

**IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS
STATE OF MISSOURI**

OPIOID MASTER DISBURSEMENT TRUST II, A/K/A		
OPIOID MDT II,		
Plaintiff,		Case No. 22SL-CC02974
v.		Division 2
ACE AMERICAN INSURANCE COMPANY, ET AL.,		
Defendants.		

**STATEMENT OF UNCONTROVERTED FACTS IN SUPPORT OF (1) PLAINTIFF’S
CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT DIRECTED TO
AMERICAN GUARANTEE AND LIABILITY INSURANCE COMPANY, AND
(2) PLAINTIFF’S CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT
DIRECTED TO ASPEN INSURANCE UK LTD., ACE AMERICAN INSURANCE
COMPANY, AND OLD COLONY STATE INSURANCE COMPANY**

Plaintiff the Opioid Master Disbursement Trust II, also known as the Opioid MDT II (the “Trust”), respectfully submits this Statement of Uncontroverted Facts in Support of (1) Plaintiff’s Cross-Motion for Partial Summary Judgment Directed to American Guarantee and Liability Insurance Company, and (2) Plaintiff’s Cross-Motion for Partial Summary Judgment Directed to Aspen Insurance UK Ltd., ACE American Insurance Company, and Old Colony State Insurance Company.

1. The Trust sets forth its Statement of Uncontroverted Facts in Support of Plaintiff’s Motion for Partial Summary Judgment Against National Union Fire Insurance Company of Pittsburgh, Pa. Regarding the Scope of the Products Hazard (aka “Your Products”) Exclusion as if set forth fully herein.

Dated: September 18, 2024
St. Louis, MO

RIEZMAN BERGER, P.C

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Disbursement Trust II a/k/a
the Opioid MDT II*

CERTIFICATE OF SERVICE

Pursuant to Missouri Rule of Civil Procedure 55.03(a), the undersigned hereby verifies that he signed the original foregoing document.

The undersigned hereby certifies that on September 18, 2024, a true copy of the foregoing was served, via electronic filing pursuant to Missouri Rules of Civil Procedure Rule 103.08, to all parties of record, and that a true copy of the foregoing was served via email pursuant to Missouri Rules of Civil Procedure Rule 43.01(c)(1)(D), to all such parties.

/s/ P. Tyler Connor
P. Tyler Connor, MBN 69049