

MAUNE RAICHLE HARTLEY FRENCH & MUDD, LLC

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Katherine Tollefson and Certain Mesothelioma Claimants

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 21-30589

Adv. Pro. No. 22-01231

Honorable Michael B. Kaplan

LTL MANAGEMENT, LLC,

Plaintiff,

v.

STATE OF NEW MEXICO, ex rel.
HECTOR H. BALDERAS, Attorney
General, and STATE OF MISSISSIPPI, ex
rel. JIM HOOD, Attorney General,

Defendants.

**MAUNE RAICHLE HARTLEY FRENCH & MUDD, LLC'S JOINDER TO
STATEMENTS IN SUPPORT OF THE STATES OF MISSISSIPPI AND NEW
MEXICO'S OPPOSITION TO PRELIMINARY INJUNCTION**

MRHFM joins the Statement of the TCC (Adv. Pro. Dkt. 22), the Objection of the Ad Hoc Committee of States (Adv. Pro. Dkt. 21) and supports the Opposition of the States of Mississippi and New Mexico to injunctive relief given non-debtor Johnson & Johnson. *See* Adv. Pro. Dkt. 18.

MRHFM opposes any injunction that obviously benefits fully solvent and record-dividend-paying Johnson & Johnson and which shields the Company from accountability before state and Article III federal courts.

Subject matter jurisdiction is not for sale. Johnson & Johnson created a stooge subsidiary and bankrupted it solely to obtain an injunction for itself. A \$450 billion non-debtor's promise to put any amount of money into a QSF someday does not give this bankruptcy court power to shield that \$450 billion non-debtor from justice for lying to and killing people. Yesterday, Johnson & Johnson announced it would no longer sell its talcum—i.e., *asbestos*—powder globally. The Company said it stands behind the safety of its products: “Johnson’s Baby Powder is safe, does not contain asbestos and does not cause cancer.”¹ This is patently false. *If* Johnson & Johnson *really* believed any of this, the Company would *not* be cowardly grasping for bankruptcy protection instead of defending itself in open court in front of judges and juries that actually have power to decide these cases. States should be allowed to hold Johnson & Johnson accountable, even if this court is preventing dying mesothelioma victims from doing the same.

Respectfully submitted:

**MAUNE RAICHLE HARTLEY
FRENCH & MUDD, LLC**

/s/ Suzanne M. Ratcliffe

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¹ *Johnson & Johnson Will Discontinue Talc-Based Baby Powder Globally in 2023*, N.Y. Times, Tiffany Hsu & Roni Caryn Rabin, August 11, 2022. <https://www.nytimes.com/2022/08/11/business/johnson-and-johnson-talc-corn-starch.html>.