

**NOTICE TO CLAIMANTS THROUGH COUNSEL  
CLAIMS FORECAST AND REVIEW OF PAYMENT PERCENTAGE  
NGC BODILY INJURY TRUST**

Section 2.2 of the Claims Resolution Procedures (“CRP”) of the NGC Bodily Injury Trust (the “Trust”) requires the following:

The Trustees shall determine the NGC Bodily Injury Trust Payment Percentage prior to making any distribution, and the Trustees shall reconsider the determination of the NGC Bodily Injury Trust Payment Percentage at least every two years to assure that it is based on accurate and current information. When making these determinations, the Trustees are not to act based only on worst-case scenarios, but shall use common sense and undertake a comprehensive evaluation of all relevant factors based on reasonable projections.

Annually, the Trustees commission a claims forecast based on claims data as of December 31 of the immediately preceding year. The purpose of the annual claims forecast is to provide claim liability projections used in the audited financial statements of the Trust and also used to determine the Payment Percentage as required by Section 2.2 of the CRP.

The preliminary claims forecast the Trust received in February 2011, based on claims data as of December 31, 2010, indicated that the forecasted liability for future claims has increased twenty-four percent (24%) from the prior forecast commissioned by the Trustees. This increase is due in part to the increased filings during 2010, including a substantial increase in the filings of mesothelioma claims. As a matter of prudence and business judgment, the Trustees have suspended the further allowance of claims until the claims forecast is finalized and the Payment Percentage re-determined. The Trustees expect this process to be completed within the next sixty (60) days following an independent review of the claims data and the Trust’s expert’s claims forecast by the claims expert engaged by the Legal Representative.

Once the claims forecast is finalized and the Payment Percentage re-determined, all allowable claims currently being held will be released and Notices of Determination – Allowance (“NOD-A”) will be transmitted to the respective claimants through counsel. These NOD-As will include the re-determined Payment Percentage and the Payment Amount indicated by the re-determined Payment Percentage.

After extensive consultation with the Trust Advisory Committee and the Legal Representative, the Trustees have approved the following:

1. All offers previously made through the issuance of an NOD-A with the accompanying Release & Indemnity, specifically including the significant number of offers that have now been outstanding past the 180-day response due date stated on the NOD-A, will be paid based on the Payment Percentage of 55.6% as long as the properly executed Release & Indemnity and all other curative information is received by the Trust on or before October 14, 2011.
2. All offers made in future NOD-As will be calculated at the re-determined (reduced) Payment Percentage.

The Trustees will continue to advise you of progress made in the re-determination of the Payment Percentage.