

Debtors' Application for an Order Directing Oral Examinations and Production of Documents Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure with Respect to American International Group, Chartis, Inc., Chartis Claims, Inc. and Certain Related Entities (the "AIG 2004 Application").

By the AIG 2004 Application, the Debtors seek entry of an order directing American International Group, Chartis Claims, Inc., Chartis, Inc. and certain related entities including American International Specialty Lines Insurance Company, Lexington Insurance Ltd. (UK), National Union Fire Insurance Company of Pittsburgh, PA, and any and all predecessor entities (collectively, "AIG") to (i) appear for oral examination and (ii) produce certain documents.

Prior to the commencement of the Debtors' chapter 11 cases, Chemtura Corporation ("Chemtura") and Chemtura Canada Corporation ("Chemtura Canada") were named as defendants in 21 diacetyl related lawsuits, 15 of which remain pending (the "Diacetyl Lawsuits"). The Diacetyl Lawsuits involve approximately 50 plaintiffs and allege that the exposure to diacetyl manufactured by Chemtura Canada and distributed by Chemtura caused respiratory illness in food industry factory workers. As a result of the establishment of the October 30, 2009 bar date, the Debtors also received approximately 375 non-duplicative claims alleging injury from exposure to diacetyl (the "Diacetyl Claims").

Chemtura and Chemtura Canada believe that they have insurance coverage for the Diacetyl Claims, including certain liability policies issued between November 4, 1996 and June 1, 2007 (collectively, the "Insurance Policies"). All of Chemtura and Chemtura Canada's insurance carriers, including AIG, have reserved their rights or denied coverage for the Diacetyl Claims based on various policy exclusion provisions. The Debtors maintain that without additional information from AIG regarding its practice of handling claims alleging injury from exposure to diacetyl under liability insurance policies, Chemtura is unable to evaluate the Insurance Policies to estimate the uninsured portion of the Diacetyl Claims. The Debtors submit that determining the extent of the Debtors' diacetyl-related liability is a gating item to developing and confirming a plan of reorganization.

The Debtors assert that prior to filing the AIG 2004 Application, the Debtors met with counsel to AIG and requested a consensual exchange of information, but such meeting failed to produce positive results. Accordingly, the Debtors seek to obtain such information pursuant to Bankruptcy Rule 2004.

The Debtors believe that all of the requested information is maintained in AIG's regular course of business, and the production of the requested documents will not be a hardship on AIG. Moreover, the Debtors have prepared a protective order governing the confidentiality of discovery to ensure that any personal health information produced in connection with the AIG 2004 Application remains confidential.

Pursuant to the AIG 2004 Application, the Debtors seek, among other things, the following documents and information from AIG:

- Documents reflecting the circumstances in any instance where AIG provided coverage to any AIG policyholder for a claim alleging injury from exposure to diacetyl.

- Documents reflecting the circumstances in any instance where AIG refused to provide coverage to any AIG policyholder for a claim alleging injury from exposure to diacetyl.
- Documents reflecting all amounts paid by AIG to or on behalf of any AIG policyholder, either in settlement of or judgment for, any claim alleging injury from exposure to diacetyl.
- Documents sufficient to identify the plaintiff or injured party where the injured party was exposed to diacetyl, as well as the period of exposure, the type of injury and medical condition of each injured party.
- Documents sufficient to identify the defendant(s) in each proceeding or action where the claim alleged injury from exposure to diacetyl.
- Documents sufficient to identify the terms of the AIG policyholder's insurance coverage under which AIG made or declined payment for claims alleging injury from exposure to diacetyl.

The AIG 2004 Application has been scheduled for hearing on February 23, 2010 at 9:45 a.m. (ET), with a corresponding objection deadline of February 16, 2010 at 4:00 p.m. (ET).