

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
Charlotte Division**

IN RE:

GARLOCK SEALING TECHNOLOGIES
LLC, et al.,

Debtors.¹

Case No. 10-BK-31607

Chapter 11

Jointly Administered

**DEBTORS' FIFTY-FIFTH OMNIBUS OBJECTION:
OBJECTIONS TO THE TEMPORARY ALLOWANCE
FOR VOTING PURPOSES OF CERTAIN ASSERTED CLASS 4 CLAIMS
FILED BY FOSTER & SEAR**

Pursuant to Section 502 of the Bankruptcy Code, Federal Rules of Bankruptcy Procedure 3007 and 3018, and the Order Approving Disclosure Statement and Establishing Asbestos Claims Bar Date and Procedures for Solicitation (Docket No. 4542) (the "Solicitation Order"), Debtors hereby file this objection (this "Objection") to the Temporary Allowance for Voting Purposes of Certain Class 4 Claims (the "Subject Claims") Filed by Foster & Sear, LLP (the "Filing Firm"). The Subject Claims do not meet the Solicitation Order's requirements for temporary allowance because they were settled and paid pre-petition, were dismissed with prejudice, are time-barred, or were resolved by final judgment pre-petition. The Subject Claims constitute a portion of claims filed by the Filing Firm and identified by Debtors as not meeting these requirements. Through Debtors' Relief Motion, submitted in connection with this Objection, Debtors request additional relief to permit Debtors to further evaluate the remaining

¹ The debtors in these jointly administered cases are Garlock Sealing Technologies LLC; Garrison Litigation Management Group, Ltd.; and The Anchor Packing Company (hereinafter "Garlock" or "Debtors").

claims submitted by Filing Firm and, if necessary, lodge objections to such claims. In support of this Objection, Debtors show the following:

JURISDICTION

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of this Objection is proper under 28 U.S.C. § 1408.

2. The statutory predicates for this Objection are 11 U.S.C. §§ 105(a) and 502(b) and Federal Rules of Bankruptcy Procedure 3001(a), 3001(c), 3007(d), 3007(f), and 3018.

3. Debtors make this Objection pursuant to the terms and requirements of the Solicitation Order.

BACKGROUND

4. On April 10, 2015, this Court entered the Solicitation Order, thereby approving Debtors' Disclosure Statement concerning Debtors' Second Amended Plan of Reorganization (the "Plan") and approving solicitation and voting procedures in connection with the confirmation of the Plan.

5. The Solicitation Order required certain Class 4 claimants seeking to vote to accept or reject the Plan to file a ballot in the form ordered prior to the Voting Deadline and Asbestos Claims Bar Date, October 6, 2015. Solicitation Order ¶ 5.

6. For Class 4 claimants to cast a ballot to vote to accept or reject the Plan, the Solicitation Order required the claimant or their attorney to make certain certifications. The Filing Firm, in this instance, filed a Master Ballot for Class 4 Claims that required attorneys for the firm to "certify under penalty of perjury that the following matters are true and correct to the best of such attorney's knowledge, information, and reasonable belief":

- a. the claimants identified in the accompanying exhibit each hold a Current GST Asbestos Claim (as defined in the Plan) that has not been dismissed with prejudice or settled and paid, and is not known to be time-barred;
- b. the Injured Parties listed in the exhibit were diagnosed with pleural or peritoneal mesothelioma, lung cancer, laryngeal cancer, or asbestosis, as indicated in the exhibit, based on, or as evidenced in, medical records or similar documentation in the possession of the claimants, their attorneys, or the respective physicians of those claimants or Injured Parties;
- c. the Injured Parties listed in the exhibit were exposed to asbestos released from asbestos-containing gaskets or packing manufactured, produced, fabricated, distributed, supplied, marketed, or sold by Garlock (“GST Asbestos Exposure”); and
- d. the attorney is authorized by the holders of claims listed in the exhibit to vote on the Plan on their behalf, and to represent that the Injured Parties listed in the exhibit have (or, if deceased, had) the respective diseases noted in the exhibit and GST Asbestos Exposure.²

7. Pursuant to the Solicitation Order, any objections to temporary allowance of Class 4 Current GST Asbestos Claims must be filed on or before November 5, 2015. *See* Solicitation Order ¶ 17.

8. This Objection is made in connection with Debtors’ Motion Seeking Relief From Solicitation Order and Modification of Criteria for Temporary Allowance of Class 4 Claims for Voting Purposes (the “Relief Motion”).

² *See* Solicitation Order Ex. 2 at Class 4-Master-8 (form of Master Ballot); *see also* Solicitation Order ¶ 17; Voting Procedures at 3-4.

9. This Objection and the Relief Motion seek relief pursuant to and consistent with the Solicitation Order.

RELIEF REQUESTED

10. Debtors seek entry of an order denying temporary allowance for voting purposes of the Subject Claims in connection with the confirmation of the Plan.³ Should the Court grant Debtors' Relief Motion, Debtors would seek to defer a hearing on this Objection pending compliance by Class 4 claimants with the documentation requirements requested in the Relief Motion.

11. A proposed order denying temporary allowance for voting purposes of the Subject Claims is submitted herewith and attached hereto as Exhibit A.⁴

BASIS FOR THE RELIEF REQUESTED

12. The Solicitation Order quite plainly set forth the criteria for claims to be temporarily allowed for voting purposes. That order, the accompanying Voting Procedures, and the Ballots themselves likewise plainly set forth such criteria.

13. In particular, to be eligible to vote, claimants, or their representatives (including attorneys voting such claimants' claims) were required to make the certifications under penalty of perjury outlined in ¶ 6 above. Among those certifications were that each claimant casting a

³ Pursuant to the Solicitation Order, Debtors need not file objections to allowance of claims in Class 4, Class 5, and Class 6 for purposes other than voting prior to any hearing on confirmation of the Plan. *Id.* ¶ 18.

⁴ This Objection is filed without prejudice to any alternative grounds Debtors may assert in objecting to temporary allowance or allowance of the Subject Claims on other bases and for other purposes, all of which grounds are hereby expressly reserved, and nothing contained herein constitutes a waiver by Debtors of such grounds. *See, e.g., In re Worldcom, Inc.*, No. 02-13533, 2006 WL 2400094, at *4 (Bankr. S.D.N.Y. 2006) (allowing Debtor to assert additional bases for objecting to proof of claim, other than those asserted in initial objection, in accordance with express reservation of rights).

ballot “hold[s] a Current GST Asbestos Claim (as defined in the Plan) that has not been **dismissed** with prejudice or **settled and paid**, and is not known to be **time-barred**.”⁵ (emphasis added)

14. As described in more detail in the Relief Motion, after the Voting Deadline, Debtors’ claims experts at Bates White began matching ballots to the Garlock Analytical Database and analyzing the claims. *See generally* Relief Motion. This analysis demonstrated that tens of thousands of voted claims did not meet the Court’s requirements for temporary allowance because they were settled and paid pre-petition, were dismissed with prejudice, are clearly time-barred, were resolved by final judgment pre-petition, do not have evidence of GST Asbestos Exposure, or do not have a diagnosis of disease.

15. The Relief Motion and the Declaration of Charles Bates and Affidavit of Elizabeth Barry, filed with the Relief Motion, all are expressly incorporated herein by reference. Those documents set forth in more detail the analysis performed by Bates White and the context for that analysis provided by Garrison.

16. Based on this analysis, numerous ballots cast by the Filing Firm did not meet voting criteria and should not have been submitted. The Subject Claims are illustrative of claims filed by the Filing Firm that did not meet voting criteria on some or all of the following grounds:

- a. *Settled*. Claims recorded as settled and paid in Debtors’ database.
- b. *Manville 2002*. Claims asserted against the Manville Trust in 2002 or earlier on behalf of claimants who never filed suit against Debtors, yet now are attempting to assert claims that are clearly time-barred under

⁵ *See* Solicitation Order Ex. 2 at Class 4-Master-8 (form of Master Ballot) (emphasis added).

applicable state law. *See* Exhibit to Relief Motion (summarizing state statutes of limitation).

- c. *Bankruptcy Ballots*. Claims voted in bankruptcies before June 2007 on behalf of claimants who never filed suit against Debtors, yet now are attempting to assert claims that are clearly time-barred under applicable state law. *See* Exhibit to Relief Motion (summarizing state statutes of limitation).
- d. *Plaintiff's Verdict or Defense Verdict*. Claims resolved by plaintiff's verdict or defense verdict and subject to a final judgment.
- e. *Dismissed*. Claims subject to dismissal orders that were never re-filed against Debtors, and are now time-barred under applicable state law. *See* Exhibit to Relief Motion (summarizing state statutes of limitation and savings period).

17. Attached as Exhibit B is a listing of the Subject Claims, which for the reasons described above and identified in Exhibit B do not meet the criteria for temporary allowance.

18. The Subject Claims are only a portion of the claims filed by the Filing Firm that did not meet voting criteria for one or more reasons identified in ¶ 16 above. Given the time constraints on Debtors to file these Objections before November 5, 2015, as well as the procedural restraints of Bankruptcy Rule 3007 (limiting omnibus objections to 100 claims), Debtors identified the Subject Claims as a sample of the objectionable ballots and/or proofs of claim filed by the Filing Firm. This Objection objects specifically to such Subject Claims.

19. Through the Relief Motion, Debtors seek a revision of the Solicitation Order to implement verification procedures that ensure claimants vote in Class 4 only if they meet

temporary allowance criteria. Those information and documentation requirements requested are described in detail in the Relief Motion.

20. The Relief Motion also requests that Debtors be (1) relieved from the 100-claim limit applicable to omnibus objections, (2) relieved of the Solicitation Order's November 5, 2015 deadline for filing objections to the temporary allowance for voting purposes of Class 4 claims, and (3) permitted to lodge objections in an omnibus fashion on a Filing Firm-by-Filing Firm basis to claims that, after providing information requested by the Relief Motion, fail to meet voting requirements.

PROCEDURAL MATTERS

21. Pursuant to the Solicitation Order, Debtors are required to meet and confer with parties in interest to develop a mutually agreeable schedule governing the disposition of this Objection. For that reason, no notice of hearing will be filed with this Objection, and Debtors will work with the Court to indicate no hearing will be scheduled on the Court docket.

22. Immediately following the filing of this Objection, Debtors will communicate with parties in interest to facilitate such conference.

23. Debtors will serve with this Objection, the Declaration of Charles Bates, the Affidavit of Elizabeth Barry, and the Relief Motion, all of which are incorporated by reference herein.

CONCLUSION

24. For the reasons set forth above, Debtors object to the temporary allowance for voting purposes of the Subject Claims.

This 5th day of November, 2015.

Respectfully submitted,

/s/Garland S. Cassada

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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
Charlotte Division**

IN RE:

GARLOCK SEALING TECHNOLOGIES
LLC, et al.¹

Debtors.

Case No. 10-31607

Chapter 11

Jointly Administered

**ORDER REGARDING DEBTORS' FIFTY-FIFTH OMNIBUS OBJECTION:
OBJECTIONS TO THE TEMPORARY ALLOWANCE FOR VOTING PURPOSES OF
CERTAIN ASSERTED CLASS 4 CLAIMS FILED BY FOSTER & SEAR**

This matter came before the Court on Debtors' Fifty-Fifth Omnibus Objection: Objections to the Temporary Allowance for Voting Purposes of Certain Asserted Class 4 Claims Filed By Foster & Sear (Docket No. __) (the "Objection").² Based upon a review of the Objection, the Declaration of Charles Bates, the Affidavit of Elizabeth Barry, and the Relief Motion, the submissions of the parties, and the arguments of counsel at the hearing on the matter, the Court finds and concludes that (i) it has jurisdiction over this matter pursuant to 28 U.S.C. §§

¹ The debtors in these jointly administered cases are Garlock Sealing Technologies LLC ("Garlock"); Garrison Litigation Management Group, Ltd. ("Garrison"); and The Anchor Packing Company (hereinafter "Debtors").

² Capitalized terms used herein but not otherwise defined shall have the meaning ascribed to them in the Objection.

157 and 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) notice of this Objection is due and sufficient under the circumstances; and (iv) the relief requested is in the best interest of Debtors.

Accordingly, after due deliberation, and good and sufficient cause appearing, the Court hereby ORDERS, ADJUDGES, AND DECREES that:

1. Pursuant to section 502(b) of the Bankruptcy Code, Federal Rules of Bankruptcy Procedure 3007 and 3018, and the Solicitation Order, the Objection is **SUSTAINED** and all Subject Claims set forth in Exhibit B to the Objection are **DENIED** temporary allowance as Class 4 claims for purpose of voting to accept or reject the Plan.

2. This Order is entered without prejudice to any alternative grounds Debtors may assert in objecting to temporary allowance or allowance of the Subject Claims on other bases and for other purposes.

3. This Court shall retain jurisdiction over all matters arising out of or related to the Motion and this Order.

This Order has been signed electronically.
The Judge's signature and court's seal
appear at the top of the Order.

United States Bankruptcy Court

EXHIBIT B
LISTING OF THE SUBJECT CLAIMS

Ballot ID	Law firm	Injured party	Claimant	Creditor	Alleged disease	Last 4 SSN	Basis for objection
440001449	FOSTER & SEAR LLP	A. V. BIBBS, DECEASED		A. V. BIBBS, DECEASED	Non-malignant	7730	Settled
440001335	FOSTER & SEAR LLP	ADRIAN WYATT ARTERBURN, DECEASED	ARTERBURN LINDA SUE	LINDA SUE ARTERBURN	Mesothelioma	9960	Manville 2002
440001474	FOSTER & SEAR LLP	ANDY LEE BOBBITT, DECEASED	NEWBERRY LINDA	LINDA NEWBERRY	Other Cancer	1415	Bankruptcy ballots
440001356	FOSTER & SEAR LLP	ARTHUR JEROME BAILEY, DECEASED		ARTHUR JEROME BAILEY, JR. DECEASED	Non-malignant	6991	Settled
440001438	FOSTER & SEAR LLP	BENJAMIN BEROTTE, DECEASED		BENJAMIN BEROTTE, DECEASED	Non-malignant	4255	Settled
440001406	FOSTER & SEAR LLP	BENNIE BEALL, DECEASED	BEALL MARY	MARY BEALL	Non-malignant	9538	Settled
440001379	FOSTER & SEAR LLP	BOBBY GENE BARKER		BOBBY GENE BARKER	Non-malignant	1888	Settled
440001476	FOSTER & SEAR LLP	BOBBY RAY BOLTON, DECEASED	STAGG RHONDA	RHONDA STAGG	Lung Cancer	0883	Manville 2002
440001500	FOSTER & SEAR LLP	BRENT WAYNE BOWERS		BRENT WAYNE BOWERS	Non-malignant	1211	Settled
440002574	FOSTER & SEAR LLP	BURT LEE HUTCHING, DECEASED	HUTCHING LORETTA	LORETTA HUTCHING	Other Cancer	4731	Manville 2002
440001311	FOSTER & SEAR LLP	CARL EUGENE AMIDON, DECEASED	AMIDON BILLIE	BILLIE AMIDON	Non-malignant	2230	Manville 2002
440002525	FOSTER & SEAR LLP	CECIL CLYDE HOLT, DECEASED	HOLT CLYDE CECIL	CLYDE CECIL HOLT	Lung Cancer	6325	Settled
440001287	FOSTER & SEAR LLP	CHARLES ALLEN, DECEASED	ALLEN MARY ELLEN	MARY ELLEN ALLEN	Lung Cancer	1440	Bankruptcy ballots
440001509	FOSTER & SEAR LLP	CHARLES EDWARD BOYINGTON, DECEASED	BOYINGTON BONNIE	BONNIE BOYINGTON	Non-malignant	3585	Settled
440001536	FOSTER & SEAR LLP	CHARLES MARVIN BRIDWELL		CHARLES MARVIN BRIDWELL	Non-malignant	5261	Settled
440001441	FOSTER & SEAR LLP	CHARLES MONROE BERRYHILL		CHARLES MONROE BERRYHILL	Other Cancer	4940	Bankruptcy ballots
440001477	FOSTER & SEAR LLP	CHARLES OSBURN BOND		CHARLES OSBURN BOND	Non-malignant	8442	Settled
440003765	FOSTER & SEAR LLP	CHARLES WILLIAM SIFFORD, DECEASED		CHARLES WILLIAM SIFFORD, DECEASED	Mesothelioma	6627	Bankruptcy ballots
440002596	FOSTER & SEAR LLP	CLEMIS JACKSON		CLEMIS JACKSON	Mesothelioma	5942	Bankruptcy ballots
440001579	FOSTER & SEAR LLP	CLYDE B. BRUTON, DECEASED	CARRAWAY BARBARA	BARBARA CARRAWAY	Lung Cancer	3242	Manville 2002
440001306	FOSTER & SEAR LLP	DAVID B. ALTENBAUGH, DECEASED		DAVID B. ALTENBAUGH, DECEASED	Non-malignant	3683	Settled
440001530	FOSTER & SEAR LLP	DAVID BRAY, DECEASED	BRAY EARL	EARL BRAY	Non-malignant	8646	Settled
440001975	FOSTER & SEAR LLP	DAVID D. DOYLE, DECEASED	DOYLE KEVIN P.	KEVIN P DOYLE	Lung Cancer	4516	Settled
440001381	FOSTER & SEAR LLP	DAVID DWIGHT BARNES		DAVID DWIGHT BARNES	Non-malignant	4474	Settled
440001253	FOSTER & SEAR LLP	DAVID WARREN ACREE, DECEASED	ACREE DWAYNE	DWAYNE ACREE	Lung Cancer	2483	Bankruptcy ballots
440001359	FOSTER & SEAR LLP	DONALD CLAY BAKER, DECEASED	ROGERS DONNA	DONNA ROGERS	Non-malignant	1072	Settled
440003733	FOSTER & SEAR LLP	DUANE FRANCIS SEVIGNY, DECEASED	SEVIGNY DUANE	DUANE SEVIGNY	Mesothelioma	4147	Manville 2002
440004151	FOSTER & SEAR LLP	EARL FORD VAILLANT, DECEASED	VAILLANT FLOYD ELLIS	FLOYD ELLIS VAILLANT	Lung Cancer	2964	Settled
440001456	FOSTER & SEAR LLP	EDWIN RUSSELL BIRD, DECEASED	BIRD PHILLIP	PHILLIP BIRD	Non-malignant	5274	Settled
440001310	FOSTER & SEAR LLP	ELMAR AMASON, DECEASED	AMASON RUBY	RUBY AMASON	Lung Cancer	9550	Bankruptcy ballots
440001316	FOSTER & SEAR LLP	ELMER LOID ANDERSON, DECEASED	ANDERSON MELINDA	MELINDA ANDERSON	Non-malignant	8353	Manville 2002
440001444	FOSTER & SEAR LLP	ERNEST JOSEPH BERTRAND, DECEASED	BERTRAND EARL	EARL BERTRAND	Non-malignant	6946	Settled
440004357	FOSTER & SEAR LLP	ERVIN ANDREW WILLIAMS, DECEASED	WILLIAMS PATRICIA	PATRICIA WILLIAMS	Mesothelioma	3091	Settled
440001288	FOSTER & SEAR LLP	EUNICE O'NEAL ALLEN, DECEASED	ALLEN DEBRA	DEBRA ALLEN	Non-malignant	4226	Settled
440001248	FOSTER & SEAR LLP	FARD KARRIEM ABDULLAH		FARD KARRIEM ABDULLAH	Non-malignant	5668	Bankruptcy ballots
440001489	FOSTER & SEAR LLP	FLOYD ALLEN BOREN, DECEASED	BOREN HENRIETTA R.	HENRIETTA R BOREN	Non-malignant	4001	Settled
440001259	FOSTER & SEAR LLP	FRANK NEWTON ADAMS, DECEASED	DANLEY MARY	MARY DANLEY	Lung Cancer	1581	Bankruptcy ballots
440001587	FOSTER & SEAR LLP	FRANK WILLIAM BUCHANAN, DECEASED	SMITH DON	DON SMITH	Non-malignant	4795	Settled
440001325	FOSTER & SEAR LLP	GENE ARBUCKLE, DECEASED	ARBUCKLE PATRICIA	PATRICIA ARBUCKLE	Non-malignant	5549	Manville 2002

Ballot ID	Law firm	Injured party	Claimant	Creditor	Alleged disease	Last 4 SSN	Basis for objection
440001312	FOSTER & SEAR LLP	GEORGE L. ANDERSON		GEORGE L. ANDERSON	Non-malignant	8035	Manville 2002
440001472	FOSTER & SEAR LLP	GERALD LEE BLUE		GERALD LEE BLUE	Non-malignant	1160	Settled
440001510	FOSTER & SEAR LLP	HENRY BOYKIN		HENRY BOYKIN JR.	Non-malignant	6146	Settled
440001313	FOSTER & SEAR LLP	HERBERT L. ANDERSON		HERBERT L. ANDERSON	Non-malignant	0593	Settled
440001314	FOSTER & SEAR LLP	HOWARD WINSTON ANDERSON		HOWARD WINSTON ANDERSON JR.	Non-malignant	1662	Settled
440001289	FOSTER & SEAR LLP	J. B. ALLEN, DECEASED	JOHNSON VADA	VADA JOHNSON	Lung Cancer	6301	Bankruptcy ballots
440001463	FOSTER & SEAR LLP	J. PAUL BLACKBURN, DECEASED	DAY EDRIA	EDRIA DAY	Other Cancer	3842	Bankruptcy ballots
440001376	FOSTER & SEAR LLP	J.C. BARFIELD, DECEASED		J.C. BARFIELD, DECEASED	Non-malignant	8348	Settled
440002723	FOSTER & SEAR LLP	JACK AGER KEITH, DECEASED	KEITH EVELYN	EVELYN KEITH	Other Cancer	7976	Manville 2002
440001502	FOSTER & SEAR LLP	JAMES BOWERS, DECEASED	BOWERS FAY	FAY BOWERS	Mesothelioma	5854	Manville 2002
440001547	FOSTER & SEAR LLP	JAMES BROWN		JAMES BROWN	Non-malignant	0278	Settled
440001404	FOSTER & SEAR LLP	JAMES DARRELL BAXTER		JAMES DARRELL BAXTER	Non-malignant	2781	Settled
440001410	FOSTER & SEAR LLP	JAMES EDDIE BEASLEY, DECEASED	BEASLEY JANELLE	JANELLE BEASLEY	Mesothelioma	2222	Settled
440001317	FOSTER & SEAR LLP	JEFF MILTON ANDERSON, DECEASED	ANDERSON DENNIS	DENNIS ANDERSON	Lung Cancer	1633	Bankruptcy ballots
440002883	FOSTER & SEAR LLP	JESUS JARIQUE LOPEZ, DECEASED	LOPEZ JESSE	JESSE LOPEZ	Mesothelioma	0129	Bankruptcy ballots
440003065	FOSTER & SEAR LLP	JIMMY DWAYNE MILLER, DECEASED	MILLER BONNIE	BONNIE MILLER	Mesothelioma	2514	Bankruptcy ballots
440004056	FOSTER & SEAR LLP	JOE H. THORNTON, DECEASED		JOE H. THORNTON, SR. DECEASED	Mesothelioma	7093	Manville 2002
440002558	FOSTER & SEAR LLP	JOE LEWIS HOWELL		JOE LEWIS HOWELL JR.	Other Cancer	3344	Manville 2002
440001568	FOSTER & SEAR LLP	JOHN EDGAR BROWN, DECEASED	BROWN BERNA DEAN	BERNA DEAN BROWN	Lung Cancer	5357	Manville 2002
440002020	FOSTER & SEAR LLP	JOHN NORMAN EDENS, DECEASED	EDENS BABY	BABY EDENS	Other Cancer	0531	Manville 2002
440001283	FOSTER & SEAR LLP	JOHN W. ALGER, DECEASED	ALGER PEGGY DURRE	PEGGY DURRE ALGER	Non-malignant	6720	Settled
440001260	FOSTER & SEAR LLP	KARIA ADAMS, DECEASED	ADAMS BESSIE L.	BESSIE L ADAMS	Lung Cancer	2708	Bankruptcy ballots
440001582	FOSTER & SEAR LLP	LANNAS BRYANT, DECEASED	BRYANT ESSIE	ESSIE BRYANT	Non-malignant	0339	Settled
440001269	FOSTER & SEAR LLP	LARRY A. ALBERTSON		LARRY A. ALBERTSON	Non-malignant	2137	Settled
440001309	FOSTER & SEAR LLP	LINO F. ALVAREZ, DECEASED	ALVAREZ EFRAIN	EFRAIN ALVAREZ	Non-malignant	6777	Manville 2002
440001348	FOSTER & SEAR LLP	MARCUS A. AYRES, DECEASED	AYRES JANE	JANE AYRES	Mesothelioma	0393	Bankruptcy ballots
440001298	FOSTER & SEAR LLP	MARTIN ELMER ALLISON		MARTIN ELMER ALLISON	Non-malignant	5584	Settled
440001492	FOSTER & SEAR LLP	MARTIN P. BORREGO, DECEASED	BORREGO ANTONIA	ANTONIA BORREGO	Lung Cancer	5095	Manville 2002
440004040	FOSTER & SEAR LLP	MELVIN HOMER THOMPSON, DECEASED	THOMPSON BETTY	BETTY THOMPSON	Mesothelioma	0856	Bankruptcy ballots
440001326	FOSTER & SEAR LLP	MIGUEL ARCE, DECEASED	GUTIERREZ MONICA	MONICA GUTIERREZ	Other Cancer	0652	Bankruptcy ballots
440001279	FOSTER & SEAR LLP	NOLAN B. ALEXANDER, DECEASED	ALEXANDER GLORIA JEAN	GLORIA JEAN ALEXANDER	Lung Cancer	4008	Bankruptcy ballots
440001468	FOSTER & SEAR LLP	NOLAN JESSY BLAND, DECEASED	BLAND JAMES	JAMES BLAND	Non-malignant	8264	Settled
440001266	FOSTER & SEAR LLP	OCELEE ADKINS, DECEASED		OCELEE ADKINS, DECEASED	Other Cancer	4507	Bankruptcy ballots
440001293	FOSTER & SEAR LLP	ODIE BELL JUMPER ALLEN, DECEASED	MILLER DAVAN TODD	DAVAN TODD MILLER	Lung Cancer	2076	Bankruptcy ballots
440001822	FOSTER & SEAR LLP	OLIVER HUMPHREY CRISMORE, DECEASED	CRISMORE HENRY (HANK)	HENRY (HANK) CRISMORE	Lung Cancer	0772	Settled
440004122	FOSTER & SEAR LLP	ORVAL ALEXANDER TULLY, DECEASED	TULLY CAROLYN	CAROLYN TULLY	Mesothelioma	6321	Bankruptcy ballots
440001294	FOSTER & SEAR LLP	ORVILLE RAY ALLEN, DECEASED	POWERS CATHERINE	CATHERINE POWERS	Lung Cancer	6800	Manville 2002
440001554	FOSTER & SEAR LLP	PERVIS LEO BROWN		PERVIS LEO BROWN	Non-malignant	7802	Settled
440001247	FOSTER & SEAR LLP	PETE ABALOS		PETE ABALOS JR.	Non-malignant	3644	Bankruptcy ballots
440001459	FOSTER & SEAR LLP	PLAS BISOR		PLAS BISOR JR.	Non-malignant	5487	Settled

Ballot ID	Law firm	Injured party	Claimant	Creditor	Alleged disease	Last 4 SSN	Basis for objection
440003199	FOSTER & SEAR LLP	QUINCY C. NELSON, DECEASED	NELSON RUBY	RUBY NELSON	Mesothelioma	2276	Manville 2002
440001555	FOSTER & SEAR LLP	RAYMOND BROWN		RAYMOND BROWN	Non-malignant	0050	Settled
440001488	FOSTER & SEAR LLP	RAYMOND DOYLE BORDEN, DECEASED	BORDEN SAMMY	SAMMY BORDEN	Lung Cancer	1146	Manville 2002
440001389	FOSTER & SEAR LLP	RAYMOND JACK BARRINGER, DECEASED	BARRINGER SHIRLEY	SHIRLEY BARRINGER	Non-malignant	2218	Settled
440003489	FOSTER & SEAR LLP	RAYMUNDO REYES, DECEASED	REYES JOHNNY	JOHNNY REYES	Mesothelioma	5746	Bankruptcy ballots
440001280	FOSTER & SEAR LLP	ROBERT ALEXANDER, DECEASED	ALEXANDER MARY J.	MARY J ALEXANDER	Non-malignant	4497	Manville 2002
440001475	FOSTER & SEAR LLP	ROBERT J. BOGGUS, DECEASED	CONGDON MARY	MARY CONGDON	Non-malignant	7346	Settled
440001345	FOSTER & SEAR LLP	ROBERT LOUIS AUSTIN, DECEASED		ROBERT LOUIS AUSTIN, DECEASED	Non-malignant	1653	Settled
440001581	FOSTER & SEAR LLP	ROY HERMAN BRYAN, DECEASED		ROY HERMAN BRYAN, DECEASED	Non-malignant	0892	Settled
440001414	FOSTER & SEAR LLP	ROY HERRON BECK, DECEASED	BECK CHINA L.	CHINA L BECK	Lung Cancer	2333	Manville 2002
440001422	FOSTER & SEAR LLP	SAMUEL WILLIAM BELL, DECEASED	COURTNEY BETHEL	BETHEL COURTNEY	Non-malignant	0055	Settled
440001432	FOSTER & SEAR LLP	THOMAS NEWTON BENSON, DECEASED	CORTEZ SHEILA	SHEILA CORTEZ	Non-malignant	6378	Settled
440001494	FOSTER & SEAR LLP	TOMAS BENAVIDEZ BOSQUEZ, DECEASED	CADENA YOLONDA	YOLONDA CADENA	Non-malignant	5957	Settled
440001263	FOSTER & SEAR LLP	WALTER ADDINGTON		WALTER ADDINGTON	Non-malignant	2908	Settled
440001543	FOSTER & SEAR LLP	WALTER JOSEPH BROUSSARD, DECEASED	BROUSSARD DEBORAH	DEBORAH BROUSSARD	Lung Cancer	1572	Manville 2002
440004414	FOSTER & SEAR LLP	WAYNE VINCENT WIRT, DECEASED	TARDY DEBORAH WIRT	DEBORAH WIRT TARDY	Mesothelioma	9232	Bankruptcy ballots
440001572	FOSTER & SEAR LLP	WILBURN WARREN BROWN, DECEASED	JONES CAROLE	CAROLE JONES	Non-malignant	2615	Settled
440001418	FOSTER & SEAR LLP	WILLIAM LEO BEENE, DECEASED	WHIPPLE TERRI	TERRI WHIPPLE	Non-malignant	8744	Settled
440001627	FOSTER & SEAR LLP	WILLIAM LEO BUTLER, DECEASED	BLACK MELISSA	MELISSA BLACK	Lung Cancer	0560	Manville 2002
440002448	FOSTER & SEAR LLP	WILLIAM SHERMAN HEILEMAN, DECEASED	EFTING DEBRA	DEBRA EFTING	Lung Cancer	4615	Settled
440003591	FOSTER & SEAR LLP	WINDOLYN ROSS		WINDOLYN ROSS	Other Cancer	2836	Manville 2002