

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
	:	
IMERYS TALC AMERICA, INC., <i>et al.</i> , <sup>1</sup>	:	Case No. 19-10289 (LSS)
	:	
Debtors.	:	(Jointly Administered)
	:	
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	:	
	:	
IMERYS TALC AMERICA, INC., IMERYS TALC VERMONT, INC. AND IMERYS TALC CANADA INC.,	:	Adv. Pro. No. 19-50115 (LSS)
	:	
Plaintiffs,	:	
	:	
THE OFFICIAL COMMITTEE OF TORT CLAIMANTS and JAMES L. PATTON, JR., AS FUTURE CLAIMS REPRESENTATIVE,	:	
	:	
Plaintiff-Intervenors,	:	
	:	
v.	:	
	:	
CYPRUS AMAX MINERALS COMPANY and CYPRUS MINES CORPORATION,	:	
	:	
Defendants.	:	
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**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON DECEMBER 11, 2019 AT 11:30 A.M. (EST)**<sup>2</sup>

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Imerys Talc America, Inc. (6358), Imerys Talc Vermont, Inc. (9050), and Imerys Talc Canada Inc. (6748). The Debtors’ address is 100 Mansell Court East, Suite 300, Roswell, Georgia 30076.

<sup>2</sup> The hearing will be held before The Honorable Laurie Selber Silverstein at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom 2, Wilmington, Delaware 19801. Any person who wishes to appear telephonically at the December 11, 2019 hearing must contact COURTCALL, LLC at 866-582-6878 prior to the hearing to register his/her telephonic appearance in accordance with the *Instructions for Telephonic Appearances Effective January 5, 2005, Revised May 11, 2018*.

**I. ADVERSARY MATTERS:**

1. Defendants' Motion to Produce Documents Pursuant to Protective Order [Adv. Docket No. 117 – filed October 8, 2019]

Objection / Response Deadline: October 11, 2019 at 4:00 p.m. (ET);  
extended to October 16, 2019

Objections / Responses Received:

- A. Cyprus Historical Excess Insurers' Objection to Cyprus' and Debtors' Motion to Facilitate Production of Privileged Documents Pursuant to Protective Orders [Dkt. Nos. 117 and 118] [Adv. Docket No. 123 – filed October 16, 2019]
- B. Declaration of Janine Panchok-Berry in Support of Cyprus Historical Excess Insurers' Objection to Cyprus' and Debtors' Motion to Facilitate Production of Privileged Documents Pursuant to Protective Orders [Dkt. Nos. 117 and 118] [Adv. Docket No. 124 – filed October 16, 2019]

Related Documents:

- i. Order Approving Adversary Proceeding Protective Order [Adv. Docket No. 115 – entered September 27, 2019]
- ii. Letter to the Honorable Laurie Selber Silverstein Requesting Postponement of Hearing Date [Adv. Docket No. 119 – filed October 9, 2019]
- iii. Reply in Support of Defendants' Motion to Produce Documents Pursuant to Protective Order [Adv. Docket No. 126 – filed October 23, 2019]
- iv. Declaration of Rani Gupta in Support of Defendants' Motion to Produce Documents Pursuant to Protective Order [Adv. Docket No. 127 – filed October 23, 2019]
- v. Second Amended Scheduling Order [Docket No. 132 – entered November 7, 2019]
- vi. Letter re Cyprus' Motion to Produce Documents Pursuant to Protective Order [Adv. Docket No. 145 – filed December 6, 2019]
- vii. Letter to the Honorable Laurie Selber Silverstein Regarding Cyprus Letter Request [Docket No. 146 – filed December 6, 2019]
- viii. Letter to the Honorable Laurie Selber Silverstein Regarding the Deposition of Jeffrey Ward [Docket No. 147 – filed December 8, 2019]

- ix. Letter to the Honorable Laurie Selber Silverstein Regarding Cyprus Letter Request [Docket No. 148 – filed December 8, 2019]
- x. Documents submitted to the Court for in camera review in connection with the Defendants’ and the Debtors’ motions identified herein
- xi. In Camera Submission: Cyprus Historical Excess Insurers’ Submission of Privilege Log, Confidentiality Agreements, and Redacted Documents [Dkt. Nos. 117, 118, 123]
- xii. In Camera Submission: Debtors’ Response to the Cyprus Historical Excess Insurers’ Submission of Privilege Log, Confidentiality Agreements, and Redacted Documents
- xiii. In Camera Submission: Defendants’ Response to the Cyprus Historical Excess Insurers’ *In Camera* Submission of “Privilege Log” and Redacted Documents

Status: The hearing regarding this matter is going forward.

- 2. Debtors’ Motion to Facilitate Production of Non-Privileged Documents [Adv. Docket No. 118 – filed October 8, 2019]

Objection / Response Deadline: October 11, 2019 at 4:00 p.m. (ET);  
extended to October 16, 2019

Objections / Responses Received:

- A. Cyprus Historical Excess Insurers' Objection to Cyprus' and Debtors' Motion to Facilitate Production of Privileged Documents Pursuant to Protective Orders [Dkt. Nos. 117 and 118] [Adv. Docket No. 123 – filed October 16, 2019]
- B. Declaration of Janine Panchok-Berry in Support of Cyprus Historical Excess Insurers' Objection to Cyprus' and Debtors' Motion to Facilitate Production of Privileged Documents Pursuant to Protective Orders [Dkt. Nos. 117 and 118] [Adv. Docket No. 124 – filed October 16, 2019]

Related Documents:

- i. Order Approving Adversary Proceeding Protective Order [Adv. Docket No. 115 – entered September 27, 2019]
- ii. Letter to the Honorable Laurie Selber Silverstein Requesting Postponement of Hearing Date [Adv. Docket No. 119 – filed October 9, 2019]

- iii. Reply in Support of Debtors' Motion to Facilitate Production of Non-Privileged Documents [Adv. Docket No. 125 – filed October 23, 2019]
- iv. Second Amended Scheduling Order [Docket No. 132 – entered November 7, 2019]
- v. Letter re Cyprus' Motion to Produce Documents Pursuant to Protective Order [Adv. Docket No. 145 – filed December 6, 2019]
- vi. Letter to the Honorable Laurie Selber Silverstein Regarding Cyprus Letter Request [Docket No. 146 – filed December 6, 2019]
- vii. Letter to the Honorable Laurie Selber Silverstein Regarding the Deposition of Jeffrey Ward [Docket No. 147 – filed December 8, 2019]
- viii. Letter to the Honorable Laurie Selber Silverstein Regarding Cyprus Letter Request [Docket No. 148 – filed December 8, 2019]
- ix. Documents submitted to the Court for in camera review in connection with the Defendants' and the Debtors' motions identified herein
- x. *In Camera* Submission: Cyprus Historical Excess Insurers' Submission of Privilege Log, Confidentiality Agreements, and Redacted Documents [Dkt. Nos. 117, 118, 123]
- xi. *In Camera* Submission: Debtors' Response to the Cyprus Historical Excess Insurers' Submission of Privilege Log, Confidentiality Agreements, and Redacted Documents
- xii. *In Camera* Submission: Defendants' Response to the Cyprus Historical Excess Insurers' *In Camera* Submission of "Privilege Log" and Redacted Documents

Status: The hearing regarding this matter is going forward.

Dated: December 10, 2019  
Wilmington, Delaware

/s/ Marcos A. Ramos

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