

DII INDUSTRIES, LLC SILICA PI TRUST

The DII Industries, LLC Silica Personal Injury Trust (“Silica PI Trust”) has been established under Chapter 11 of the Bankruptcy Code to resolve all silica-related personal injury claims for which a Halliburton (“Non-HW”) or a Harbison-Walker (“HW”) entity has legal responsibility.

This letter is intended to summarize certain of the more salient issues related to filing an indirect claim with the Silica PI Trust. Nothing in this letter is intended to replace or modify the requirements of the Trust Distribution Procedures (“TDP”). All claimants are encouraged to thoroughly read and understand the TDP (a copy of which is enclosed) before filing an indirect claim with the Silica PI Trust.

Section 4.6(a) of the DII Silica TDP provides as follows with respect to indirect claims:

. . . Indirect Silica Unsecured PI Trust Claims that are asserted against the Silica PI Trust based upon theories of contribution or indemnification under applicable law may not be processed or paid by the Silica PI Trust unless the holder of such claim (the “Indirect Silica PI Trust Claimant”) establishes to the satisfaction of the Trustee that (a) the Indirect Silica PI Trust Claimant has paid in full obligations that the Silica PI Trust otherwise would have had to an individual claimant (the “Direct Silica PI Trust Claimant”), (b) the Silica PI Trust has been or shall be forever and fully released from all liability to both the Direct Silica PI Trust Claimant and the Indirect Silica PI Trust Claimant, and (c) the claim is not otherwise barred by a statute of limitation or repose or by other applicable non-bankruptcy law. In no event shall any Indirect Silica PI Trust Claimant have any rights against the Silica PI Trust superior to the rights of the related Direct Silica PI Trust Claimant against the Silica PI Trust, including any rights with respect to the timing, amount or manner of payment.

Filing Requirements

In light of the above provision, an Indirect Silica PI Trust Claimant must comply with the following requirements:

- All indirect claimants must submit a completed DII Silica Trust Claim Form (including all supporting materials) for the direct claimant(s) for which the indirect claimant is seeking compensation. A copy of the DII Silica Trust Claim Form, including the instructions for submitting a direct claim, is included with this letter.
- All indirect claimants must submit documentary evidence, in the form of an appropriate full release in favor of the DII Silica PI Trust, showing that the DII Silica PI Trust has been fully released from all liability to the direct claimant(s) for which the indirect claimant is seeking compensation. All indirect claimants must also submit a copy of the endorsed settlement check, or other documentary evidence, showing payment to the direct claimant in the amount stated in the release.
- All indirect claimants must submit documentary evidence, in the form of an affidavit, showing that the Indirect Silica PI Trust Claimant has paid in full the obligation that the DII Silica PI Trust otherwise would have had to the individual direct claimant. The affidavit shall also include the amount of the payment. A copy of a sample affidavit is included and such affidavit should be appended to the Claim Form referenced above.

Processing

Upon receipt of all required information the DII Silica PI Trust will assign the indirect claim a position in the processing queue. The position in the processing queue will be determined solely based on the date all complete and accurate information is received by the DII Silica PI Trust. Processing of the claim by the Trust will proceed on a FIFO basis.

In processing the claim the DII Silica PI Trust will first determine whether the underlying direct claim meets all requirements for compensation, and will then determine the injury category and amount of compensation. The Trust will then evaluate the documentary evidence submitted in support of the indirect claim to verify that the DII Silica PI Trust has been fully released from all liability to the direct claimant and that the direct claimant has been paid in full by the indirect claimant. If these conditions are met the Trust will make an offer to the indirect claimant in an amount equal to the lesser of (a) the payment made by the indirect claimant, or (b) the value of the direct claim within the context of the DII Silica TDP.

Payment

Concurrent with the mailing of the offer the DII Silica PI Trust will also provide a release to be completed by the indirect claimant. If the indirect claimant accepts the offer, the claim will be placed in the Trust's payment queue in accordance with the TDP.

Where to Submit Claim Forms

All submissions to the DII Silica Trust should be addressed to:

DII Industries Silica PI Trust/Indirect Claims
c/o The Celotex Asbestos Settlement Trust
The Nemours Building
1007 N. Orange Street, Suite 110
Wilmington, Delaware 19801

Further Information

For up-to-date forms and further information, please visit the Trust's website at www.diisilicatrust.com.

Sincerely,

Silica PI Trustee

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