

## **Debtors' Tenth, Eleventh, Twelfth, Thirteenth and Fourteenth Omnibus Objections to Certain Tier I Proofs of Claim (the "Claims Objections").**

By the Claims Objections, the Debtors seek entry of orders disallowing and expunging certain claims which are either duplicative, late-filed, paid-in-full, amended and superseded, or fail to provide sufficient information (collectively, the "Disputed Claims").

By order dated August 21, 2009, the Court established October 30, 2009 (the "Bar Date") as the deadline to assert a claim against any of the Debtors. On January 20, 2010, the Court entered an order approving the Debtors' Motion for Entry of an Order Establishing Procedures for Objections to Claims (the "Claims Objection Procedures Order"). Pursuant to the Claims Objection Procedures Order, the Debtors may file omnibus objections to claims.

### **Duplicative, Late-Filed and Paid-in-Full Claims**<sup>1</sup>

By the Claims Objections, the Debtors seek to expunge certain claims that are duplicative of other proofs of claim previously filed in the Debtors' chapter 11 cases. The Debtors reserve their right, as well as the rights of any other parties in interest, to object to the surviving claims in the future.

Further, the Debtors also object to (i) certain late-filed claims wherein the claimants failed to file their proofs of claim by the Bar Date, and (ii) certain claims which, according to the Debtors, have already been paid-in-full or were previously satisfied.

### **Amended and Superseded Claims**<sup>2</sup>

By the Claims Objections, the Debtors object to the allowance of certain of the Disputed Claims (the "Amended and Superseded Claims") which, according to the Debtors, have been amended and superseded by a corresponding surviving claim filed in the Debtors' chapter 11 cases. The Debtors contend that the Amended and Superseded Claims should be disallowed to prevent multiple recoveries on a single claim.

### **Claims Containing Insufficient Information**<sup>3</sup>

By the Claims Objections, the Debtors object to the allowance of certain of the Disputed Claims for failure to provide sufficient information. Among other things, the Debtors believe that certain of the Disputed Claims lack sufficient information related to (i) the claimant's alleged exposure to asbestos, (ii) where such exposure occurred, and (iii) the magnitude of the alleged injury derived from asbestos exposure.

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<sup>1</sup> The Debtors' Tenth Omnibus Objection to Certain Tier I Proofs of Claim contains a schedule of claims that the Debtors allege are either duplicative, late-filed or have previously been paid-in-full.

<sup>2</sup> The Debtors' Eleventh and Twelfth Omnibus Tier I Objections to Certain Proofs of Claim contain schedules of claims that the Debtors allege have been amended and superseded.

<sup>3</sup> The Debtors' Thirteenth and Fourteenth Omnibus Tier I Objections to Certain Proofs of Claim contain schedules of claims that the Debtors allege have insufficient information.

The Debtors reserve the rights of all parties in interest to assert additional objections to the Disputed Claims in the future.

***A hearing on the Claims Objections has been scheduled for March 9, 2010 at 9:45 a.m. with a corresponding objection deadline of March 2, 2010 at 4:00 p.m.***