

CPF Client Trust

Cross-Trust Claims Audit Program

CPF has developed an audit program for the client Trusts that have adopted a policy of implementing a Claims Audit Program for ensuring that law firms are in compliance with all terms and conditions of the TDP's/CRP's and the CPF and/or Trust Electronic Filer Agreement ("EFA") regarding the reliability of medical and exposure evidence. Specifically, the purpose of this cross-trust audit is to ensure that each law firm maintains within its claim files documentation that supports the information submitted electronically or via hard copy claim form. The audit of claims will be performed quarterly. The Claims Audit Program will be conducted as part of the quarterly joint audit of certain CPF client trusts who have adopted the cross-trust audit program (the "Auditing Trusts").

Sample Selection

Unless directed by the Auditing Trusts to review a larger number of claims per quarter, Claims Processing Facility, Inc. ("CPF") will randomly select 50 claimants per quarter for audit among the Auditing Trusts. The sample size of 50 claimants is based on a Confidence Level of 98% and desired Margin of Error of 2.5%; the maximum number of claimants randomly selected per quarter from any given Auditing Trust will be 10, and any increase in the maximum number of claimants selected from the client Trusts, will be at specific direction of the Trust under the specific procedures of each Trust's TDP/CRP. The audit *population*, from which the sample will be selected, will consist of all claimants whose claims are in a Reviewed Approved¹ status with any Auditing Trust at the date selections are made. Each claim filed with an Auditing Trust that has ever been Sufficiently Complete for assignment to the FIFO Processing Queue will become subject to the claims audit upon the selection of the claimant for inclusion in the audit sample.

Each claimant selected for the audit sample will immediately be placed on administrative hold until the documentation required for the audit has been received from the law firm and the Auditing Trusts have satisfactorily completed their review. ***Law firms will be afforded a thirty (30) day opportunity from the initial date of notice (date sample selection is received by the law firm) to satisfactorily provide the requested documentation for each claimant selected. Unless the law firm informs the Trust that the law firm cannot timely comply with the audit request, if a law firm fails to comply with the audit request, the Trustees may at their discretion direct CPF to suspend processing and payment of all claims filed by such non-responsive firm or take such other action as the Trustees deem appropriate. A law firm may, for good cause, request extensions of time to comply with the documentation requirement of the audit. Such extensions***

¹ Reviewed Approved claims are those claims where CPF has completed the review and approved an offer, but has not yet sent a release to the filer.

will be in the sole discretion of the Auditing Trusts based on the totality of the circumstances. If the law firm informs the Trust that the claimant or the representative of the claimant directed the law firm not to comply with the audit request, then the non-complying claimant's claim will be deemed withdrawn pursuant to the relevant TDP, and will be considered to have failed the audit. CPF will complete the audit within thirty (30) days following submission by the law firm of all requested claim information to CPF.

Documentation Requirements

For each claimant sampled, the law firm will be required to provide all non-privileged documents (except as noted below) of the types listed below that the law firm relied upon in submitting the medical and exposure information for the subject claim(s) to the Auditing Trusts.

1. Answers to interrogatories
2. Transcripts of depositions of the claimant and co-workers
3. Verified work histories (and of the OEP if the audited claim is a secondary exposure claim)
4. Social Security records (and of the OEP if the audited claim is a secondary exposure claim)
5. All exposure affidavits executed by the claimant, co-workers or family members related to the claim (and any sworn statements executed by the claimant, injured party, co-workers, family members, or the OEP (if the audited claim is a secondary exposure claim) related to the audited claim)
6. Lawsuit filings filed against a debtor predecessor to an Auditing Trust for all claims alleging a pre-petition lawsuit filing naming such debtor
7. Lawsuit filings for all claims in which claimant is alleging a tolling agreement (along with a copy of the tolling agreement)
8. For Massachusetts and Louisiana pre-petition lawsuit filings against other defendants, proof that the lawsuit was pending against one or more defendant(s) as of the petition date
9. All B-reading interpretations and ILO forms (except for mesothelioma claims)
10. All chest x-ray/chest CT scan reports (except for mesothelioma claims)
11. All pulmonary function tests (including tracings and flow volume loops) for Severe Asbestosis and Asbestosis/Pleural Disease with reduced pulmonary function claims only
12. All pathology or autopsy reports documenting asbestosis, asbestos-related pleural disease, malignant mesothelioma or a primary carcinoma of the lung, colon, esophagus, larynx, pharynx or stomach
13. Admission, history and physical and discharge summaries of any

- hospitalizations for asbestos-related disease and/or any malignant disease which is recognized as compensable by the Auditing Trusts
14. All physical examination or pulmonary consultation reports
 15. All non-privileged interpretive reports provided by experts retained by counsel or the claimant to review tests, x-rays, or diagnostic reports in order to render an opinion
 16. All documents that provided the claimant with his or her first notification that he or she had an asbestos-related disease.²

For each claimant sampled, the confidentiality of the documents and other information provided to, or reviewed by, each Auditing Trust pursuant to the audit shall be maintained by each Auditing Trust and shall not be provided or disclosed to any other person or entity without an order of a court of competent jurisdiction or as otherwise provided in the TDP/CRP. Communications by CPF to the claimant, the claimant's law firm and each Auditing Trust regarding the audit shall be confidential unless otherwise directed by an Auditing Trust pursuant to a provision of the TDP or by a court of competent jurisdiction.

The Auditing Trusts will not require the production of original x-ray films and will not be re-reading such films or retesting claimants in the normal course of the claims audit. However, the Auditing Trusts reserve the right to request such original evidence and expand the scope of the audit for targeted populations of claims in the event a pattern of submitting misleading or potentially fraudulent information is found.

Review

CPF will review all documentation provided by the law firms in a timely manner in order to answer the following questions relative to each claim:

1. Is there documentation within the law firm's file to support the reliability of the exposure history submitted to the Auditing Trusts?
2. Is there documentation to support that the claimant's claims were filed in keeping with all applicable state or federal statutes of limitations?
3. Is the medical documentation consistent with established medical guidelines for establishing a diagnosis of an asbestos-related disease and supportive of the disease level submitted to the Auditing Trusts?

² It is the position of the Auditing Trusts that withholding a document that indicates an earlier beginning to a claimant's statute of limitations would be subject to exceptions to any otherwise applicable privilege.

Issue Resolution

In the event of any findings of concern, CPF will communicate the details of the findings to the law firm and the Auditing Trusts and request additional information or explanation. If the law firm fails to provide additional information, or disputes the findings, CPF will inform the Auditing Trusts and seek advice as to the appropriate course of action.

Issues will be discussed with the Trustees on a regular basis throughout the course of the quarterly audit. If any patterns of particular concern are discovered, the scope of the audit may be expanded and/or focused through additional targeted sampling to determine the extent of the issue.

In the event a law firm fails to timely provide documentation requested with respect to an audited claim or a supplemental request for information or explanation, the Auditing Trusts may direct CPF to suspend processing and payment of all claims filed by such non-responsive law firm. In the event the documentation for an audited claim submitted by a law firm is not satisfactory to the Trustee(s), such audited claim will be rejected and removed by the applicable Auditing Trust from the FIFO Offer Queue. The Auditing Trusts may also take any action that is permitted under the applicable TDP. If the law firm disputes the findings of a claims audit, CPF will inform the applicable Auditing Trust and seek advice as to the appropriate course of action

Management Representation

Upon conclusion of the audit, each law firm will be required to sign a law firm management representation letter in the form attached hereto as Exhibit A.

Reporting of Results

Upon the conclusion of each quarterly audit, CPF will produce a report to the Trustees summarizing the findings and recommending specific actions to be taken as a result of any systemic issues identified or adverse findings that require corrective and/or disciplinary action. Depending on the nature of the issue to be addressed, such action may involve revisions to claims materials, filing requirements or the electronic filing system, or possible sanctions in the event of findings of fraud or abuse. CPF will communicate any potentially adverse findings to the law firm and the Trustees, and the law firm will be given an opportunity to resolve any concerns before any punitive follow-up actions are taken by the Trust. The particular nature of any sanctions to be imposed will be discussed as the need arises.

At the conclusion of the audit of a particular claimant, which shall occur 60 days after CPF reports to the Trustees that it has completed the audit and no action is needed, the materials provided to CPF by the claimant, the claimant's law firm, and/or an Auditing Trust in the course of the audit

of that claimant will be destroyed, including all such materials provided by CPF to the Trust, Trustees, or any other person or entity, provided, however, that notwithstanding the foregoing, in all cases CPF shall retain a record of the audit process in sufficient detail, so that an audit trail is established. The foregoing provision applies to the audit process and does not apply to the claim file maintained by the Trust pursuant to the Trust's customary practice of retention of claim files.

EXHIBIT A

Law Firm

Date

Via Regular Mail or Electronic Mail (_____@cpf-inc.com)

Claims Manager

Claims Processing Facility, Inc.

1771 W. Diehl Rd. Suite 220

Naperville, IL 60563

Re: Claims Processing Facility ("CPF") Cross Trust Audit

Injured Name:

SSN: XXX-XX-_____

Dear Claims Administrator:

We are providing this management representation letter in connection with the claims audit performed by Claims Processing Facility, Inc. ("CPF") for

The undersigned is competent and authorized to make the representations set forth herein.

We understand that the claims audit was conducted pursuant to the claims audit program adopted by the Auditing Trusts pursuant to their TDPs . We further understand that the Auditing Trusts conducted the audit to ensure that the law firm representing the claimant named above has complied with the terms and conditions of the TDPs and the Electronic Filer Agreements regarding the medical and exposure evidence submitted to the Auditing Trusts to support the claim. Specifically, we recognize that the Auditing Trusts conducted the audit to ensure that our law firm maintains in its files documentation which supports the information submitted electronically or by hard copy claim form.

We acknowledge our responsibility, as the filing law firm, to comply with the requirements of Rule 11(b) of the Federal Rules of Civil Procedure in presenting information to the Auditing Trusts and to provide all non- privileged documentation and supporting evidence detailed in the Auditing Trusts' claims audit program and requested by CPF in conjunction with the audit.

We confirm, to the best of our knowledge and belief, as of the date of this letter, that we have provided the Auditing Trusts with complete and accurate copies of all of the non-privileged documents requested by CPF on behalf of the Auditing Trusts as part of the audit of the above-named claimant pursuant to the terms of the claims audit program.

We acknowledge that CPF on behalf of and at the direction of the Auditing Trusts may request additional non-privileged information or explanations to the extent permitted by the Auditing Trusts' claims audit program.

Yours truly,

(Signature)

(Title)