

Debtors' Objection to Frank McKinnon's Proof of Claim No. 14317 (the "McKinnon Objection").

By the McKinnon Objection, the Debtors seek to expunge the \$1,529,384,000 claim asserted by Frank McKinnon ("McKinnon") for injuries to his father and the Campers (as defined below) allegedly caused by the release of chemicals into the environment in Arkansas by Great Lakes Chemical Company ("GLCC") (the "Disputed Claim").

Specifically, the Disputed Claim seeks payment on account of (i) the death of McKinnon's father ("Claim 1"), (ii) injuries allegedly suffered by 507 un-named children (the "Campers") who attended a summer camp in Arkansas ("Claim 2"), and (iii) financial damage allegedly caused by the Debtors to McKinnon ("Claim 3"). The liquidated portion of the Disputed Claim seeks (i) \$8,000,000 on account of Claim 1, (ii) \$3,000,000 on account of Claim 2, and (iii) \$384,000 on account of Claim 3.

The Disputed Claim supersedes three proofs of claim previously filed by McKinnon (collectively, the "Superseded Claims"). On February 16, 2010, the Debtors filed an omnibus objection to certain claims seeking to, among other things, formally expunge the Superseded Claims from the Debtors' claims register. On March 1, 2010, McKinnon sent a letter to the Court conceding that the Disputed Claim did amend and supersede one of the previously filed claims. On April 5, 2010, McKinnon sent a letter to the Court requesting that the Disputed Claim be withdrawn without prejudice, which the Court endorsed on April 6, 2010. On April 8, 2010, the Court entered an order disallowing the Superseded Claims pursuant to the Debtors' request.

The Debtors assert that the Disputed Claim should be expunged and disallowed in its entirety because, among other reasons, (i) McKinnon voluntarily withdrew the Disputed Claim and (ii) McKinnon has no right to payment under federal law. The Debtors further contend that even if McKinnon relied on state law, all three components of the Disputed Claim are barred by the applicable statute of limitations. Moreover, the Debtors assert that Claim 1 does not articulate how GLCC caused the death of McKinnon's father or why McKinnon is entitled to \$8,000,0000 in asserted liquidated damages. With respect to Claim 2, the Debtors contend that McKinnon lacks standing to assert the claim on behalf of the Campers under Arkansas law and has failed to demonstrate how GLCC caused at least \$1,521,000,000 in injuries and damages to the Campers. Lastly, the Debtors maintain that Claim 3 is unsubstantiated as McKinnon has offered no explanation and provided no documentation in support of thereof. Accordingly, the Debtors request that the Disputed Claim be expunged and disallowed in its entirety.

A Hearing on the McKinnon Objection has been scheduled for July 13, 2010 at 9:45 a.m. with a corresponding objection deadline of July 6, 2010 at 4:00 p.m.