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

IN RE:

GARLOCK SEALING TECHNOLOGIES LLC, et al.,

Case No. 10-BK-31607

Chapter 11

Debtors.¹

Jointly Administered

DEBTORS' SIXTY-FOURTH OMNIBUS OBJECTION: OBJECTIONS TO THE TEMPORARY ALLOWANCE FOR VOTING PURPOSES OF CERTAIN ASSERTED CLASS 4 CLAIMS <u>FILED BY MOODY</u>

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 Edward O. Moody, P.A. (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").

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

JURISDICTION

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":

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- 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 <u>Exhibit A</u>.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 \P 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).

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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).

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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.
- *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 <u>Exhibit B</u> is a listing of the Subject Claims, which for the reasons described above and identified in <u>Exhibit B</u> 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

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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.

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This 5th day of November, 2015.

Respectfully submitted,

/s/Garland S. Cassada Garland S. Cassada N.C. Bar No. 12352 Jonathan C. Krisko N.C. Bar No. 28625 Richard C. Worf, Jr. N.C. Bar No. 37143

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gcassada@rbh.com jkrisko@rbh.com rworf@rbh.com

Special Corporate and Litigation Counsel to the Debtors Garlock Sealing Technologies LLC, Garrison Litigation Management Group, Ltd., and The Anchor Packing Company Case 10-31607 Doc 4992 Filed 11/05/15 Entered 11/05/15 23:16:15 Desc Main Document Page 9 of 15

EXHIBIT A

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

IN RE:

GARLOCK SEALING TECHNOLOGIES LLC, et al.¹

Case No. 10-31607

Chapter 11

Debtors.

Jointly Administered

ORDER REGARDING DEBTORS' SIXTY-FOURTH OMNIBUS OBJECTION: OBJECTIONS TO THE TEMPORARY ALLOWANCE FOR VOTING PURPOSES OF CERTAIN ASSERTED CLASS 4 CLAIMS FILED BY MOODY

This matter came before the Court on Debtors' Sixty-Fourth Omnibus Objection:

Objections to the Temporary Allowance for Voting Purposes of Certain Asserted Class 4 Claims

Filed By Moody (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. §§ 157 and

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.

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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

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EXHIBIT B LISTING OF THE SUBJECT CLAIMS

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-					1	1	
Ballot ID	Law firm	Injured party	Claimant	Creditor	Alleged disease		Basis for objection
	EDWARD O. MOODY. P.A	ALVIN BLAKE	JOHNIE BLAKE	JOHNIE BLAKE	Mesothelioma	9849	Settled
440009376	EDWARD O. MOODY. P.A	ARNOLD J. REGNER, JR.	JACQUELYN BAKKEN	JACQUELYN BAKKEN	Mesothelioma	4087	Settled
440009161	EDWARD O. MOODY. P.A	BETTY D. PETERSON	ERIC PETERSON	ERIC PETERSON	Other Cancer	3744	Bankruptcy ballots
440007571	EDWARD O. MOODY. P.A	BILLIE D. HART	JAMES A. HART	JAMES A. HART	Lung Cancer	5774	Settled
440008297	EDWARD O. MOODY. P.A	BILLY J. LAMBERT	MARY LAMBERT	MARY LAMBERT	Lung Cancer	1097	Settled
440005808	EDWARD O. MOODY. P.A	BILLY L. BATES		BILLY L. BATES	Non-malignant	6157	Settled
440006504	EDWARD O. MOODY. P.A	BILLY W. COLLINS	MARY CATHERINE COLLINS	MARY CATHERINE COLLINS	Lung Cancer	2734	Manville 2002
440009340	EDWARD O. MOODY. P.A	BOB A. RATCLIFF	STEVE RATCLIFF	STEVE RATCLIFF	Mesothelioma	9985	Manville 2002
440005568	EDWARD O. MOODY. P.A	BOBBY J. ADAMS		BOBBY J. ADAMS	Non-malignant	4255	Bankruptcy ballots
440006041	EDWARD O. MOODY. P.A	BRYSON H. BRAY	RICHARD BRETT BRAY	RICHARD BRETT BRAY	Lung Cancer	0242	Bankruptcy ballots
440009626	EDWARD O. MOODY. P.A	CARL L. SANFORD	EVELYN SANFORD	EVELYN SANFORD	Lung Cancer	0085	Manville 2002
440005667	EDWARD O. MOODY. P.A	CECIL M. ANDREWS	EDWARD O. MOODY	EDWARD O. MOODY	Non-malignant	5046	Settled
440005581	EDWARD O. MOODY. P.A	CEDRIC C. AGEE	RUBY LOVELACE	RUBY LOVELACE	Non-malignant	6155	Bankruptcy ballots
440008104	EDWARD O. MOODY. P.A	CHARLES E. JONES	CHARLES RUBEN BAKER	CHARLES RUBEN BAKER	Lung Cancer	3042	Settled
440009596	EDWARD O. MOODY. P.A	CHARLES J. SALES	PATRICIA MAE DOBBS	PATRICIA MAE DOBBS	Mesothelioma	5856	Bankruptcy ballots
440006018	EDWARD O. MOODY. P.A	CHARLIE E. BRADY		CHARLIE E. BRADY	Non-malignant	9433	Settled
440005564	EDWARD O. MOODY. P.A	COLUMBUS L. ABRAMS, JR.		COLUMBUS L. ABRAMS, JR.	Non-malignant	9019	Bankruptcy ballots
440005569	EDWARD O. MOODY. P.A	CURTIS W. ADAMS		CURTIS W. ADAMS	Non-malignant	4406	Bankruptcy ballots
440005847	EDWARD O. MOODY. P.A	DALE BEESON	JOSEPHINE BEESON	JOSEPHINE BEESON	Lung Cancer	0301	Bankruptcy ballots
440006175	EDWARD O. MOODY. P.A	DARTLY BUNN		DARTLY BUNN	Non-malignant	1266	Manville 2002
440009248	EDWARD O. MOODY. P.A	DAVID C. POWELL		DAVID C. POWELL	Mesothelioma	1695	Settled
440005769	EDWARD O. MOODY. P.A	DENNIS C. BARBEE		DENNIS C. BARBEE	Non-malignant	4546	Settled
440006289	EDWARD O. MOODY. P.A	DONALD CAREY	CAROLYN CAREY	CAROLYN CAREY	Non-malignant	9622	Manville 2002
440008913	EDWARD O. MOODY. P.A	DONALD E. MORGAN	MITCHELL MORGAN	MITCHELL MORGAN	Mesothelioma	7436	Settled
440005983	EDWARD O. MOODY. P.A	DOROTHY M. BOWMAN		DOROTHY M. BOWMAN	Non-malignant	4122	Settled
440005922	EDWARD O. MOODY. P.A	DOYLE L. BLANKENSHIP, JR.		DOYLE L. BLANKENSHIP, JR.	Non-malignant	9579	Manville 2002
440010398	EDWARD O. MOODY. P.A	DOYLON WASHINGTON, SR.	TERESA MAE JOHNSON	TERESA MAE JOHNSON	Other Cancer	3419	Bankruptcy ballots
440005833	EDWARD O. MOODY. P.A	EARNEST L. BEASLEY		EARNEST L. BEASLEY	Non-malignant	2946	Settled
440005744	EDWARD O. MOODY. P.A	ELIZABETH BAKSA		ELIZABETH BAKSA	Non-malignant	5810	Manville 2002
440005933	EDWARD O. MOODY. P.A	ELMER H. BOEHM		ELMER H. BOEHM	Lung Cancer	0962	Bankruptcy ballots
440006767	EDWARD O. MOODY. P.A	EVERETT DEAN	ALAN DEAN	ALAN DEAN	Lung Cancer	1910	Settled
440005612	EDWARD O. MOODY. P.A	EVERETT L. ALLEN		EVERETT L. ALLEN	Non-malignant	4963	Settled
440006255	EDWARD O. MOODY. P.A	EVERT B. CALHOUN, JR.	ALTA L. CALHOUN	ALTA L. CALHOUN	Non-malignant	5180	Manville 2002
440005809	EDWARD O. MOODY. P.A	FLOYD L. BATES, JR.	CYNTHIA BATES	CYNTHIA BATES	Mesothelioma	7254	Bankruptcy ballots
440007625	EDWARD O. MOODY. P.A	FRED HEGWOOD, JR.	TEOLA J. HEGWOOD	TEOLA J. HEGWOOD	Lung Cancer	2891	Settled
440009370	EDWARD O. MOODY. P.A	GEORGE E. REEDER	MARK SMITH	MARK SMITH	Mesothelioma	3079	Settled
440005787	EDWARD O. MOODY. P.A	HAROLD D. BARNETT		HAROLD D. BARNETT	Non-malignant	1054	Settled
	EDWARD O. MOODY. P.A	HARVEY VERGASON	NANCY VERGASON	NANCY VERGASON	Mesothelioma	8363	Bankruptcy ballots

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Ballot ID Law firm	Injured party	Claimant	Creditor	Alleged disease	Last 4 SSN	Basis for objection
440006195 EDWARD O. MOODY	. P.A HENRY C. BURNETTE	PAULA HOUSE	PAULA HOUSE	Lung Cancer	5142	Settled
440005580 EDWARD O. MOODY	. P.A HENRY L. ADROW		HENRY L. ADROW	Non-malignant	7345	Bankruptcy ballots
440005919 EDWARD O. MOODY	. P.A HENRY W. BLAKELY	GWEN BLAKELY	GWEN BLAKELY	Non-malignant	6926	Settled
440007786 EDWARD O. MOODY	. P.A HENRY W. HOOTEN	NEAL HOOTEN	NEAL HOOTEN	Lung Cancer	1723	Settled
440007686 EDWARD O. MOODY	. P.A HUEY P. HICKS	DOROTHY JEAN HICKS	DOROTHY JEAN HICKS	Lung Cancer	6592	Settled
440005938 EDWARD O. MOODY	. P.A IZOLA E. BOLDEN	ANITA BOLDEN-HANSEN	ANITA BOLDEN-HANSEN	Lung Cancer	9828	Settled
440006184 EDWARD O. MOODY	. P.A J. D. BURKETT, JR.	EDWARD O. MOODY	EDWARD O. MOODY	Non-malignant	7527	Manville 2002
440006257 EDWARD O. MOODY	. P.A J. W. CALHOUN	MOZELLE CALHOUN	MOZELLE CALHOUN	Non-malignant	1884	Manville 2002
440010630 EDWARD O. MOODY	. P.A JAMES A. WILLIFORD	ERVA WILLIFORD	ERVA WILLIFORD	Mesothelioma	0477	Settled
440008911 EDWARD O. MOODY	. P.A JAMES C. MORELAND		JAMES C. MORELAND	Other Cancer	9577	Manville 2002
440006105 EDWARD O. MOODY	. P.A JAMES E. BROWN		JAMES E. BROWN	Non-malignant	2405	Manville 2002
440006628 EDWARD O. MOODY	. P.A JAMES R. CRAWFORD	PATRICIA CASEY	PATRICIA CASEY	Lung Cancer	1842	Settled
440006815 EDWARD O. MOODY	. P.A JEFFREY M. DOBBS	BARBARA DOBBS COFFMAN	BARBARA DOBBS COFFMAN	Mesothelioma	7853	Settled
440006214 EDWARD O. MOODY	. P.A JEROME S. BURROW	RICKY BURROW	RICKY BURROW	Lung Cancer	4203	Manville 2002
440006327 EDWARD O. MOODY	. P.A JIMMY L. CASH		JIMMY L. CASH	Non-malignant	8247	Manville 2002
440009443 EDWARD O. MOODY		JEANETTE LIMBOCKER	JEANETTE LIMBOCKER	Mesothelioma	8242	Settled
440005675 EDWARD O. MOODY	. P.A JOSEPH G. ARCENEAUX	CATHERINE ARCENEAUX	CATHERINE ARCENEAUX	Non-malignant	4454	Settled
440005782 EDWARD O. MOODY	. P.A JOSEPH L. BARNES	DIANE SIMMS	DIANE SIMMS	Non-malignant	6265	Manville 2002
440005718 EDWARD O. MOODY	. P.A JOYCE A. BAH		JOYCE A. BAH	Non-malignant	4645	Settled
440006107 EDWARD O. MOODY	. P.A KELTON BROWN	MARTHA HULETT BROWN	MARTHA HULETT BROWN	Non-malignant	2852	Manville 2002
440006212 EDWARD O. MOODY	. P.A KENNETH BURROUGHS	TONI WRIGTH	TONI WRIGTH	Mesothelioma	4171	Settled
440005565 EDWARD O. MOODY	. P.A KING D. ACKER		KING D. ACKER	Non-malignant	8720	Bankruptcy ballots
440005777 EDWARD O. MOODY	. P.A LAWRENCE BARKER, JR.	BARBARA BARKER	BARBARA BARKER	Non-malignant	4117	Settled
440007849 EDWARD O. MOODY	. P.A LAWRENCE S. HUGHES	STELLA HUGHES	STELLA HUGHES	Lung Cancer	1029	Manville 2002
440006029 EDWARD O. MOODY	. P.A LEO BRANCH	LAMARTHA YORK-BYRUM	LAMARTHA YORK-BYRUM	Non-malignant	4872	Manville 2002
440006030 EDWARD O. MOODY	. P.A LEONARD BRANCH	LAMARTHA YORK	LAMARTHA YORK	Lung Cancer	5412	Bankruptcy ballots
440006281 EDWARD O. MOODY	. P.A LEVI CANTRELL	JOAN CANTRELL	JOAN CANTRELL	Lung Cancer	5377	Settled
440005745 EDWARD O. MOODY	. P.A LOUIS BAKSA	ELIZABETH BAKSA	ELIZABETH BAKSA	Non-malignant	5843	Settled
440008449 EDWARD O. MOODY	. P.A MACK H. LONG	FREDYE ALFORD	FREDYE ALFORD	Lung Cancer	9581	Settled
440009450 EDWARD O. MOODY	. P.A MELVIN E. RINGGOLD	LARRY M. RINGGOLD	LARRY M. RINGGOLD	Mesothelioma	3599	Settled
440007837 EDWARD O. MOODY	. P.A MELVIN L. HUFFMAN	VIRGINIA HUFFMAN	VIRGINIA HUFFMAN	Mesothelioma	7883	Settled
440008583 EDWARD O. MOODY	. P.A MELVIN L. MATHIS	KEVIN L. MATHIS	KEVIN L. MATHIS	Mesothelioma	4615	Manville 2002
440005669 EDWARD O. MOODY	. P.A MILES J. ANDREWS	VICTORIA WEBSTER	VICTORIA WEBSTER	Lung Cancer	2201	Bankruptcy ballots
440005562 EDWARD O. MOODY	. P.A ODELL ABRAHAM		ODELL ABRAHAM	Non-malignant	0479	Bankruptcy ballots
440005701 EDWARD O. MOODY	. P.A ORVILLE D. ATCHLEY	PEGGY S. ATCHLEY	PEGGY S. ATCHLEY	Non-malignant	7329	Manville 2002
440008342 EDWARD O. MOODY			OTIS J. LAWSON	Lung Cancer	5467	Settled
440005830 EDWARD O. MOODY	. P.A PAUL C. BEARD		PAUL C. BEARD	Lung Cancer	5670	Bankruptcy ballots
440006054 EDWARD O. MOODY			PHILLIP BREWTON	Non-malignant	5429	Manville 2002
440006038 EDWARD O. MOODY	. P.A PHILLIP R. BRASSFIELD	TIM SYNAR	TIM SYNAR	Mesothelioma	7055	Settled

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Ballot ID	Law firm	Injured party	Claimant	Creditor	Alleged disease	Last 4 SSN	Basis for objection
440005573	EDWARD O. MOODY. P.A	RAIFORD H. ADAMS, SR.	WELDON ADAMS	WELDON ADAMS	Lung Cancer	7914	Bankruptcy ballots
440007209	EDWARD O. MOODY. P.A	RANDY GEORGE		RANDY GEORGE	Other Cancer	2098	Bankruptcy ballots
440006851	EDWARD O. MOODY. P.A	RAYMOND R. DRUMMOND	SHIRLEY DRUMMOND	SHIRLEY DRUMMOND	Mesothelioma	7878	Settled
440007583	EDWARD O. MOODY. P.A	REBECCA HASTINGS	DON HASTINGS	DON HASTINGS	Mesothelioma	1478	Manville 2002
440007449	EDWARD O. MOODY. P.A	ROBERT HALL	LETRICIA JONES	LETRICIA JONES	Lung Cancer	7980	Settled
440006323	EDWARD O. MOODY. P.A	ROMA L. CARTER	VIRGA CARTER	VIRGA CARTER	Lung Cancer	7098	Settled
440007003	EDWARD O. MOODY. P.A	RONALD G. FALLS, SR.	RONALD G. JR. FALLS	RONALD G.FALLS JR	Mesothelioma	0800	Settled
440006283	EDWARD O. MOODY. P.A	RUTH CANTRELL	WESLEY CANTRELL	WESLEY CANTRELL	Non-malignant	7681	Manville 2002
440005670	EDWARD O. MOODY. P.A	SAMUEL L. ANKTON		SAMUEL L. ANKTON	Non-malignant	2061	Settled
440005577	EDWARD O. MOODY. P.A	SHIRLEY ADCOCK	BERNICE ADCOCK	BERNICE ADCOCK	Non-malignant	0691	Bankruptcy ballots
440005871	EDWARD O. MOODY. P.A	STEVE H. BENNETT	RUBY L. BENNETT	RUBY L. BENNETT	Non-malignant	0015	Settled
440006352	EDWARD O. MOODY. P.A	THERRELL W. CHANCELLOR		THERRELL W. CHANCELLOR	Non-malignant	2526	Manville 2002
440005575	EDWARD O. MOODY. P.A	TOMMY E. ADAMS, JR.		TOMMY E. ADAMS, JR.	Non-malignant	3498	Bankruptcy ballots
440005939	EDWARD O. MOODY. P.A	VAN L. BOLDEN	ANITA BOLDEN-HANSEN	ANITA BOLDEN-HANSEN	Lung Cancer	7022	Settled
440005560	EDWARD O. MOODY. P.A	VICTOR J. ABELS	SHARON ABELS	SHARON ABELS	Lung Cancer	2050	Bankruptcy ballots
440005838	EDWARD O. MOODY. P.A	WADE BEASLEY, SR.	ANGELIA ROBINSON	ANGELIA ROBINSON	Lung Cancer	9519	Settled
440005677	EDWARD O. MOODY. P.A	WALLACE R. ARCHER		WALLACE R. ARCHER	Non-malignant	9471	Manville 2002
440005911	EDWARD O. MOODY. P.A	WILLARD BLACKMON		WILLARD BLACKMON	Lung Cancer	9345	Bankruptcy ballots
440005587	EDWARD O. MOODY. P.A	WILLIAM AKINS		WILLIAM AKINS	Non-malignant	4987	Settled
440005996	EDWARD O. MOODY. P.A	WILLIAM E. BOYTE		WILLIAM E. BOYTE	Non-malignant	8278	Settled
440008194	EDWARD O. MOODY. P.A	WILLIAM M. KARBER	JIMMY A. KARBER	JIMMY A. KARBER	Mesothelioma	8177	Bankruptcy ballots
440005785	EDWARD O. MOODY. P.A	WILLIE BARNES, JR.	KARL DENIS BARNES	KARL DENIS BARNES	Mesothelioma	2009	Settled
440009595	EDWARD O. MOODY. P.A	Z. L. SAFLEY	BURL WELLS	BURL WELLS	Mesothelioma	9770	Settled