

Motion on Behalf of Chemtura Retiree John J. Prior and Other Similarly-Situated Retirees for Modification and Resettlement of this Court's November 30, 2009 Order (the "Motion to Reconsider").

By the Motion to Reconsider, John Prior and other similarly situated retirees (collectively, the "Group") request that the Court reconsider and resettle the November 30, 2009 Order (the "Order") Granting in Part, and Continuing in Part, the Debtors' Motion for an Order Authorizing Certain Debtors to Modify or Terminate Certain Other Post-Employment Benefits (the "OPEB Motion").

On October 29, 2009, the Debtors provided notice of the OPEB Motion (the "Notice") to all retirees. The Group submits that they did not have sufficient time to obtain copies of the necessary documents from the Debtors and thus were unable to file an appropriate response because the Notice did not include a copy of the OPEB Motion. Mr. Prior, however, both filed a response and appeared in court on his own behalf. Therefore, the Group believes that any ruling with respect to Mr. Prior should apply equally to the Group and all similarly situated retirees.

On November 25, 2009, Lemberg & Associates, LLP, on behalf of Mr. Prior and the Group, submitted a counter-proposal to the Court of what it believed was an appropriate order to settle the OPEB Motion. On November 30, 2009, however, the Court entered the Order as submitted by the Debtors.

The Group believes that reconsideration of the Order is appropriate to allow the Court to reach a fair and equitable result with respect of the relief requested in the OPEB Motion. The Group concedes that the Notice was procedurally adequate, but requests that the Court exercise its equitable powers to fashion a remedy applicable to all retirees who are similarly situated to Mr. Prior.

Objections to the Motion to Reconsider are due by December 31, 2009 at 4:00 p.m. (ET).