

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:

\_\_\_\_\_ District of Delaware  
(State)

Case number (If known): \_\_\_\_\_ Chapter 11

Check if this is an amended filing

**Official Form 201**  
**Voluntary Petition for Non-Individuals Filing for Bankruptcy**

04/16

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, Instructions for Bankruptcy Forms for Non-Individuals, is available.

1. **Debtor's name** Imerys Talc America, Inc.

2. **All other names debtor used in the last 8 years** Luzenac America, Inc.  
Imerys Talc Ohio Inc.

Include any assumed names, trade names, and doing business as names

Imerys Talc Delaware, Inc.

3. **Debtor's federal Employer Identification Number (EIN)** 8 4 - 1 1 9 6 3 5 8

4. **Debtor's address** Principal place of business Mailing address, if different from principal place of business

1732 North First Street  
Number Street

\_\_\_\_\_  
Number Street

Suite 450

\_\_\_\_\_  
P.O. Box

San Jose CA 95112  
City State Zip Code

\_\_\_\_\_  
City State Zip Code

Location of principal assets, if different from principal place of business

Santa Clara  
County

See attached Schedule 1  
Number Street

\_\_\_\_\_  
City State Zip Code

\_\_\_\_\_  
County

5. **Debtor's website (URL)** https://www.imerys-performance-additives.com/

6. **Type of debtor**  Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))  
 Partnership (excluding LLP)  
 Other. Specify: \_\_\_\_\_

Debtor Imerys Talc America, Inc. Case number (if known) \_\_\_\_\_  
 Name

7. Describe debtor's business

A. Check one:

- Health Care Business (as defined in 11 U.S.C. § 101(27A))
- Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- Railroad (as defined in 11 U.S.C. § 101(44))
- Stockbroker (as defined in 11 U.S.C. § 101(53A))
- Commodity Broker (as defined in 11 U.S.C. § 101(6))
- Clearing Bank (as defined in 11 U.S.C. § 781(3))
- None of the above

B. Check all that apply:

- Tax-exempt entity (as described in 26 U.S.C. § 501)
- Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
- Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

2 1 2 3

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- Chapter 7
- Chapter 9
- Chapter 11. Check all that apply:
  - Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,566,050 (amount subject to adjustment on 4/01/19 and every 3 years after that).
  - The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
  - A plan is being filed with this petition.
  - Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
  - The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
  - The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.
- Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

- No
- Yes. District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_  
 MM/DD/YYYY
- District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_  
 MM/DD/YYYY

If more than 2 cases, attach a separate list.

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

- No
- Yes. Debtor See attached Schedule 2 Relationship See attached Schedule 2  
 District See attached Schedule 2  
 Case number, if known \_\_\_\_\_ When Contemporaneously  
 MM/DD/YYYY

List all cases. If more than 1, attach a separate list.

Debtor Imerys Talc America, Inc. Case number (if known) \_\_\_\_\_  
 Name

11. **Why is the case filed in this district?** *Check all that apply:*  
 Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.  
 A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. **Does the debtor own or have possession of any real property or personal property that needs immediate attention?**  No  
 Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

**Why does the property need immediate attention?** (*Check all that apply.*)

- It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety. What is the hazard? \_\_\_\_\_
- It needs to be physically secured or protected from the weather.
- A plan is being filed with this petition.
- Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- Other \_\_\_\_\_

**Where is the property?** \_\_\_\_\_

Number Street

City State Zip Code

**Is the property insured?** \_\_\_\_\_

- No
- Yes. Insurance agency \_\_\_\_\_  
 Contact name \_\_\_\_\_  
 Phone \_\_\_\_\_

**Statistical and administrative information**

13. **Debtor's estimation of available funds** *Check one:*  
 Funds will be available for distribution to unsecured creditors.  
 After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

14. **Estimated number of creditors (on a consolidated basis with Imerys Talc Vermont, Inc.)**

<input type="checkbox"/> 1-49	<input type="checkbox"/> 1,000-5,000	<input type="checkbox"/> 25,001-50,000
<input type="checkbox"/> 50-99	<input type="checkbox"/> 5,001-10,000	<input type="checkbox"/> 50,001-100,000
<input type="checkbox"/> 100-199	<input checked="" type="checkbox"/> 10,001-25,000	<input type="checkbox"/> More than 100,000
<input type="checkbox"/> 200-999		

15. **Estimated assets (on a consolidated basis with Imerys Talc Vermont, Inc.)**

<input type="checkbox"/> \$0-\$50,000	<input type="checkbox"/> \$1,000,001-\$10 million	<input type="checkbox"/> \$500,000,001-\$1 billion
<input type="checkbox"/> \$50,001-\$100,000	<input type="checkbox"/> \$10,000,001-\$50 million	<input type="checkbox"/> \$1,000,000,001-\$10 billion
<input type="checkbox"/> \$100,001-\$500,000	<input type="checkbox"/> \$50,000,001-\$100 million	<input type="checkbox"/> \$10,000,000,001-\$50 billion
<input type="checkbox"/> \$500,001-\$1 million	<input checked="" type="checkbox"/> \$100,000,001-\$500 million	<input type="checkbox"/> More than \$50 billion

Debtor Imerys Talc America, Inc. Case number (if known) \_\_\_\_\_  
 Name

16. **Estimated liabilities<sup>1</sup>** (on a consolidated basis with Imerys Talc Vermont, Inc.)
- |  |  |  |
|--|--|--|
| <input type="checkbox"/> \$0-\$50,000          | <input type="checkbox"/> \$1,000,001-\$10 million              | <input type="checkbox"/> \$500,000,001-\$1 billion     |
| <input type="checkbox"/> \$50,001-\$100,000    | <input type="checkbox"/> \$10,000,001-\$50 million             | <input type="checkbox"/> \$1,000,000,001-\$10 billion  |
| <input type="checkbox"/> \$100,001-\$500,000   | <input checked="" type="checkbox"/> \$50,000,001-\$100 million | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million           | <input type="checkbox"/> More than \$50 billion        |

**Request for Relief, Declaration, and Signatures**

**WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. **Declaration and signature of authorized representative of debtor**
- The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.
  - I have been authorized to file this petition on behalf of the debtor.
  - I have examined the information in this petition and have a reasonable belief that the information is true and correct.

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

Executed on 02/13/2019  
 MM/DD/YYYY

X /s/ Alexandra Picard Alexandra Picard  
 Signature of authorized representative of debtor Printed name  
 Title Chief Financial Officer

18. **Signature of attorney** X /s/ Mark D. Collins Date 02/13/2019  
 Signature of attorney for debtor MM/DD/YYYY

Mark D. Collins  
 Printed name  
Richards, Layton & Finger, P.A.  
 Firm name  
One Rodney Square, 920 North King Street  
 Number Street  
Wilmington DE 19801  
 City State Zip Code  
302.651.7700 collins@rif.com  
 Contact Phone Email address  
2981 DE  
 Bar number State

<sup>1</sup> The amount of estimated liabilities does not include contingent or potential future liabilities.

**Schedule 1**

Location of principal assets, if different from principal place of business

17509 Van Road, Houston, Texas 77049 (Harris County)
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767 Old Yellowstone Trail, Three Forks, Montana 59752 (Gallatin County)
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**Schedule 2**

Pending Bankruptcy Cases Filed by the Debtor and Affiliates of the Debtor

On the date hereof, each of the affiliated entities listed below (including the debtor in this chapter 11 case, collectively, the “Debtors”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Delaware. The Debtors have filed a motion requesting that the chapter 11 cases of these entities be consolidated for procedural purposes only and jointly administered under the number assigned to the chapter 11 case of Imerys Talc America, Inc.

Imerys Talc America, Inc.
Imerys Talc Vermont, Inc.
Imerys Talc Canada Inc.

**IMERYS TALC AMERICA, INC.**

**Written Consent of the Board of Directors  
in Lieu of a Meeting**

**Date: February 13, 2019**

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The undersigned, constituting all of the members of the Board of Directors (the “Board”) of Imerys Talc America, Inc., a Delaware corporation (the “Corporation”), acting in accordance with section 141(f) of the General Corporation Law of the State of Delaware, hereby waive notice of a meeting and hereby consent to and adopt the following resolutions as the action of the Board in lieu of a meeting and hereby direct that this written consent be delivered to the Corporation for inclusion in the minutes or filing with the corporate records.

***Approval of Bankruptcy Filing***

**WHEREAS**, the Board has reviewed and considered the materials presented by the management and financial and legal advisors of the Corporation regarding the potential present and future liabilities of the Corporation, the strategic alternatives available to it, and the impact of the foregoing on the Corporation’s business;

**WHEREAS**, the Board has consulted with the management and financial and legal advisors of the Corporation and has considered fully each of the strategic alternatives available to the Corporation; and

**WHEREAS**, the Board has determined that it is in the Corporation’s best interest to seek relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

**NOW, THEREFORE, BE IT RESOLVED**, that the Board hereby approves the commencement of a case under chapter 11 of the Bankruptcy Code by the Corporation (the “Chapter 11 Case”).

**RESOLVED FURTHER**, that each officer of the Corporation (each, an “Authorized Person”), be, and each of them hereby is, acting singly, authorized to take all such steps and do all such acts and things as they shall deem necessary or advisable to commence the Chapter 11 Case, including, but not limited to, executing, verifying, and delivering a voluntary petition in the name of the Corporation under chapter 11 of the Bankruptcy Code and causing the same to be filed with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), the making of any and all other necessary filings with the Bankruptcy Court and any other filings that such Authorized Persons determine to be necessary or advisable, the making and execution of any necessary or advisable instruments, certificates, affidavits, or other documents in connection therewith, the signing or endorsement of any checks, posting of any bonds, and the payment of any fees and expenses in such connection, and to take any and all action to make, execute, verify, and file all applications, certificates, documents, or other instruments and to do any and all acts and things that any one or more of them shall deem

necessary, advisable, or appropriate in order to carry out the intent and purpose of any and all of the foregoing resolution.

**RESOLVED FURTHER**, that each Authorized Person be, and hereby is, authorized, directed, and empowered, with full power of delegation, on behalf of and in the name of the Corporation, to execute, verify, and/or file, or cause to be filed and/or executed or verified (or direct others to do so on their behalf as provided herein), and to amend, supplement, or otherwise modify from time to time, all necessary or appropriate documents, including, without limitation, petitions, affidavits, schedules, motions, lists, applications, pleadings, and other documents, agreements, and papers, including any and all loan agreements, documents, notes, guaranties, security agreements, pledge agreements, and all other documents, agreements, or instruments as may be deemed necessary or appropriate by such Authorized Person, and to take any and all actions that the Authorized Person deems necessary or appropriate, each in connection with the Chapter 11 Case, any postpetition financing, or any cash collateral usage contemplated hereby or thereby.

**RESOLVED FURTHER**, that each Authorized Person be, and hereby is, authorized, directed, and empowered, on behalf of and in the name of the Corporation, to employ and retain the law firms of Latham & Watkins LLP and Richards, Layton & Finger, P.A. to act as attorneys for the Corporation in connection with the Chapter 11 Case.

**RESOLVED FURTHER**, that each Authorized Person be, and hereby is, authorized, directed, and empowered, on behalf of and in the name of the Corporation, to employ and retain Alvarez & Marsal North America, LLC as financial advisor to the Corporation in connection with the Chapter 11 Case.

**RESOLVED FURTHER**, that each Authorized Person be, and hereby is, authorized, directed, and empowered, on behalf of and in the name of the Corporation, to employ and retain Prime Clerk LLC as claims, noticing, and solicitation agent and administrative advisor for the Corporation in its Chapter 11 Case.

**RESOLVED FURTHER**, that each Authorized Person be, and hereby is, authorized, directed, and empowered, on behalf of and in the name of the Corporation, to employ and retain such further legal, restructuring, financial, accounting, and other professionals (together with the foregoing identified firms, the “Professionals”) as may be deemed necessary or appropriate by any Authorized Person to assist the Corporation in carrying out its responsibilities in the Chapter 11 Case and achieving a successful reorganization.

**RESOLVED FURTHER**, that, each Authorized Person be, and hereby is, authorized, with full power of delegation, in the name and on behalf of the Corporation, to take or cause to be taken any and all such further action and to execute and deliver or cause to be executed or delivered, and to amend, supplement, or otherwise modify from time to time, all such further agreements, documents, certificates, statements, notices, undertakings, and other writings, and to incur and to pay or direct payment of all such fees and expenses, as in the judgment of the Authorized Person shall be necessary, appropriate, or advisable to effectuate the purpose and intent of any and all of these resolutions.



**RESOLVED FURTHER**, that all acts lawfully done or actions lawfully taken by any officer of the Corporation or any of the Professionals in connection with the Chapter 11 Case or any proceedings related thereto, or any matter related thereto, be, and hereby are, adopted, ratified, confirmed, and approved in all respects as the acts and deeds of the Corporation.

**RESOLVED FURTHER**, that any and all actions, whether previously or subsequently taken by any Authorized Person or any other person authorized to act by an Authorized Person, that are consistent with the intent and purpose of the foregoing resolutions or in connection with any matters referred to herein, shall be, and the same hereby are, in all respects, ratified, approved, and confirmed.

*[Signature Page(s) Follow]*

**IN WITNESS WHEREOF**, the undersigned hereby consent to the actions set forth herein effective as of the date first set forth above.



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Alexandra Picard

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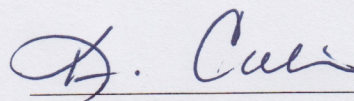
Kevin Collins

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Giorgio La Motta

**IN WITNESS WHEREOF**, the undersigned hereby consent to the actions set forth herein effective as of the date first set forth above.

\_\_\_\_\_  
Alexandra Picard



\_\_\_\_\_  
Kevin Collins

\_\_\_\_\_  
Giorgio La Motta

**IN WITNESS WHEREOF**, the undersigned hereby consent to the actions set forth herein effective as of the date first set forth above.

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Alexandra Picard

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Kevin Collins

A handwritten signature in cursive script, appearing to read 'Kevin Collins', written over a horizontal line.

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Giorgio La Motta

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

-----	X	
In re:	:	Chapter 11
	:	
IMERYYS TALC AMERICA, INC., <i>et al.</i> , <sup>1</sup>	:	Case No. 19-_____ (_____)
	:	
Debtors.	:	(Joint Administration Requested)
	:	
-----	X	

**DEBTORS’ CONSOLIDATED LIST OF THE TOP THIRTY LAW FIRMS WITH THE MOST SIGNIFICANT REPRESENTATIONS OF TALC CLAIMANTS**

The following is a consolidated list (the “Top Plaintiffs’ Firms List”), in alphabetical order, of the top thirty law firms with the most significant representations of parties asserting talc claims against Imerys Talc America, Inc. and Imerys Talc Vermont, Inc. (together with Imerys Talc Canada Inc., the “Debtors”).<sup>2</sup> Concurrently with this petition, the Debtors have filed a motion seeking authority to file this Top Plaintiffs’ Firms List (on a consolidated basis) and a consolidated list of creditors holding the thirty largest unsecured claims (excluding talc claims). The Top Plaintiffs’ Firms List does not include any person or entity who is an “insider” under section 101(31) of title 11 of the United States Code. The Top Plaintiffs’ Firms List was prepared with information existing as of January 31, 2019. The Debtors reserve the right to amend the Top Plaintiffs’ Firms List based on additional information they may identify. The information contained in the Top Plaintiffs’ Firms List shall not constitute an admission by, nor shall it be binding on, the Debtors.

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax 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.

<sup>2</sup> No talc-related personal injury claims have been filed against Imerys Talc Canada Inc.

Name of Law Firm	Name, Telephone Number, Mailing Address, and E-mail of Law Firm Contact	Nature of Claim	Indicate if Claim is Contingent, Unliquidated, Disputed or Subject to Set-off
Ashcraft & Gerel, LLP	Attn: James F. Green 4900 Seminary Road, Ste. 650 Alexandria, VA 22311 Phone: 703-997-1774 Email: JGreen@ashcraftlaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Beasley Allen Crow Methvin Portis & Miles PC	Attn: Leigh O'Dell 218 Commerce Street P.O. Box 4160 Montgomery, AL 36103-4160 Phone: 800-898-2034 Fax: 334-954-7555 Email: leigh.odell@beasleyallen.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Belluck & Fox, LLP	Attn: Joseph Belluck 546 5th Avenue, 4th Floor New York, NY 10036 Phone: 212-681-1575 Email: jbelluck@belluckfox.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Burns Charest, LLP	Attn: Warren Burns 900 Jackson Street, Ste. 500 Dallas, TX 75202 Phone: 469-904-4550 Fax: 469-444-5002 Email: wburns@burnscharest.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Cohen Placitella & Roth, PC	Attn: Christopher Placitella 127 Maple Ave Red Bank, NJ 07701 Phone: 888-649-8431 Fax: 215-567-6019 Email: cplacitella@cprlaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Golomb & Honik, P.C.	Attn: Richard Golomb 1835 Market Street, Suite 2900 Philadelphia, PA 19102 Phone: 215-985-9177 Fax: 215-985-4169 Email: rgolomb@golombhonik.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Gori Julian & Associates P.C.	Attn: Randy Gori 156 N Main St. Edwardsville, IL 62025 Phone: (888) 362-6890 Fax: 614-659-9834 Email: randy@gorijulianlaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated

Name of Law Firm	Name, Telephone Number, Mailing Address, and E-mail of Law Firm Contact	Nature of Claim	Indicate if Claim is Contingent, Unliquidated, Disputed or Subject to Set-off
Kazan, McClain, Satterley & Greenwood	Attn: Joseph Satterly 55 Harrison St., Suite 400 Oakland, CA 94607 Phone: 877-995-6372 Fax: 510-834-4913 Email: jsatterley@kazanlaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Kiesel Law LLP	Attn: Melanie Menses Palmer 8648 Wilshire Blvd Beverly Hills, CA 90211 Phone: 310-854-4444 Fax: 310-854-0812 Email: palmer@kiesel.law	Personal Injury	Disputed/ Contingent/ Unliquidated
Levy Konigsberg LLP	Attn: Robert Ellis 800 3 <sup>rd</sup> Ave, 11 <sup>th</sup> Floor New York NY 10022 Phone: 212-605-6200	Personal Injury	Disputed/ Contingent/ Unliquidated
Maune, Raichle, Hartley, French & Mudd, LLC	Attn: David Amell 70 Washington St., Suite 200 Oakland, CA 94607 Phone: 800-358-5922 Email: damell@mrhfmllaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
McDermott & Hickey, LLC	Attn: Kevin McDermott 20525 Center Ridge Rd, Ste 200 Rocky River, OH 44116 Phone: 216-712-7452 Fax: 216-916-9238 Email: kevin@mcdermotthickeylaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Meirowitz & Wasserberg, LLP	Attn: Samuel Meirowitz 233 Broadway Suite 2070 New York, NY 10279 Phone: 212-897-1988 Fax: 646-432-6887 Email: sam@mwinjurylaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Morelli Law Firm, PLLC	Attn: Benedict Morelli 777 Third Avenue, 31st Floor New York, NY 10017 Phone: 212-751-9800 Fax: 212-751-0046 Email: bmorelli@morellilaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Morris Bart, LLC	Attn: Richard Root 601 Poydras Street, 24th Floor New Orleans, LA 70130 Phone: 504-217-2793 Fax: 504-599-3380 Email: rroot@morrisbart.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Motley Rice LLC	Attn: Carman Scott 28 Bridgeside Boulevard Mt. Pleasant, SC 29464 Phone: 843-216-9000 Email: cscott@motleyrice.com	Personal Injury	Disputed/ Contingent/ Unliquidated

Name of Law Firm	Name, Telephone Number, Mailing Address, and E-mail of Law Firm Contact	Nature of Claim	Indicate if Claim is Contingent, Unliquidated, Disputed or Subject to Set-off
Napoli Shkolnik PLLC	Attn: Hunter Shkolnik One Greentree Center, Ste. 201 10000 Lincoln Drive Marlton, NJ 08053 Phone: 212-397-1000 Email: hunter@napolilaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Porter & Malouf, PC	Attn: Timothy W. Porter 825 Ridgewood Road Ridgeland, MS 39157 Phone: 601-957-1173 Fax: 601-957-7366 Email: tim@portermalouf.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Potts Law Firm	Attn: Adam Funk 3737 Buffalo Speedway, Ste. 1900 Houston, TX 77098 Phone: 713-963-8881 Email: afunk@potts-law.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Onder, Shelton, O'Leary & Peterson, LLC	Attn: Stephanie Rados 110 E. Lockwood, 2nd Floor St. Louis, MO 63119 Phone: 314-963-9000 Email: rados@onderlaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Robinson Calcagnie, Inc.	Attn: Mark Robinson 19 Corporate Plaza Drive Newport Beach, CA 92660 Phone: 949-720-1288 Fax: 949-720-1292 Email: mrobinson@robinsonfirm.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Sanders Phillips Grossman, LLP	Attn: Randi Kassan 2860 Michelle Drive, Ste. 220 Irvine, CA 92606 Phone: 888-570-4528 Fax: 516-741-0128 Email: rkassan@thesandersfirm.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Simmons Hanly Conroy, LLC	Attn: Laurence Nassif 112 Madison Avenue, 7th Floor New York, NY 10016 Phone: 212-784-6400 Fax: 212-213-5949 Email: lnassif@simmonsfirm.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Simon Greenstone Panatier, PC	Attn: Jeffrey Simon 1201 Elm Street, Suite 3400 Dallas, TX 75204 Phone: 214-276-7680 Fax: 214-276-7699 Email: jsimon@sgplaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated



Name of Law Firm	Name, Telephone Number, Mailing Address, and E-mail of Law Firm Contact	Nature of Claim	Indicate if Claim is Contingent, Unliquidated, Disputed or Subject to Set-off
The Dugan Law Firm, APLC	Attn: James R. Dugan 365 Canal Street, Ste. 1000 New Orleans, LA 70130 Phone: 504-648-0180 Fax: 504-648-0181 Email: jdugan@dugan-lawfirm.com	Personal Injury	Disputed/ Contingent/ Unliquidated
The Lanier Law Firm, PLLC	Attn: Mark Lanier 6810 FM 1960 W Houston, TX 77069 Phone: 713-569-5200 Fax: 713-659-2204 Email: wml@lanierlawfirm.com, mark.lanier@lanierlawfirm.com	Personal Injury	Disputed/ Contingent/ Unliquidated
The Miller Firm, LLC	Attn: Michael Miller 108 Railroad Avenue Orange, VA 22960 Phone: 540-672-4224 Fax: 540-672-3055 Email: mmiller@millerfirmllc.com	Personal Injury	Disputed/ Contingent/ Unliquidated
The Smith Law Firm, PLLC	Attn: Robert Allen Smith, Jr. 681 Towne Center Boulevard, Ste B. Ridgeland MS, 39157 Phone: 601-952-1422 Fax: 601-952-1426 Email: allen@smith-law.org	Personal Injury	Disputed/ Contingent/ Unliquidated
Waters Krause & Paul	Attn: Kevin Loew 222 N Sepulveda Blvd Ste 1900 El Segundo, CA 90245 Phone: 310-414-8146 Fax: 310-414-8156 Email: kloew@waterskraus.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Weitz & Luxenberg P.C.	Attn: Perry Weitz 220 Lake Drive East, Suite 210 Cherry Hill, NJ 08002 Phone: 856-755-1115 Fax: 856-755-1995 Email: pweitz@weitzlux.com	Personal Injury	Disputed/ Contingent/ Unliquidated

**Fill in this information to identify the case and this filing:**

Debtor Name Imerys Talc America, Inc.

United States Bankruptcy Court for the District of Delaware

Case number (if known): \_\_\_\_\_

Official Form 202

**Declaration Under Penalty of Perjury for Non-Individual Debtors 12/15**

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

**WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**

**Declaration and signature**

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership, or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- Schedule A/B: Assets-Real and Personal Property* (Official Form 206A/B)
- Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- Schedule H: Codebtors* (Official Form 206H)
- Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- Amended Schedule* \_\_\_\_
- Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- Other document that requires a declaration – *Consolidated List of the Top Thirty Law Firms with the Most Significant Representations of Talc Claimants*

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

Executed on 02/13/2019  
MM/DD/YYYY

**X** /s/ Alexandra Picard  
Signature of individual on behalf of debtor

Alexandra Picard  
Printed name

Chief Financial Officer  
Position or relationship to debtor

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

----- X  
 In re: : Chapter 11  
 :  
 Imerys Talc America, Inc. : Case No. 19-\_\_\_\_\_ (\_\_\_\_\_)  
 :  
 Debtor. :  
 :  
 Employer Tax I.D. No. 84-1196358 :  
 ----- X

**DEBTOR’S LIST OF EQUITY SECURITY HOLDERS  
AND STATEMENT OF CORPORATE OWNERSHIP**

Pursuant to Rules 1007(a)(1), 1007(a)(3), and 7007.1 of the Federal Rules of Bankruptcy Procedure, the above-captioned debtor and debtor-in-possession submits the following list of equity security holders of the above-captioned debtor’s stock:

Shareholder	Address of Shareholder	Number of Shares
Imerys Minerals Holding Limited	Par Moor Centre, Par Moor Road, PL24 2SQ Par, Cornwall United Kingdom	100

**Fill in this information to identify the case and this filing:**

Debtor Name Imerys Talc America, Inc.

United States Bankruptcy Court for the District of Delaware

Case number (if known): \_\_\_\_\_

Official Form 202

**Declaration Under Penalty of Perjury for Non-Individual Debtors 12/15**

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

**WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**

**Declaration and signature**

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership, or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- Schedule A/B: Assets-Real and Personal Property* (Official Form 206A/B)
- Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- Schedule H: Codebtors* (Official Form 206H)
- Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- Amended Schedule* \_\_\_\_\_
- Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- Other document that requires a declaration – *Debtor's List of Equity Security Holders and Statement of Corporate Ownership*

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

Executed on 02/13/2019  
MM/DD/YYYY

**X** /s/ Alexandra Picard  
Signature of individual on behalf of debtor

Alexandra Picard  
Printed name

Chief Financial Officer  
Position or relationship to debtor

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

-----	X	
In re:	:	Chapter 11
	:	
IMERYYS TALC AMERICA, INC., <i>et al.</i> , <sup>1</sup>	:	Case No. 19-_____ (_____)
	:	
Debtors.	:	(Joint Administration Requested)
	:	
-----	X	

**CONSOLIDATED LIST OF CREDITORS HOLDING THE  
THIRTY LARGEST UNSECURED CLAIMS**

Imerys Talc America, Inc., Imerys Talc Vermont, Inc., and Imerys Talc Canada Inc. (together, the “Debtors”) each filed a petition in this Court on the date hereof for relief under chapter 11 of title 11 of the United States Code. Contemporaneously with the filing of their petitions, the Debtors filed a motion requesting, among other things, authority to file a consolidated list of creditors holding the thirty largest unsecured claims (the “Largest Unsecured Creditors List”), excluding parties asserting talc claims against the Debtors. Moreover, the Debtors have requested authority to file a separate consolidated list of the top thirty law firms with the most significant representations of parties asserting talc claims against the Debtors.

The Largest Unsecured Creditors List is based on the Debtors’ books and records as of approximately February 12, 2019, and was prepared in accordance with Rule 1007(d) of the Federal Rules of Bankruptcy Procedure for filing in the Debtors’ chapter 11 cases. The Largest Unsecured Creditors List does not include (i) persons who come within the definition of “insider” set forth in 11 U.S.C. § 101(31), or (ii) parties asserting talc claims against the Debtors or the law firms representing those parties.

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax 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.

The information contained in the Largest Unsecured Creditors List shall not constitute an admission by, nor shall it be binding on, the Debtors.

Fill in this information to identify the case and this filing:

Debtor Name Imerys Talc America, Inc.

United States Bankruptcy Court for the District of Delaware

Case number (if known): \_\_\_\_\_

Check if this is an amended filing

## Official Form 204

### Chapter 11 or Chapter 9 Cases: Consolidated List of Creditors Who Have the 30 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 30 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 30 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim		
					Total claim, partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	AOC, LLC 955 Highway 57 East Collierville, TN 38017	Frederick S. Norman CEO & President EMAIL - FNorman@aoc-resins.com PHONE - (901) 854-2800 FAX - (901) 854-1183	Customer Payable	Unliquidated			\$750,000
2	William Day Construction Limited 2500 Elm Street Azilda, ON P0M 1B0 Canada	William Day President EMAIL - william.day@daygroup.ca PHONE - (705) 682-1555 FAX - (705) 682-2739	Trade Payable				\$623,617
3	UE Compression Holdings 9461 Willow Court Henderson, CO 80640	Jack Maley CEO EMAIL - jmaley@uecompression.com PHONE - 303-515-8600 FAX - 303-515-8554	Trade Payable	Unliquidated			\$135,000
4	Corning, Inc. One Riverfront Plaza Corning, NY 14831	Wendell P. Weeks Chairman and Chief Executive Officer EMAIL - Wendell.Weeks@corning.com PHONE - (607) 974-9000	Customer Payable				\$121,948
5	Tyoga Container Company 9 Fish Street Tioga, PA 16946	Charlie Frysinger President EMAIL - charlie@tyogacontainer.com PHONE - (570) 835-5296 ext. 227	Trade Payable	Unliquidated			\$87,000
6	BNSF Railway Company - Chicago 3110 Solutions Center Chicago, IL 60677-3001	Roger Nober General Counsel EMAIL - roger.nober@bnsf.com PHONE - (800) 795-2673	Trade Payable				\$83,448
7	Emera Energy Gas Trading 1223 Lower Water Street Halifax, NS B3J 3S8 canada	Judy Steele President and COO EMAIL - judy.steele@emera.com PHONE - (902) 474-7800	Trade Payable				\$62,338

Debtor: Imerys Talc America, Inc.  
Name

Case number (if known) \_\_\_\_\_

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, partially secured	Deduction for value of collateral or	Unsecured claim
8	Casella Organics 25 Greens Hill Ln Rutland, VT 05741	John W. Casella Chief Executive Officer EMAIL - john.casella@casella PHONE - (802) 775-0325 FAX - (802) 775-6198	Trade Payable			\$49,191	
9	Laforest Electrick 897 Government Road South Timmins, ON P4R 1N4 Canada	Richard Laforest Owner EMAIL - rlaforest@vianet.ca PHONE - 705-264-3979 FAX - 705-566-8327	Trade Payable			\$36,688	
10	Farber & Company 444 West Ocean Boulevard, Suite 516 Long Beach, CA 90802-4528	Eric Farber CEO & Chief Legal Officer EMAIL - eric@farberandco.com PHONE - (562) 432-8748 FAX - (562) 495-9170	Trade Payable			\$33,187	
11	Material Motion, Inc. 203 Rio Circle Decatur, GA 30030	Steve Schneider President EMAIL - steve@materialmotion.com PHONE - 404-237-6127 FAX - 404-237-6128	Trade Payable			\$32,986	
12	CN Canadian National Railway Company 935 de La Gauchetière Street West Montreal, QC H3B 2M9	Sean Finn Executive Vice-President Corporate Service and Chief Legal Officer EMAIL - sean.finn@cn.ca PHONE - (514) 399-8100	Trade Payable			\$32,789	
13	Univar Canada, Ltd. 9800 Van Horne Way Richmond, BC V6X 1W5 Canada	Mike Hildebrand President EMAIL - mike.hildebrand@univarcanda.com PHONE - (604) 273-1441	Trade Payable			\$25,925	
14	Savage Trucking, Inc. 29 Peck Road Chester, VT 05143	Kirk Aubry President and Chief Executive Officer EMAIL - kirkaubry@savageservices.com PHONE - 800-827-4439	Trade Payable			\$25,725	
15	Amatic CPA Group 220 W Lamme St #3a Bozeman, MT 59715	Christina A. Reikenberg Shareholder EMAIL - criekenberg@amaticscpa.com PHONE - 406-404-1925 FAX - 406-404-1926	Trade Payable			\$25,594	
16	McLanahan Corporation 200 Wall Street Hollidaysburg, PA 16648	Sean K. McLanahan President and CEO EMAIL - smclanahan@mclanahan.com PHONE - (814) 695 9807 FAX - (814) 695 6684	Trade Payable			\$21,935	
17	Challenger Pallet & Supply, Inc. 1206 North Beck Street Salt Lake City, UT 84116	Tad Hegsted President EMAIL - hegsted.t@cpspallet.com PHONE - (801) 596-1969	Trade Payable			\$21,922	
18	Nederman Mikropul Canada, Inc. 5865McLaughlin Road, Unit 1 Mississauga, ON L5R 1B8 CANADA	Matthew Cusick Senior Vice President & CFO EMAIL - matthew.cusick@nederman.com PHONE - 46 42 18 87 00	Trade Payable			\$21,855	
19	Nasco Propane 290 Railway St. Timmins, ON P4N 7E3 Canada	George Scott Owner EMAIL - PHONE - (705) 264-5213 FAX - (705) 264-6979	Trade Payable			\$21,302	



Debtor: Imerys Talc America, Inc.  
Name

Case number (if known) \_\_\_\_\_

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, partially secured	Deduction for value of collateral or	Unsecured claim
20	Steel Pro, Inc. 771 Main Street Rockland, ME 4841	Steve Ladd President EMAIL - steve.ladd@steelprousa.com PHONE - 207-596-0061 FAX - 207-596-0239	Trade Payable				\$20,250
21	Watkins & Shepard Trucking, Inc. P.O. Box 5328 Missoula, MT 59806-5328	Ray Kuntz CEO EMAIL - rayk@wksh.com PHONE - (406) 532-6121 FAX - (406) 721-4116	Trade Payable				\$20,175
22	Normand Verville Enterprises 449 Feldman Road Timmins, ON P4N 7E2 Canada	Normand Verville President EMAIL - vervilleent@hotmail.com PHONE - (705) 267-6707 FAX - (705) 268-1950	Trade Payable				\$19,290
23	C.H. Robinson Worldwide, Inc. 8100 Mitchell Road Suite 200 Green Prairie, MN 55344	Ben Campbell Chief Legal Officer EMAIL - ben.campbell@chrobinson.com PHONE - (952) 937-6713 FAX - (952) 937-6737	Trade Payable				\$17,630
24	Johnson Controls Fire Protection LP 5757 N. Green Bay Ave. P.O. Box 591 Milwaukee, WI 53201	George R. Oliver Chairman and Chief Executive Officer EMAIL - g.oliver@jci.com PHONE - (414) 524-1200	Trade Payable				\$17,540
25	Cole International, Inc. 3033-34 Avenue, NE Calgary, Alberta T1Y 6X2 Canada	Donald Lucky President EMAIL - don.lucky@coleintl.com PHONE - (403) 262-2771 FAX - (403) 262-7301	Trade Payable				\$17,451
26	DMS Machining & Fabrication 10 Transport Dr. BARRE, VT 05641	Byron Atwood President & Owner EMAIL - byron@eamesoffice.com PHONE - 802-479-1088	Trade Payable				\$16,639
27	Northwestern Corporation 3010 W. 69th Street Souix Falls, SD 57108	Heather H. Grahame General Counsel EMAIL - heather.grahame@northwestern.com PHONE - 605-978-2900	Trade Payable				\$16,570
28	Union Gas, Ltd. 50 Keil Drive North Chatham, ON N7M 5M1 Canada	Stephen W. Baker President & Director EMAIL - sbaker@uniongas.com PHONE - 888-774-3111	Trade Payable				\$15,985
29	Geomapping Associates, Ltd. Inc. 1563 US Route 7 Pittsford, VT 57639-9554	James Purdy President EMAIL - geomappingltd@comcast.net PHONE - 802-483-6635 FAX - 802-483-6685	Trade Payable				\$15,215
30	Traffic Tech 180 N. Michigan Ave. Suite 700 Chicago, IL 60601	Mark Schiele President EMAIL - m.schiele@trafficttech.com PHONE - 877-383-1167	Trade Payable				\$14,740

**Fill in this information to identify the case and this filing:**

Debtor Name Imerys Talc America, Inc.

United States Bankruptcy Court for the District of Delaware

Case number (if known): \_\_\_\_\_

Official Form 202

**Declaration Under Penalty of Perjury for Non-Individual Debtors 12/15**

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**Declaration and signature**

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I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

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- Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
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- Schedule H: Codebtors* (Official Form 206H)
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- Amended Schedule* \_\_\_\_
- Chapter 11 or Chapter 9 Cases: Consolidated List of Creditors Who Have the 30 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- Other document that requires a declaration

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

Executed on 02/13/2019  
MM/DD/YYYY

**X**

/s/ Alexandra Picard  
Signature of individual on behalf of debtor

Alexandra Picard  
Printed name

Chief Financial Officer  
Position or relationship to debtor