

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re:  BESTWALL LLC,  Debtor.	Chapter 11  Case No. 17-31795 (LTB)
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**NOTICE OF HEARING TO CONSIDER APPROVAL OF  
DISCLOSURE STATEMENT FOR AMENDED PLAN OF REORGANIZATION  
PROPOSED BY THE OFFICIAL COMMITTEE OF ASBESTOS CLAIMANTS  
AND THE FUTURE CLAIMANTS' REPRESENTATIVE**

PLEASE TAKE NOTICE THAT the Official Committee of Asbestos Claimants (the “**Committee**”) and Sander L. Esserman (the “**FCR**” and together with the Committee, the “**Plan Proponents**”), as the legal representative for persons who have not yet asserted an asbestos-related personal-injury claim against the above-captioned debtor (the “**Debtor**”) have filed:

- the *Amended Plan of Reorganization Proposed by the Official Committee of Asbestos Claimants and the Future Claimants' Representative (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time) (as it may be amended, the "Plan")*;<sup>1</sup>
- the *Disclosure Statement for Amended Plan of Reorganization Proposed by the Official Committee of Asbestos Claimants and the Future Claimants' Representative (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “**Disclosure Statement**”)*; and

The Plan, attached to the Disclosure Statement as **Exhibit A**, contemplates two alternative paths contingent upon (a) asbestos claimants voting to accept the plan, (b) GP Holdings voting to accept the Plan, and (c) Georgia-Pacific’s agreement on assumption and assignment of the Funding Agreement to the Asbestos PI Trust. The two possible scenarios are generally referred to as the § 524(g) Alternative and the Unimpairment Alternative.

Under the § 524(g) Alternative, the Plan provides for an Asbestos Channeling Injunction pursuant to § 524(g) of the Bankruptcy Code. For a description of the Causes of Action that may be enjoined and the identities of the Entities that would be subject to the Injunction, see Article XI.C of the Plan and Section 2.2(b) and of the Disclosure Statement. The Plan also proposes

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<sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Plan.

certain releases, injunctions, and exculpations, pursuant to which certain parties are released from liability or exculpated for a variety of claims.

PLEASE TAKE FURTHER NOTICE that the Plan Proponents intend to present the Disclosure Statement for approval at a hearing before the Honorable Laura T. Beyer on **Friday, August 21, 2020, at 9:30 A.M.** in Bankruptcy Courtroom 1-5 in the United States Courthouse, 401 West Trade Street, Charlotte, North Carolina (the "**Disclosure Statement Hearing**"). The Disclosure Statement may be amended, modified, or supplemented at any time prior to or at the Disclosure Statement Hearing, and the Disclosure Statement Hearing may be adjourned from time to time without further notice, except for the announcement of the adjourned date(s) through the agenda for the Disclosure Statement Hearing and/or at the Disclosure Statement Hearing or any continued hearing(s).

PLEASE TAKE FURTHER NOTICE THAT objections, if any, to the approval of the Disclosure Statement must: (A) be in writing; (B) state the name, address, and nature of the Claim or Interest of the objecting or responding party proposing a modification to the Disclosure Statement; (C) state with particularity the legal and factual basis and nature of any objection and set forth the proposed modification to the Disclosure Statement, together with suggested language; (D) be filed with the Clerk of the Bankruptcy Court, 401 West Trade Street, Charlotte, North Carolina, 28202, together with proof of service, **on or before August 19, 2020 at 4:00 p.m. (ET)** (the "**Objection Deadline**"); and (E) be served upon the following parties so as to be received on or before the Objection Deadline: (i) counsel to the Official Committee of Asbestos Claimants at Robinson & Cole LLP, 1201 N. Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey and Davis L. Wright) and (ii) counsel to the FCR, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801 (Attn: Edwin J. Harron, and Sharon M. Zieg); and (iii) the United States Bankruptcy Administrator 402 W. Trade Street, Suite 200, Charlotte, North Carolina 28202-1669 Attn: Alexandria Kenny.

PLEASE TAKE FURTHER NOTICE THAT copies of the Plan and the Disclosure Statement are available on the Bankruptcy Court's website at [www.ncwb.uscourts.gov](http://www.ncwb.uscourts.gov), from [www.donlinrecano.com/bestwall](http://www.donlinrecano.com/bestwall), or by contacting the undersigned counsel.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS CASE. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief requested in the Motion, including the approval of the Disclosure Statement.

Dated: July 22, 2020

/s/ Glenn C. Thompson

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