

APG ASBESTOS TRUST PRE-PETITION LIQUIDATED CLAIMS

The APG Asbestos Trust (the “Trust”) has received information from the APG Entities¹ identifying the claimants listed on the attached schedule as having Pre-Petition Liquidated APG Asbestos Trust Claims, as that term is defined in Section 5.2(a) of the TDP.

Under Section 5.2(a) of the TDP, each claimant on the schedule has the right to retain the liquidated value of the Pre-Petition Liquidated APG Asbestos Trust Claim. Alternatively, the claimant may abandon their Pre-Petition Liquidated APG Asbestos Trust Claim and seek to have their claim processed as an Unliquidated Asbestos Trust Claim pursuant Section 5.3 of the TDP. If the claimant elects to abandon their Pre-Petition Liquidated APG Asbestos Trust Claim and file the claim with the Trust to be liquidated under Section 5.3 of the TDP, the claim will be processed upon the claimant’s submission of a completed unliquidated claim form. If such Unliquidated Asbestos Trust Claim is subsequently denied by the Trust, the claimant may withdraw the Unliquidated Asbestos Trust Claim and pursue the pre-existing Pre-Petition Liquidated Claim.

To pursue the Pre-Petition Liquidated Claim, you must file a pre-petition claim form. The Pre-Petition Liquidated Claims are classified under 2 categories:

Category A: Claims which were processed and qualified for payment by the APG Entities prior to the bankruptcy filing.

Upon final verification of eligibility, an offer and a Trust release will be sent.

Category B: Claims which were settled but NOT processed and qualified for payment by the APG Entities prior to the bankruptcy filing.

All required documentation identified in the pre-petition claim form must be provided to the Trust. Please note: for multi-plaintiff settlement agreements, counsel may send one copy of the settlement with an attachment 'A' list to apginquiries@mfrclaims.com. The claim will be processed according to the criteria set forth in the applicable settlement agreement. Approved claims will receive an offer and a Trust release.

If the claimant elects to retain the liquidated value of the Pre-Petition Claim, the Trust shall pay, as soon as practical upon the receipt by the Trust of a release executed by the claimant, an amount determined in accordance with Section 5.2(a) of the TDP. If the release is executed by someone other than the injured party, a Certificate of Official Capacity or other estate documentation must be submitted if available.

If you believe that the list is not complete, any settlement amounts are disputed or a list has not been received, please contact the Trust within 30 days by emailing Mike Rooney at apginquiries@mfrclaims.com.

¹ Capitalized terms used herein and not otherwise defined shall have the meanings assigned to them in the APG Asbestos Trust Distribution Procedures (the “APG TDP”), as such may be amended.