

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p>	
<p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>WOLLMUTH MAHER & DEUTSCH LLP Paul R. DeFilippo, Esq. 500 Fifth Avenue New York, New York 10110 Telephone: (212) 382-3300 Facsimile: (212) 382-0050 pdefilippo@wmd-law.com</p> <p>JONES DAY Gregory M. Gordon, Esq. Brad B. Erens, Esq. Dan B. Prieto, Esq. Amanda Rush, Esq. 2727 N. Harwood Street Dallas, Texas 75201 Telephone: (214) 220-3939 Facsimile: (214) 969-5100 gmgordon@jonesday.com bberens@jonesday.com dbprieto@jonesday.com asrush@jonesday.com (Admitted <i>pro hac vice</i>)</p> <p><i>ATTORNEYS FOR DEBTOR</i></p>	<p>LOWENSTEIN SANDLER LLP Kenneth A. Rosen, Esq. Mary E. Seymour, Esq. One Lowenstein Drive Roseland, New Jersey 07068 (973) 597-2500 (Telephone) (973) 597-2400 (Facsimile) krosen@lowenstein.com mseymour@lowenstein.com</p> <p>WHITE & CASE LLP Jessica C. Lauria (admitted <i>pro hac vice</i>) Glenn M. Kurtz (admitted <i>pro hac vice</i>) Gregory M. Starner (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, New York 10020 (212) 819-8200 (Telephone) (212) 354-8113 (Facsimile) jessica.lauria@whitecase.com gkurtz@whitecase.com gstarner@whitecase.com</p> <p><i>ATTORNEYS FOR JOHNSON & JOHNSON AND JOHNSON & JOHNSON CONSUMER, INC.</i></p>
<p>In re:</p> <p>LTL MANAGEMENT LLC,¹</p> <p style="text-align: center;">Debtor.</p>	<p>Chapter 11</p> <p>Case No.: 21-30589(MBK)</p> <p>Honorable Michael B. Kaplan</p>

**NOTICE OF MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION TO PREVENT REUTERS FROM PUBLICIZING
CONFIDENTIAL DOCUMENTS SUBJECT TO A PROTECTIVE ORDER**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

PLEASE TAKE NOTICE that, on the date set by the Bankruptcy Court pursuant to a proposed Order Shortening Time (“OST”) and Application therefor submitted simultaneously herewith, LTL Management LLC, the above-captioned debtor and its parent company, Johnson & Johnson (collectively, the “Movants”) by and through their counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for a Temporary Restraining Order and Preliminary Injunction: (1) precluding the Reuters news agency from using or relying upon any documents designated as “Confidential” in this proceeding; (2) requiring the return of any such documents; and (3) ordering each attorney who has made an appearance in the above-captioned proceeding to submit to the Court a declaration under penalty of perjury stating whether he or she disclosed any materials designated as “Confidential” in this proceeding to Reuters (the “Motion”).

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Movants’ undersigned counsel, (b) the counsel to the Official Committee of Talc Claimants I, (c) the counsel to the Official Committee of Talc Claimants II, (d) the Office of the United States Trustee for the District of New Jersey and (e) any other party entitled to notice in accordance with any OST entered by the Court.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: February 3, 2022

WOLLMUTH MAHER & DEUTSCH LLP LOWENSTEIN SANDLER LLP

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