 2:00 p.m. (ET)

Objection Deadline: March 13, 2019 at 4:00 p.m. (ET)

NOTICE OF APPLICATION

PLEASE TAKE NOTICE that James L. Patton, Jr., the proposed legal representative for future talc-related personal injury claimants (the “Future Claimants’ Representative”) in the above-captioned matter, has filed the attached *Application for Order Authorizing the Proposed Future Claimants’ Representative to Retain and Employ Ankura Consulting Group, LLC as Claims Evaluation Consultants, Nunc Pro Tunc to the Petition Date* (the “Ankura Application”).

PLEASE TAKE FURTHER NOTICE that any objections or responses to the relief requested in the Ankura Application must be filed on or before **March 13, 2019 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Third Floor, Wilmington, Delaware 19801. At the same time, copies of any objections or responses must be served upon the undersigned proposed counsel to the proposed Future Claimants’ Representative so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE ANKURA APPLICATION WILL BE HELD ON MARCH 20, 2019 AT 2:00 P.M. (ET) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, SIXTH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS OR RESPONSES TO THE ANKURA APPLICATION ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED THEREIN WITHOUT FURTHER NOTICE OR A HEARING.

¹ The Debtors in these cases, together with the last four digits of each Debtor’s federal taxpayer identification number, are: Imerys Talc America, Inc. (6358), Imerys Talc Vermont, Inc. (9050) and Imerys Talc Canada Inc. (6748). The Debtors’ address is 100 Mansell Court East, Suite 300, Roswell, Georgia 30076.

Dated: February 27, 2019

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Edwin J. Harron

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eharron@ycst.com
szieg@ycst.com
skohut@ycst.com

*Proposed Counsel to the Proposed
Future Claimants' Representative*

EXHIBIT A

Declaration of Thomas Vasquez, Ph.D.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

IMERYS TALC AMERICA, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-10289 (LSS)

Jointly Administered

DECLARATION OF THOMAS VASQUEZ, Ph.D.

Pursuant to 28 U.S.C. § 1746, Thomas Vasquez, Ph.D., hereby declares as follows:

1. I am a Senior Managing Director at Ankura Consulting Group, LLC (“Ankura”).
2. James L. Patton, Jr., the proposed legal representative (the “Future Claimants’ Representative”) for persons who have not yet asserted a talc-related personal injury claim against the Debtors in the above-captioned cases but may in the future assert such a claim (the “Future Claimants”), has requested that Ankura provide claims evaluation and financial valuation consulting services, and Ankura has agreed to provide such services during this bankruptcy proceeding. Ankura was selected by the Future Claimants’ Representative because Ankura professionals have extensive experience estimating asbestos liabilities and advising on financial valuation.
3. Ankura is a business advisory and expert services firm, headquartered in Washington, D.C. The professionals at Ankura include those who were formerly affiliated with Analysis, Research, and Planning Corporation, also known as ARPC. In April 2016, ARPC merged into Ankura. Prior to its merger, ARPC had provided law firms, corporations, governments, and non-profit groups with advisory services relating to economic, financial, statistical, business-analytics and operational expertise for more than 40 years. I will refer to the

¹ The Debtors in these cases, together with the last four digits of each Debtor’s federal taxpayer identification number, are: Imerys Talc America, Inc. (6358), Imerys Talc Vermont, Inc. (9050) and Imerys Talc Canada Inc. (6748). The Debtors’ address is 100 Mansell Court East, Suite 300, Roswell, Georgia 30076.

professionals who were formerly with ARPC and are now with Ankura as “Ankura Professionals.”

4. Ankura Professionals were retained to assist the debtors in the chapter 11 bankruptcy cases of: In re Energy Futures Holding Corp., No. 14-10979 (Bankr. D. Del. 2014); In re The Budd Co., No. 14-11873 (Bankr. N.D. Ill. 2014); In re United Gilsonite Labs., No. 11-2032 (RNO) (Bankr. M.D. Pa. 2011); In re W.R. Grace, Inc., No. 01-1139 (JKF) (Bankr. D. Del. 2001); In re Owens Corning, No. 00-3837 (JKF) (Bankr. D. Del. 2000); In re Fuller-Austin Insulation Co., No. 98-2028 (JJF) (Bankr. D. Del. 1998); In re Eagle-Picher Indus., Inc., No. 91-10100 (BP) (Bankr. S.D. Ohio 1991); and In re A. H. Robins Co., No. 85-31307 (BWS) (Bankr. E.D. Va. 1985). ARPC also performed work on behalf of special counsel to the debtor in the case of In re ACandS, Inc., No. 02-12687 (JKF) (Bankr. D. Del. 2002).

5. Ankura Professionals were retained to assist the Unsecured Creditors Committee in the chapter 11 bankruptcy case of In re National Gypsum Co., No. 90-37213 (SAF) (Bankr. N.D. Tex. 1990).

6. Ankura Professionals were retained as claims evaluation consultants to the future claimants’ representatives in the chapter 11 bankruptcy cases of: In re Bestwall LLC, No. 17-31795 (LTB) (Bankr. W.D.N.C. 2017); In re Kaiser Gypsum Co., No. 16-31602 (JCW) (Bankr. W.D.N.C. 2016); In re Yarway Corp., No. 13-11025 (BLS) (Bankr. D. Del. 2013); In re Metex Mfg. Corp., No. 12-14554 (BRL) (Bankr. S.D.N.Y. 2012); In re Specialty Prods. Holding Corp., No. 10-11780 (JKF) (Bankr. D. Del. 2010); In re Leslie Controls, Inc., No. 10-12199 (CSS) (Bankr. D. Del. 2010); In re Durabla Mfg. Co., No. 09-14415 (MFW) (Bankr. D. Del. 2009); In re The Flintkote Co., No. 04-11300 (JKF) (Bankr. D. Del. 2004); In re Met-Coil Sys. Corp., No. 03-12676 (MFW) (Bankr. D. Del. 2003); In re Mid-Valley, Inc., No. 03-35592 (JKF) (Bankr.

W.D. Pa. 2003); In re Plibrico Co., No. 02 B 09952 (Bankr. N.D. Ill. 2002); In re Western Asbestos Co., No. 02-46284 T (Bankr. N.D. Ca. 2002); In re A-Best Prods., LLC, No. 02-12734 (JKF) (Bankr. D. Del. 2002); In re Glob. Indus. Techs., Inc., No. 02-21626 (JKF) (Bankr. W.D. Pa. 2002); In re N. Am. Refractories Co., No. 02-20198 (JKF) (Bankr. W.D. Pa. 2002); In re Kaiser Aluminum Corp., No. 02-10429 (JKF) (Bankr. D. Del. 2002); In re United States Mineral Prods. Co., No. 01-2471 (JKF) (Bankr. D. Del. 2001); In re Federal-Mogul Glob., Inc., No. 01-10578 (JKF) (Bankr. D. Del. 2001); In re USG Corp., No. 01-2094 (JKF) (Bankr. D. Del. 2001); In re Burns and Roe Enters., Inc., No. 00-41610 (RG) (D.N.J. 2000); In re Armstrong World Indus., Inc., No. 00-4471 (JKF) (Bankr. D. Del. 2000); In re Babcock & Wilcox Co., No. 00-10992 (JAB) (Bankr. E.D. La. 2000); and In re Pittsburgh Corning Corp., No. 00-22876 (JKF) (Bankr. W.D. Pa. 2000).²

7. Ankura Professionals were retained by each of the following existing asbestos personal injury trusts to perform assessments of the liabilities facing the trusts and/or provide claims management consulting services: Amatex Asbestos Trust; Manville Personal Injury Settlement Trust; Pacor Trust; Fuller-Austin Asbestos Trust; UNR Asbestos-Disease Claims Trust; National Gypsum Corporation Settlement Trust; Celotex Asbestos Settlement Trust; Eagle-Picher Personal Injury Settlement Trust; Fibreboard Asbestos Compensation Trust; Claims Processing Facility (formed in connection with the UNR Disease-Claims Trust and the Eagle-Picher Personal Injury Settlement Trust); DII Industries, LLC Asbestos PI Trust; DII Industries, LLC Silica PI Trust; JT Thorpe Successor Trust; Keene Creditor Trust; Western Asbestos Settlement Trust; A-Best Products Company Asbestos Personal Injury Settlement Trust;

² A motion is pending to appoint Mr. Patton as the future claimants' representative in the case of In re Maremont Corporation, Ch. 11 Case No. 19-10118-KJC (Bankr. D. Del.) and In re The Fairbanks Company, Ch. 11 Case No. 18-41768 (PWB) (Bankr. N.D. Ga.). Mr. Patton has informed us that, if appointed, he intends to seek to retain Ankura as his claims evaluation consultants in those matters.

Babcock and Wilcox Asbestos Personal Injury Settlement Trust; Armstrong World Industries Personal Injury Settlement Trust; United States Gypsum Personal Injury Settlement Trust; Owens Corning/Fibreboard Personal Injury Settlement Trust; Shook and Fletcher Asbestos Settlement Trust; Kaiser Aluminum & Chemical Personal Injury Settlement Trust; US Mineral Products Company Asbestos PI Trust; Raytech Corporation Asbestos Trust; Motors Liquidation Company Asbestos PI Trust; ABB Lummus Global Inc. Asbestos PI Trust; ACandS Asbestos Settlement Trust; and TH Agriculture and Nutrition Asbestos Personal Injury Trust. Ankura Professionals were also retained by the future claimants' representative to perform assessments of the liabilities facing the Porter Hayden Bodily Injury Trust; the Leslie Controls, Inc. Asbestos Personal Injury Trust; the APG Asbestos Trust; the Combustion Engineering Asbestos PI Trust; the NARCO Asbestos Trust; the Quigley Asbestos PI Trust; and the Yarway Asbestos Personal Injury Trust.

8. As described in the Ankura Application, the Debtors provided to Ankura a retainer of \$150,000 to pay the pre-petition fees and expenses of Ankura incurred while conducting due diligence of the Debtors, their talc-related personal injury claims and financial posture. After reconciling, the balance of the retainer remaining is \$150,000 as of the Petition Date. Attached as Exhibit B to the Ankura Application is a summary of Ankura's pre-petition invoices and payments.

9. Subject to court approval, and in accordance with section 330(a) of the Code and any order entered by this Court establishing procedures for interim compensation and reimbursement of expenses of professionals, compensation will be paid to Ankura on an hourly basis, plus reimbursement of actual and necessary expenses incurred by Ankura. Ankura professionals charge for services by the hour, with the rates depending on the experience and

training of the individuals working on the task. The hourly rates for Ankura professionals are \$550–\$750 for Senior Managing Directors, \$450–\$550 for Managing Directors, \$350–\$450 Senior Directors, \$275–\$350 Directors, and \$150–\$275 for Senior Associates and Associates. Expenses for travel and consumables are billed at cost to the client. Charges are not accumulated or billed to the client for non-professional or clerical staff.

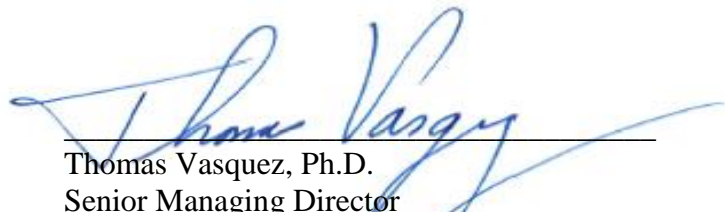
10. Neither I nor any principal of, or professional employed by, Ankura has agreed to share or will share any portion of the compensation to be received in connection with its retention in these cases with any other person other than the principals and regular employees of Ankura.

11. Ankura has conducted a search of its records with respect to the Debtors and the list attached hereto as Schedule 1 of creditors and other parties in interest. To the best of my knowledge, information, and belief, Ankura is a disinterested person, as that term is defined in section 101(14) of the Bankruptcy Code.

12. Ankura will periodically conduct further inquiries regarding its status as a disinterested party, and any time during the period of its employment, if Ankura should discover any facts bearing on the matters described herein, Ankura will supplement the information contained in this declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 27, 2019.



Thomas Vasquez, Ph.D.
Senior Managing Director
Ankura Consulting Group, LLC

Schedule 1

Interested Parties List

1. **Debtors and Affiliated Entities**

000 Calderys	Changbai Celite Diatomite Co., Ltd
Africa Refractory Consultants Pty Ltd	Choicewise Ltd
Akrotirio Trahilas Dyo SA	Donbasskeramika
Almatech Mineral International Ltd	Donkaolin
Almeria, SA de CV	ECCA Holdings Pty Ltd
Alumica Canada Inc.	ECCA Minerals Pty Ltd
Americarb, Inc.	Eco-Bos Development Limited
AMMIN Holdings, Inc.	Elmin Bauxites
Angang Stollberg & Samil	Elmin Bauxites Srl
Ardoisières d'Angers	Euroargille
Ardoise et Jardin	Fagersta Eldfasta AB
Australian Vermiculite Ind. Pty Ltd	Fiberlean Technologies Limited
B&B Refractories Pty Ltd	Fokis Mining Park
Calderys Algérie Services SPA	Guiyang Jianai Special Aluminates Co. Ltd
Calderys Algérie SPA	Gimpex-Imerys India Private Ltd
Calderys Australia Pty Ltd	Harborlite Aegean Endustri Mineralleri
Calderys Belgium	Sanayi AS
Calderys China Co., Ltd	Imerplast UK Limited
Calderys Danmark A/S	ImerTech
Calderys de Mexico, SA de CV	Imerys Administrative Germany GmbH
Calderys Deutschland GmbH	Imerys Al Zayani Fused Minerals Co.
Calderys Finland OY	W.L.L.
Calderys France	Imerys Alüminät Dis Ticaret
Calderys Ibérica Refractorios, SA	Imerys Aluminates Asia Pacific PTE LTD
Calderys India Refractories Limited	Imerys Aluminates Corporate SAS
Calderys Italia s.r.l.	Imerys Aluminates GMBH
Calderys Japan Co Ltd	Imerys Aluminates Group SAS
Calderys KFT	Imerys Aluminates Italia S.R.L
Calderys Korea Co. Ltd	Imerys Aluminates Limited
Calderys Nordic AB	Imerys Aluminates Nordic AB
Calderys Norway AS	Imerys Aluminates SA
Calderys Polska Sp. Zoo	Imerys Argentina Srl
Calderys Refractorios Venezolanos	Imerys Asia Pacific Pte Ltd
Calderys Refrakter	Imerys Belgium SA
Calderys South Africa Pty Ltd	Imerys Bentonite Georgia LTD
Calderys Taiwan Co. Ltd	Imerys Bentonite Hungary Kft
Calderys The Netherlands BV	Imerys Bentonite Italy S.p.A.
Calderys Ukraine Ltd	Imerys Bentonite USA, LLC
Calderys UK Ltd	Imerys Canada 2004 Inc.
Calderys USA, Inc.	Imerys Canada L.P.
Carbonatos Andinos SA	Imerys Carbonates Austria GmbH
Cebo Holland B.V.	Imerys Carbonates India Limited
Cebo International B.V.	Imerys Carbonates (Thailand) Co, Ltd
Cebo Marine B.V.	Imerys Carbonates USA, Inc.
Cebo UK limited	

Imerys Ceramics Brasil – Minerais para
 Cerâmicas Ltda
 Imerys Ceramics Egypt
 Imerys Ceramics France
 Imerys Ceramics (India) Private Limited
 Imerys Ceramics Italia
 Imerys Ceramics New Zealand
 Imerys Ceramics Portugal, SA
 Imerys Ceramics (Thailand) Ltd
 Imerys Clays, Inc.
 Imerys CSI Switzerland Sagl
 Imerys Diatomita Alicante, S.A.
 Imerys Diatomita Mexico, SA de CV
 Imerys do Brasil Comercio de Extracao de
 Minerios Ltda
 Imerys Filtration France
 Imerys Filtration Minerals, Inc.
 Imerys Fine Chemical (Changshu) Co., Ltd
 Imerys Fused Minerals Beyrède SAS
 Imerys Fused Minerals Domodossola SpA
 Imerys Fused Minerals France Sarl
 Imerys Fused Minerals Greenville, Inc.
 Imerys Fused Minerals Guizhou Co. Ltd
 Imerys Fused Minerals Hull Limited
 Imerys Fused Minerals Laufenburg GmbH
 Imerys Fused Minerals Murg GmbH
 Imerys Fused Minerals Niagara Falls, Inc.
 Imerys Fused Minerals Ruse d.o.o.
 Imerys Fused Minerals Salto Ltda
 Imerys Fused Minerals Teutschenthal
 GmbH
 Imerys Fused Minerals Villach GmbH
 Imerys Fused Minerals (Yingkou) Co, Ltd
 Imerys Fused Minerals Zschornowitz GmbH
 Imerys Gecko Holding (Namibia) (Pty) Ltd
 Imerys Gecko Graphite (Namibia) (Pty) Ltd
 Imerys Gecko Okanjande Mining (Pty) Ltd
 Imerys Graphite & Carbon Belgium SA
 Imerys Graphite & Carbon Canada Inc.
 Imerys Graphite & Carbon Japan K.K.
 Imerys Graphite & Carbon Korea
 Imerys Graphite & Carbon Switzerland SA
 Imerys High Resistance Minerals Japan
 K.K.
 Imerys Industrial Minerals Denmark A/S
 Imerys Industrial Minerals Greece S.A.
 Imerys Itatex Soluções Minerais Ltda
 Imerys Kaolin Belgium
 Imerys Kaolin, Inc.
 Imerys Kiln Furniture España, S.A.
 Imerys Kiln Furniture Hungary Kft.
 Imerys Kiln Furniture (Thailand) Ltd
 Imerys Metalcasting France Sarl
 Imerys Metalcasting Germany GmbH
 Imerys Mica Kings Mountain, Inc.
 Imerys Mica Suzorite Inc.
 Imerys Middle East Holding Company
 W.L.L.
 Imerys Mineral AB
 Imerys Mineral Arabia LLC
 Imerys Minerales Chile SpA
 Imerys Minerales Peru SA
 Imerys Minerali SpA
 Imerys Minerali Gamalero Srl
 Imerys Minerali Corsico Srl
 Imerys Minerals Australia Pty Ltd
 Imerys Minerals Bulgaria AD
 Imerys Minerals China, Inc.
 Imerys Minerals GmbH
 Imerys Minerals Holding Limited
 Imerys Minerals (India) Private Ltd
 Imerys Minerals International Sales
 Imerys Minerals Japan K.K.
 Imerys Minerals Korea Ltd
 Imerys Minerals Ltd
 Imerys Minerals Malaysia Sdn Bhd
 Imerys Minerals Netherlands B.V.
 Imerys Minerals Oy
 Imerys Minerals (Taiwan) Ltd
 Imerys Minerals (Thailand) Ltd
 Imerys Minerals USA, Inc.
 Imerys Minerals Vietnam Ltd
 Imerys Mineraux Belgique SA
 Imerys Minéraux France
 Imerys Newquest (India) Pte Ltd
 Imerys Oilfield Minerals, Inc.
 Imerys Pacific Ltd
 Imerys Participações Ltda
 Imerys PCC France
 Imerys PCC UK Ltd
 Imerys Performance and Filtration Minerals
 Private Limited

Imerys Perlita Barcelona, S.A.
 Imerys Perlita Paulinia Mineraiis Ltda
 Imerys Perlita Tucuman S.A.
 Imerys Perlite Sardinia Srl
 Imerys Perlite USA, Inc.
 Imerys Pigments (Qingyang) Co., Ltd
 Imerys Pigments Trading (Shanghai) Co.,
 Ltd
 Imerys Pigments (Wuhu) Co., Ltd
 Imerys RE
 Imerys Refractory Minerals Clérac
 Imerys Refractory Minerals Glomel
 Imerys Refractory Minerals International
 Sales
 Imerys Refractory Minerals South Africa
 (Pty) Ltd
 Imerys Refractory Minerals USA, INC.
 Imerys Rio Capim Caulim
 Imerys S.A.
 Imerys Seramik Hammdeleri Sanayi ve
 Ticaret AS
 Imerys Services
 Imerys Services Germany GmbH & Co. KG
 Imerys (Shanghai) Filtration Minerals
 Trading Co., Ltd
 Imerys (Shanghai) Investment Management
 Co., Ltd
 Imerys South Africa Pty Ltd
 Imerys South Europe S.L.
 Imerys Specialities Japan Co., Ltd
 Imerys Steelcasting do Brasil Ltda
 Imerys Steelcasting India Private Limited
 Imerys Steelcasting USA, Inc.
 Imerys Tableware Balkans Srl
 Imerys Tableware CR sro
 Imerys Tableware Deutschland GmbH
 Imerys Tableware France
 Imerys Talc America, Inc.
 Imerys Talc Austria GmbH
 Imerys Talc Australia Pty Ltd
 Imerys Talc Belgium
 Imerys Talc Canada Inc.
 Imerys Talc Europe
 Imerys Talc Finland Oy
 Imerys Talc Germany GmbH
 Imerys Talc Italy S.p.A.
 Imerys Talc Luzenac France
 Imerys Talc Mexico, S.A. de C.V.
 Imerys Talc Spain, S.A.
 Imerys Talc UK Holding Ltd
 Imerys Talc Vermont, Inc.
 Imerys TCSI Switzerland Sagl
 Imerys Technology Center Austria GmbH
 Imerys Trading Minerals Egypt
 Imerys Trustees Ltd
 Imerys UK Finance
 Imerys UK Ltd
 Imerys UK Pension Fund Trustees Ltd
 Imerys USA, Inc.
 Imerys Wollastonite USA, LLC
 Imerys Zhejiang Zirconia Co., Ltd
 Industria Macinazione Minerali Per
 L'Industria Ceramica S.P.A.
 Industrial Minerals of Greece
 Industrialmin
 Isocon S.A.
 K-T Clay de Mexico, SA de CV
 Kaolin Australia Pty Ltd
 Kentucky-Tennessee Clay Company
 Kerneos Aluminat Dis Tic As
 Kerneos Australia Pty Ltd
 Kerneos (China) Aluminate Technologies
 Co. Ltd
 Kerneos de Mexico SA de CV
 Kerneos do Brasil Comercial Ltda
 Kerneos Espana SL
 Kerneos Holding North America Inc.
 Kerneos Holding Northern Europe Ltd
 Kerneos Inc.
 Kerneos India Aluminate Private Ltd
 Kerneos India Aluminate Technologies
 Private Ltd
 Kerneos Polska SP Zoo
 Kerneos Southern Africa Pty Ltd
 Kinta Powdertec Sdn Bhd
 L-Imerys Industria e Comércio de Cal Ltda
 Latomia N. Korakas SA
 Laviosa Chimica Mineraria S.p.A.
 Laviosa France
 Laviosa India Private Limited
 Laviosa Promasa S.A.
 Laviosa Sanayi ve Ticaret Ltd Sirketi

Linjiang Imerys Diatomite Co., Ltd	Plibrico Ltd
Liquid Quimica Mexicana, SA de CV	PPSA Overseas
LLC Imerys Aluminates	PT. Esensindo Cipta Cemerlang
Metalleion-Metalleymaton SA	PT. Stollberg - Samil Indonesia
Mikro Mineral Endüstriyel Mineraller	PT Binah Surindah Cemerlang
Sanayi ve Ticaret AS	PT Imerys Ceramics Indonesia
Milos Initiative	PT Indoporlen
Milos Mining Museum	PT Indoporlen Sakti
Mineralien Schiffahrt Spedition und	Pyramax Ceramics Southeast, LLC
Transport GmbH	QA Refractories Pty Ltd
Micron-Ita Industria E Comercio de	QingDao Stollberg & Samil Co., Ltd
Micron-Ita Mineracao Ltda	QS Abrasivi Marengo Srl
Minera Montparnas SA	Quartz Corp (Shanghai) Co., Ltd
Minera Roca Rodando Srl de CV	Quartz de Mauritanie SA
Minerais Ltda	ReClaym Limited
Minven	Refractory Minerals Pty Ltd
MIRCAL SA	Rumico Feuerfeste Baustoffe GmbH
MIRCAL Australia Pty Ltd	S&B Bentonite (Chaoyang) Co., Ltd
MIRCAL Bresil	S&B Endustriyel Mineraller A.S.
MIRCAL de Mexico, SA de CV	S&B Holding GmbH
MIRCAL Europe	S&B Industrial Minerals (Tianjin) Co., Ltd
MIRCAL Italia SpA	S&B Minerals US Holding GmbH
MONREFCO GmbH	S&B Minerals Finance Sarl
MRD Co., Ltd	S&B Minerals Participations LLC
MRD-ECC Co., Ltd	S&B Minerals Participations Sarl
MSL Minerais S.A.	S&B Minerals Participations 2 Sarl
N.G. Johnson Limited	S&B Industrial Minerals (Henan) Co., Ltd
N.G. Johnson (Northern) Holdings Limited	S&B Industrial Minerals Morocco
N.G. Johnson (Northern) Limited	S&B Industrial Minerals Spain Slu
NAIMEX Srl	S&B Wines S.A.
Niigata GCC Ltd	SA des Kaolins de Nozay
Nippon Power Graphite Co., Ltd	Samrec Pty Ltd
Nizerolles SA	SCEA Sainte-Colombe
North African Industrial Mineral	Servicios Piedra Tumbante Srl de CV
Exploration Sarl - Naimex	Set Linings GmbH
Nyco Minerals LLC	Sibimin Overseas Ltd
Organik Madencilik AS	Sidex Monolithiques SRL
Pabalk Maden Sanayi ve Ticaret AS	Societe de Valorisation des Mineraux
Parimetal	Industriels SAS
Para Pigmentos SA – PPSA	Spica
Parnasse Trente Deux	Springdeals Six Pty Ltd
Parnasse Trente Trois	Stollberg & Samil Co., Ltd
Peramin	Termorak (Thailand) Co Ltd
Pergem Mineral	The Quartz Corp SAS
PGB SA	The Quartz Corp USA
Plibrico Installaciones Refractarias	The Quartz Corp AS

Tygerkloof Mining (Proprietary) Ltd
Vatutinsky Kombinat Vognetryviv
Vermiculita y Derivados, SI
Vougioukli Quarries AVEE
World Minerals USD LLC
World Minerals USD Sarl

Xinyang-Athenian Mining Co. Ltd
YBB Calcium Products Co, Ltd
Yueyang Imerys Antai Minerals Co., Ltd
Zhengzhou Jianai Special Aluminates Co.
Ltd

2. **Debtors' Previous Names**

DOCROM, Inc.
Cyprus Talc Corporation
Cyprus Windsor Minerals Corporation
Eastern Magnesia Talc Co., Inc.

Luzenac America, Inc.
Luzenac, Inc.
Windsor Minerals, Inc.

3. **Debtors' Restructuring and Other Significant Professionals**

Alston & Bird LLP
Alvarez and Marsal North America, LLC
Bowles & Verna LLP
Dentons US LLP
Ernst & Young, LLP
Fasken Martineau DuMoulin LLP
Finnegan, Henderson Farabow, Garrett &
Dunner, LLP
Ford & Harrison, LLP
Gordon Rees Scully Mansukhani, LLP
Haynsworth Sinkler Boyd, P.A.
Kazmarek Mowrey Cloud Laseter, LLP
KCIC, LLC
Lamb and McNaughton, PC
Latham & Watkins LLP

Mathews, Dinsdale & Clark, LLP
McGuire Woods, LLP
Neal Gerber & Eisenberg LLP
Ogletree, Deakins, Nash, Smoak & Stewart,
P.C.
PricewaterhouseCoopers, LLP – Canada
Prime Clerk LLC
Rawle & Henderson LLP
Richards, Layton & Finger, P.A.
Richter Advisory Group Inc.
Ryan, LLC
Stikeman Elliott LLP
Taylor & Anderson, LLP
The Levinson Group

4. **Major Secured Lenders (Including Current and Former Administrative Agents)**

None

5. **Counsel/Professionals to Major Secured Lenders**

None

6. **Holders of 1% or More of Outstanding Common Equity Securities of the Debtors**

None²

² Shareholders are accounted for in Section 1 above.

7. **Current and Former Officers and Directors**

Alexandra Picard	Joel Ventura
Anthony Wilson	Julie Cummings
Bernd Beyer	Karin Jonsson
Brent Roper	Kent Cutler
Brian Hanrahan	Kevin Collins
Catherine Caouette	Lucie Gouanelle Gardette
Cheree Finan	Mario Seixas
Christopher Robinson	Mekalaradha (Radha) Murphy
Cindy Hein	Michel Francoeur
Dave Marek	Noa Tal
Diane Hryshko	Oliver Wolfsensberger
Didier Arseguel	Peter Yoxall
Eva Brooks	Ralph Calmes
Gary Goldberg	Richard Pierce Jr.
Giorgio La Motta	Ryan Van Meter
Ivan Balazard	Shannon Delquadro
James Kuykendall	Shannon Freeman
Jeffrey C. Hicks	Susan B. Radcliffe
Jim Miller	

8. **Potential Major Unsecured Creditors (Excluding Creditors Asserting Talc Claims)**

AOC, LLC	Material Motion, Inc.
Amatic CPA Group	McLanahan Corporation
BNSF Railway Company	Nasco Propane
C.H. Robinson Worldwide, Inc.	Nederman Mikropul Canada, Inc.
Canadian National Railway Company	Normand Verville Enterprises
Casella Organics	Northwestern Corporation
Challenger Pallet & Supply, Inc.	Savage Trucking, Inc.
Cole International, Inc.	Steel Pro, Inc.
Corning, Inc.	Traffic Tech
DMS Machining & Fabrication	Tyoga Container Company
Emera Energy Gas Trading	UE Compression Holdings
Farber & Company	Union Gas, Ltd.
Geomapping Associates, Ltd. Inc.	Univar Canada, Ltd.
Johnson Controls Fire Protection LP	Watkins & Shepard Trucking, Inc.
Laforest Electrick	William Day Construction Limited

9. **Major Suppliers, Vendors, and Other Parties**

Adams Warehouse & Delivery, Inc.	Asahi Kasei Plastics North America Inc.
AM Welles, Inc.	Atlas Boiler & Equipment Co.

Atlas Copco Compressors, Inc.
Autumn Transport, Inc.
B.H. Roettker Company, Inc.
Border States Electric Supply
Charger Logistics, Inc.
Cianbro Corporation
CIBC Mellon
Cit Group / Capital Finance, Inc.
Comprehensive Traffic Systems LLC
Connell Brothers Company
Constellation NewEnergy, Inc.
Crete Carrier Corporation
D&B
Dalian Helm International Logistics Co
LTD
Dick Irvin, Inc.
Dixon Electric
Do All Maintenance
Echo Global Logistics, Inc.
EDF Trading North America, LLC
Evonik Corporation
Fanuc Robotics America, Inc.
FTI Consulting (SC) Inc.
Gotar Technologies, Inc.
Grancisco J. Martinez
Green Mountain Ent. Inc.
Gui Lin Minerals Co., Ltd.
H Bar N
Haicheng No.2 Talc Powder Factory
Haoran International, Inc.
Harris County, Texas
Highlands Fuel Delivery, LLC
HJR Services, LLC
Hood Flexible Packaging Corporation
Hudson Shipping Lines, Inc.
Hughes Hubbard & Reed LLP
Hydro One Networks, Inc.
IXOM Colombia S.A.S
Ixom Orica Chemicals Chile SA
Joseph Macuba
Kaeser Compressors Canada, Inc.
Kaeser Compressors, Inc.
Lakeland Freightways, Inc. c/o Manitoulin
Transport
LC Staffing Service
Levert Personnel Resources, Inc.

Levick Strategic Communications
Ludlow Electric Dept.
Manitoulin Warehousing & Distribution
Marine Chartering Co Inc.
Markowski's Excavating Inc.
McDougall Energy, Inc.
Micromeritics Instrument Corporation
Minchem International, Inc.
Minister of Finance
MMC, Inc.
MMKK, Inc.
Mondi Bags USA, LLC
Mondi Romeoville, Inc.
Motion Industries, Inc.
Neopal, LLC
New England Mechanical Overlay, Inc.
Nikede Comercio E Representacoes LTDA
Norred & Associates Inc.
North Monsen Company
Orica Mountain West
Orica USA, Inc.
Pallets Inc.
PCC Logistics - Pacific Coast Container
Personnel Management Group Inc.
Pro-Min
Quinn Emanuel Urquhart & Sullivan UK,
LLP
Robert J. Smith, Jr. & Jean Smith
Rocky Mountain Supply, Inc.
RW Smith & Co., Inc.
S&S Tin Baling, Inc.
Savage Safe Handling
Shell Energy North America (US), LP
SM Hewitt (Sarnia), Ltd.
ST Equipment & Technology
Swift Transportation Services, LLC
TEA Solutions, Inc.
The Andersons
The Bucket Shop Group
Thiele Kaolin Company, Inc.
Tractor & Equipment Co.
Univar USA, Inc.
UPS Supply Chain Solutions, Inc.
Vermont Railway, Inc.
Watco Companies, LLC
Wells Fargo Rail Corporation

Werner Global Logistics US, LLC
Workplace Safety & Insurance Board

Yuan Da Plastic Corporation

10. **Potential Investors and Their Counsel/Advisors**

None

11. **Significant Customers**

Adell Plastics, Inc.	Ingenia Polymers
Advanced Composites Mexicana SA de CV	Interplastic Corp.
Advanced Composites, Inc.	ITW Evercoat
AE Fleming	Jeld-Wen
Alberta Pacific	Johnson & Johnson
AOFU Environmental	Kohl Marketing, Inc.
Basell Poliolefinas S De RI	Kopla America, Inc.
BASF	Lintech International, LLC
Borealis Compounds, Inc.	LMI Custom Mixing, LLC
BPI Coatings Solutions, LLC	Mytex Polymers
Brenntag Specialties	ND Paper Inc.
Canadian Forest Products	NGK Materials USA, Inc.
Carlisle SynTec	Nippon Dynawave Packaging Company
CGC, Inc.	Pactiv
Chemco International (Hong Kong) Ltd.	Pharma Tech Industries
Chemical Distributors	PolyOne
CMPC Pulp SA (Fabrica Santa Fe)	Rhetech, Inc.
Contitech USA, Inc.	Rustoleum Corporation
Corning GmbH	Sappi Fine Paper
Corning Shared Services	Sherwin Williams
Dae Ha America Corp.	St. Bernard Soap Company
Daishowa Marubeni International, Ltd.	Sumika Polymer Compounds, Inc.
Dar Tech, Inc.	Suzano Papel E Celulose SA
Domtar Inc.	Synthetic Specialties
Equistar Chemicals, LP	Timbertech Limited
Fibria Celulose SA	Total Petrochemicals USA, Inc.
Finch Paper, LLC	Twin Rivers Madawaska
Firestone Building Products	Universal Forest Products
Fitz Chem Corporation	US Gypsum
GTM Mexico Product and Services S.A. De C.V.	Valspar
Harris and Ford, LLC	Van Horn Metz
Henkel Global Supply Chain B.V.	Verso Corporation
Heritage Plastics, Inc.	West Pharmaceutical Services, Inc.
HM Royal of California, Inc.	Westrock MWV, LLC
Horn	Wolf Container & Chemical Co., Inc.
IMCD Canada Limited	Woodland Pulp, LLC

12. **Top Plaintiffs' Law Firms Representing Parties Asserting Talc Claims Against the Debtors**

Ashcraft & Gerel, LLP	McDermott & Hickey, LLC
Beasley Allen Crow Methvin Portis & Miles PC	Meirowitz & Wasserberg, LLP
Belluck & Fox, LLP	Morelli Law Firm, PLLC
Brayton Purcell LLP	Morris Bart, LLC
Burns Charest LLP	Motley Rice LLC
Cohen & Malad LLP	Napoli Shkolnik, PLLC
Cohen Placitella & Roth, PC	Onder, Shelton, O'Leary & Peterson, LLC
Cooney & Conway	Phillips & Paolicelli LLP
Dean Omar Branham, LLP	Potts Law Firm
Deaton Law Firm	Porter & Malouf, PC
Early, Lucarelli, Sweeney & Meisenkothen, LLC	Rebecca S. Vinocur, P.A.
Flint Law Firm, LLC	Robinson Calcagnie, Inc.
Girardi Keese	Ross Feller Casey, LLP
Goldberg Persky & White, P.C.	Sanders Phillips Grossman, LLP
Goldenberg Law, PLLC	Satterley & Kelley PLLC
Golomb & Honik, PC	Seeger Weiss, LLP
Gori Julian & Associates PC	Simmons Hanly Conroy, LLC
Heygood Orr & Pearson	Simon Greenstone Panatier, PC
Holland Law Firm	Szaferman, Lakind, Blumstein & Blader, P.C.
Johnson Becker PLLC	The Dugan Law Firm APLC
Johnson Law Group	The Ferraro Law Firm, P.A.
Kazan, McClain, Satterley & Greenwood	The Lanier Law Firm, PLLC
Kiesel Law, LLP	The Miller Firm, LLC
Levin Simes LLP	The Simon Law Firm, PC
Levy Konigsberg LLP	The Smith Law Firm, PLLC
Lipsitz & Ponterio, LLC	Thornton Law Firm LLP
Locks Law Firm	Wagstaff & Cartmell, LLP
Maune, Raichle, Hartley, French & Mudd, LLC	Waters Krause & Paul
	Weitz & Luxenberg P.C.

13. **Prepetition Legal Representative for Future Talc Personal Injury Claimants**

James L. Patton, Jr.

14. **Professionals to Prepetition Legal Representative for Future Talc Personal Injury Claimants**

Ankura Consulting Group LLC	Young Conaway Stargatt & Taylor, LLP
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15. **Insurers and Issuers of Surety Bonds**

AGCS	A.G. Securitas
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Aetna Casualty and Surety Company	Hartford Accident and Indemnity Company
Affiliated FM Insurance Company	Home Insurance Company
AIG Europe Limited	Ideal Mutual Insurance Company
AIG Insurance Company of Canada	Industrial Indemnity
AIU Insurance Company	Ins. Co. of PA
Allianz Global Corporate & Specialty	Ins. Corp. of Singapore
Allianz Global Risks US Insurance Co.	Insurance Company of North America
Allianz Insurance Company	Insurance Company of the State of
Allianz Underwriters Insurance Company	Pennsylvania (The)
American Centennial Insurance Company	Integrity Insurance Company
American Excess Insurance Company	International Insurance Company
American Motorists Insurance Company	International Sureties, Ltd
American Re-Insurance Company	International Surplus Lines Insurance
Aon Reed Stenhouse	Company
AON Risk Services Swiss Ré & XL	L'Union Atlantique S.A. D'Assurances
Assurances Generales De France	Landmark Insurance Company
Assurantiekantoor VanWijk & Co.	Lexington Insurance Company
Birmingham Fire Ins. Company	Lloyds of London
Birmingham Fire Insurance Company of	London Guarantee and Accident Company
Pennsylvania	of New York
Central National Insurance Company of	London Market
Omaha (The)	Manhattan Fire & Marine Insurance
Chubb Insurance Company	Company (The)
City Insurance Company	Marsh S.A.
CNA & XL	Mead Reinsurance Corporation
Colonia Versicherungs AG, Koln	Middlesex Assurance Company
Columbia Casualty Company	Midland Insurance Company
Continental Casualty Company	Mission Insurance Company
Drake Insurance Company of New York	Mission National Insurance Company
Employers Insurance of Wausau, A Mutual	Munich Ré
Company	Mutual Fire, Marine and Inland Insurance
Employers Mutual Casualty Company	Company (The)
Employers Surplus Lines Insurance	N.V. Rotterdamse Assurantiemas
Company	N.V. Schadeverzekeringsmaatschappij Maas
Eurinco Allgemeine Versicherungs AG,	Lloyd
Dusseldorf	National Casualty Company
Federal Insurance Co. (Chubb)	National Union Fire Insurance Company of
Fireman's Fund Insurance Company	Pittsburgh, PA
First State Insurance Company	New Hampshire Insurance Company
FM Global	North River Insurance Company
Gibraltar Casualty Company	Northbrook Excess and Surplus Insurance
Granite State Insurance Company	Company
Great Northern Insurance Company	Northeastern Fire Insurance Company of
Great Southwest Fire Insurance Company	Pennsylvania
Groupe Drouot	Old Republic Insurance Company
Harbor Insurance Company	Pacific Employers Ins. Company

Pine Top Insurance Company
 Prudential Reinsurance Company
 Republic Indemnity Company of America
 Republic Insurance Company
 Republic Western Ins. Company
 Reserve
 Royal Belge I.R., S.A. d'Assurances
 Royal Indemnity Company
 Royal Insurance Co. of America
 Safety Mutual Casualty Corp.
 Seguros La Republica SA
 Siaci Saint Honore
 Sompo International
 Southern American Insurance Company
 Starr Indemnity & Liability Company
 Stonewall Insurance Company

The American Insurance Company
 Transamerica Premier Insurance Company
 Transcontinental Insurance Company
 Transit Casualty Company
 Travelers Indemnity Company
 Truck Exchange Insurance
 Truck Insurance Exchange
 UAP
 Unigard Mutual Insurance Company
 Union Indemnity
 Union Indemnity Insurance Company of
 New York
 Westchester Fire (ACE) / Zurich American
 XL Insurance America, Inc.
 Zurich American Insurance Company
 Zurich Insurance Company

16. **Taxing and Other Significant Governmental Authorities**

Alabama Department of Revenue
 Ann Harris Bennett Tax Assessor-Collector
 & Voter Registrar
 Arizona Department of Revenue
 Calaveras County Tax Collector
 California Franchise Tax Board
 Canada Revenue Agency
 Cavendish Town Treasurer
 City of Timmins
 Colorado Department of Revenue
 Delaware Division of Revenue
 Department of Taxation and Finance
 Gallatin County Treasurer
 Georgia Department of Revenue
 Grafton Town Treasurer
 Illinois Department of Revenue
 IRS Department of Treasury
 Kentucky Department of Revenue
 Madison County Clerk & Recorder
 Madison County Treasurer
 Maine Revenue Services
 Massachusetts Department of Revenue
 Michigan Department of Treasury
 Mine Safety & Health Administration
 Minister of Finance of Ontario
 Minister of Finance of Quebec
 Minister of Revenue Quebec

Minnesota Department of Revenue
 Mississippi Department of Revenue
 Missouri Department of Revenue
 Montana Bureau of Land Management
 Montana Department of Environmental
 Quality
 Montana Department of Revenue
 Nebraska Department of Revenue
 New Jersey Division of Taxation
 New York Department of Taxation and
 Finance
 North Carolina Department of Revenue
 Ohio Department of Taxation
 Ontario Aggregate Resources Corporation
 Ontario Ministry of Labour and
 Employment Practices
 Oregon Department of Revenue
 Pennsylvania Department of Revenue
 Receiver General of Canada
 Rhode Island Department of Revenue
 Division of Taxation
 Sheldon ISD Tax Office
 South Carolina Department of Revenue
 Tennessee Department of Revenue
 Texas Commission On Environmental
 Quality
 Texas Comptroller of Public Accounts

Three Forks City
Town of Chester
Town of Ludlow
Town of Reading
Town of Troy
Town of West Windsor

Town of Windham
Vermont Department of Taxes
Virginia Department of Taxation
Washington State Department of Revenue
West Virginia Department of Revenue
Wisconsin Department of Revenue

17. **United States Bankruptcy Judges in the District of Delaware**

The Honorable Brendan L. Shannon
The Honorable Christopher S. Sontchi,
Chief Judge
The Honorable Kevin Gross

The Honorable Kevin J. Carey
The Honorable Laurie Selber Silverstein
The Honorable Mary F. Walrath

18. **Staff for the Honorable Laurie Selber Silverstein**

Cacia Batts

Lora Johnson

19. **United States Trustee for the District of Delaware (and Key Staff Members)**

Benjamin Hackman, Trial Attorney
Brya Keilson, Trial Attorney
Christine Green, Paralegal Specialist
David Buchbinder, Trial Attorney
Diane Giordano, Bankruptcy Analyst
Dion Wynn, Paralegal Specialist
Edith A. Serrano, Paralegal Specialist
Hannah M. McCollum, Trial Attorney
Holly Dice, Auditor (Bankruptcy)
Jaclyn Weissgerber, Trial Attorney
James R. O'Malley, Bankruptcy Analyst
Jane Leamy, Trial Attorney
Jeffrey Heck, Bankruptcy Analyst

Juliet Sarkessian, Trial Attorney
Karen Starr, Bankruptcy Analyst
Linda Casey, Trial Attorney
Linda Richenderfer, Trial Attorney
Lauren Attix, OA Assistant
Michael Panacio, Bankruptcy Analyst
Michael West, Bankruptcy Analyst
Ramona Vinson, Paralegal Specialist
Richard Schepacarter, Trial Attorney
Shakima L. Dortch, Paralegal Specialist
T. Patrick Tinker, Assistant U.S. Trustee
Timothy J. Fox, Jr., Trial Attorney

20. **Clerk of Court and Deputy for the District of Delaware**

Stephen Grant, Chief Deputy Clerk
Una O'Boyle, Clerk of Court

EXHIBIT B**Summary of Pre-Petition Invoices and Payments**

The below chart summarizes the Debtors' payment of invoices under the terms of the Proposed FCR Agreement (as defined in the FCR Appointment Motion):

Payee	Invoice Date	Invoice Amount
Ankura Consulting Group	11/30/2018	\$15,056.87
Ankura Consulting Group	12/21/2018	\$62,925.00
Ankura Consulting Group	02/01/2019	\$106,421.70
	Total	\$184,403.57

EXHIBIT C

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

IMERYYS TALC AMERICA, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-10289 (LSS)

Jointly Administered

Ref. Docket No. _____

**ORDER AUTHORIZING THE PROPOSED FUTURE
CLAIMANTS' REPRESENTATIVE TO RETAIN AND
EMPLOY ANKURA CONSULTING GROUP, LLC AS
CONSULTANTS, NUNC PRO TUNC TO THE PETITION DATE**

Upon the application (the "Ankura Application") of James L. Patton, Jr., the proposed legal representative (the "Future Claimants' Representative") for persons who have not yet asserted a talc-related personal injury claim against the Debtors but may in the future assert such a claim, for the issuance and entry of an order, pursuant to sections 105(a), 524(g), and 1103 of title 11 of the United States Code (the "Bankruptcy Code") and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), authorizing the employment and retention of Ankura Consulting Group, LLC ("Ankura") as claims evaluation and financial valuation consultants, *nunc pro tunc* to the Petition Date; and upon the declaration of Thomas Vasquez, Ph.D. in support thereof (the "Vasquez Declaration"); and this Court being satisfied based on the representations made in the Ankura Application and the Vasquez Declaration that the professionals of Ankura are "disinterested persons" as that term is defined under section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, and that Ankura's involvement in other cases does not conflict with the obligations of Ankura to the Future Claimants' Representative in these cases; and that Ankura's employment by the Future

¹ The Debtors in these cases, together with the last four digits of each Debtor's federal taxpayer identification number, are: Imerys Talc America, Inc. (6358), Imerys Talc Vermont, Inc. (9050) and Imerys Talc Canada Inc. (6748). The Debtors' address is 100 Mansell Court East, Suite 300, Roswell, Georgia 30076.

Claimants' Representative is necessary and in furtherance of the Future Claimants' Representative's duties, and would be in the best interests of the Debtors' estates; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The relief requested in the Ankura Application is granted.
2. In accordance with sections 105, 524(g), and 1103 of the Bankruptcy Code, the Future Claimants' Representative is hereby authorized to employ and retain Ankura as claims evaluation and financial valuation consultants on the terms set forth in the Ankura Application and Vasquez Declaration, *nunc pro tunc* to the Petition Date.
3. Ankura shall be compensated in such amounts as may be allowed by this Court upon the filing of appropriate applications for allowance of interim or final compensation in accordance with the procedures set forth in sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, and any order entered by this Court establishing procedures for interim compensation and reimbursement of expenses of professionals. The Future Claimants' Representative shall not be personally responsible for providing compensation or expense reimbursements to Ankura under any circumstance.
4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this order.

Dated: _____, 2019
Wilmington, Delaware

LAURIE SELBER SILVERSTEIN
UNITED STATES BANKRUPTCY JUDGE