

RECEIVED

Jun 21 2022

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM UNION COUNTY
Court of Common Pleas
William A. McKinnon, Circuit Court Judge

Appellate Case No. 2021-000557

Dwayne Thompson, ... Respondent,

v.

Rolling Fog Vapor Company, LLC,

Of whom LG Chem, Ltd. and LG Chem America, Inc. are
the..... Petitioners.

APPENDIX
VOLUME ONE

C. Mitchell Brown A. Mattison Bogan Rachel Atkin Hedley Nelson Mullins Riley & Scarborough LLP Post Office Box 11070 Columbia, SC 29211 (803) 799-2000 <i>Attorneys for Petitioners, LG Chem, Ltd. and LG Chem America, Inc.</i>	Alexander P. Lewis W. Blake Cummings Cummings & Lewis, LLC Post Office Box 5766 Spartanburg, SC 29304 Ronnie L. Crosby William F. Barnes, III Austin H. Crosby Parker Law Group 101 Mulberry Street East P.O. Box 457 Hampton, SC 29924 <i>Attorneys for Respondent</i>

Appendix Index

VOLUME ONE

Orders and Judgments

Order Denying LG Chem, Ltd.’s Motion to Quash Service and Motion to Dismiss for Lack of Personal Jurisdiction (Judge Maddox), December 6, 2019	1
Order Denying LG Chem America, Inc.’s Motion to Dismiss (Judge Maddox), December 23, 2019	5
Order Granting LG Chem, Ltd. and LG Chem America, Inc.’s Joint Motion for Clarification And Denying Reconsideration (Judge Maddox), July 20, 2020	7
Judge McKinnon’s Order denying LG Chem, Ltd.’s Renewed Motion to Dismiss, March 19, 2021	12
Judge McKinnon’s Order denying LG Chem America, Inc.’s Renewed Motion to Dismiss, March 19, 2021	20
Judge McKinnon’s Form 4 Order denying LG Chem, Ltd.’s and LG Chem America, Inc.’s Motions to Reconsider the Court’s Order of March 19, 2021 orders, April 21, 2021.....	29
Court of Appeals’ Order dismissing LG Chem, Ltd. and LG Chem America, Inc.’s appeal, March 10, 2022	32
Court of Appeals’ Order denying LG Chem, Ltd. and LG Chem America, Inc.’s Petition for Rehearing, May 19, 2022.....	34

Pleadings

Summons and Complaint, March 4, 2019	36
Plaintiff’s Certificate of Service of Summons and Complaint, April 11, 2019.....	45

Transcripts

Transcript of September 23, 2019 Hearing (Motion to Dismiss and Quash) (Judge Maddox)	46
Transcript of February 1, 2021 Hearing (LG Chem, Ltd. and LG Chem America, Inc.’s Renewed Motions to Dismiss) (Judge McKinnon).....	59

Motions and Briefs

LG Chem, Ltd.’s Motion to Dismiss and Quash Service of Process, with

Affidavit of Sung Han Ryu, April 24, 2019.....	104
LG Chem, Ltd.’s Memorandum in Support of Motion to Dismiss and Quash Service of Process, September 18, 2019	114
Plaintiff’s Opposition to LG Chem, Ltd.’s Motion to Dismiss and Quash Service of Process with exhibits, September 20, 2019	138
LG Chem America, Inc.’s Motion to Dismiss with Affidavit of HyunSoo Kim, April 24, 2019	286
LG Chem America, Inc.’s Memorandum in Support of Motion to Dismiss, September 18, 2019	293
Plaintiff’s Opposition to LG Chem America, Inc.’s Motion to Dismiss with exhibits, September 20, 2019	310
LG Chem, Ltd.’s and LG Chem America, Inc.’s Motion for Clarification or, Alternatively, Reconsideration, December 16, 2019 (Judge Maddox).....	378
Plaintiff Response to LG Chem, Ltd.’s and LG Chem America, Inc.’s Motion for Clarification or, Alternatively Reconsideration with exhibits, May 4, 2020.....	384
LG Chem, Ltd.’s and LG Chem America, Inc.’s Memorandum in Support of their Joint Motion for Clarification or, alternatively, Reconsideration with exhibits, April 17, 2020	408
LG Chem, Ltd.’s Renewed Motion to Dismiss with Exhibit A, November 2, 2020.....	436

VOLUME TWO

Plaintiff’s Opposition to LG Chem, Ltd.’s Renewed Motion to Dismiss with exhibits, January 28, 2021	442
LG Chem, Ltd.’s Reply, with exhibits, February 1, 2021	529
Plaintiff’s Proposed Order, with exhibits.....	626
LG Chem, Ltd.’s Objections to Plaintiff’s Proposed Order, March 2, 2021	691
LG Chem America, Inc.’s Renewed Motion to Dismiss with Exhibit A, November 2, 2020...	787
Plaintiff’s Opposition to LG Chem America, Inc.’s Renewed Motion to Dismiss with exhibits, January 29, 2021	792

VOLUME THREE

LG Chem America, Inc.’s Reply, with exhibits, February 2, 2021	879
Plaintiff’s Proposed Order, with exhibits.....	951
LG Chem America, Inc.’s Objections to Plaintiff’s Proposed Order, March 2, 2021	1026
LG Chem, Ltd.’s Motion to Reconsider (March 19, 2021) Order Denying Motion to Dismiss, March 29, 2021	1100
LG Chem America, Inc.’s Motion to Reconsider (March 19, 2021) Order Denying Motion to Dismiss, March 29, 2021	1123
LG Chem, Ltd. and LG Chem America, Inc.’s Memorandum in Support of Immediate Appealability, July 19, 2021	1145
Miscellaneous	
Court of Appeals Notice of Appeal, May 21, 2021	1237
Letter from Court of Appeals to Appellants LG Chem, Ltd. and LG Chem America, Inc.’s Counsel requesting a memorandum addressing immediate appealability, July 9, 2021	1262
LG Chem, Ltd. and LG Chem America, Inc.’s Petition for Rehearing to Court of Appeals, March 25, 2022.....	1265

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF UNION	)	CIVIL ACTION NO.: 2019-CP-44-00054
	)	
DWAYNE THOMPSON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	ORDER DENYING LG CHEM, LTD.'S
	)	MOTION TO QUASH SERVICE OF
	)	PROCESS AND MOTION TO DISMISS
LG CHEM, LTD., LG CHEM AMERICA,	)	FOR LACK OF PERSONAL
INC., and ROLLING FOG VAPOR	)	JURISDICTION
COMPANY, LLC,	)	
	)	
Defendants.	)	
	)	

This matter came before the court for a hearing on September 23, 2019, on Defendant LG Chem, Ltd.'s ("LG Chem") motion to quash service of process and motion to dismiss for lack of personal jurisdiction. After reviewing the parties' submissions and hearing argument of counsel, the Court denies LG Chem's motion to dismiss for lack of personal jurisdiction, but without prejudice to refile.

This Court finds that LG Chem was properly served through the South Carolina Secretary of State. S.C. Code Ann. §15-9-245 states in pertinent part:

- (a) Every foreign business or nonprofit corporation which is not authorized to do business in this state, by doing in this State, either itself or through an agent, **any business, including any business activity for which authority need not be obtained as provided by Section 33-15-101**, is considered to have designated the Secretary of State as its agent upon whom process against it may be served in any action or proceeding arising in any court in this State out of or in connection with **the doing of any business in this State**.
- (b) Service of process is made by delivering to and leaving with the Secretary of State, or with any person designated by him to receive such service, duplicate copies of the process, notice, or demand. The Secretary of State immediately shall cause one of the copies to be forwarded by certified mail, addressed to the corporation either at its registered office in the jurisdiction of its incorporation, its principal place of business in the jurisdiction, or at the last address of the foreign business or nonprofit corporation known to the plaintiff, in that order.

(Emphasis added.)

Service is effective upon such a foreign corporation by delivering suit papers to the Secretary of State. §15-9-245(a). The Secretary is directed to immediately forward a copy to the corporation by certified mail. § 15-9-245(b). Substituted service is thus effective by delivery upon the Secretary of State as an agent, who then utilizes mail services to directly notify the foreign defendant. S.C. R. Civ. P. 4(d)(7) (providing that service may be made upon a corporation “by delivering a copy of the summons and complaint to an officer, a managing or general agent, or to any other agent authorized by appointment or by law to receive service of process...”); *see also Hammond v. Honda Motor Co., Ltd.*, 128 F.R.D. 638 (D.S.C. 1989)

The statute’s definition of “doing business” includes “**business activity for which authority need not be obtained as provided by § 33-15-101.**” S.C. Code §15-9-245(a) (emphasis added.) South Carolina has an expansive long-arm statute whereby a foreign corporation unauthorized to do business in the United States is considered to be “doing business” if it sells through an independent contractor or owns and controls **a subsidiary corporation that does business in South Carolina**; this is the case even if that foreign corporation does not do so directly. The affidavit from LG Chem does not dispute that it sells its products through an independent contractor, nor does it dispute that it owns and controls a subsidiary corporation that does business in South Carolina. The import records submitted by the plaintiff show 984 shipments from LG Chem through the Port of Charleston from November 1, 2006 thru present date. (Exh. 7 to Plaintiff’s Memorandum in Opposition). Of these shipments 818 were cosigned by LG Chem America, Inc. (*Id.*) This Court finds that LG Chem is “doing business” in South Carolina as defined in §15-9-245 and § 33-15-101 and therefore LG Chem was properly served

through the Secretary of State. Defendant's motion to quash service of process is denied.

AND IT IS SO ORDERED.

Dated: _____

_____, South Carolina

J. Cordell Maddox, Jr.
Circuit Court Judge



Union Common Pleas

Case Caption: Dwayne Thompson VS Lg Chem, Ltd. , defendant, et al
Case Number: 2019CP4400054
Type: Order/Other

So Ordered

s/ J. Cordell Maddox Jr.

Electronically signed on 2019-12-06 12:03:35 page 4 of 4

STATE OF SOUTH CAROLINA)

COUNTY OF UNION)

DWAYNE THOMPSON,)

Plaintiff,)

v.)

LG CHEM, LTD., LG CHEM AMERICA,)
INC., and ROLLING FOG VAPOR)
COMPANY, LLC,)

Defendants.)

IN THE COURT OF COMMON PLEAS

CIVIL ACTION NO.: 2019-CP-44-00054

**ORDER DENYING LG CHEM
AMERICA, INC.'S MOTION TO DISMISS**

This matter came before the court for a hearing on September 23, 2019, on Defendant LG Chem America, Inc.'s ("LGCAI") motion to dismiss for lack of personal jurisdiction. After reviewing the parties' submissions and hearing argument of counsel, the Court denies LGCAI's motion, but without prejudice to refile.

AND IT IS SO ORDERED.

Dated: _____

_____, South Carolina

J. Cordell Maddox, Jr.
Circuit Court Judge



Union Common Pleas

Case Caption: Dwayne Thompson VS Lg Chem, Ltd. , defendant, et al
Case Number: 2019CP4400054
Type: Order/Other

So Ordered

s/ J. Cordell Maddox Jr.

Electronically signed on 2019-12-23 15:20:51 page 2 of 2

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF UNION	)	SIXTEENTH JUDICIAL CIRCUIT
	)	
DWAYNE THOMPSON,	)	Civil Action No. 2019-CP-44-00054
	)	
Plaintiff,	)	
	)	
vs.	)	<u>ORDER GRANTING DEFENDANT</u>
	)	<u>LG CHEM, LTD. AND LG CHEM</u>
ROLLING FOG VAPOR COMPANY, LLC,	)	<u>AMERICA, INC.'S JOINT MOTION</u>
LG CHEM, LTD., and LG CHEM	)	<u>FOR CLARIFICATION AND</u>
AMERICA, INC.,	)	<u>DENYING RECONSIDERATION</u>
	)	
Defendants.	)	

This matter is before the Court on Defendants LG Chem, Ltd. ("LG Chem") and LG Chem America, Inc.'s ("LGCAI") Joint Motion for Clarification or, Alternatively, Reconsideration. After considering all submissions and arguments of counsel, and for the reasons stated below, the Court (1) grants LG Chem and LGCAI's Joint Motion for Clarification to clarify that only limited discovery is permitted at this time, limited to the threshold issues of whether LG Chem or LGCAI designed, manufactured, or sold the subject battery and the extent of LG Chem's and LGCAI's jurisdictional contacts with South Carolina, and (2) denies the Motion for Reconsideration of the Court's December 12, 2019 and December 23, 2019 Orders.

FACTS

In this products liability action, Plaintiff seeks recovery for injuries allegedly sustained when a lithium-ion battery cell exploded in his pocket. (Compl. ¶¶ 11–12.) Plaintiff alleges he purchased the battery cell, an "LG Brown Hg2 INR 18650 3000mAh" model cell allegedly manufactured by LG Chem, from Defendant Rolling Fog Vapor Company, LLC ("Rolling Fog"), a South Carolina retailer of e-cigarettes and accessories. (*Id.* ¶¶ 2, 9.) Plaintiff filed this action on

March 4, 2019, asserting claims of negligence, strict liability, and breach of warranty against LG Chem, LGCAI, and Rolling Fog.

On April 24, 2019, LG Chem filed a Motion to Dismiss and Quash Service of Process, and LGCAI filed a separate Motion to Dismiss. Defendants and Plaintiff filed memoranda in support of and opposing the motions on September 18, 2019. The parties appeared for a hearing on September 23, 2019, and the Court gave its oral ruling and thereafter entered written orders denying LG Chem's and LGCAI's motions on December 6 and December 21, 2019 respectively (hereinafter referred to as the "written orders").

Following entry of the written orders, LG Chem and LGCAI filed this Motion for Clarification or, Alternatively, Reconsideration on December 16, 2019. The Motion has been fully briefed by both parties, and all submissions have been considered by the Court.

LEGAL STANDARD

Under Rule 54(b) of the South Carolina Rules of Civil Procedure, this Court has the authority to clarify, or reconsider, its written orders denying LG Chem's Motion to Quash and denying both LG Chem's and LGCAI's motions to dismiss for lack of personal jurisdiction. Under Rule 54(b), "any order . . . which adjudicates fewer than all the claims or the rights and liabilities of fewer than all the parties . . . is subject to revision at any time before the entry of judgment adjudicating all the claims and the rights and liabilities of all the parties." *See Broom, Jr. v. Andrews*, 2017 WL 10701535, at *2 (S.C. Ct. Com. Pls. Nov. 2, 2007) ("Rule 54(b) . . . instructs that unless the Court expressly directs the entry of judgment, any intermediate order is subject to revision, at any time, until a final judgment is issued."). Courts may also clarify their prior orders under Rule 54(b). *See, e.g., Carpenter v. Measter*, 2010 WL 4219701 (S.C. Ct. Com. Pls. Feb. 23,

2010) (issuing a revised order under Rule 54(b) clarifying its previous order granting partial summary judgment).

ANALYSIS

A. Motion for Reconsideration

Having carefully considered the arguments and submissions by LG Chem, LGCAI, and Plaintiff supporting and opposing LG Chem and LGCAI's Joint Motion for Reconsideration, the Court denies the motion to the extent it seeks reconsideration. As set forth in the Court's oral rulings at the September 23, 2019 hearing, the allegations in the Complaint and the parties' submissions do not provide enough information upon which to base a decision as to whether the battery at issue in this matter was designed, manufactured, and sold by LG Chem or LGCAI or whether the Court has personal jurisdiction over these Defendants. This lack of information still remains an issue that prevents a decision on personal jurisdiction. Therefore, Defendants' Motion for Reconsideration of the motions to dismiss for lack of personal jurisdiction is denied.

B. Motion for Clarification

Defendants requested clarification of the written orders, which did not directly address whether the issue of jurisdiction should be decided before proceeding with the merits of the case, including the parties engaging in any merits-related discovery. As stated above, the Court needs more information before ruling on the issue of personal jurisdiction, an issue that should be decided before proceeding with the merits of the case. *See Bridges v. Wyandotte Worsted Co.*, 243 S.C. 1, 9, 132 S.E.2d 18, 22 (1963) ("The decision of the question of whether the court has jurisdiction is a preliminary one to the determination of the merits of the cause"), *overruled in part on other grounds, Sabb v. S.C. State Univ.*, 350 S.C. 416, 567 S.E.2d 231 (2002); *Hidria, USA, Inc. v. Delo*, 415 S.C. 533, 538–39, 783 S.E.2d 839, 842 (Ct. App. 2016) (explaining the trial court's decision

to “permit[] the parties to conduct discovery on the jurisdictional issues raised in [the defendant’s] motion to dismiss” and to hold “its ruling on the motion to dismiss in abeyance pending completion of the jurisdictional discovery”). Discovery must first determine whether the battery at issue in this lawsuit was designed, manufactured, and sold by LG Chem or LGCAI and the extent of LG Chem’s and LGCAI’s jurisdictional contacts with South Carolina. Therefore, the written orders are clarified to hold that the parties may conduct discovery for a period of 90 days following entry of this Order limited to these issues.

CONCLUSION

For the foregoing reasons, the Court allows the parties 90 days from the date of entry of this Order to conduct discovery limited to the specific issues of whether LG Chem or LGCAI designed, manufactured, or sold the subject battery and the extent of LG Chem’s and LGCAI’s jurisdictional contacts with South Carolina. After the close of jurisdictional discovery, LG Chem and LGCAI may refile motions to dismiss. LG Chem and LGCAI shall have no obligation to file a responsive pleading until 15 days after the jurisdictional discovery period ends.

IT IS SO ORDERED.

J. Cordell Maddox, Jr.
Judge, Sixteenth Judicial Circuit

Union, South Carolina

_____, 2020



Union Common Pleas

Case Caption: Dwayne Thompson VS Lg Chem, Ltd. , defendant, et al
Case Number: 2019CP4400054
Type: Order/Other

So Ordered

s/ J. Cordell Maddox Jr.

Electronically signed on 2020-07-20 15:01:37 page 5 of 5

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF UNION	)	CIVIL ACTION NO.: 2019-CP-44-00054
	)	
DWAYNE THOMPSON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	ORDER DENYING LG CHEM, LTD.'S
	)	MOTION TO DISMISS
LG CHEM, LTD., LG CHEM AMERICA,	)	
INC., and ROLLING FOG VAPOR	)	
COMPANY, LLC,	)	
	)	
Defendants.	)	
	)	

This matter came before the Court for a hearing on February 1, 2020, on Defendant LG Chem LTD.'s ("LG Chem") renewed motion to dismiss for lack of personal jurisdiction. After reviewing the parties' submissions and hearing argument of counsel, the Court denies LG Chem's motion for the reasons stated below.

FACTS AND PROCEDURAL HISTORY

This is a product liability action involving an allegedly defective lithium-ion battery used for an e-cigarette device. Plaintiff, a South Carolina citizen, alleges that on July 27, 2018, the battery, while in his pants pocket, exploded and burst into flames, causing severe burn injuries. The injuries occurred in Spartanburg, South Carolina. Defendant Rolling Fog Vapor Company, LLC, is a retail store in Spartanburg, South Carolina, that sold the battery and e-cigarette device to Plaintiff. (Cmplt. ¶ 2). Defendant LGA, a Delaware corporation, and Defendant LG Chem, Ltd., ("LG"), a South Korean corporation, allegedly designed, manufactured, imported, and sold the battery. *Id.* at ¶¶ 3-6.

On March 4, 2019, Plaintiff filed this action in Union County, South Carolina. The Complaint asserts causes of action for negligence, strict liability, and breach of warranty against all Defendants. Plaintiff alleges LG Chem has “continuing contacts with South Carolina by transacting substantial business in this state and manufacturing, distributing, and/or selling goods with the reasonable expectation that they will be used in this state and which are in fact used in this state.” (Cmplt. ¶ 7).

On November 2, 2020, LG Chem filed a renewed motion to dismiss for lack of personal jurisdiction, along with an affidavit of Sung Han Ryu, an LG Chem representative. Mr. Ryu states, *inter alia*, that LG Chem is a Korean company with its headquarters and principal offices in Seoul, South Korea. (Aff. ¶4). It does not own or lease property in South Carolina. *Id.* at ¶ 7. Mr. Ryu attests that LG Chem does not design, manufacture, distribute or sell a lithium-ion battery for use by individual consumers. *Id.* at ¶ 13.

On January 28, 2021, Plaintiff filed a memorandum in opposition to the renewed motion to dismiss, along with hundreds of import records for the Port of Charleston. The import records show that from December 2016 to February 2019 alone, LG Chem had approximately 296 shipments to the Port of Charleston in South Carolina. (Ex. 1 – Import Data). The import data indicates shipments to Carolina Covertech in North Augusta, Continental Tire in Sumter, Covidien in Greenwood, Fitesa in Simpsonville, Flex in West Columbia, Milliken Company in Spartanburg, and Volvo Car US Operations, Inc. in Ridgeville. (Ex. 1 – Import Data).

STANDARD

“The question of personal jurisdiction over a nonresident defendant is one which must be resolved upon the facts of each particular case. The decision of the trial court should be affirmed unless unsupported by the evidence or influenced by an error of law.” *Moosally v. W.W. Norton &*

Co., 358 S.C. 320, 327, 594 S.E.2d 878, 882 (Ct. App. 2004) (internal citation omitted). When addressing a motion to dismiss for lack of personal jurisdiction, “‘Courts will take as true the allegations of the nonmoving party and resolve all factual disputes in its favor.’ This includes any factual disputes brought up by submitted affidavits.” *Brown v. Investment Mgmt. & Research*, 323 S.C. 395, 399, 475 S.E.2d 754, 756 (1996) (quoting 5A Charles A. Wright & Arthur R. Miller, *Federal Practice and Procedure* § 1351 (Supp. 1995)).

ANALYSIS

Taking as true all allegations of Plaintiff and resolving all factual disputes in his favor, the Court finds there are sufficient minimum contacts between LG Chem and South Carolina to support exercising specific personal jurisdiction¹ over LG Chem.

“Specific jurisdiction over a cause of action arising from a defendant’s contacts with the state is granted pursuant to the long arm statute.” *Id.* at 491, 611 S.E.2d at 508 (citing S.C. Code Ann. § 36-2-803 (2003)). “South Carolina’s long-arm statute . . . has been construed to extend to the outer limits of the due process clause.” *Cockrell v. Hillerich & Bradsby Co.*, 363 S.C. 485, 491, 611 S.E.2d 505, 508 (2005). Therefore, “the sole question becomes whether the exercise of personal jurisdiction would violate due process.” *Id.*

“Due process requires that there exist minimum contacts between the defendant and the forum state such that maintenance of the suit does not offend traditional notions of fair play and substantial justice.” *Cockrell*, 363 S.C. at 491, 611 S.E.2d at 508. “[D]ue process mandates that the defendant possess sufficient minimum contacts with the forum state, so that he could reasonably anticipate being haled into court there.” *Id.* at 491-92, 611 S.E.2d at 508. This is the “‘stream of commerce’ theory” used by South Carolina courts. *State v. NV Sumatra Tobacco*

¹ Plaintiff did not dispute LG Chem’s argument as to general jurisdiction.

Trading, Co., 379 S.C. 81, 89, 89 n.5, 666 S.E.2d 218, 222, 222 n.5 (2008) (“declin[ing] to embrace the ‘stream of commerce plus’ theory”).² “It is essential in each case that there be some act by which the defendant purposefully avails itself of the privilege of conducting activities within the forum state, thus invoking the benefits and protections of its laws.” *Moosally v. W.W. Norton & Co.*, 358 S.C. 320, 332, 594 S.E.2d 878, 884 (Ct. App. 2004).

“The court must also find that the exercise of jurisdiction is reasonable or fair.” *Cockrell*, 363 S.C. at 492, 611 S.E.2d at 508 (internal quotation marks omitted). “Under the fairness prong, the court must consider: (1) the duration of the activity of the nonresident within the state; (2) the character and circumstances of the commission of the nonresident’s acts; (3) the inconvenience resulting to the parties by conferring or refusing to confer jurisdiction over the nonresident; and (4) the State’s interest in exercising jurisdiction.” *Id.*

Initially, the Court finds Plaintiff proves personal jurisdiction based on the pretrial stage pleadings. “At the pretrial stage, the burden of proving personal jurisdiction over a nonresident is met by a prima facie showing of jurisdiction either in the complaint or in affidavits.” *Cockrell*, 363 S.C. at 491, 611 S.E.2d at 508. “There is no ‘other evidence’ requirement for personal jurisdiction where the complaint itself demonstrates jurisdiction.” *Mid-State Distribs. v. Century Imps.*, 310 S.C. 330, 332, 426 S.E.2d 777, 779 (1993). Plaintiff alleges in the Complaint that LG Chem has “continuing contacts with South Carolina by transacting substantial business in this state and manufacturing, distributing, and/or selling goods with the reasonable expectation that they will be used in this state and which are in fact used in this state.” (Cmplt. ¶ 7). This demonstrates specific personal jurisdiction under the long-arm statute and due process analysis by asserting sufficient

² See also *Sheppard v. Mercedes-Benz USA, LLC*, C/A No. 2010-CP-38-1558 (Nov. 15, 2012), p. 7 (affirming South Carolina’s use of the stream of commerce theory pursuant to *Sumatra Tobacco*).

minimum contacts and the fairness and expectation of being haled into court in South Carolina under the stream of commerce theory.

Alternatively, the Court also finds that, based on the evidence submitted, Plaintiff demonstrates specific personal jurisdiction. LG Chem possesses sufficient minimum contacts with South Carolina so that it should reasonably anticipate being haled into court here.

Under South Carolina's long-arm statute,

A court may exercise personal jurisdiction over a person who acts directly or by an agent as to a cause of action arising from the person's: (1) transacting any business in this State; (2) contracting to supply services or things in the State; . . . (4) causing tortious injury or death in this State by an act or omission outside this State if he regularly does or solicits business, or engages in any other persistent course of conduct, or derives substantial revenue from goods used or consumed or services rendered in this State.

S.C. Code Ann. § 36-2-803(A). LG Chem has a presence in South Carolina in the form of continuously and regularly using a South Carolina port to conduct its business activities, and deriving revenue from South Carolina. Along with the evidence of LG Chem's activities and conduct discussed below, this satisfies the minimum contacts analysis.

Plaintiff submitted an exhibit showing approximately 296 product shipments from LG Chem through the Port of Charleston, South Carolina, from December 2016 to February 2019. Plaintiff also demonstrated that these products are delivered to seven (7) different locations in South Carolina. This is ample evidence that LG Chem transacted business in South Carolina; contracted to supply things in South Carolina; and caused injury in South Carolina when it regularly does or solicits business, or engages in a persistent course of conduct, or derives substantial revenue from goods used or consumed in South Carolina. *See* S.C. Code Ann. § 36-5-803(A); *Moosally*, 358 S.C. at 336, 594 S.E.2d at 886 ("W.W. Norton's continual practice of marketing and distributing books in South Carolina satisfies the power prong of the due process analysis."); *Catalana v. Carnival Cruise Lines, Inc.*, 618 F. Supp. 18, 22 (D. Md. 1984) ("By using

the port of Baltimore as a site for regularly scheduling cruises, Carnival has purposefully availed itself of the privilege of conducting activities within the forum State, thus invoking the benefits and protections of its laws.”). LG Chem participated in the economic markets of this state and derived revenue from this state. Therefore, the minimum contacts prong is satisfied.

LG Chem does not dispute that they distribute and sell various products that come through the Port of Charleston. However, they argue that because, according to them, they do not ship lithium-ion batteries through a South Carolina port that this Court does not have jurisdiction over them. Defendant concedes, however, that vehicle batteries were shipped through Charleston. Defendants are correct that both *J. McIntyre Machinery, Ltd. v. Nicastro*, 564 U.S. 873 (2011) and *Bristol-Myers Squibb Co. v. Superior Ct. of Cal.*, 137 S. Ct. 1773 (2017) provide that the conduct in question in the forum state must be “related” or “connected” to the injuries. The Court finds the sale of batteries is a sufficient connection. Defendant seeks to have the Court impose a rule that unless the evidence indicates Defendant sold the particular product in question to buyers in the forum state, specific jurisdiction is not proper. The Court does not find either *J. McIntyre* or *Bristol-Myers* mandate such a narrow view of specific jurisdiction.

The exercise of personal jurisdiction is also reasonable and fair. First, LG Chem has conducted activities in South Carolina for a sufficient duration. The import records show its use of the Port for over ten years. Second, the character and circumstances of the commission of LG Chem’s acts support exercising personal jurisdiction. It consistently and repeatedly uses the Port of Charleston and receives products directly to South Carolina. Third, there is no inconvenience to the parties by conferring jurisdiction over LG Chem. LG Chem is actively litigating cases around the country involving the same type of battery at issue in this case. Fourth, South Carolina has an interest in exercising jurisdiction over LG Chem. “South Carolina has an interest in

providing redress for its citizens.” *Cribb v. Spatholt*, 382 S.C. 490, 504, 676 S.E.2d 714, 721 (Ct. App. 2009) (citing *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 473 (1985) (“A State generally has a ‘manifest interest’ in providing its residents with a convenient forum for redressing injuries inflicted by out-of-state actors.”)). Finally, three other circuit court judges in South Carolina have examined this precise issue and determined that South Carolina has personal jurisdiction over LG Chem. (Ex. 2, Order from the Honorable Michael G. Nettles, Ex. 3, Order from the Honorable Courtney Clyburn Pope, and Ex. 4, Order from the Honorable Bentley Price). The Court has specific personal jurisdiction over LG Chem.

CONCLUSION

After reviewing all relevant cases presented by the parties, the Court is bound by *Sumatra*. Based on *Sumatra* and the additional authority cited above, the Court denies LG Chem’s motion.³

AND IT IS SO ORDERED.

Dated: _____

York, South Carolina

William A. McKinnon
Circuit Court Judge

³ Defendant also asserts the Court’s Order is inconsistent with Judge Maddox’s July 20, 2020 Order. The Court disagrees, as Judge Maddox specifically states “lack of information prevents a decision” – declining to decide is not the same as finding a lack of personal jurisdiction.



Union Common Pleas

Case Caption: Dwayne Thompson VS Lg Chem, Ltd. , defendant, et al
Case Number: 2019CP4400054
Type: Order/Dismissal

So Ordered

/s William A. McKinnon, Chief Judge for
Administrative Purposes, 16th Cir., #2761

Electronically signed on 2021-03-19 12:30:08 page 8 of 8

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF UNION	)	CIVIL ACTION NO.: 2019-CP-44-00054
	)	
DWAYNE THOMPSON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	ORDER DENYING LG CHEM
	)	AMERICA, INC.'S
	)	MOTION TO DISMISS
LG CHEM, LTD., LG CHEM AMERICA,	)	
INC., and ROLLING FOG VAPOR	)	
COMPANY, LLC,	)	
	)	
Defendants.	)	
	)	

This matter came before the Court for a hearing on February 1, 2020, on Defendant LG Chem America, Inc.'s ("LGA") motion to dismiss for lack of personal jurisdiction. After reviewing the parties' submissions and hearing argument of counsel, the Court denies LGA's motion for the reasons stated below.

FACTS AND PROCEDURAL HISTORY

This is a product liability action involving an allegedly defective lithium ion battery used for an e-cigarette device. Plaintiff, a South Carolina citizen, alleges that on July 27, 2018, the battery, while in his pants pocket, exploded and burst into flames, causing severe burn injuries. The injuries occurred in Spartanburg, South Carolina. Defendant Rolling Fog Vapor Company, LLC, is a retail store in Spartanburg, South Carolina, that sold the battery and e-cigarette device to Plaintiff. (Cmplt. ¶ 2). Defendant LGA, a Delaware corporation, and Defendant LG Chem, Ltd., ("LG"), a South Korean corporation, allegedly designed, manufactured, imported, and sold the battery. *Id.* at ¶¶ 3-6.

On March 4, 2019, Plaintiff filed this action in Union County, South Carolina. The Complaint asserts causes of action for negligence, strict liability, and breach of warranty against all Defendants. As to LGA, Plaintiff alleges LGA has “continuing contacts with South Carolina by transacting substantial business in this state and manufacturing, distributing, and/or selling goods with the reasonable expectation that they will be used in this state and which are in fact used in this state.” (Cmpl. ¶ 7).

On November 2, 2020, LGA filed a renewed motion to dismiss for lack of personal jurisdiction, along with an affidavit of HyunSoo Kim, an LGA Compliance Manager. Mr. Kim states, *inter alia*, that LGA is incorporated in Delaware with its principal place of business in Georgia. (Aff. ¶5). It does not own or rent property in South Carolina. *Id.* at ¶ 6. Mr. Kim attests that LGA did not design, manufacture, distribute or sell a lithium-ion battery for use by individual consumers. *Id.* at ¶ 10.

On January 28, 2021, Plaintiff filed a memorandum in opposition to the renewed motion to dismiss, along with a South Carolina Certificate of Authority for LGA and hundreds of import records for the Port of Charleston. On September 15, 2010, LGA obtained a Certificate of Authority from the South Carolina Secretary of State that authorizes it to transact business in South Carolina. (Ex. 1). LGA maintains a registered agent in Columbia, South Carolina. *Id.* The import records show that from December 2016 to February 2019, LGA received as consignee approximately 244 product shipments from LG to the Port of Charleston in South Carolina. (Ex. 2). LGA is a wholly-owned subsidiary of LG, and LGA’s business activities for LG are “sales and trading” of its products within the United States.¹

¹ See LG Chem, Ltd. and Subsidiaries, *Consolidated Interim Financial Statements*, June 30, 2018 and 2017, http://www.lgchem.com/upload/file/audit-report/2018_2Q_ConFS_ENG.pdf at p. 10.

STANDARD

“The question of personal jurisdiction over a nonresident defendant is one which must be resolved upon the facts of each particular case. The decision of the trial court should be affirmed unless unsupported by the evidence or influenced by an error of law.” *Moosally v. W.W. Norton & Co.*, 358 S.C. 320, 327, 594 S.E.2d 878, 882 (Ct. App. 2004) (internal citation omitted). When addressing a motion to dismiss for lack of personal jurisdiction, “‘Courts will take as true the allegations of the nonmoving party and resolve all factual disputes in its favor.’ This includes any factual disputes brought up by submitted affidavits.” *Brown v. Investment Mgmt. & Research*, 323 S.C. 395, 399, 475 S.E.2d 754, 756 (1996) (quoting 5A Charles A. Wright & Arthur R. Miller, *Federal Practice and Procedure* § 1351 (Supp. 1995)).

ANALYSIS

Taking as true all allegations of Plaintiff and resolving all factual disputes in his favor, the Court finds there are sufficient minimum contacts between LGA and South Carolina to support exercising specific personal jurisdiction² over LGA.

“Specific jurisdiction over a cause of action arising from a defendant’s contacts with the state is granted pursuant to the long arm statute.” *Id.* at 491, 611 S.E.2d at 508 (citing S.C. Code Ann. § 36-2-803 (2003)). “South Carolina’s long-arm statute . . . has been construed to extend to the outer limits of the due process clause.” *Cockrell v. Hillerich & Bradsby Co.*, 363 S.C. 485, 491, 611 S.E.2d 505, 508 (2005). Therefore, “the sole question becomes whether the exercise of personal jurisdiction would violate due process.” *Id.*

“Due process requires that there exist minimum contacts between the defendant and the forum state such that maintenance of the suit does not offend traditional notions of fair play and

² Plaintiff did not dispute LGA’s argument as to general jurisdiction.

substantial justice.” *Cockrell*, 363 S.C. at 491, 611 S.E.2d at 508. “[D]ue process mandates that the defendant possess sufficient minimum contacts with the forum state, so that he could reasonably anticipate being haled into court there.” *Id.* at 491-92, 611 S.E.2d at 508. This is the “‘stream of commerce’ theory” used by South Carolina courts. *State v. NV Sumatra Tobacco Trading, Co.*, 379 S.C. 81, 89, 89 n.5, 666 S.E.2d 218, 222, 222 n.5 (2008) (“declin[ing] to embrace the ‘stream of commerce plus’ theory”).³ “It is essential in each case that there be some act by which the defendant purposefully avails itself of the privilege of conducting activities within the forum state, thus invoking the benefits and protections of its laws.” *Moosally v. W.W. Norton & Co.*, 358 S.C. 320, 332, 594 S.E.2d 878, 884 (Ct. App. 2004).

“The court must also find that the exercise of jurisdiction is reasonable or fair.” *Cockrell*, 363 S.C. at 492, 611 S.E.2d at 508 (internal quotation marks omitted). “Under the fairness prong, the court must consider: (1) the duration of the activity of the nonresident within the state; (2) the character and circumstances of the commission of the nonresident’s acts; (3) the inconvenience resulting to the parties by conferring or refusing to confer jurisdiction over the nonresident; and (4) the State’s interest in exercising jurisdiction.” *Id.*

Initially, the Court finds Plaintiff proves personal jurisdiction based on the pretrial stage pleadings. “At the pretrial stage, the burden of proving personal jurisdiction over a nonresident is met by a prima facie showing of jurisdiction either in the complaint or in affidavits.” *Cockrell*, 363 S.C. at 491, 611 S.E.2d at 508. “There is no ‘other evidence’ requirement for personal jurisdiction where the complaint itself demonstrates jurisdiction.” *Mid-State Distribs. v. Century Imps.*, 310 S.C. 330, 332, 426 S.E.2d 777, 779 (1993). Plaintiff alleges in the Complaint that LGA has

³ See also *Sheppard v. Mercedes-Benz USA, LLC*, C/A No. 2010-CP-38-1558 (Nov. 15, 2012), p. 7 (affirming South Carolina’s use of the stream of commerce theory pursuant to *Sumatra Tobacco*).

“continuing contacts with South Carolina by transacting substantial business in this state and manufacturing, distributing, and/or selling goods with the reasonable expectation that they will be used in this state and which are in fact used in this state.” (Cmplt. ¶ 7). This demonstrates specific personal jurisdiction under the long-arm statute and due process analysis by asserting sufficient minimum contacts and the fairness and expectation of being haled into court in South Carolina under the stream of commerce theory.

Alternatively, the Court also finds that, based on the evidence submitted, Plaintiff demonstrates specific personal jurisdiction. LGA possesses sufficient minimum contacts with South Carolina so that it should reasonably anticipate being haled into court here.

Under South Carolina’s long-arm statute,

A court may exercise personal jurisdiction over a person who acts directly or by an agent as to a cause of action arising from the person’s: (1) transacting any business in this State; (2) contracting to supply services or things in the State; . . . (4) causing tortious injury or death in this State by an act or omission outside this State if he regularly does or solicits business, or engages in any other persistent course of conduct, or derives substantial revenue from goods used or consumed or services rendered in this State.

S.C. Code Ann. § 36-2-803(A). LGA has a presence in South Carolina in the form of being registered to transact business here, having a registered process agent here, continuously and regularly using a State port to conduct its business activities, and deriving revenue from South Carolina. Plaintiff points to LGA’s Certificate of Authority to transact business as evidence that supports the exercise of personal jurisdiction. The Court agrees. Section 33-15-101 of the South Carolina Code lists 13 categories of activities that are **not** considered transacting business in South Carolina. S.C. Code Ann. § 33-15-101. LGA’s decision to obtain a Certificate of Authority demonstrates that its activities in South Carolina are more substantial than those listed in § 33-15-101. Further, by obtaining a Certificate of Authority, LGA agreed at a minimum to the jurisdiction of the South Carolina Department of Revenue and our Courts to determine its South Carolina tax

liability. S.C. Code Ann. § 33-15-105(d). Along with the evidence of LGA's activities and conduct discussed below, this satisfies the minimum contacts analysis.

Plaintiff submitted an exhibit showing approximately 244 product shipments from LG to LGA as consignee through the Port of Charleston, South Carolina, from December 2016 to February 2019. This is ample evidence that LGA transacted business in South Carolina; contracted to supply things in South Carolina; and caused injury in South Carolina when it regularly does or solicits business, or engages in a persistent course of conduct, or derives substantial revenue from goods used or consumed in South Carolina. *See* S.C. Code Ann. § 36-5-803(A); *Moosally*, 358 S.C. at 336, 594 S.E.2d at 886 ("W.W. Norton's continual practice of marketing and distributing books in South Carolina satisfies the power prong of the due process analysis."); *Catalana v. Carnival Cruise Lines, Inc.*, 618 F. Supp. 18, 22 (D. Md. 1984) ("By using the port of Baltimore as a site for regularly scheduling cruises, Carnival has purposefully availed itself of the privilege of conducting activities within the forum State, thus invoking the benefits and protections of its laws."). LGA participated in the economic markets of this state and derived revenue from this state. Therefore, the minimum contacts prong is satisfied and it should come as no surprise to LGA that the subject battery ended up in South Carolina and injured a South Carolina citizen.

The exercise of personal jurisdiction is also reasonable and fair. First, LGA has conducted activities in South Carolina for a sufficient duration. It obtained a Certificate of Authority to transact business in South Carolina over ten years ago and the import records show its use of the Port for over ten years. Second, the character and circumstances of the commission of LGA's acts support exercising personal jurisdiction. It consistently and repeatedly uses the Port of Charleston and receives products directly to South Carolina. Third, there is no inconvenience to the parties by conferring jurisdiction over LGA. It is a U.S. corporation with a Certificate of Authority and

registered agent in South Carolina. Fourth, South Carolina has an interest in exercising jurisdiction over LGA. “South Carolina has an interest in providing redress for its citizens.” *Cribb v. Spatholt*, 382 S.C. 490, 504, 676 S.E.2d 714, 721 (Ct. App. 2009) (citing *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 473 (1985) (“A State generally has a ‘manifest interest’ in providing its residents with a convenient forum for redressing injuries inflicted by out-of-state actors.”)). Finally, four other circuit court judges in South Carolina have examined this precise issue and determined that South Carolina has personal jurisdiction over LGA. (Ex. 3, Order from the Honorable Michael G. Nettles, Ex. 4, Order from the Honorable Courtney Clyburn Pope, Ex. 5, Order from the Honorable Perry M. Buckner, III, and Ex. 6, Order from the Honorable Bentley Price). The Court has specific personal jurisdiction over LGA.

CONCLUSION

After reviewing all relevant cases presented by the parties, the Court is bound by *Sumatra*. Based on *Sumatra* and the additional authority cited above, the Court denies LGA’s motion.⁴

AND IT IS SO ORDERED.

Dated: _____

York, South Carolina

William A. McKinnon
Circuit Court Judge

⁴ Defendant also asserts the Court’s Order is inconsistent with Judge Maddox’s July 20, 2020 Order. The Court disagrees, as Judge Maddox specifically states “lack of information prevents a decision” – declining to decide is not the same as finding a lack of personal jurisdiction.



Union Common Pleas

Case Caption: Dwayne Thompson VS Lg Chem, Ltd. , defendant, et al
Case Number: 2019CP4400054
Type: Order/Dismissal

So Ordered

/s William A. McKinnon, Chief Judge for
Administrative Purposes, 16th Cir., #2761

Electronically signed on 2021-03-19 12:28:48 page 9 of 9

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Union
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2019CP4400054

Dwayne Thompson
PLAINTIFF(S)

Lg Chem, Ltd. et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED** (*CHECK REASON*): ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled);
☐ Other
- ☐ **ACTION STRICKEN** (*CHECK REASON*): ☐ Rule 40(j), SCRCP; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT** (*CHECK APPLICABLE BOX*):
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

Defendants' Motions to Reconsider the Court's March 19, 2021 orders are denied, for the reasons stated by the Court in its prior orders.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 04/21/2021 .

Rolling Fog Vapor Company, Llc

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



Union Common Pleas

Case Caption: Dwayne Thompson VS Lg Chem, Ltd. , defendant, et al

Case Number: 2019CP4400054

Type: Order/Electronic Form 4

So Ordered

/s William A. McKinnon, Chief Judge for
Administrative Purposes, 16th Cir., #2761

Electronically signed on 2021-04-21 11:38:00 page 3 of 3

The South Carolina Court of Appeals

Dwayne Thompson, Respondent,

v.

LG Chem, LTD., LG Chem America, Inc., and Rolling
Fog Vapor Company, LLC, Defendants,

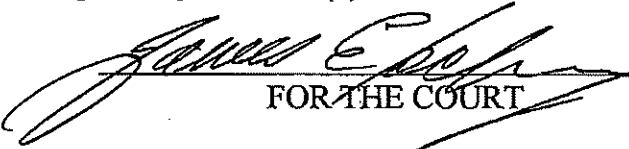
Of which LG Chem, LTD. and LG Chem America, Inc.
are the Appellants.

Appellate Case No. 2021-000557

ORDER

Appellants have served and filed a notice of appeal from an order denying a motion to dismiss for lack of personal jurisdiction. After careful consideration, the appeal is dismissed because the underlying order is not immediately appealable. See S.C. Code Ann. § 14-3-330; *Mid-State Distributors, Inc. v. Century Importers, Inc.*, 310 S.C. 330, 426 S.E.2d 777 (1993) (overruling *National Exchange Bank v. Stelling*, 32 S.C. 102, 10 S.E. 766 (1890), and *Agnew v. Adams*, 24 S.C. 86 (1885)). The remittitur will be sent as required by Rule 221(b), SCACR.

Columbia, South Carolina


FOR THE COURT

cc:

C. Mitchell Brown, Esquire
Rachel Atkin Hedley, Esquire
Allen Mattison Bogan, Esquire
Alexander Page Lewis, Esquire
William Blake Cummings, Esquire
Ronnie Lanier Crosby, Esquire
William Franklin Barnes, III, Esquire
Austin Howell Crosby, Esquire

FILED
Mar 10 2022

Eileen Hindman

From: Clark, Tyler P. <tpclark@sccourts.org>
Sent: Thursday, March 10, 2022 4:30 PM
To: Mitch Brown; Rachel Hedley; Matt Bogan; blake.cummings@cummingslewis.com; alex.lewis@cummingslewis.com; rcrosby@pmped.com; wbarnes@pmped.com; acrosby@pmped.com
Cc: Eileen Hindman; Roxanne Englin; wbcummings@bellsouth.net; teamrcrosby@pmped.com; teambarnes@pmped.com; teamacrosby@pmped.com
Subject: Dwayne Thompson v. LG Chem, Ltd. 2021-000557
Attachments: Thompson v. LG Chem - Order.pdf

◀External Email▶ - From: tpclark@sccourts.org

Dear Counsel,

Please find correspondence from the Court of Appeals.

Sincerely,

Tyler Clark

Appeals Specialist
SC Court of Appeals
1220 Senate St.
Columbia, SC 29201
Ph. (803) 734-1890
F. (803) 734-1839

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

# The South Carolina Court of Appeals

Dwayne Thompson, Respondent,

v.

LG Chem, LTD., LG Chem America, Inc., and Rolling  
Fog Vapor Company, LLC, Defendants,

Of which LG Chem, LTD. and LG Chem America, Inc.  
are the Appellants.

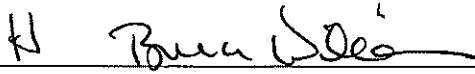
Appellate Case No. 2021-000557

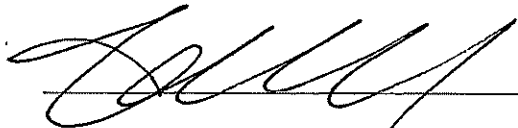
---

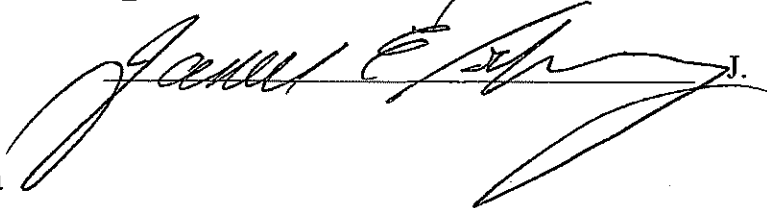
## ORDER

---

After careful consideration of the petition for rehearing, the Court is unable to discover that any material fact or principle of law has been either overlooked or disregarded, and hence, there is no basis for granting a rehearing. Accordingly, the petition for rehearing is denied.

 C.J.

 J.

 J.

Columbia, South Carolina

cc:

**FILED**  
**May 19 2022**

C. Mitchell Brown, Esquire  
Rachel Atkin Hedley, Esquire  
Allen Mattison Bogan, Esquire  
Alexander Page Lewis, Esquire  
William Blake Cummings, Esquire  
Ronnie Lanier Crosby, Esquire  
William Franklin Barnes, III, Esquire  
Austin Howell Crosby, Esquire

IN THE COURT OF COMMON PLEAS

CIVIL ACTION NO.: 2018-CP-44-

DWAYNE THOMPSON,

Plaintiff,

Y.

LG CHEM, LTD., LG CHEM AMERICA,  
INC., and ROLLING FOG VAPOR  
COMPANY, LLC,

Defendants.

## SUMMONS

*(Jury Trial Requested)*

**TO THE DEFENDANTS ABOVE-NAMED:**

**YOU ARE HEREBY SUMMONED** and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at 101 Mulberry Street East, Post Office Box 457, Hampton, SC 29924, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

*-signature page to follow-*



Alexander P. Lewis  
SC Bar No. 78991  
W. Blake Cummings  
SC Bar No. 80067  
Cummings & Lewis, LLC  
Post Office Box 5766  
Spartanburg, South Carolina 29304  
Phone: (864) 573-9688  
[alex.lewis@cummingslewis.com](mailto:alex.lewis@cummingslewis.com)  
[blake.cummings@cummingslewis.com](mailto:blake.cummings@cummingslewis.com)

-and-

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

BY: s/Austin H. Crosby  
Ronnie L. Crosby  
SC Bar No. 66481  
Austin H. Crosby  
SC Bar No. 80161  
101 Mulberry Street East  
P.O. Box 457  
Hampton, SC 29924  
(803) 943-2111  
[rcrosby@pmped.com](mailto:rcrosby@pmped.com)  
[acrosby@pmped.com](mailto:acrosby@pmped.com)  
ATTORNEYS FOR PLAINTIFF

March 4, 2019  
Hampton, South Carolina

|                                 |   |                               |
|---------------------------------|---|-------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS  |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2018-CP-44- |
| DWAYNE THOMPSON,                | ) |                               |
|                                 | ) |                               |
| Plaintiff,                      | ) |                               |
|                                 | ) |                               |
| v.                              | ) | <b><u>COMPLAINT</u></b>       |
|                                 | ) | <i>(Jury Trial Requested)</i> |
| ROLLING FOG VAPOR COMPANY,      | ) |                               |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                               |
| AMERICA, INC.,                  | ) |                               |
|                                 | ) |                               |
| Defendants.                     | ) |                               |

The Plaintiff alleges:

1. That he is a resident of Union County, South Carolina.
2. That Defendant, Rolling Fog Vapor Company, LLC ("Rolling Fog"), is a domestic limited liability company with its principal place of business in Spartanburg County, South Carolina, and is engaged in the business of selling vapor accessories, e-liquids, lithium-ion rechargeable batteries including, but not limited to, the LG Brown Hg2 INR 18650 3000mAh ("subject battery") and other e-cigarette/vaporizer products.
3. That Defendant, LG Chem, Ltd. ("LG"), is a foreign corporation organized under the laws of Korea with its principal place of business in Seoul, South Korea, and is engaged in the business of manufacturing, designing, testing, marketing, certifying, supplying, selling, importing and distributing lithium ion rechargeable batteries including, but not limited to, the subject battery that forms the basis of this action.
4. The Defendant, LG Chem America, Inc., ("LGA"), is a foreign corporation organized under the laws of Delaware and is engaged in the business of manufacturing, designing, testing, marketing, certifying, supplying, selling, importing and distributing lithium ion

rechargeable batteries including, but not limited to, the subject battery that forms the basis of this action.

5. The subject battery was manufactured, designed, supplied, sold, imported and distributed by LG and LGA.

6. At all times mentioned herein, Defendants were engaged in the business of manufacturing, fabricating, designing, assembling, distributing, selling, inspecting, warranting, retailing, wholesaling, and advertising the e-cigarette products that the Plaintiff purchased and used.

7. LG and LGA have continuing contacts with South Carolina by transacting substantial business in this state and manufacturing, distributing, and/or selling goods with the reasonable expectation that they will be used in this state and which are in fact used in this state.

8. Each cause of action alleged against the Defendants arises out of a battery explosion in Spartanburg County, South Carolina, on July 27, 2018, that seriously and permanently injured the Plaintiff.

9. Plaintiff purchased the subject battery, which was manufactured, designed and imported by LG and LGA, from Defendant Rolling Fog's store located at 958 East Main Street in Spartanburg, South Carolina.

10. A case was not provided with the purchase of the subject batteries.

11. While at his place of employment located at 2155 S 2006, Spartanburg, South Carolina, the subject battery exploded and burst into flames in Plaintiff's right front pant pocket.

12. As a result of the explosion and the chemicals from the subject battery, Plaintiff sustained third degree burns on numerous portions of his body requiring skin grafts. He also suffered and continues to suffer permanent injury and/or disfigurement to his body, pain and

suffering, mental anguish, emotional distress, loss of wages and related medical, hospital and caretaking expenses.

13. Plaintiff's injuries and damages were due to and proximately caused by the negligent, reckless and careless conduct of the Defendants in the following particulars, for which the Defendants are liable:

**FIRST CAUSE OF ACTION**  
**(Negligence as to Defendant Rolling Fog Vapor Company, LLC)**

14. The above allegations are incorporated as if repeated verbatim.
15. Plaintiff is informed and believes the Defendant was negligent, willful, wanton, careless, reckless and grossly negligent in the following particulars:
- a. In selling a lithium-ion battery such as the subject battery that was designed and manufactured without a positive temperature coefficient thermistor or similar device to prevent rapid discharge when short circuited, leading to overheating and catastrophic failure;
  - b. In selling a battery that was designed and manufactured without internal temperature controls and/or protective circuitry;
  - c. In selling a battery with manufacturing defects present;
  - d. In selling a battery that was unreasonably dangerous for its foreseeable and intended use;
  - e. In selling a battery that failed to comply with generally accepted engineering safety standards applicable to lithium-ion batteries;
  - f. In failing to sell and market the subject battery with a package or container that would prevent short circuiting that could lead to rapid discharge, overheating, and catastrophic failure;
  - g. In failing to warn customers that the subject battery should not be stored in a pocket and that short circuiting of the battery could lead to catastrophic failure;
  - h. In failing to train personnel with regard to industry standards, proper use, and proper storage of the 18650 lithium-ion Hg2 batteries;



- i. In failing to provide adequate warnings and instructions to warn the users of the dangers associated with the use and failure of the lithium-ion Hg2 INR 18650 3000mAh batteries;
- j. In failing to warn of the defective condition of the subject battery; and
- k. In such other particulars as the evidence may establish.

**SECOND CAUSE OF ACTION**  
(Negligence as to Defendants LG and LGA)

- 16. The above allegations are incorporated as if repeated verbatim.
- 17. Plaintiff is informed and believes the Defendants were negligent, willful, wanton, careless, reckless and grossly negligent in the following particulars:
  - a. In failing to include a positive temperature coefficient thermistor or similar device to prevent rapid discharge which short circuited, leading to overheating and catastrophic failure;
  - b. In failing to incorporate any other protection circuitry, current interrupt devices, or other protections against rapid discharge, overheating, and explosion;
  - c. In failing to sell and market the subject battery with a package or container that would prevent short circuiting that could lead to rapid discharge, overheating, and catastrophic failure;
  - d. In failing to warn consumers that the subject battery should not be stored in a pocket and that short circuiting of the subject battery could lead to catastrophic failure;
  - e. In failing to manufacture, design, assemble, test, instruct, warn, distribute, supply and/or sell the subject battery in such a condition so that it would operate safely as a reasonable consumer would expect;
  - f. In failing to manufacture, design, assemble, test, instruct, warn, distribute, supply and/or sell the subject battery in such a manner that it would not spontaneously explode;
  - g. In failing to manufacture, design, assemble, test, instruct, warn, distribute, supply and/or sell the subject battery in such a manner that it would not spontaneously heat and catch fire;

- h. In failing to provide reasonable and adequate warnings to the suppliers, purchasers and users of the subject battery to alert users about the dangerous conditions described herein; and
- i. In such other particulars as the evidence may establish.

**THIRD CAUSE OF ACTION**  
**(Strict Liability as to All Defendants)**

- 18. The above allegations are incorporated as if repeated verbatim.
- 19. Defendants are engaged in the business of selling vaporizing products to the public, including selling the subject battery to the Plaintiff.
- 20. Defendants placed into the stream of commerce the subject battery, which was defective, unfit, and unreasonably dangerous to the intended users or consumers, including Plaintiff.
- 21. Plaintiff's injuries and damages occurred because the subject battery was designed, manufactured, imported, and sold by the Defendants in a defective condition that was unreasonably dangerous to the Plaintiff.
- 22. The subject battery was in the same or substantially the same condition as when sold by the Defendants and was being used in a reasonably foreseeable manner.
- 23. The Defendants sold the subject battery in an unreasonably dangerous and defective condition, and as a result, the Defendants are strictly liable, pursuant to S.C. Code Ann §15-73-10, to Plaintiff in an amount to be ascertained by the jury at the trial of this action.

**FOURTH CAUSE OF ACTION**  
**(Breach of Warranty as to All Defendants)**

- 24. The above allegations are incorporated as if repeated verbatim.
- 25. That by act, word, and/or deed at the time of sale, the Defendants made certain Express Warranties, certain Implied Warranties of Merchantability, and certain Implied

Warranties of Fitness for a Particular Purpose, regarding the subject battery, which was part of the basis of the bargain and/or which arose by operation of law.

26. Plaintiff rightfully and reasonably relied upon the warranties of the Defendants to his great detriment, injury, and damage.

27. The Defendants expressly and impliedly warranted at the time of sale that the subject battery was fit, safe, in good condition, of merchantable quality, and was fit for a particular purpose, namely a safe vaporizer battery, when in fact, the subject battery was unfit, unsafe, not of merchantable quality, and was not fit or suited for its particular purpose.

28. By reason of and in consequence of Defendants' breach of express and implied warranties, Plaintiff suffered the injuries and damages as set forth herein, for which the Defendants are liable.

29. In order to investigate this claim, Plaintiff will need access to certain information concerning the design and manufacture of the subject battery including, but not limited to, design specifications with change histories, design evaluations, chemistry, materials, and manufacture process. Some or al of this information may fall subject to a claim of trade secret. Without access to this information, Plaintiff will be substantially prejudiced in her investigation and proof of defect herein. Plaintiff believes that access to this information will likely lead to admissible evidence at the trial of this case.

WHEREFORE, Plaintiff prays for judgement against the Defendants for actual damages, together with punitive damages in an appropriate amount, for the costs of this action, and for such other and further relief as the Court may deem just and proper.

*-signature page to follow-*

Alexander P. Lewis  
SC Bar No. 78991  
W. Blake Cummings  
SC Bar No. 80067  
Cummings & Lewis, LLC  
Post Office Box 5766  
Spartanburg, South Carolina 29304  
Phone: (864) 573-9688  
[alex.lewis@cummingslewis.com](mailto:alex.lewis@cummingslewis.com)  
[blake.cummings@cummingslewis.com](mailto:blake.cummings@cummingslewis.com)

-and-

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

BY: s/Austin H. Crosby  
Ronnie L. Crosby  
SC Bar No. 66481  
Austin H. Crosby  
SC Bar No. 80161  
101 Mulberry Street East  
P.O. Box 457  
Hampton, SC 29924  
(803) 943-2111  
[rcrosby@pmped.com](mailto:rcrosby@pmped.com)  
[acrosby@pmped.com](mailto:acrosby@pmped.com)  
ATTORNEYS FOR PLAINTIFF

March 4, 2019  
Hampton, South Carolina

STATE OF SOUTH CAROLINA )

COUNTY OF UNION )

DWAYNE THOMPSON, )

Plaintiff, )

v. )

LG CHEM, LTD., LG CHEM AMERICA, )  
INC., and ROLLING FOG VAPOR )  
COMPANY, LLC, )

Defendants. )

IN THE COURT OF COMMON PLEAS

CIVIL ACTION NO.: 2018-CP-44-00054

**CERTIFICATE OF SERVICE**

Service of the Summons and Complaint in the above captioned action was effected on Defendant LG Chem, Ltd. through the South Carolina Secretary of State's Office on March 22, 2019, by certified mail as evidenced by the attached U.S. Postal Domestic Return Receipt and service acceptance letter from the South Carolina Secretary of State's Office

Alexander P. Lewis, SC Bar No. 78991  
W. Blake Cummings, SC Bar No. 80067  
CUMMINGS & LEWIS, LLC  
Post Office Box 5766  
Spartanburg, South Carolina 29304  
[alex.lewis@cummingslewis.com](mailto:alex.lewis@cummingslewis.com)  
[blake.cummings@cummingslewis.com](mailto:blake.cummings@cummingslewis.com)  
P: (864) 573-9688

-and-

s/Austin H. Crosby

Ronnie L. Crosby, SC Bar No. 66481  
Austin H. Crosby, SC Bar No. 80161  
PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, P.A.  
Post Office Box 457  
Hampton, South Carolina 29924  
[rcrosby@pmped.com](mailto:rcrosby@pmped.com)  
[acrosby@pmped.com](mailto:acrosby@pmped.com)  
P: (803) 943-2111 / F: (803) 943-3943

April 11, 2019  
Hampton, South Carolina



1 STATE OF SOUTH CAROLINA

2 -----x

3 DWAYNE THOMPSON,

4 Plaintiff,

5 Case No.

6 -against- 2019-CP-44-00054

7 LG CHEM AMERICA, INC., et al

8 Defendants.

9 -----x

10 September 23, 2019

11 Union, S.C.

12

13 B E F O R E:

14 HONORABLE CORDELL MADDOX

15

16 A P P E A R A N C E S:

17 RONNY CROSBY,

18 Attorney for the Plaintiff

19

20 KATE CAMMELMANN,

21 Attorney for the Defendants

22

23

24 Aileen Butler

25 Official Court Reporter

1 THE COURT: Is this a motion to dismiss, is that  
2 right?

3 MS. CAPPELMANN: It is. We have two motions so do  
4 you want me to take them in turn?

5 THE COURT: Sure.

6 MS. CAPPELMANN: Okay. The first one is LG Kim  
7 America's motion to dismiss for lack of personal  
8 jurisdiction.

9 THE COURT: Okay.

10 Ms. CAPPELMANN: This is based on the fact and I  
11 know that the plaintiff's argument is that LG Kim  
12 America has a certificate of authority filed with the  
13 Secretary of State. Our position our is that in and  
14 of itself is not enough. The statute the plaintiff's  
15 cites in opposition to our motion says that any  
16 corporation that has filed a certificate of authority  
17 has agreed to jurisdiction for the purposes of tax  
18 inquires with the court and the Department of Revenue.  
19 However, they didn't say anything about any kind of  
20 order contractual, or any other kind of jurisdiction.  
21 So, I think that's purposeful when you're talking  
22 about the plain reading of the law and the legislative  
23 intent. They don't cite any case law to support their  
24 contention that just by statute making them under the  
25 jurisdiction of the courts for that specific purpose

1 means that they are under the jurisdiction of the  
2 courts for all purposes.

3 Additionally, the -- I think they're going to have  
4 some like bills of lading or shipping data. LG Chem  
5 if you look at the affidavit of HyunSoo Kim, LG Kim  
6 actually does not -- I apologize that's the incorrect  
7 affidavit. I beg the Court's indulgence.

8 THE COURT: Take your time. Is this case a case  
9 about an exploding battery?

10 MS. CAPPELMANN: It is, Your Honor. I have the  
11 affidavit. I can't put my hands on it right now. But  
12 the affidavit in support of LG Chem America's motion  
13 to dismiss says that LG Kim of America it doesn't  
14 actually manufacturer these batteries. It is actually  
15 more -- it does the kind of rubbers and polymers and  
16 those sorts of things. It has nothing to do with the  
17 lithium-ion batteries. So any -- they don't make the  
18 minimum contacts required to have jurisdiction based  
19 on the subject matter of this actually case.

20 So based on those arguments we would say there is  
21 no personal or specific jurisdiction based on the  
22 facts of this case.

23 THE COURT: Okay. All right. Yes, sir.

24 MR. CROSBY: Good morning, Your Honor. Ronny  
25 Crosby representing the plaintiff.

1           Your Honor, this case does involve an exploding  
2           battery. I am sure you probably heard about some of  
3           those over time on the news where these batteries,  
4           these lithium-ion batteries, catch on fire. This was  
5           in an e-cigarette type application. It was sold and  
6           there not -- no one is here this morning. They're not  
7           involved in this case by Planet Vapor, one of these  
8           vape stores over in Spartanburg. The incident  
9           occurred here in Union County and the plaintiff  
10          suffered severe burns as a result of the battery.

11          The battery was manufactured by LG Chem a Korean  
12          company and imported by its wholly owned distributor,  
13          LG Chem America. And we have pled in the complaint  
14          which really the Court does not have to look beyond.  
15          We passed up an order in a similar case pending in  
16          Florence County where Judge Nettles heard this exact  
17          argument with regard to the same parties in another  
18          e-cigarette battery case and he looked more to the  
19          pleadings which the law allows you to do. We have  
20          pled that these companies manufactured and placed this  
21          battery into the stream of commerce with the  
22          expectation that it would be used in South Carolina  
23          and that it was so used in South Carolina and caused  
24          injury here which is all that is needed to meet the  
25          requirements of the long-arm statute which is

1 36-2-803. But if you want to look further and Miss  
2 Cappelmann referenced the import data. We've passed  
3 as exhibit seven extensive imports of products by  
4 these companies into the Port of Charleston and the  
5 way that works is the Korean company that manufactures  
6 them they were consigned to LG Chem America in Korea  
7 and they were shipped right in through the port of  
8 Charleston. I think we had eight hundred and  
9 something shipments into the Port of Charleston in  
10 addition to lithium ion batteries, other products.  
11 But these companies, not only is LG Chem America  
12 registered to do business here, they are in fact doing  
13 millions of dollars worth of business here in South  
14 Carolina by importing goods not just to LG Chem  
15 America but they import to Volvo and Eaton and various  
16 other companies in South Carolina and that's the  
17 Korean company importing there. But -- and they serve  
18 the market in South Carolina through this distribution  
19 system.

20 I can't imagine, Your Honor, if there's not  
21 jurisdiction here then we can probably start looking  
22 around at the computer sitting here in front of the  
23 court reporter or your computer I suspect -- or this  
24 cord over here that's on the floor, most of this is  
25 all manufactured in some other country and imported



1 here. And there's a big push right now around the  
2 country to challenge personal jurisdiction especially  
3 in product cases made with products made over in China  
4 or India or Korea. And, you know, if what the defense  
5 is saying is the law then this Court would have  
6 jurisdiction over almost no products' case and that's  
7 not the intent of our long-arm statute or any of the  
8 cases interpreting either the long-arm statute or the  
9 due process clause which really is what ultimately  
10 controls. Our court has held that the due process  
11 that our long-arm statute is to be interpreted to the  
12 outer limits of the due process clause. And if you  
13 look to the case of N.V. Sumatra Tobacco Company which  
14 we cited in our brief and I think we outlined it in  
15 the memorandums, there our court held they had  
16 jurisdiction over this Indonesia company that sold to  
17 two other companies before it got to an importer in  
18 Miami and then the cigarettes ultimately ended up in  
19 South Carolina and the South Carolina Supreme Court  
20 held even though there was four layers involved there  
21 that our courts had jurisdiction because they knew  
22 that their products were coming in to South Carolina  
23 and they would be used and sold and used here in South  
24 Carolina and this is a lot less tenuous than that case  
25 because here we've got a Korean company that has a

1 wholly owned distributor in the United States  
2 importing not just into some other port in the US but  
3 right through the Port of Charleston right into this  
4 state.

5 Your Honor, the court clearly has jurisdiction over  
6 this matter and has an interest in providing a form  
7 for redress for one of its citizens that was severely  
8 injured while using this product. And as would be  
9 reflected in the order that we passed up from Judge  
10 Nettles there is certainly no unfairness for this  
11 defendant -- these defendants to defend this case  
12 here. They're defending the one in Florence County  
13 now and by the fact that they regularly use our ports  
14 it's obviously not inconvenient for them to defend a  
15 case here in South Carolina and specifically here he  
16 in Union County and we would ask the Court to deny  
17 both motions to dismiss.

18 THE COURT: Okay.

19 MS. CAPPELMANN: If I may briefly reply?

20 THE COURT: Yes.

21 MS. CAPPELMANN: The N.V. Sumatra case Mr. Crosby  
22 refers to in their brief they cite all these different  
23 points of contact that would put them at subject to  
24 jurisdiction in South Carolina such as they admitted  
25 to the fact that they manufactured the United brand

1 cigarettes. They owned the United States trademark  
2 for that brand. Almost seven million United brand  
3 cigarettes were actually sold in South Carolina.  
4 Sumatra either on it's own or by someone else filed an  
5 ingredient report. All these things that Sumatra  
6 apparently did to conform its product to the United  
7 States and the fact that it knew that its products  
8 were being sold in South Carolina. That's not what LG  
9 Chem America is saying here. LG Chem America  
10 maintains that all of these batteries that the  
11 plaintiff is referring to they have different -- they  
12 aren't -- their destination isn't in South Carolina.  
13 From what I recall from looking at it some of them  
14 were in Georgia. I haven't seen exhibit seven because  
15 the last time I checked the public index it wasn't  
16 available for me to view online and I didn't receive a  
17 courtesy copy. So I haven't seen this import data.  
18 But from what I recall from the other motion that Mr.  
19 Crosby referenced, none of those lithium-ion batteries  
20 ended up -- their main destination was not South  
21 Carolina from what I recall, and there were only maybe  
22 two or three entries out of however many pages.  
23 Everything else was rubbers, polymers, all those sort  
24 of things. So, again, they aren't making those  
25 concessions that Sumatra has made.

1 I also haven't addressed the other motion yet but  
2 I can address that now.

3 THE COURT: Go ahead.

4 MS. CAPPELMANN: The other motion is based on  
5 similar circumstances. LG Chem based out of South  
6 Korea does not have a certificate of authority to do  
7 business in South Carolina. The plaintiff has alleged  
8 in its complaint that by doing business here it has  
9 accepted the South Carolina Secretary of State as its  
10 agent for service. However, for one thing under the  
11 the Hague through the supremacy clause that the  
12 international compact has priority over the state's  
13 statute. It -- you can very easily, plausibly, come  
14 up with a situation in which before even the service  
15 documents from the secretary of state gets to the  
16 final destination in say South Korea they would  
17 already be in default because if service is perfected  
18 through -- at the time that the secretary of state  
19 sends it to the foreign company -- I mean it takes --  
20 I've seen months for it to get to a foreign company.  
21 In China or South Korea it just takes that long and  
22 that's of course an absurd result.

23 South Korea they opted out of Article 10 of the  
24 Hague compact or Hague convention which says that they  
25 do not authorize service by mail. It has to be

1 through their central authority and that hasn't  
2 happened.

3 I understand that one of my predecessors years ago  
4 might have accepted service, however LG Chem they're  
5 inclined to accept service and I don't think there is  
6 any law that says we have to even though they might  
7 have done that in the past.

8 THE COURT: So your position is they have not  
9 designated the secretary of state because they opted  
10 out of the Hague compact?

11 MS. CAPPELMANN: That and we're just basing this  
12 on an allegation in the complaint. There hasn't been  
13 any evidentiary support to show that LG Chem has  
14 actually done business selling lithium-ion batteries in  
15 South Carolina. In fact industrywide, we're all sort  
16 of starting to suspect there's this black market that  
17 has been created in the past few years because these  
18 batteries are sold in a pack for purposes of being  
19 used in the lithium-ion battery packs for like power  
20 tools and things like that.

21 THE COURT: Right.

22 MS. CAPPELMANN: Lawn equipment. They aren't  
23 selling the individual batteries for any specific  
24 purpose to consumers as all. I understand that we  
25 have these cases now. Its come up. But I would say



1 that none of these companies are intending for  
2 consumers to use these individual lithium-ion  
3 batteries and certainly not for vaping equipment.

4 THE COURT: So somehow one of these two-pack  
5 batteries got divided up and sold in a vape to a guy  
6 and it allegedly caught on fire. That's where we are  
7 factually.

8 MS. CAPPELMANN: Correct.

9 THE COURT: And you're not even sure it's a LG  
10 Chem battery?

11 MS. CAPPELMANN: I haven't seen it so I don't  
12 know. Usually it will say LG Chem on the wrap, you  
13 know, but there has been -- and I don't have any  
14 evidence with me today, but there have been instances  
15 where wraps are possibly being changed. You know, I  
16 don't know. I'm not sure. I'm not necessarily saying  
17 that's necessary happened in this situation.

18 THE COURT: Sure. You just don't know yet.

19 MS. CAPPELMANN: Correct.

20 THE COURT: Okay. Well, here's what I am going to  
21 do. I think -- you know, I read your Judge Nettles's  
22 order and I sort of agree with him. In these early  
23 stages these motions to dismiss are pretty often  
24 denied because of exactly factually we don't know  
25 where we are. So what I am going to do is dismiss

1           these with no prejudice to refile once discovery is --  
2           there's been more discovery so you can find out  
3           factually. I mean, you know, at this point nobody  
4           knows whether it's one of their batteries. If it is  
5           one of their batteries then you get to the bill of  
6           lading issue and whether or not they've subjected  
7           themselves to jurisdiction.

8           I don't think I really need to go as far as judge  
9           Nettles order because I think factually there's just  
10          not enough information to grant or deny at this point.  
11          So I am going deny but without prejudice and you can  
12          file at a later date after you had some more  
13          discovery.

14                 MS. CAPPELMANN: Thank you.

15                         (END OF TRANSCRIPT)

## CERTIFICATION

I, the undersigned Aileen Butler, Official Court Reporter for the 16TH Judicial Circuit of the State of South Carolina, do hereby certify that the foregoing is a true, accurate, and complete transcript of record of all the proceedings in the captioned case, in the Circuit Court for Union County, South Carolina, on the 23rd day of September, 2019.

I do further certify that I am neither of kin, counsel, nor interest to any party hereto.

October 17, 2019

S/ Aileen Butler

1 STATE OF SOUTH CAROLINA

2 -----x

3 DWAYNE THOMPSON ,

4 Plaintiff,

5 Case No.

6 -against- 2019-CP-44-00054

7 LG CHEM LIMITED ET AL,

8 Defendants.

9 -----x

10 February 1, 2021

11

12

13 B E F O R E:

14 HONORABLE WILLIAM MCKINNON

15

16 A P P E A R A N C E S:

17 AUSTIN HOWEL CROSBY,

18 Attorney for the Plaintiff

19

20 RACHEL ATKIN HEDLEY,

21 Attorney for the Defendant

22

23

24 Aileen Butler

25 Official Court Reporter

1 (Whereupon, the following took place via  
2 virtually)

3 THE COURT: Miss Hedley, your motion.

4 MS. HEDLEY: Thank you, Your Honor. May it please  
5 the Court. Good morning. Again, for the record, my  
6 name is Rachel Hedley and I am appearing this morning  
7 on behalf of defendants LG Chem Limited and LG Chem  
8 America Inc.

9 Before I get into the motion I do want to address  
10 very briefly, Your Honor, there's a discovery motion  
11 on the docket and there are motions to dismiss on the  
12 docket.

13 THE COURT: Okay.

14 MS. HEDLEY: The discovery motion is now moot and  
15 I will cover that in a moment, but I'll go through the  
16 arguments on the motion to dismiss and then address  
17 the motion for protective order. The plaintiff did  
18 not put in an opposition and as I mentioned I believe  
19 it's moot.

20 THE COURT: Okay. Mr. Crosby, do you concur that  
21 the discovery motion is moot?

22 MR. CROSBY: Your Honor, I think a little bit of  
23 background on that might help clarify. We are taking  
24 the position that based on other trial court orders  
25 from around this state -- in fact we've cited three of

1           them in our brief and just found out this morning that  
2           there's actually an additional one that was just  
3           entered in January of this year denying this exact  
4           same motion with regards to these exact same two  
5           defendants. We are able to proceed with the motions  
6           to dismiss. I think depending on Your Honor's ruling  
7           on the discovery issue and whether or not based on  
8           Judge Maddox's prior order that we wouldn't have in  
9           fact have to engage in further discovery. I think an  
10          interpretation of that would dictate whether or not  
11          that is moot. So I don't necessarily agree that it's  
12          moot. I think Your Honor will have to give us some  
13          guidance as to your preference as to how to handle  
14          that.

15                THE COURT: Okay. Miss Hedley, I apologize for  
16                interrupting you. Go ahead.

17                MS. HEDLEY: That's okay. Thank you, Your Honor.

18                First of all very briefly, a summary of the  
19                argument and the basic facts. In this case which  
20                involves allegations that the plaintiff, Dwayne  
21                Thompson, alleges that he purchased a lithium-ion  
22                battery from a vape store called Rolling Fog Vapor and  
23                that while that battery that he purchased to use for  
24                an e-cigerrate vaping device was in his pocket he  
25                alleges that it exploded.



1           In the complaint the plaintiff identifies the  
2           battery as quote, an LG Brown Hg2 INR 18650. Now, INR  
3           appears to be some sort of brand name. It is not an  
4           LG Chem battery. LG Chem does not sell -- never sold  
5           anything called INR. But the 18650 -- and this is  
6           just for Your Honor's reference -- that is a size  
7           demarcation. It is a standard term in the industry.  
8           So the 18 references the diameter. The 65 references  
9           the length. And the zero makes it cylindrical. So I  
10          believe it's 18 millimeters in diameter, 65  
11          millimeters in length and then cylindrical. That is  
12          just a standard size in the industry manufactured by  
13          leading manufacturers that include Sony and Samsung  
14          and Panasonic. So what's at issue in this case is an  
15          allegation that the plaintiff purchased this battery  
16          from --

17               (WHEREUPON, the audio drops out)

18           THE COURT: Your video is fine, but audio is  
19           dropping out. Can you call in.

20           MS. HEDLEY: Let me try that. I apologize I am in  
21           interest. I will /PHAOT this and see if I can /TKPO  
22           the audio.

23           THE COURT: You may have to turn your computer  
24           speakers off Ms. Hedley as well so the volume will  
25           only come through your phone.

1 MS. HEDLEY: Thank you. Can you hear me?

2 THE COURT: Yes, ma'am.

3 MS. HEDLEY: I got phone in my hand. I'm ready.  
4 Sorry about that. So I was just mentioning just in  
5 terms of basic background, the size and type of this  
6 battery.

7 So in the complaint plaintiff alleged that the  
8 manufacturer was LG Chem limited which is a Korean  
9 company and also alleged that LG Chem America Inc.  
10 was a seller/importer/distributor of this battery.  
11 And the prior history in this case is very important  
12 to the Court's decision. We filed a reply brief this  
13 morning. I know that we filed two and they were 20  
14 pages long each so I'm confident the Court may not yet  
15 had the opportunity to review those.

16 THE COURT: I will be honest, I did my best to  
17 skim them. I have not read them carefully, but I did  
18 have a question. Did Judge Maddox actually issue a  
19 ruling saying there was not a prima facia case or did  
20 he just say he wasn't going to rule yet.

21 MS. HEDLEY: Thank you, Your Honor. So what  
22 happened is in September of 2019 at the hearing the  
23 plaintiff presented the exact same arguments that the  
24 plaintiff is presenting to Your Honor. As to LG Chem  
25 America the same argument about consent to

1 jurisdiction and the registration statute. The same  
2 argument that Sumatra is all that's required in the  
3 allegation of placing a product essentially in the  
4 stream of commerce. All of the same information  
5 argued regarding the order in the \*Renee Moore case.  
6 All the same information. And at the oral ruling  
7 Judge Maddox stated that more information was needed  
8 to decide the jurisdictional issue. A written order  
9 was entered in December and then the parties had a  
10 disagreement about what that meant. And our position  
11 LG Chem Limited and LG Chem America our position was  
12 that it was very clear that Judge Maddox had ruled  
13 that there was not enough information to decide the  
14 jurisdictional issue and therefore we would go forward  
15 with discovery limited only to the product ID question  
16 and a question of whether LG Chem Limited and LG Chem  
17 America had sufficient contact with South Carolina to  
18 to establish jurisdiction. Our position was that it  
19 was so limited. The plaintiff took the position that  
20 it was not. We filed a motion. Both entities filed a  
21 Motions for Reconsideration or in the alternative  
22 clarification and we asked the Court to reconsider and  
23 essentially just decide no, the motion should be  
24 granted outright. Also as to the service of process  
25 issue on LG Chem. Alternatively we asked if the Court

1 is not going to completely throw these cases out then  
2 please clarify the prior written order to document and  
3 confirm the oral ruling back in September 2019 which  
4 was that there is not enough information on this  
5 record to find there's jurisdiction. The plaintiff  
6 opposed that and ultimately Judge Maddox ruled in our  
7 favor in July of this year and said that there was not  
8 enough information to decide the jurisdictional issue.  
9 So our argument at this point is that Judge Maddox  
10 already had in front of him every single thing that  
11 the plaintiff is putting in front of Your Honor. The  
12 same facts. The same law, including the other  
13 decision from some other South Carolina Circuit Court.  
14 All of that was in front of Judge Maddox and Judge  
15 Maddox said there's not enough here to decide  
16 jurisdiction. The law however makes it very clear  
17 that it is the plaintiff's burden to establish  
18 jurisdiction and if the plaintiff did not meet that  
19 burden according to the information that was presented  
20 then then the plaintiff can not meet that burden with  
21 the information that is presented now because it is  
22 the same information and the plaintiff has waived any  
23 right for further discovery and that goes to my second  
24 point about the motion for protective order that I am  
25 going to address.

1           So our position is that in order for this Court on  
2           these facts which were the exact same facts that were  
3           presented to Judge Maddox to now say that the  
4           plaintiff can move forward that would undo Judge  
5           Maddox's ruling and that is against South Carolina Law  
6           for the plaintiff to come in here and do that.

7           THE COURT: Exactly what -- that's was my original  
8           question to you. To me there's a difference between a  
9           judge saying I don't have enough information to make a  
10          ruling and you seem to be saying because of the burden  
11          being on the plaintiff that is equivalent to a ruling  
12          that there was not a prima facia case presented. Is  
13          that what you are saying?

14          MS. HEDLEY: That is what I am saying Your Honor.

15          THE COURT: I am not sure those two are the same  
16          things. Just reading -- I haven't read his underlying  
17          order but reading the quotes from your brief, your  
18          memo, it appears he's just saying I'm not issuing a  
19          ruling. Isn't that what he's saying?

20          MS. HEDLEY: What he said in September was, I will  
21          deny the motion without prejudice and the defendants  
22          can bring the motion again as soon as jurisdictional  
23          discovery has been concluded.

24          At this point our position is jurisdictional  
25          discovery has been concluded because the 90 days has

1           gone by. The plaintiff has not produced any evidence  
2           of contacts with South Carolina. The plaintiff has  
3           put in a brief that said we don't need any more  
4           discovery. We don't want any more discovery. So  
5           regardless of how Your Honor views Judge Maddox's  
6           decision it's very clear that he said the defendant  
7           can come back and renew this motion after  
8           jurisdictional discovery. We are after jurisdictional  
9           discovery. The plaintiff is not offering any  
10          additional facts. So we don't see any other way other  
11          than on the current record to grant this motion  
12          without undoing what Judge Maddox said before. So  
13          that's our position on the motion to be granted.

14                 Now, I'm also glad to address the law for Your  
15          Honor's benefit addressing exactly why we believe that  
16          any other ruling would violate constitutional due  
17          process.

18                 THE COURT: Yes, ma'am, please.

19                 MS. HEDLEY: Thank you.

20                 So again, as I mentioned, plaintiff says that he  
21          purchased this battery from a vape store. In support  
22          of his motion to dismiss -- and again, just for the  
23          record I just want to reiterate that LG Chem Limited  
24          is a Korean company headquartered in South Korea. Our  
25          position is that service to the South Carolina



1 Secretary of State is improper and is insufficient and  
2 inconsistent with the Hague Service Convention.

3 However, that issue was already decided by Judge  
4 Maddox and we moved to reconsider. He denied it. So  
5 for the record a that maintains our position but we  
6 are not asking this Court to undo that order now.  
7 Okay. So moving beyond to the question of personal  
8 jurisdiction, LG Chem introduced admissible evidence  
9 showing that it did not supply Rolling Vapor vape  
10 store. Not only that, LG Chem never supplied any vape  
11 store. Not only that, LG Chem never supplied anyone  
12 that LG Chem was aware was serving a consumer market  
13 for stand-alone batteries. And so, if the battery  
14 that arrived in South Carolina where the plaintiff  
15 purchased it was in fact manufactured by LG Chem  
16 Limited then it arrived in South Carolina as the  
17 result of unilateral actions of third parties and not  
18 as the result of any action that LG Chem directed to  
19 South Carolina.

20 THE COURT: Where did LG Chem believe their  
21 batteries were going if they didn't think they were  
22 going to consumer products?

23 MS. HEDLEY: I am glad to address that.

24 So LG Chem manufactured these battery cells for  
25 use by sophisticated companies and I'll -- and I'll as

1 examples, a computer manufacturer or an e-vite  
2 manufacturer that will take the cells, pack them in a  
3 battery pack with protective circuitry and put them in  
4 the back of these consumer electronic devices. So LG  
5 Chem was never serving in a consumer market to  
6 actually purchase and handle the walk-around with one  
7 of these cells in their pocket. So they did have  
8 customers in the United States, but those customers  
9 were limited to original equipment manufacturers who  
10 would purchase cells and install them directly into  
11 the equipment. Battery packers who would purchase the  
12 cells, create the battery pack and supply those to the  
13 manufacturers. And then finally, a very limited  
14 number of distributors. None of whom were located in  
15 South Carolina that would purchase cells, and then  
16 supply them to the battery packers to go into the  
17 battery packs. So at no time LG Chem was never  
18 supplying to a consumer market. And that  
19 distinguishes the case in particular from Sumatra  
20 which we put in our briefs. Regardless of whether if  
21 the Court is bound by Sumatra whether Sumatra would  
22 stand constitutional scrutiny after the United States  
23 Supreme Court's more recent decisions on personal  
24 jurisdiction I denote that it would, but our position  
25 is that it does not matter. The Court does not need

1 to go against Sumatra here. But reading together  
2 Sumatra and the Cockrell case and considering the  
3 Supreme Court authorities of Walden versus Fiore which  
4 in 2014 reiterated that jurisdiction over a defendant  
5 can not be based on the unilateral actions of third  
6 parties. And in Bristol-Myers it does not matter the  
7 extent of a defendants connections with a foreign  
8 state or business in the state if the claims at issue  
9 don't arise out of those connection. And so the  
10 plaintiff is asking Your Honor to follow what other  
11 circuit courts in South Carolina have done. However,  
12 of course Your Honor is aware that those are not  
13 binding on this Court and we have also pointed to  
14 numerous authorities and I believe I've only cited a  
15 handful in these briefs, but there are many others.  
16 Federal Courts around the country including the Ninth  
17 Circuit Court of Appeals. Recently the Federal  
18 District Court in Georgia, the Supreme Court of the  
19 State of Missouri. Numerous appellant courts in  
20 various states have all confirmed that these same  
21 constitution principle prevent the exercise of  
22 personal jurisdiction over LG Chem in a forum and the  
23 plaintiff's allegation in the complaint are limited to  
24 saying that LG Chem allegedly manufactured this  
25 battery cell and separately saying that LG Chem

1 regularly transacted business in the state. Does not  
2 even allege in the complaint any connection. It could  
3 be any kind of business. It could be selling petra  
4 chemical. And the charts that was submitted  
5 previously, which again, there's nowhere on those  
6 charts that show that LG Chem shipped into this state  
7 lithium-ion battery cells to Rolling Fog Vapor or to  
8 any other vape store. Selling lithium-ion battery  
9 cells for example to Volvo, a car manufacturer, not  
10 18650 cells or pouch-type cells that never be confused  
11 and they are going into a car, the car battery. So  
12 again, our position would be that none of that  
13 information could possibly support personal  
14 jurisdiction.

15 Judge Maddox said I need more information. The  
16 law says that it is the plaintiff's burden. So, yes,  
17 we do believe that Judge Maddox's decision was -- the  
18 complaint and this chart does not amount to the  
19 plaintiff meeting its burden. Otherwise there would  
20 have been no reason for Judge Maddox to say we need  
21 more discovery regarding the plaintiff's contacts --  
22 excuse me -- regarding the defendant's contacts with  
23 South Carolina. And I do want to briefly mention that  
24 although the legal principles are the same the two  
25 defendants of course LG Chem Limited is a Korean

1 company headquartered in Korea, did not have any  
2 physical presence in South Carolina. LG Chem America  
3 Inc. is a Delaware corporation with its principal  
4 place of business in Atlanta, Georgia. So LG Chem  
5 America Inc. would be subject to general jurisdiction  
6 in those two states under recent Supreme Court  
7 authority in Delaware and in Georgia, but not here.  
8 And registered to do business in South Carolina and  
9 the tax statute, again, those were already presented  
10 to Judge Maddox. But additionally, that would run  
11 contrary to the United States Supreme Court precedent  
12 which in recent years. Particularly as recently as  
13 the BNSF Railway decision, 2017, the United States  
14 Supreme Court has reiterated that when it comes to  
15 general jurisdiction it's the state of incorporation  
16 and the principal place of business and anything other  
17 than that would have to be so extraordinary as to show  
18 that the defendant was actually at home in the state  
19 and I don't think the plaintiff is even arguing that  
20 either LG Chem Limited or LG Chem America is at home.  
21 So I think general jurisdiction is really not an  
22 issue.

23 THE COURT: So let me make sure I understand. So  
24 your argument on the specific jurisdiction is, in  
25 general that because there's no evidence of this

1 particular product coming into South Carolina evidence  
2 of other sales from LG Chem are insufficient?

3 MS. HEDLEY: So our position would be that  
4 certainly sales of petro chemicals or car batteries  
5 into the State of South Carolina there's no possible  
6 connection to this claim. But even if LG Chem sold  
7 18650's battery cells to a manufacturer in South  
8 Carolina that still would not be enough. And in a  
9 case called Richter, R-i-c-h-t-e-r, for example,  
10 Federal District Court in Illinois correctly found  
11 that despite LG Chem having sold cells to battery  
12 packers in that state it was not enough to satisfy  
13 constitutional due process.

14 In the Missouri case the plaintiff simply alleged  
15 similar -- in fact, the plaintiff allegations in  
16 Missouri were more than what we have here. The  
17 plaintiff alleged that LG Chem sold through a  
18 distributor to Missouri. The trial court originally  
19 denied LG Chem's motion and we took a writ to the  
20 Supreme Court of Missouri which ultimately granted the  
21 writ and found that the trial court had erred because  
22 allegations that LG Chem should have foreseen that  
23 some third party would bring its cell into the foreign  
24 state and sell it to a consumer were not sufficient to  
25 satisfy the constitution. And so in summary, we think

1 that the plaintiff's argument really reduced to its  
2 essence, is that LG Chem manufactured the cell. The  
3 cell found its way into South Carolina and LG Chem  
4 does unrelated business in South Carolina. That is  
5 simply not enough to satisfy the constitution under  
6 Cockrell, under Sumatra and certainly not under any of  
7 the United States Supreme Court precedents we've  
8 cited.

9 THE COURT: Miss Hedley, I'll be honest. The  
10 argument that there is a distinction when the company  
11 is selling a product to one group of people, group A,  
12 but not to group B, that there's no specific  
13 jurisdiction over a claim by group B if they buy  
14 product by another channel. That is a new argument to  
15 me.

16 What is the single best case you have that  
17 supports that contention?

18 MS. HEDLEY: Well, again, I mean the case --  
19 excuse me, the Richter case from Illinois.

20 THE COURT: The Richer case from Illinois. Okay.

21 MS. HEDLEY: As well as the Walsh case which is  
22 the Ninth Circuit Court of Appeal. An LG Chem case.  
23 There are several LG Chem cases. But the Richter case  
24 most particularly. Additionally, another case from a  
25 California Appellant Court called Kadow, K-a-d-o-w.



1 But also Bristol-Myers, the United States Supreme  
2 Court. And the reason I mention that is because in  
3 Bristol-Myers the issue there was mass manufacturer  
4 distribution and sale of a prescription medication  
5 called Plavix, p-l-a-v-i-x. And in the State of  
6 California the defendant, Bristol-Myers, which was a  
7 nonresident for California had sold hundred of  
8 thousands of prescriptions but had 250 in state sale's  
9 representatives, research laboratories, a government  
10 advocacy center and a distributor all for that product  
11 and yet the United States Supreme Court said a  
12 non-resident plaintiff can not come in to California  
13 and sue Bristol-Myers in California despite fact it  
14 was selling these very medications to consumers in the  
15 very state because there is no connection.

16 So our position would be how could it possibly  
17 follow after Bristol-Myers that a plaintiff could come  
18 into South Carolina and say they purchased a cell from  
19 a vape store. That vape store did not get that cell  
20 from LG Chem Limited. Did not say there was a  
21 distributor that LG Chem was supplying that was  
22 supplying that vape store.

23 The plaintiff is relying simply on allegations  
24 that show no connection between any business LG Chem  
25 conducted in South Carolina and these claims as well

1 as a chart which is inadmissible. Hearsay. So it's  
2 not admissible. But regardless, even if it were it  
3 does not show LG Chem shipping 18650 battery cells  
4 into South Carolina. And so we do not believe that  
5 personal jurisdiction can exist under the specific  
6 jurisdiction argument and numerous courts around the  
7 country. In at least 12 different states; Appellant  
8 Courts, Federal Courts, State Courts, State Appellant  
9 Courts have recognized that the very same constitution  
10 principals that support our motion require the  
11 dismissal of LG Chem in a case involving these  
12 allegations. And I know I started off this hearing by  
13 saying I believe that the discovery motion has been  
14 rendered moot. And the reason I say that is because  
15 Judge Maddox said that the plaintiff could have 90  
16 days to conduct jurisdictional discovery. Which  
17 regard to LG Chem America the plaintiff did not serve  
18 any. So come completely waived any right to ask for  
19 jurisdictional discovery from LG Chem America. The 90  
20 days elapsed. We filed a renewed motion according to  
21 Judge Maddox's order.

22 As to LG Chem Limited the plaintiff did serve  
23 discovery, but very broad in scope. The plaintiff  
24 wanted to know everything there was to know about the  
25 LG Chem sales throughout the United States. Even

1 sales and business contacts and activities that  
2 occurred well after the alleged date of the incident  
3 which was in 2018. Information regarding sales of  
4 other products throughout the United States. And  
5 ultimately we put in a supplemental memoranda in  
6 support last week on Tuesday addressing that motion  
7 for protective order and on Thursday -- honestly to  
8 our surprise, after the plaintiff had not said a word  
9 to us about anything relating to the discovery since  
10 we agreed back in August that we could not agree and  
11 therefore filed a motion for protective order. The  
12 plaintiff said we don't need any more discovery. The  
13 facts and the record as it is, this is enough. And so  
14 we submit that the motion for protective order is not  
15 opposed. And if the Court is inclined not to grant --  
16 let me rephrase it. Our position would be that at this  
17 time there is nothing in the record to support the  
18 plaintiff's burden of establishing jurisdiction. The  
19 allegations are not sufficient. There are no facts in  
20 the record. The plaintiff had the opportunity to  
21 conduct jurisdictional discovery which we maintain  
22 would turn out the same way. There are no related  
23 contacts but the plaintiff gave that up. And so that  
24 is why at this point we are asking that the Court  
25 grant the motion as to both defendants and dismiss

1 both for lack of personal jurisdiction.

2 Thank you, Your Honor.

3 THE COURT: Mr. Crosby.

4 MR. CROSBY: Thank you. Austin Crosby here along  
5 with my partner William Barnes and co-counsel, Alex  
6 Lewis and Blake Cummings, on behalf of the plaintiff.  
7 Judge, I want to pick up right where Miss Hedley just  
8 left off. That is these LG entities have contended  
9 from day one that there's no document they could  
10 possibly produce that would change the outcome of this  
11 court's ruling on personal jurisdiction. Candidally  
12 we're taking them on their word on that which is why  
13 we decided to push forward with these motions to  
14 dismiss because they say there's no document we can  
15 produce that would change the outcome.

16 A little bit of background I think on not just  
17 this case but other cases around the country I think  
18 will help put this in a context a little bit better.  
19 This is not isolated case involving manufacturing  
20 defect of the battery. There are literally hundreds  
21 of these cases pending around the country. To bring  
22 it more at home level -- and I don't want to misstate  
23 to the Court the number of actively pending cases, but  
24 I know that either currently pending or were pending  
25 in the very recent past there are in addition to this

1 case our firm is working on another case involving  
2 this identical battery, that's the Ranae Moore case  
3 which has been cited numerous times. There's also a  
4 case pending in Akin County in which Judge Courtney  
5 Clyburn Pope has ruled to deny this exact same motion.  
6 There's a case pending in Beaufort County which Judge  
7 Buckner has ruled to deny this exact same motion. And  
8 again, we just found out today that there is is okay  
9 in Charleston with Judge Price has denied this exact  
10 same motion. But again on a broader scale there's  
11 been numerous, dozens if not more of these motions  
12 heard around the country and LG is fighting this exact  
13 same battle on multiple fronts.

14 We believe that candidly the Court does have  
15 enough information to render a ruling at this point in  
16 time based not only on the orders of the other South  
17 Carolina Circuit Court judges but based on the import  
18 data that was attached to our memo which shows the  
19 number of these shipments that come into the country.

20 Your Honor was spot on in your analysis that  
21 there is no distinction between LG Chem shipping an  
22 18650 battery to South Carolina as opposed to shipping  
23 another product that they design and manufacturer to  
24 this state. It's really no different if you think  
25 about Ford Motor Company I assume that shipments of

1 Ford vehicles are coming from overseas into our  
2 country, the argument that LG is asking this Court to  
3 adopt and embrace is that well, Ford may have F-150's  
4 imported into South Carolina but if they don't import  
5 Ford Explorers and you have Ford Explorer rollover,  
6 you can't bring a case against Ford involving a  
7 Employer. And to your point, Your Honor, there is no  
8 case standing for that proposition just because the  
9 product is not identical in nature that this Court is  
10 not able to exercise jurisdiction over that defendant.  
11 It's simply not the case at all.

12 Let me address a few things, a few statements made  
13 by counsel. She said the motion for protective order  
14 is not opposed. Your Honor, again, I think depending  
15 on what Your Honor rules on whether or not we are  
16 bound by Judge Maddox's prior ruling. I would  
17 respectfully submit that on this Webex call right now,  
18 the only lawyer that was at that hearing that was  
19 involved at that point in time -- and I'm referring to  
20 the defense lawyers. There was another firm, the firm  
21 of Lewis Brisbois which was handling the case at that  
22 juncture and I am not saying it was a  
23 mischaracterization but I think counsel's  
24 representation of what Judge Maddox's ruling is is not  
25 exactly in line of what he said at that hearing. And

1 Your Honor picked up on it. He did not rule that the  
2 plaintiffs have not met their burden of establishing a  
3 prima facie case in involving jurisdiction. He was  
4 concerned with one main issue that was raised by the  
5 defense and that is a lot of times in these cases  
6 there are knock-off batteries that are not LG brand  
7 batteries. They look the same. They perform the same  
8 function but they're not an LG battery. That issue  
9 was raised again by prior defense counsel in that  
10 hearing in front of Judge Maddox back in 2019 and he  
11 understandably said well, I do think the parties need  
12 more time to inspect the product and confirm it is an  
13 LG battery. That inspection has taken place. Our  
14 experts have already confirmed in fact it was an LG  
15 battery. LG was given the opportunity to inspect that  
16 battery. I've heard nothing from them though that  
17 would indicate it is not an LG battery or that they  
18 contest that issue. So Judge Maddox was concerned  
19 with that issue. In addition to allowing the parties  
20 90 days to conduct jurisdictional discovery and  
21 actually the order said the parties may conduct  
22 jurisdictional discovery. It's our position today  
23 that further jurisdictional discovery is not needed  
24 based on the information that's in front of this Court  
25 and that exact same information that is before Your



1 Honor is what has been considered by every single one  
2 of these other Circuit Court Judges in South Carolina.

3 THE COURT: Let me stop you for a second. Am I  
4 correct, I believe Miss Hedley said that Judge Maddox  
5 characterized his order as a denial of their motion  
6 without prejudice, is that correct?

7 MR. CROSBY: That is correct Your Honor.

8 THE COURT: Okay, let me speak to Miss Hedley  
9 again.

10 Miss Hedley, the general principal is you can't  
11 file a successive motion raising the same argument  
12 unless there is new evidence to support it in Rule 43,  
13 but if Judge Maddox characterized his ruling on your  
14 motion as without prejudice, doesn't that mean we're  
15 on a blank slate today and I can rule however I  
16 please.

17 MS. HEDLEY: Well, Your Honor I don't think so  
18 only because of the fact that Judge Maddox clearly  
19 stated that the information that the plaintiff is  
20 relying on today was not sufficient.

21 THE COURT: But that ruling was without prejudice  
22 to it being re-raised. I'm struggling how an order  
23 without prejudice can preclude the party from making  
24 the argument again. Isn't that by definition without  
25 prejudice means?

1 MS. HEDLEY: Yes, as to the motion, but I do think  
2 that the -- and some of the comments that counsel is  
3 making were made in the briefing related to our motion  
4 for clarification where I understand that I was not at  
5 that hearing but of course I familiarized myself  
6 carefully with the transcript and the other pleadings  
7 and I am very familiar with the progress of this case.  
8 But that is exactly the position that the plaintiff  
9 took when we asked Judge Maddox to clarify the written  
10 order to more accurately capture the oral ruling he  
11 had made. He granted our motion. He entered an order  
12 agreeing with our position and so the plaintiff is now  
13 again advancing that position but again Judge Maddox  
14 agreed with our understanding of the oral ruling and  
15 had documented that in the July 20, 2020, order  
16 additionally limiting to 90 days and the plaintiff  
17 have not -- have waived any right for further  
18 discovery. Have not put in any other information.  
19 And so I do believe that Judge Maddox's decision  
20 controls but I also believe that there is nothing in  
21 this record that can support the plaintiff's burden  
22 and so regardless of how Your Honor views our argument  
23 that this would be going against what Judge Maddox  
24 did. We also briefed and clearly set forth that  
25 there's no basis. The only basis that the plaintiff

1 is offering is, well, three other South Carolina  
2 Circuit Judges said so. I understand that, but I also  
3 understand what the law says and to the extent that  
4 counsel is arguing, you know, that LG Chem is fighting  
5 this exact same battle on multiple fronts, that is --  
6 I don't know that I would say fighting. I would say  
7 winning because this is the correct analysis and  
8 numerous courts, state and federal and appellant  
9 courts in state after state after state. Federal  
10 courts; Hawaii, California, Washington State, Ohio,  
11 Illinois, Georgia, Arizona. Federal courts all  
12 applying and adopting the exact same argument that I  
13 am making.

14 State courts in New York, in New Jersey, in  
15 neighboring North Carolina, in Texas, in California,  
16 Oklahoma, in Washington State, in I believe South  
17 Dakota or perhaps it was Idaho. Sorry, I don't get  
18 out west much. But in many, many other states.  
19 Again, state courts saying that these constitutional  
20 due principal mandate the outcome that we are asking  
21 for here.

22 THE COURT: Okay. Mr. Crosby, I apologize for  
23 interrupting your argument.

24 Based on what I've heard today I don't think I am  
25 persuaded by the argument that Judge Maddox's ruling

1 binds me today. And again, if you want to send some  
2 authority I will be happy to look at it. If his order  
3 was without prejudice my understanding of the term  
4 "without prejudice" means without prejudice to a  
5 further motion by that party on the same grounds. So  
6 I don't think by definition I can be bound by an order  
7 by another Judge that is entered without prejudice.  
8 But Mr. Crosby if don't mind if you can focus your  
9 argument on the underlying issue of whether or not  
10 there is jurisdiction.

11 MR. CROSBY: I'll be happy to, Your Honor. Very  
12 briefly, I anticipated that issue that Miss Hedley  
13 just raised coming up today about what's happening in  
14 other states and I would submit this, but if Your  
15 Honor feels it would be helpful, there's briefing that  
16 was done in the State of Iowa and it was just done  
17 last month, January of 2021, and it addresses the same  
18 issue because another Circuit Judge sitting in you  
19 same position heard the argument that LG was winning  
20 this jurisdictional battle all around the country. I  
21 don't think the facts support that, Your Honor. I  
22 will submit this brief if Your Honor would like. It  
23 shows ten different states, South Carolina being one  
24 of those ten states and it's got roughly 20 orders  
25 where trial courts around the country have ruled to

1 deny this exact same motion. So, I would respectfully  
2 submit that LG is not winning this battle. I think  
3 that argument has been set forth in other cases in  
4 front of other judges and I don't think that has any  
5 true significance. I'm not sure that it's factually  
6 correct, Your Honor, with regard to the number of  
7 times they are winning.

8 THE COURT: Is it exhibit two that you are  
9 referring to, the chart?

10 MR. CROSBY: Well, exhibit two is the import data,  
11 Your Honor. So Your Honor is aware, that is data that  
12 was collected from the U.S. customs. They keep that  
13 information. That information was wired and then  
14 assembled on that spreadsheet to show the number of  
15 shipments coming into the Port of Charleston.

16 THE COURT: Okay, I'll be honest. It's a little  
17 confusing to look at for someone who is not heavily  
18 involved in this case. Where in the chart are the  
19 particular batteries at issue?

20 MR. CROSBY: Your Honor, I believe the chart does  
21 not show specific products. It doesn't distinguish  
22 between any type of product as opposed to shipments  
23 that LG Chem Limited is making into the Port of  
24 Charleston and on the majority of those I can give you  
25 the numbers here. They're cited in our brief. We got

1 data going back to 2006 that shows this import data.  
2 For ease of our conversation today we focused on the  
3 data between December 2016 and February of 2019. So  
4 roughly a little over two years of data and we got 296  
5 shipments from LG Chem that are coming through the  
6 Port of Charleston. Of those 296 shipments 244 of  
7 those LG Chem America is listed as consigning those  
8 shipments. And I did a little quick math last night.  
9 Basically that amounts about every three days a  
10 shipment is coming into the Port of Charleston with  
11 products from LG Chem.

12 Do you have that exhibit two in front of you?

13 THE COURT: I do. Yes, sir.

14 MR. CROSBY: And I happy to kind of go through any  
15 of that that may not be as clear as we should have  
16 made it if Your Honor would like.

17 THE COURT: It's okay. My main question was, are  
18 any of these entries the particular batteries in  
19 question and my understanding is we don't know. It's  
20 not specific enough.

21 MR. CROSBY: That's correct, Your Honor. I'm not  
22 able to represent to the Court that we can point out  
23 which specific shipments of those were 18650  
24 batteries. What I would point out is the point Your  
25 Honor raised earlier and that I think for purposes of

1 a decision of whether or not this Court can exercise  
2 personal jurisdiction over the LG defendants I really  
3 think it's to a certain degree it's immaterial whether  
4 it's 18650 batteries or other products that LG Chem is  
5 availing themselves of shipping and selling in South  
6 Carolina.

7 THE COURT: What's your best case? Miss Hedley,  
8 my understanding is her argument is that not only do  
9 you have to show these batteries were shipped into  
10 South Carolina but that they were shipped to consumers  
11 and not OEM manufacturers. Do you have a case?  
12 What's your best case saying the shipments of other  
13 goods and batteries in general is enough for  
14 jurisdiction.

15 MR. CROSBY: Your Honor, I don't think how  
16 specifically they address it in these cases but I  
17 truly think that South Carolina verses Sumatra, it NV  
18 Sumatra. It's from our own Supreme Court here in  
19 South Carolina. It's still good law and I think  
20 really from this whole analysis that and Worldwide  
21 Volkswagon case which we all remember from first year  
22 in law school. I really think those cases are  
23 probably the best on point. And really what we're  
24 talking about of course is stream of commerce theory  
25 where these LG defendants are availing themselves and

1 putting their products into the stream of commerce.  
2 So I think those cases and particularly the Sumatra  
3 case are probably the best ones.

4 THE COURT: All right..

5 MR. CROSBY: So back to your request as far as the  
6 actual merits of the jurisdictional issue. And Miss  
7 Hedley was correct, we're not arguing general  
8 jurisdiction. I don't believe general jurisdiction  
9 would apply to the defendants. We have purposely only  
10 argued specific jurisdiction. And a little bit of  
11 factual information I think would help with this  
12 issue. If you were to believe the argument that LG is  
13 making here that this Court would not be able to  
14 exercise jurisdiction over a South Carolina resident  
15 who purchased a battery from a store in South Carolina  
16 and then his injury took place in the State of South  
17 Carolina. There is truly no other forum which would  
18 be appropriate other than right here in South Carolina  
19 where all of this it took place. LG seems to think  
20 they can insulate themselves virtue of being an  
21 overseas manufacturer, but it's simply not the case.  
22 It doesn't comport with our South Carolina long-arm  
23 statute which is truly what governs most of what we  
24 are talking about. It's well detailed in the brief,  
25 Your Honor, but we're talking about 36-2-803. And the



1 particular language in that statute that is important  
2 is the production, manufacture or distribution of  
3 goods with the reasonable expectation that those goods  
4 are to be used or consumed in this state and are so  
5 used or consumed. And that last bit of language, Your  
6 Honor, I think is most important part. We know this  
7 exact part, 18650 was used and consumed in the State  
8 of South Carolina. It was purchased from a store here  
9 and we know that it would have arrived from a shipment  
10 from overseas coming through South Carolina. And at  
11 the end of the day that's probably the best proof is  
12 the fact that the product did in fact end here. The  
13 defendants directed their products to be shipped to  
14 the United States, and in fact the facts of this case  
15 support that that is in fact what happened. So when  
16 you are look at this long-arm statute I think really  
17 that language there is the reasonable expectation to  
18 be used or consumed. LG I don't believe can say,  
19 well, we know we shipped these thousands and thousands  
20 of products through the Port of Charleston in South  
21 Carolina, but however we're immune from being sued. I  
22 don't think it comports with what our long-arm statute  
23 says and specifically due process.

24 The Court's job here is really from our view to  
25 apply the stream of commerce test to assess whether or

1 not due process is afforded to LG with them being a  
2 foreign manufacturer and that analysis, Your Honor,  
3 really hinges upon their minimum contacts which we  
4 would submit are established through the import data  
5 that's been provided to the Court. When you get  
6 beyond that prong, Your Honor, the analysis charged to  
7 the reasonableness and fairness of exercising  
8 jurisdiction over these defendants. And I think a  
9 point that probably hasn't been brought to Your  
10 Honor's attention is, we're really talking about the  
11 same company here when we're talking about LG Chem  
12 America and LG Chem Limited. LG Chem America is  
13 simply a wholly-owned subsidiary of LG Chem Limited.  
14 As that import data that you were looking at earlier  
15 shows almost all of these shipments by LG Chem into  
16 the United States list LG Chem America as the  
17 consigning party. So LG Chem America while there  
18 maybe arguments made they are different companies they  
19 are by far and large the same company. Just simply  
20 fulfilling different roles with regard to what they  
21 do.

22 I want to touch on one thing with regard to the  
23 discovery in this case, and Your Honor has heard a  
24 little bit about it as we've gone along. We have been  
25 fighting this issue, this jurisdictional issue with

1           these defendants for over a year and a half now. And  
2           when Judge Maddox decided to allow limited  
3           jurisdictional discovery we did search jurisdictional  
4           discovery. I want to make sure that point is clear.  
5           We served it to LG Chem Limited and our response we  
6           got back from the defendants was, well, we're  
7           objecting to everything you sent. It's overly broad.  
8           And they basically assert a boilerplate objections to  
9           that discovery. Once they were ordered to go and  
10          conduct jurisdictional discovery which the plaintiffs  
11          tried to comply with, we were then met with, well,  
12          we're not going to produce anything and then basically  
13          more delay tactics from these defendants. And that's  
14          unfortunately why we had to attach that Alabama order  
15          which you will see, Your Honor, that addresses the  
16          discovery abuse that I would submit to this Court that  
17          has gone on around this country with regard to these  
18          LG defendants. When we attempted to do discovery that  
19          Judge Maddox contemplated we were met with resistance  
20          and find ourselves right back here at step one  
21          basically.

22                 THE COURT: Miss Hedley I believe contended your  
23          co-counsel had stated that plaintiff didn't want any  
24          more jurisdictional discovery or wouldn't need it, is  
25          that correct?

1 MR. CROSBY: I would alter that slightly, Your  
2 Honor. When we did serve additional discovery on the  
3 LG defendants we were met with basically lengthy  
4 objections that were basically boilerplate objections  
5 that when we tried to work those issues such as  
6 agreeing on a protective order which we've discussed  
7 numerous times. We couldn't agree on a protective  
8 order. They wouldn't produce any documents and  
9 basically what we unfortunately after a year and a  
10 half of litigating just this jurisdictional issue came  
11 to realize was that this was all an attempt by these  
12 LG defendants to stall litigation. Not only in this  
13 case but litigation around the country. That's what  
14 that order from Alabama court really exemplified and  
15 unfortunately it took us a while to realize what was  
16 going on and that's why, Your Honor, based we thing  
17 that based on the record in front of you not only what  
18 we submitted to the Court but also these orders from  
19 around our state that there is sufficient information  
20 for the Court to rule on.

21 THE COURT: Okay, let me make sure. What you're  
22 telling me is one possible resolution of today's  
23 hearing is I would say go back to discovery if I were  
24 to deny the motion for protective order and then the  
25 main motion for personal jurisdiction would be heard a

1 different day but you're saying you don't want me to  
2 do that.

3 MR. CROSBY: Well, Your Honor, I would submit, you  
4 know, I believe the position that you stated earlier  
5 with regards to Judge Maddox's order being his ruling  
6 that he denied LG he's motion to dismiss without  
7 prejudice. My understanding of the law is consistent  
8 with what Your Honor articulated which is, there is  
9 nothing that would bar this Court from ruling to deny  
10 these two motions to dismiss based on the same  
11 evidence. If Your Honor felt differently, then I  
12 would say that I think an option certainly is us going  
13 back and conducting further jurisdictional discovery.

14 THE COURT: Let me make sure you're not telling me  
15 you want more time for jurisdictional discovery?

16 MR. CROSBY: We are not currently requesting more  
17 time for jurisdictional discovery, Your Honor.

18 THE COURT: Okay. In that case I do agree with  
19 the defendant that their motion for protective order  
20 is mooted. Any objection to that conclusion?

21 MR. CROSBY: No, Your Honor.

22 THE COURT: Okay. So we're on agreement on that.  
23 Miss Hedley, I will give you the final argument on  
24 anything you want to speak about.

25 MS. HEDLEY: Thank you, Your Honor. The Court has

1           been very generous of its time and I appreciate that.  
2           This is an important issue and I will be as brief as I  
3           can. I would like to comment in a very targeted way  
4           to just some of the things raised by plaintiff's  
5           counsel.

6           First, the chart. I have the chart in front of me  
7           and if the chart were to be submitted to Your Honor  
8           electronically where it could search as PDF can be, I  
9           disagree that the chart doesn't give any information  
10          and I think the Court can easily look at the chart and  
11          I'm looking at it right now.

12          THE COURT: Give me a second. Let me see if my  
13          PDF is searchable. Yes, mine is searchable.

14          MS. HEDLEY: Then if Your Honor were to search for  
15          example the word resin I'm confident there would be a  
16          lot of hits for that. I'm looking at entries that  
17          talk about resin.

18          THE COURT: Yes, ma'am, I do see those.

19          MS. HEDLEY: And another example would be methyl  
20          acrylate but honestly Your Honor could just type in  
21          methyl, m-e-t-h-y-l.

22          THE COURT: Right. Okay.

23          MS. HEDLEY: And so the type of products are  
24          identified. And my first question would be the same  
25          as what Your Honor asked plaintiff, where on that

1 chart do you see 18650 battery cells coming into South  
2 Carolina? And I don't think that it's accurate to say  
3 that this chart just shows a bunch of products. It  
4 specifies. Now, the chart is hearsay and  
5 inadmissible. My understanding is that is a chart  
6 that's created by counsel reflecting information from  
7 the U.S. Customs and that information I believe is  
8 recorded by the importer. But the bottom line is,  
9 this chart does say what the products are and it shows  
10 petrochemicals and resins. Some are on here. I  
11 believe there maybe shipments of car batteries to  
12 Volvo. But there are not -- that I'm aware of --  
13 shipments of 18650 battery cells, and if there are  
14 they are very limited and there certainly not going to  
15 any vape stores but the plaintiff has pointed to that.  
16 The plaintiff has told Your Honor that it doesn't say  
17 what the products are and we believe the chart shows  
18 otherwise.

19 THE COURT: Okay, but there are definitely entries  
20 for batteries being imported but this goes back to  
21 your argument that importing for the use by Volvo car  
22 companies is not sufficient to justify jurisdiction in  
23 this case, is that correct?

24 MS. HEDLEY: That's correct, Your Honor and those  
25 car batteries for example could never be confused with

1 an 18650. They're not the size or shape. They don't  
2 look the same. So there's simply no confusion.  
3 That's number one. Number two, the plaintiff says we  
4 know how it got here. It would have arrived from  
5 overseas. However in many of the cases -- and I would  
6 submit to the Court that the supply chain works in two  
7 directions. The plaintiff could go to Rolling Fog  
8 Vapor and say where did you get your supply from. In  
9 other cases plaintiffs have gone to vape stores and  
10 said, where did you get your supply from? The vape  
11 stores have pointed to some other distributor, very  
12 frequently entities in China and these entities in  
13 China have been named as defendants in some of these  
14 cases and in cases where the allegation has been made  
15 LG Chem has introduced admissible evidence that it did  
16 not do business with those entities. How they are  
17 getting the battery cells I do not know. But what I  
18 do know is that there is no chain of distribution  
19 suggesting that LG Chem put the battery cells on a  
20 ship to the United States. It landed in the United  
21 States and somebody took it off the back of a truck  
22 and then sold it to the vape store. They're coming  
23 into the country in some way but it's not by LG Chem  
24 directing them there and pertinent here, is not by LG  
25 Chem directing it to South Carolina, which is what due



1 process would require.

2 Number three, I believe plaintiff's counsel called  
3 Your Honor all the way back to Worldwide Volkswagon  
4 and I believe -- and I don't have the cite in front of  
5 me, but there's a quote in that case, defendant's  
6 shadow cannot be the agent for the service of process.  
7 Plaintiff's argument is basically LG Chem manufactured  
8 this product. It found its way to South Carolina.  
9 Game over. And we submit that that is not what due  
10 process requires.

11 To the argument that no other forum would be  
12 appropriate, counting back to talk about the decision  
13 by the Supreme Court of Missouri, that oral argument  
14 if the Court were interested is available on the  
15 Supreme Court of Missouri's website and that was the  
16 first question that was asked. And to counsel's point  
17 that I may not have been at the hearing before Judge  
18 Maddox's but I have been at most of the hearings in  
19 these other cases, in these other jurisdictions. I  
20 stood before the Supreme Court of Missouri and was  
21 asked that very question with regard to whether  
22 there's a forum. And so, to those points due process  
23 controls and we again respectfully submit that these  
24 other orders, these other South Carolina Circuit  
25 Courts simply do not comply with constitutional due

1 process and nothing in Sumatra requires a different  
2 result.

3 Also, for the record, I do need to briefly mention  
4 that counsel mentioned that quote I wrote down, "We  
5 are really talking about the same company here." LG  
6 Chem Limited is a Korean company. LG Chem America  
7 Inc. is an independent subsidiary. They are separate  
8 and independent companies. So for purposes of  
9 jurisdiction there is ample body of case law that have  
10 not been briefed or addressed, but it has not been  
11 raised before I don't believe in this case. But just  
12 because they are a parent subsidiary relationship does  
13 not support the exercise of jurisdiction and that's  
14 very clear. I believe the Dangler (phonetics) case,  
15 U.S. Supreme Court said that.

16 So finally, to the extent that counsel is throwing  
17 out the amount of time that has gone by and saying  
18 it's been a year and a half, this is a delay tactic.  
19 All of that is unsupported by the record. In fact  
20 much of the delay here is because plaintiff disagreed  
21 with us as to the meaning of the order in September of  
22 2019. We were forced to go to a motion for  
23 reconsideration and we won that motion in July of this  
24 year. Judge Maddox said, yes, LG Chem Limited and LG  
25 Chem America, you are correct. Discovery is limited

1 to jurisdictional issues. And so finally to the  
2 extent that plaintiff again raises this case which I  
3 did address in our reply brief, it's Cannon case from  
4 Alabama. It's an aberration. The order itself was  
5 primarily drafted by the plaintiff's counsel but the  
6 discovery -- and I'm glad to give Your Honor the  
7 history of that case if you would like. I don't think  
8 it's important here.

9 THE COURT: That's not necessarily.

10 MS. HEDLEY: But some of the examples of the  
11 discovery are in our reply brief as to how overbroad  
12 and abusive that discovery was. However, we have also  
13 submitted to Your Honor many decisions including an  
14 order issued by trial court in Arizona in the Tague  
15 case, T-a-g-u-e, as well as one in New Jersey in a  
16 case called Cribb, C-r-i-b-b. In both of those again,  
17 in the Cribb case the Judge allowed extensive  
18 discovery. Nationwide contact of LG Chem related to  
19 these 18650 batteries cells and ultimately concluded  
20 that there was nothing to connect LG Chem to how the  
21 batteries arrived in a New Jersey vape store in that  
22 case or in an Arizona vape store in the Tague case.

23 So we again respectfully submit that this Court is  
24 bound by the decisions of South Carolina Supreme Court  
25 and the United States Supreme Court. There have been

1 numerous decisions by other courts around the country  
2 and in fact this very argument about saying, well,  
3 there's no forum here was recently heard and rejected  
4 by a federal judge in Atlanta and those cases are  
5 cited in our brief; the Davis case and the Fullerton  
6 case order on September 28th of 2020. And there was a  
7 lengthy oral argument where the plaintiff made a  
8 similar argument that was rejected. But ultimately  
9 constitutional due process set forth two very clear  
10 principles. One, and that's Walden versus Fiore as I  
11 mentioned, that the unilateral actions of third  
12 parties can not support the exercise of jurisdiction.  
13 And two, and that's Bristol-Myers in 2017, that the  
14 plaintiff's claim must arise out of or relate to  
15 contact that the defendant formed with the forum  
16 state. Not contact formed by the plaintiff or other  
17 third parties such as Rolling Fog Vapor or whoever it  
18 is that supplied Rolling Fog Vapor which the plaintiff  
19 has not identified. But those contacts would have to  
20 have been form by LG Chem Limited or LG Chem America  
21 Inc. respectfully. And again, we submit that there is  
22 nothing in the record that would support the  
23 plaintiff's burden of establishing jurisdiction and  
24 therefore we ask that the Court grant these motions.

25 If there are any issues that we covered that the

1 Court would like supplemental briefing I'm happy to  
2 provide that.

3 THE COURT: That's unnecessary. But counsel, I  
4 will take this matter under advisement. You all will  
5 hear from me as quickly as I can make a ruling.

6 MR. CROSBY: Thank you, Your Honor.

7 MS. HEDLEY: Your Honor, one very brief thing.  
8 Again we ask --

9 THE COURT: Go ahead.

10 MS. HEDLEY: Again, we ask that our motion be  
11 granted. However, if for whatever reason the Court  
12 were to deny the motions which we don't believe it  
13 should, then I believe there is still a motion for a  
14 entry of a confidentiality order that has never been  
15 opposed so that should be entered. However, again,  
16 our position is that LG Chem Limited and LG Chem  
17 America should be dismissed from this action without  
18 further proceedings.

19 Thank you.

20 THE COURT: Thank you, counsel. I will take the  
21 matter under advisement.

22 MR. CROSBY: Thank you, Your Honor.

23 (END OF TRANSCRIPT)

24

25

## CERTIFICATION

I, the undersigned Aileen Butler, Official Court Reporter for the 16TH Judicial Circuit of the State of South Carolina, do hereby certify that the foregoing is a true, accurate, and complete transcript of record of all the proceedings in the captioned case, in the Circuit Court for York County, South Carolina, on the 1st day of February, 2021.

I do further certify that I am neither of kin, counsel, nor interest to any party hereto.

February 24, 2021

S/ *Aileen Butler*

|                                    |   |                                    |
|------------------------------------|---|------------------------------------|
| STATE OF SOUTH CAROLINA            | ) |                                    |
|                                    | ) | IN THE COURT OF COMMON PLEAS       |
| COUNTY OF UNION                    | ) | SIXTEENTH JUDICIAL CIRCUIT         |
|                                    | ) |                                    |
| Dwayne Thompson,                   | ) | Civil Action No. 2019-CP-44-00054  |
|                                    | ) |                                    |
| Plaintiff,                         | ) |                                    |
|                                    | ) |                                    |
| vs.                                | ) | <b>MOTION TO DISMISS AND QUASH</b> |
|                                    | ) | <b>SERVICE OF PROCESS</b>          |
| Rolling Fog Vapor Company, LLC, LG | ) |                                    |
| Chem, LTD., and LG Chem America,   | ) |                                    |
| Inc.,                              | ) |                                    |
|                                    | ) |                                    |
| Defendants.                        | ) |                                    |
|                                    | ) |                                    |

**TO: ALEXANDER P. LEWIS, ESQ., W. BLAKE CUMMINGS, ESQ., RONNIE L. CROSBY, ESQ. AND AUSTIN H. CROSBY, ESQ., ATTORNEYS FOR PLAINTIFF DWAYNE THOMPSON**

YOU WILL PLEASE TAKE NOTICE that the undersigned as attorneys for the defendant LG Chem, Ltd. ("LG Chem") will move before the Court at a time and date to be set by the Court for an order dismissing this lawsuit against LG Chem for lack of personal jurisdiction and insufficient service of process, and quashing Plaintiff's attempt at service of process upon LG Chem, pursuant to SCRCP 12(b)(2) and 12(b)(5). The grounds for this motion are as follows:

LG Chem is a South Korean company that does not do business in South Carolina and is not subject to personal jurisdiction in South Carolina. South Korea is a signatory to the Hague Service Convention, and South Korean companies must be served in accordance with its requirements. *See* art. 3, 20 U.S.T. 362; *Volkswagenwerk Aktiengesellschaft v. Schlunk*, 486 U.S. 694, 698 (1988). The Hague Service Convention requires, among other things, that South Korean companies be served with process through the South Korean Central Authority.

Plaintiff did not attempt to follow the procedures required by the Hague Service Convention for serving LG Chem. Instead, according to a Certificate of Service filed in the instant action on

April 11, 2019, Plaintiff attempted to serve LG Chem with the Summons and Complaint via the South Carolina Secretary of State pursuant to S.C. Code Ann. § 15-9-245. However, the Hague Service Convention preempts inconsistent methods of service of process prescribed by state law by virtue of the Supremacy Clause of Article VI of the United States Constitution. *Volkswagenwerk*, 486 U.S. at 698; *Bakala v. Bakala*, 352 S.C. 612, 626, 576 S.E.2d 156, 163 (2003). Moreover, because South Korea has objected to Article 10 of the Hague Service Convention, a South Korean company, like LG Chem, may not be served via mail. *See, e.g., Monagas v. Samsung Elecs. Am., Inc.*, C.A. No. 3:13-CV-927, 2013 WL 5970977, at \*2 (D. Conn. Nov. 8, 2013). Plaintiff's failure to comply with the requirements of the Hague Service Convention renders Plaintiff's service insufficient, and therefore, Plaintiff's claims against LG Chem should be dismissed. Even if LG Chem were subject to South Carolina law regarding service, which it is not, Plaintiff still failed to properly serve LG Chem, and this Court has not acquired personal jurisdiction over LG Chem as a result of Plaintiff's insufficient service.

Furthermore, LG Chem is not subject to personal jurisdiction in South Carolina in this case. LG Chem is a Korean company with its headquarters and principal place of business in Seoul, South Korea. Accordingly, it is not subject to the general jurisdiction of South Carolina courts. *BNSF Ry. Co v. Tyrrell*, 137 S. Ct. 1549, 1558 (2017); *Daimler AG v. Bauman*, 571 U.S. 117, 127 (2014). In addition, for specific personal jurisdiction to attach, due process requires that minimum contacts exist between the defendant and the forum state such that maintenance of the suit does not offend traditional notions of fair play and substantial justice. *Cockrell v. Hillerich & Bradsby Co.*, 363 S.C. 485, 491-92, 611 S.E.2d 505, 508 (2005) (citing *Burger King Corp. v. Rudzewicz*, 471 U.S. 462 (1985)). Because minimum contacts do not exist between LG Chem and South Carolina related to



the Plaintiff's claims sufficient to satisfy due process, this Court lacks personal jurisdiction over LG Chem.

This motion is supported by the pleadings, applicable law, the Affidavit of Sung Han Ryu filed herewith, and LG Chem's supporting memorandum of law to be filed at a later date, along with any exhibits and any additional affidavits or memoranda that LG Chem may hereafter file or submit to this Court.

WHEREFORE, for the foregoing reasons, LG Chem respectfully requests that the Court enter an Order dismissing LG Chem from this action for lack of personal jurisdiction and insufficient service of process, and such other and further relief the Court deems just and proper.

Respectfully submitted this 24<sup>th</sup> day of April, 2019.

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann  
KATE CAPPELMANN  
South Carolina Bar No.: 100551

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
[kate.cappelmann@lewisbrisbois.com](mailto:kate.cappelmann@lewisbrisbois.com)

Counsel for Defendant  
*LG Chem, Ltd.*

|                                 |   |                                    |
|---------------------------------|---|------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS       |
|                                 | ) |                                    |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO. : 2018-CP-4400054 |
|                                 | ) |                                    |
| DWAYNE THOMPSON,                | ) |                                    |
|                                 | ) |                                    |
| Plaintiff,                      | ) |                                    |
|                                 | ) |                                    |
| vs.                             | ) |                                    |
|                                 | ) |                                    |
| ROLLING FOG VAPOR COMPANY,      | ) |                                    |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                    |
| AMERICA, INC.,                  | ) |                                    |
|                                 | ) |                                    |
| Defendants.                     | ) |                                    |
| _____                           | ) |                                    |

**CERTIFICATE OF SERVICE**

I certify that on this date, I filed **LG CHEM, LTD.’S MOTION TO DISMISS FOR INSUFFICIENT SERVICE OF PROCESS AND LACK OF PERSONAL JURISDICTION** in this action with the Clerk of Court using the Court’s E-Filing System. A Notice of Electronic Filing will automatically generate to the following counsel of record:

Alexander P. Lewis  
W. Blake Cummings  
***Cumming & Lewis, LLC***  
P.O. Box 5766  
Spartanburg, SC 29304

and

Austin H. Crosby  
Ronnie L. Crosby  
***Peters, Murdaugh, Parker, Eltzroth & Detrick, PA***  
101 MULBERRY STREET EAST  
P.O. Box 457  
HAMPTON, SC 29924

*Counsel for Plaintiff*

This 24<sup>th</sup> day of April, 2019.

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
kate.cappelmann@lewisbrisbois.com

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann  
KATE CAPPELMANN  
South Carolina Bar No.: 100551

Counsel for Defendant  
*LG Chem, Ltd.*



서울 영등포구 여의나루로 67  
(여의도동, 신송빌딩) 1401호  
[별지 제41호서식]

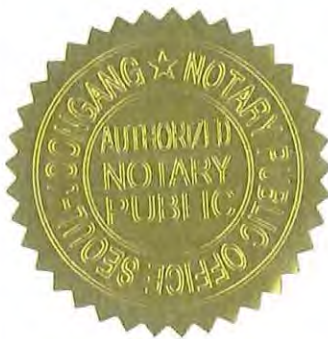
서울중앙 공증인 합동사무소

(전화) 02-3478-8200  
(팩스) 02-3478-5544

ELECTRONICALLY FILED - 2019 Apr 24 2:55 PM - UNION - COMMON PLEAS - CASE#2019CP4400054

Registered No. 2019 - 847

# NOTARIAL CERTIFICATE



NOTARY PUBLIC OFFICE  
SEOUL-JOONGANG

floor 14 Sinsong Bldg

67, yeouinaru-ro, yeongdeungpo-gu, Seoul, Korea

|                                 |   |                                         |
|---------------------------------|---|-----------------------------------------|
| STATE OF SOUTH CAROLINA         | ) |                                         |
|                                 | ) | IN THE COURT OF COMMON PLEAS            |
| COUNTY OF UNION                 | ) | SIXTEENTH JUDICIAL CIRCUIT              |
| DWAYNE THOMPSON,                | ) | Civil Action No. 2019-CP-44-00054       |
|                                 | ) |                                         |
| Plaintiff,                      | ) |                                         |
|                                 | ) |                                         |
| vs.                             | ) | <b><u>AFFIDAVIT OF SUNG HAN RYU</u></b> |
|                                 | ) |                                         |
| ROLLING FOG VAPOR COMPANY,      | ) |                                         |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                         |
| AMERICA, INC.,                  | ) |                                         |
|                                 | ) |                                         |
| Defendants.                     | ) |                                         |
|                                 | ) |                                         |



Personally appeared before me, Sung Han Ryu, who first being duly sworn, deposes and says:

1. I am over the age of eighteen and am competent to testify to the matters contained in this affidavit.
2. I am a Team Leader and authorized representative for Defendant LG Chem, Ltd. ("LG Chem"). I have personal knowledge of the facts described in this affidavit. If called upon as a witness, I could and would testify competently under oath as to all such facts based upon my personal knowledge and my review of the business records of LG Chem.
3. This affidavit is submitted in support of Defendant LG Chem's Motion to Dismiss and Quash Service of Process, and I have been authorized by LG Chem to execute this affidavit for this purpose.
4. LG Chem is a Korean company with its headquarters and principal offices in Seoul, South Korea.
5. LG Chem has never had an office in South Carolina.
6. LG Chem has never been registered to do business in the State of South Carolina, and has never sought qualifications to do business in South Carolina, or registered as a corporation with the South Carolina Secretary of State.
7. LG Chem has never owned or leased any real property in South Carolina.



8. LG Chem has never had a registered agent for the service of process in South Carolina.

9. LG Chem has never had a telephone number, post office box, mailing address, or bank account in South Carolina.

10. LG Chem has never paid income or property taxes in South Carolina.

11. LG Chem has no employees that reside or work in South Carolina.

12. LG Chem manufactures 18650 lithium-ion power cells for use in specific applications by sophisticated companies.

13. LG Chem does not design, manufacture, distribute, advertise, or sell 18650 lithium-ion power cells for use by individual consumers as replaceable, rechargeable batteries in electronic cigarette devices.

14. The type of battery identified in the complaint in this case is described as an "LG Brown Hg2 INR 18650 3000mAh." If the subject battery identified in Plaintiff's complaint was, in fact, an LG brand 18650 lithium-ion cell, the 18650 lithium-ion cell was not designed or manufactured in South Carolina.

15. Plaintiff alleges that he purchased the subject e-cigarette equipment and battery from Defendant Rolling Fog Vapor Company, LLC ("Rolling Fog"), which Plaintiff alleges is a "domestic limited liability company with its principal place of business in Spartanburg County, South Carolina." Compl., ¶¶ 2, 9. LG Chem has no relationship with Rolling Fog. LG Chem does not direct or control the actions of Rolling Fog. LG Chem has never authorized Rolling Fog to advertise, distribute, or sell LG 18650 lithium-ion power cells for use by individual consumers as replaceable, rechargeable batteries in e-cigarette devices.

16. LG Chem has never authorized any distributor, wholesaler, retailer or re-seller to advertise, distribute or sell LG 18650 lithium-ion power cells for use by individual consumers as replaceable, rechargeable batteries in e-cigarette devices.

I, Sung Han Ryu, hereby declare under penalty of perjury that the foregoing statements made by me are true and correct. I am aware that if any foregoing statements made by me are willfully false, I am subject to punishment.

Executed this 24th day of April, 2019.

Ryu, Sung Han  
Sung Han Ryu

SWORN to and subscribed before me

this 24th day of April, 2019.

\_\_\_\_\_(L.S.)

Notary Public for **SEOUL JOONGANG**  
**NOTARY PUBLIC OFFICE**

**S.K. CHUNG**

My Commission Expires: 2024. 2



서울 영등포구 여의나루로 67  
(여의도동, 신송빌딩) 1401호  
[별지 제42호서식]

## 서울중앙 공증인 합동사무소

(전화) 02-3478-8200  
(팩스) 02-3478-5544

ELECTRONICALLY FILED - 2019 Apr 24 2:55 PM - UNION - COMMON PLEAS - CASE#2019CPCP4400054

등부 2019 년 제 847호

Registered No. 2019-847

### 인 증

### NOTARIAL CERTIFICATE

SUNG HAN RYU-----

위 선서진술서-----

에 기재된 유 성 한-----

-----

-----

은 본 공증인의 면전에서 위 사서증서에  
자기가 서명 - 한 것임을 자인하였다.

personally appeared before me and  
admitted his(her) subscription to the  
attached AFFIDAVIT OF SUNG HAN RYU.

-----

-----

-----

-----

2019년 04월 24일

이 사무소에서 위 인증한다.

This is hereby attested on this  
24th day of Apr. 2019 at this office.



서울중앙 공증인 합동사무소

NOTARY PUBLIC OFFICE  
SEOUL-JOONGANG

서울남부지방검찰청 소 속

Seoul Southern  
District Prosecutor's Office

서울 영등포구 여의나루로 67  
(여의도동, 신송빌딩) 1401호

floor 14 Sinsong Bldg  
67, yeouinaru-ro, yeongdeungpo-gu, Seoul, Korea

정 성 광



공증인

정 성 광

본 사무소는 인가번호 제158호에 의거하여  
2014년 01월 20일 법무부 장관으로부터  
공증인 업무를 행할 것을 인가 받았다.

S. K. Chung

Signature of the Notary Public

Sung Kwang Chung

This office has been authorized by the  
Minister of Justice, the Republic of  
Korea, to act as Notary Public Since  
20, Jan. 2014 Under Law No.158.



|                                 |   |                                       |
|---------------------------------|---|---------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS          |
|                                 | ) |                                       |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2019-CP-4400054     |
|                                 | ) |                                       |
| DWAYNE THOMPSON,                | ) |                                       |
|                                 | ) |                                       |
| Plaintiff,                      | ) | <b>DEFENDANT LG CHEM, LTD.'S</b>      |
|                                 | ) | <b>MEMORANDUM IN SUPPORT</b>          |
| vs.                             | ) | <b>OF ITS MOTION TO QUASH SERVICE</b> |
|                                 | ) | <b>OF PROCESS AND DISMISS FOR</b>     |
|                                 | ) | <b>LACK OF PERSONAL JURISDICTION</b>  |
| ROLLING FOG VAPOR COMPANY,      | ) |                                       |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                       |
| AMERICA, INC.,                  | ) |                                       |
|                                 | ) |                                       |
| Defendants.                     | ) |                                       |
| _____                           | ) |                                       |

Defendant LG Chem, Ltd. (“LGC”) respectfully submits this memorandum of law in support of its motion to quash service of process and to dismiss for lack of personal jurisdiction, pursuant to South Carolina Rules of Procedure 12(b)(2) and 12(b)(5).

## **I. INTRODUCTION**

LGC is a South Korean company with its headquarters and principal place of business in South Korea. It has no systematic contacts with the State of South Carolina. South Korea is a signatory to the Hague Service Convention, which pre-empts inconsistent methods of service prescribed by state law. *Volkswagenwerk Aktiengesellschaft v. Schlunk*, 486 U.S. 694, 699 (1988). Plaintiff did not serve LGC with process in accordance with the procedures required by the Hague Service Convention. Accordingly, Plaintiff’s attempted service on LGC through the South Carolina Secretary of State was insufficient as a matter of law, and the Court should quash service.

Even if Plaintiff had properly served LGC—which he did not—Plaintiff cannot carry his burden of demonstrating that this Court has either general or specific personal jurisdiction over

LGC. As to general jurisdiction, controlling authority of the United States Supreme Court precludes the exercise of general jurisdiction over LGC in South Carolina, where it is not “at home.” *BNSF Ry. Co. v. Tyrell*, 137 S. Ct. 1549, 1558 (2017). As to specific jurisdiction, Plaintiff cannot establish that his claims arise out of purposeful connections formed between LGC and South Carolina, as required by due process. *Bristol-Myers Squibb Co. v. Superior Court*, 137 S. Ct. 1773, 1781 (2017).

Plaintiff alleges he was injured by an “Hg2” lithium-ion “18650 3000mAh ... battery” he purchased from Defendant Rolling Fog Vapor Company, LLC to use with his vaping device. LGC does not design, manufacture, distribute, advertise, or sell lithium-ion cells for use by individual consumers as replaceable, rechargeable batteries in e-cigarettes or vaping devices. Instead, it appears a black market has developed whereby third parties have acquired 18650 lithium-ion cells manufactured not only by LGC, but also by other legitimate manufacturers, like Samsung, Sony, and Panasonic, and sold them in a chain of distribution for purchase by consumers, like the Plaintiff, for use as replaceable, rechargeable batteries in e-cigarette and vaping devices. LGC has never conducted any business with Rolling Fog Vapor Company, LLC, the alleged retailer of the product at issue, nor engaged in any other forum-related activities related to the distribution and sale of an “Hg2” lithium-ion cell to South Carolina consumers for use as replaceable, rechargeable batteries in e-cigarette or vaping devices. Accordingly, if the subject battery at issue in Plaintiff’s complaint was manufactured by LGC, it arrived in South Carolina as the result of the unilateral actions of others, not as the result of any purposeful conduct by LGC.

Accordingly, Plaintiff cannot show the required nexus between LGC, the forum, and the claims at issue to satisfy constitutional due process. Therefore, the Complaint against LGC should be dismissed for lack of personal jurisdiction.

## **II. FACTS**

Plaintiff alleges that he purchased an LG Brown Hg2 INR 18650 3000mAh battery from Defendant Rolling Fog Vapor Company, LLC (“Rolling Fog”) to use in his vaping device. (*See* Exhibit A, Plaintiff’s Complaint, at ¶¶2, 8-9.) Plaintiff alleges that Rolling Fog Vapor did not provide him with a case for the HG2 cell. (*Id.* at ¶10). Plaintiff alleges that he was injured when the battery combusted while in his pants pocket. (*Id.* at ¶12.) Plaintiff alleges that LGC designed, manufactured, supplied, sold, imported, and distributed the battery. (*Id.* at ¶5.)

LGC is a South Korean company with its headquarters and principal place of business in Seoul, South Korea. (Affidavit of Sung Han Ryu, dated April 24, 2019, at ¶4.) LGC is not incorporated in South Carolina, it is not headquartered in South Carolina, and it has never had any physical presence in or systematic connection to South Carolina. (*Id.* at ¶¶4-11.) LGC has never had an office or facility in South Carolina, has never had employees in South Carolina, has never been registered to do business in South Carolina, has never owned or leased any real property in South Carolina, and does not have a registered agent in South Carolina. (*Id.*)

Plaintiff also incorrectly alleges, without evidentiary support, that LGC is “in the business of manufacturing, fabricating, designing, assembling, distributing, selling, inspecting, warranting, retailing, wholesaling, and advertising the e-cigarette products that the Plaintiff purchased and used.” (Compl. at ¶6.) To the contrary, LGC manufactures 18650 lithium-ion cells for use in specific applications by sophisticated companies. (Ryu Aff. at ¶12.) LGC does not design, manufacture, distribute, advertise, or sell 18650 lithium-ion cells for use by individual consumers as replaceable,

rechargeable batteries in e-cigarette or vaping devices. (*Id.* at ¶13.) LGC has never conducted business with Rolling Fog Vapor and does not direct or control its actions. (*Id.* at ¶15.) LGC has never authorized Rolling Fog Vapor or any wholesaler, distributor, retailer or re-seller to advertise or sell 18650 lithium ion cells for use by individual consumers as replaceable, rechargeable batteries in e-cigarette or vaping devices. (*Id.* at ¶16.)

On April 11, 2019, Plaintiff filed a certificate of service alleging that he served LGC via the South Carolina Secretary of State. Plaintiff attached a letter from the South Carolina Secretary of State indicating that the Secretary purportedly served LGC via mail addressed to “LG Chem, Ltd., LG Twin Towers 128 Yeoui-daero, Yeongdeumgpo-gu, Seoul 07336, Korea.” (*See* Exhibit B, Letter from Secretary of State). Plaintiff never served LGC through the Korean Central Authority, consistent with the requirements of the Hague Service Convention.

### **III. ARGUMENT AND CITATION TO AUTHORITY**

#### **A. The Court Should Quash Service of Process and Dismiss LGC Because LGC Was Not Properly Served.**

Plaintiff filed a proof of service stating that he served LGC through the South Carolina Secretary of State. However, because LGC is a foreign company, Plaintiff was required to serve it through the Hague Service Convention. His failure to do so renders service invalid as a matter of law. The Court should quash service.

“The Hague Service Convention is an international treaty that pre-empts inconsistent methods of service prescribed by state law in all cases where service abroad is required.” *Bakala v. Bakala*, 352 S.C. 612, 626, 576 S.E.2d 156, 163 (2003) (citing *Volkswagenwerk*, 486 U.S. 694). The Hague Service Convention is “intended to provide a simpler way to serve process abroad, to assure that defendants sued in foreign jurisdictions will receive actual and timely notice of suit, and to facilitate proof of service abroad.” *Volkswagenwerk*, 486 U.S. at 699. Both South Korea and the



United States are signatories to the Hague Convention. See <https://www.hcch.net/en/states/hcch-members/details1/?sid=48>; see also, *Baek v. Radish Media, Inc.*, No. 18-cv-7475, 2018 U.S. Dist. LEXIS 196014, at \*5 (C.D. Cal. Nov. 16, 2018).

The Hague Service Convention applies “in all cases, in civil or commercial matters, where there is occasion to transmit a judicial or extrajudicial document for service abroad.” 20 U.S.T. 361, art. 1. The Hague Service Convention requires that each country establish a central authority to receive requests for service from other countries, serve the documents, and provide certificates of service. See *id.* at arts. 2-6; accord *Bakala*, 352 S.C. at 626, 576 S.E.2d at 163. A country may consent to foreign methods of service other than a request to its central authority, if it affirmatively chooses *not* to object to article 10. *Id.* at art. 10(a); accord *Bakala*, 352 S.C. at 626, 576 S.E.2d at 163. Accordingly, service abroad by mail is only permissible if the receiving country has not lodged an objection to Article 10. *Bakala*, 352 S.C. at 626.

South Korea objected to article 10 of the Hague Service Convention and does not permit the sending of judicial documents by postal channels directly to persons abroad. Declarations and Reservations ¶ 2, HCCH, available at <https://www.hcch.net/en/instruments/conventions/status-table/notifications/?csid=408&disp=resdn>; see also, *Baek*, 2018 U.S. Dist. LEXIS 196014, at \*5; *Monagas v. Samsung Elecs. Am., Inc.*, No. 3:13CV927 MPS, 2013 WL 5970977, at \*2 (D. Conn. Nov. 8, 2013) (attempted mail service on South Korean company was ineffective because it violated the Hague Service Convention). Accordingly, South Korean residents, including LGC, may only be served through South Korea’s designated Central Authority. *Baek*, 2018 U.S. Dist. LEXIS 196014, at \*5. Plaintiff’s failure to comply with the requirements of the Hague Service Convention renders Plaintiff’s attempted service invalid. Plaintiff’s attempted service must be quashed.

Furthermore, even though South Carolina service rules are inapplicable to service on LGC due to the application of the Hague Service Convention and the Supremacy Clause, Plaintiff still failed to comply with South Carolina service rules in his attempt to serve LGC through the Secretary of State, pursuant to South Carolina Code § 15-9-245.

South Carolina Code § 15-9-245 requires that parties attempting to serve process via the Secretary of State must file an affidavit of compliance with “the return receipt signed by the foreign business or nonprofit corporation or other official proof of delivery or, if acceptance was refused, there must be filed the original or a photostated or certified copy of the envelope with a notation by the postal authorities that acceptance was refused.” S.C. Code § 15-9-245(c). Plaintiff has not filed a return receipt or evidence of refusal. Service therefore would still not be proper under this statute.

Because Plaintiff’s attempted service on LGC was invalid as a matter of law, this Court has not acquired personal jurisdiction over LGC. Accordingly, the Court should quash Plaintiff’s attempted service of process on LGC and dismiss it from this action.

**B. This Court Lacks Personal Jurisdiction Over LGC.**

Plaintiff cannot satisfy his burden to establish the existence of either general or specific jurisdiction over LGC. Accordingly, even if Plaintiff had properly served LGC—which he did not—LGC should still be dismissed from this action.

“Personal jurisdiction is exercised as ‘general jurisdiction’ or ‘specific jurisdiction.’” *Coggeshall v. Reprod. Endocrine Associates of Charlotte*, 376 S.C. 12, 16, 655 S.E.2d 476, 478 (2007). “General jurisdiction is the State’s right to exercise personal jurisdiction over a defendant even though the suit does not arise out of or relate to the defendant’s contacts with the forum[.]” *Id.* “Specific jurisdiction is the State’s right to exercise personal jurisdiction because the cause of action arises specifically from a defendant’s contacts with the forum[.]” *Id.*

“The party seeking to invoke personal jurisdiction over a non-resident defendant ... bears the burden of establishing jurisdiction.” *Power Prods. & Servs. Co., Inc. v. Kozma*, 379 S.C. 423, 430, 665 S.E.2d 660, 664 (Ct. App. 2008). “When a motion to dismiss attacks the allegations of the complaint on the issue of jurisdiction, the court is not confined to the allegations of the complaint but may resort to affidavits or other evidence to determine jurisdiction.” *Coggeshall*, 376 S.C. at 16, 655 S.E.2d at 478. Conclusory allegations will not suffice. *Power Prods.*, 379 S.C. at 430, 665 S.E.2d at 664.

**1. LGC Is Not Subject to General Personal Jurisdiction in South Carolina Because It Is Not “At Home” Here.**

“A court may assert general jurisdiction over foreign (sister-state or foreign-country) corporations to hear any and all claims against them when their affiliations with the State are so ‘continuous and systematic’ as to render them essentially at home in the forum State.” *Daimler AG v. Bauman*, 571 U.S. 117, 127 (2014) (quoting *Goodyear Dunlop Tires Operations, S.A. v. Brown*, 564 U.S. 915, 925 (2011)). In *Daimler*, the United States Supreme Court explained that a foreign corporation is “essentially at home” in two forums: (1) where it is formally incorporated and (2) where its principal place of business is located. *Id.* at 139. Only in an “exceptional case” can a court exercise general jurisdiction in a forum that is not “the corporation’s place of incorporation [or] its principal place of business.” *BNSF*, 137 S. Ct. at 1558. An example of an exceptional case is when war forces a “corporation’s owner to temporarily relocate the enterprise from the Philippines to Ohio,” which becomes “the center of the corporation’s wartime activities.” *Id.* (quoting *Perkins v. Benguet Consol. Mining Co.*, 342 U.S. 437, 448 (1952)).

In *BNSF*, the Supreme Court held that Montana could not exercise general jurisdiction over BNSF even though BNSF had “over 2,000 miles of railroad track and more than 2,000 employees in Montana.” *Id.* at 1559. And in *Daimler*, the Supreme Court declined plaintiffs’ invitation to “look



beyond the exemplar bases *Goodyear* identified [place of incorporation and principal place of business], and approve the exercise of general jurisdiction in every State in which a corporation ‘engages in a substantial, continuous, and systematic course of business.’” 571 U.S. at 137-38. The Court stated that “[t]hat formulation . . . is unacceptably grasping” and would impermissibly result in “exorbitant exercises of all-purpose jurisdiction” in every “State in which [a company’s] sales are sizable.” *Id.* at 138, 139. “A corporation that operates in many places can scarcely be deemed at home in all of them.” *Id.* at 139 n.20. “Otherwise, ‘at home’ would be synonymous with ‘doing business’ tests framed before specific jurisdiction evolved in the United States.” *Id.*

LGC is a Korean company, with its headquarters and principal place of business in South Korea, (Ryu Aff. ¶4), and it lacks any continuous or systematic contacts with South Carolina. (*Id.* at ¶¶5-11). It is undisputed that South Carolina is not LGC’s place of incorporation or its principal place of business, (Compl. ¶3), and there are no allegations or evidence in the record demonstrating that LGC has exceptional “continuous or systematic” contacts with South Carolina warranting the exercise of general jurisdiction. Accordingly, LGC is not “essentially at home” in South Carolina, and it is not subject to general jurisdiction in this State.

## **2. LGC Is Not Subject to Specific Jurisdiction Because Plaintiff’s Claims Do Not Arise Out of Any Activities LGC Directed to South Carolina.**

Under South Carolina law, “[t]he determination of whether the requirements of due process are satisfied involves a two-prong analysis: (1) the ‘power’ prong, in which minimum contacts provide courts the ‘power’ to adjudicate the action; and (2) the ‘fairness’ prong, which requires the exercise of jurisdiction to be ‘reasonable’ or ‘fair.’” *Moosally v. W.W. Norton & Co., Inc.*, 358 S.C. 320, 331, 594 S.E.2d 878, 884 (Ct. App. 2004).

Due process requires that there exist minimum contacts between the defendant and the forum state such that maintenance of the suit does not offend traditional notions of fair play and substantial



justice. *Cockrell v. Hillerich & Bradsby Co.*, 363 S.C. 485, 491, 611 S.E.2d 505, 508 (2005). Further, to satisfy constitutional due process, the exercise of “specific jurisdiction is confined to adjudication of issues deriving from, or connected with, the very controversy that establishes jurisdiction.” *Goodyear*, 564 U.S. at 919 (internal quotation omitted). Accordingly, in order for a court to exercise specific jurisdiction, the suit must arise out of or relate to the defendant’s contacts with the forum. *Bristol-Myers*, 137 S. Ct. at 1780 (citing *Daimler*, 571 U.S. at 127); accord *Power Prods.*, 379 S.C. at 432, 665 S.E.2d at 665 (“[A] minimum contacts analysis requires a court to find that the defendant directed its activities to residents of South Carolina and that the cause of action arises out of or relates to those activities. Without minimum contacts, the court does not have the ‘power’ to adjudicate the action.”).

When considering whether the defendant has created sufficient contacts with the forum to support the exercise of specific jurisdiction, “the focus must center on the contacts generated by the defendant, and not on the unilateral actions of some other entity.” *Cockrell*, 363 S.C. at 492, 611 S.E.2d at 508-09 (citing *Helicopteros Nacionales de Colombia, S.A. v. Hall*, 466 U.S. 408, 417, 104 S.Ct. 1868, 80 L.Ed.2d 404 (1984) (holding “unilateral activity of another party or a third person is not an appropriate consideration”)). “The foreseeability that is critical to due process analysis is not the mere likelihood that a product will find its way into the forum state. Rather, it is that the defendant’s conduct and connection with the forum state are such that he should reasonably anticipate being haled into court there.” *Cockrell*, 363 S.C. at 492, 611 S.E.2d at 508-09 (citing *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 297 (1980).)

Here, Plaintiff has not alleged or introduced evidence of any contacts between LGC and South Carolina related to his claims. Instead, Plaintiff alleges only in conclusory fashion that LGC has continuing contacts with South Carolina by “manufacturing, distributing, and/or selling goods

with the reasonable expectation that they will be used in this state and which are in fact used in this state.” (Compl. ¶7.) This allegation, even if true, would be insufficient to establish personal jurisdiction in this case, because Plaintiff does not allege any conduct by LGC related to his claims, as required by due process. Nor could he, when LGC has introduced admissible, uncontroverted evidence showing that it does not design, manufacture, distribute, advertise, or sell lithium-ion cells for use by individual consumers as replaceable, rechargeable batteries in e-cigarettes or vaping devices and has never conducted any business with Rolling Fog Vapor Company, LLC, the alleged retailer of the product at issue. (Ryu Aff., ¶¶13, 15, 16.)

Therefore, if the subject battery at issue in Plaintiff’s complaint was originally manufactured by LGC, it arrived in South Carolina as the result of the unilateral actions of third parties, acting without LGC’s authorization. This is insufficient to satisfy due process. In *Cockrell*, the Supreme Court of South Carolina found personal jurisdiction was lacking over defendants, the University of Massachusetts at Lowell Baseball Research Center and James Sherwood, a mechanical engineer and Director of the Research Center, because the subject product (baseball bats) “did not arrive in South Carolina through the respondents’ efforts.” *Cockrell*, 363 S.C. at 494, 611 S.E.2d at 510. Instead, the bats arrived in South Carolina through the unilateral efforts of the distributor, Hillerich. Here, LGC’s purported involvement with the subject suit is even more attenuated; LGC has introduced admissible evidence that it never authorized any distributor, wholesaler, retailer, or other re-seller to advertise, distribute, or sell its 18650 lithium-ion cells for use by individual consumers as replaceable, rechargeable batteries in e-cigarette or vaping devices. Accordingly, if the subject battery at issue in Plaintiff’s complaint was manufactured by LGC, it arrived in South Carolina as the result of the unilateral actions of others, not as the result of any purposeful conduct by LGC. Due process cannot be satisfied. *Helicopteros Nacionales*, 466 U.S. at 417.

Because the power prong cannot be satisfied, the Court need not reach the fairness prong. Regardless, Plaintiff cannot establish that the exercise of specific jurisdiction over LGC is constitutionally reasonable or fair. Under the fairness prong, courts analyze factors such as “the burden on the defendant, the extent of the plaintiff’s interest, South Carolina’s interest, efficiency of adjudication, and the several states’ interest in substantive social policies.” *Moosally*, 358 S.C. at 332, 594 S.E.2d at 885. “The weaker the contacts . . . the less likely it is that jurisdiction is reasonable.” *Grayson Consulting, Inc. v. Cathcart*, C.A. Nos. 2:07-cv-02992, 2:07-cv-00593, 2013 WL 5755400, at \*3 (D.S.C. Oct. 23, 2013). These factors apply with particular force in actions against foreign national defendants. *Asahi Metal Indus. Co., Ltd. v. Superior Court*, 480 U.S. 102, 114 (1987). As noted by the Supreme Court: “The unique burdens placed upon one who must defend oneself in a foreign legal system should have significant weight in assessing the reasonableness of stretching the long arm of personal jurisdiction over national borders.” *Id.* at 114.

Consideration of these factors affirms that subjecting LGC to specific jurisdiction in South Carolina would be constitutionally unreasonable. LGC will face significant burdens in defending this case in a foreign judicial system. Representatives of LGC would have to travel, at great expense, from South Korea to the United States in order to defend this litigation in a foreign legal system. All of the witnesses and evidence relevant to LGC’s alleged manufacturing of the lithium-ion cell are in South Korea. Finally, it would be unfair and unreasonable to subject LGC to personal jurisdiction in South Carolina when LGC has no continuing contacts with South Carolina and did not authorize the sale of its product to a consumer, like the Plaintiff. Accordingly, even if the power prong were satisfied, the exercise of specific jurisdiction over LGC would not comport with fundamental fairness.



#### IV. CONCLUSION

Defendant LG Chem, Ltd. respectfully requests that this Court quash Plaintiff's improper service and dismiss LG Chem from this action for lack of personal jurisdiction

Respectfully submitted, this 18th day of September, 2019.

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann  
KATE CAPPELMANN  
South Carolina Bar No.: 100551

Counsel for Defendant  
*LG Chem, Ltd.*

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
[kate.cappelmann@lewisbrisbois.com](mailto:kate.cappelmann@lewisbrisbois.com)

|                                 |   |                                    |
|---------------------------------|---|------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS       |
|                                 | ) |                                    |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO. : 2018-CP-4400054 |
|                                 | ) |                                    |
| DWAYNE THOMPSON,                | ) |                                    |
|                                 | ) |                                    |
| Plaintiff,                      | ) |                                    |
|                                 | ) |                                    |
| vs.                             | ) |                                    |
|                                 | ) |                                    |
| ROLLING FOG VAPOR COMPANY,      | ) |                                    |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                    |
| AMERICA, INC.,                  | ) |                                    |
|                                 | ) |                                    |
| Defendants.                     | ) |                                    |
| _____                           | ) |                                    |

**CERTIFICATE OF SERVICE**

I certify that on this date, I filed **LG CHEM LTD.’S MEMORANDUM IN SUPPORT OF ITS MOTION TO QUASH SERVICE OF PROCESS AND DISMISS FOR LACK OF PERSONAL JURISDICTION** in this action with the Clerk of Court using the Court’s E-Filing System. A Notice of Electronic Filing will automatically generate to the following counsel of record:

Alexander P. Lewis  
W. Blake Cummings  
**Cumming & Lewis, LLC**  
P.O. Box 5766  
Spartanburg, SC 29304

and

Austin H. Crosby  
Ronnie L. Crosby  
**Peters, Murdaugh, Parker, Eltzroth & Detrick, PA**  
101 MULBERRY STREET EAST  
P.O. Box 457  
HAMPTON, SC 29924

*Counsel for Plaintiff*

This 18th of September, 2019.

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann  
KATE CAPPELMANN  
South Carolina Bar No.: 100551

Counsel for Defendant  
*LG Chem, Ltd.*

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
kate.cappelmann@lewisbrisbois.com

EXHIBIT "A"



|                                 |   |                               |
|---------------------------------|---|-------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS  |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2018-CP-44- |
| DWAYNE THOMPSON,                | ) |                               |
|                                 | ) |                               |
| Plaintiff,                      | ) |                               |
|                                 | ) |                               |
| v.                              | ) | <b><u>COMPLAINT</u></b>       |
|                                 | ) | <i>(Jury Trial Requested)</i> |
|                                 | ) |                               |
| ROLLING FOG VAPOR COMPANY,      | ) |                               |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                               |
| AMERICA, INC.,                  | ) |                               |
|                                 | ) |                               |
| Defendants.                     | ) |                               |

The Plaintiff alleges:

1. That he is a resident of Union County, South Carolina.
2. That Defendant, Rolling Fog Vapor Company, LLC ("Rolling Fog"), is a domestic limited liability company with its principal place of business in Spartanburg County, South Carolina, and is engaged in the business of selling vapor accessories, e-liquids, lithium-ion rechargeable batteries including, but not limited to, the LG Brown Hg2 INR 18650 3000mAh ("subject battery") and other e-cigarette/vaporizer products.
3. That Defendant, LG Chem, Ltd. ("LG"), is a foreign corporation organized under the laws of Korea with its principal place of business in Seoul, South Korea, and is engaged in the business of manufacturing, designing, testing, marketing, certifying, supplying, selling, importing and distributing lithium ion rechargeable batteries including, but not limited to, the subject battery that forms the basis of this action.
4. The Defendant, LG Chem America, Inc., ("LGA"), is a foreign corporation organized under the laws of Delaware and is engaged in the business of manufacturing, designing, testing, marketing, certifying, supplying, selling, importing and distributing lithium ion

rechargeable batteries including, but not limited to, the subject battery that forms the basis of this action.

5. The subject battery was manufactured, designed, supplied, sold, imported and distributed by LG and LGA.

6. At all times mentioned herein, Defendants were engaged in the business of manufacturing, fabricating, designing, assembling, distributing, selling, inspecting, warranting, retailing, wholesaling, and advertising the e-cigarette products that the Plaintiff purchased and used.

7. LG and LGA have continuing contacts with South Carolina by transacting substantial business in this state and manufacturing, distributing, and/or selling goods with the reasonable expectation that they will be used in this state and which are in fact used in this state.

8. Each cause of action alleged against the Defendants arises out of a battery explosion in Spartanburg County, South Carolina, on July 27, 2018, that seriously and permanently injured the Plaintiff.

9. Plaintiff purchased the subject battery, which was manufactured, designed and imported by LG and LGA, from Defendant Rolling Fog's store located at 958 East Main Street in Spartanburg, South Carolina.

10. A case was not provided with the purchase of the subject batteries.

11. While at his place of employment located at 2155 S 2006, Spartanburg, South Carolina, the subject battery exploded and burst into flames in Plaintiff's right front pant pocket.

12. As a result of the explosion and the chemicals from the subject battery, Plaintiff sustained third degree burns on numerous portions of his body requiring skin grafts. He also suffered and continues to suffer permanent injury and/or disfigurement to his body, pain and



suffering, mental anguish, emotional distress, loss of wages and related medical, hospital and caretaking expenses.

13. Plaintiff's injuries and damages were due to and proximately caused by the negligent, reckless and careless conduct of the Defendants in the following particulars, for which the Defendants are liable:

**FIRST CAUSE OF ACTION**

**(Negligence as to Defendant Rolling Fog Vapor Company, LLC)**

14. The above allegations are incorporated as if repeated verbatim.
15. Plaintiff is informed and believes the Defendant was negligent, willful, wanton, careless, reckless and grossly negligent in the following particulars:
- a. In selling a lithium-ion battery such as the subject battery that was designed and manufactured without a positive temperature coefficient thermistor or similar device to prevent rapid discharge when short circuited, leading to overheating and catastrophic failure;
  - b. In selling a battery that was designed and manufactured without internal temperature controls and/or protective circuitry;
  - c. In selling a battery with manufacturing defects present;
  - d. In selling a battery that was unreasonably dangerous for its foreseeable and intended use;
  - e. In selling a battery that failed to comply with generally accepted engineering safety standards applicable to lithium-ion batteries;
  - f. In failing to sell and market the subject battery with a package or container that would prevent short circuiting that could lead to rapid discharge, overheating, and catastrophic failure;
  - g. In failing to warn customers that the subject battery should not be stored in a pocket and that short circuiting of the battery could lead to catastrophic failure;
  - h. In failing to train personnel with regard to industry standards, proper use, and proper storage of the 18650 lithium-ion Hg2 batteries;

- i. In failing to provide adequate warnings and instructions to warn the users of the dangers associated with the use and failure of the lithium-ion Hg2 INR 18650 3000mAh batteries;
- j. In failing to warn of the defective condition of the subject battery; and
- k. In such other particulars as the evidence may establish.

**SECOND CAUSE OF ACTION**  
**(Negligence as to Defendants LG and LGA)**

- 16. The above allegations are incorporated as if repeated verbatim.
- 17. Plaintiff is informed and believes the Defendants were negligent, willful, wanton, careless, reckless and grossly negligent in the following particulars:
  - a. In failing to include a positive temperature coefficient thermistor or similar device to prevent rapid discharge which short circuited, leading to overheating and catastrophic failure;
  - b. In failing to incorporate any other protection circuitry, current interrupt devices, or other protections against rapid discharge, overheating, and explosion;
  - c. In failing to sell and market the subject battery with a package or container that would prevent short circuiting that could lead to rapid discharge, overheating, and catastrophic failure;
  - d. In failing to warn consumers that the subject battery should not be stored in a pocket and that short circuiting of the subject battery could lead to catastrophic failure;
  - e. In failing to manufacture, design, assemble, test, instruct, warn, distribute, supply and/or sell the subject battery in such a condition so that it would operate safely as a reasonable consumer would expect;
  - f. In failing to manufacture, design, assemble, test, instruct, warn, distribute, supply and/or sell the subject battery in such a manner that it would not spontaneously explode;
  - g. In failing to manufacture, design, assemble, test, instruct, warn, distribute, supply and/or sell the subject battery in such a manner that it would not spontaneously heat and catch fire;



- h. In failing to provide reasonable and adequate warnings to the suppliers, purchasers and users of the subject battery to alert users about the dangerous conditions described herein; and
- i. In such other particulars as the evidence may establish.

**THIRD CAUSE OF ACTION**  
**(Strict Liability as to All Defendants)**

- 18. The above allegations are incorporated as if repeated verbatim.
- 19. Defendants are engaged in the business of selling vaporizing products to the public, including selling the subject battery to the Plaintiff.
- 20. Defendants placed into the stream of commerce the subject battery, which was defective, unfit, and unreasonably dangerous to the intended users or consumers, including Plaintiff.
- 21. Plaintiff's injuries and damages occurred because the subject battery was designed, manufactured, imported, and sold by the Defendants in a defective condition that was unreasonably dangerous to the Plaintiff.
- 22. The subject battery was in the same or substantially the same condition as when sold by the Defendants and was being used in a reasonably foreseeable manner.
- 23. The Defendants sold the subject battery in an unreasonably dangerous and defective condition, and as a result, the Defendants are strictly liable, pursuant to S.C. Code Ann §15-73-10, to Plaintiff in an amount to be ascertained by the jury at the trial of this action.

**FOURTH CAUSE OF ACTION**  
**(Breach of Warranty as to All Defendants)**

- 24. The above allegations are incorporated as if repeated verbatim.
- 25. That by act, word, and/or deed at the time of sale, the Defendants made certain Express Warranties, certain Implied Warranties of Merchantability, and certain Implied

Warranties of Fitness for a Particular Purpose, regarding the subject battery, which was part of the basis of the bargain and/or which arose by operation of law.

26. Plaintiff rightfully and reasonably relied upon the warranties of the Defendants to his great detriment, injury, and damage.

27. The Defendants expressly and impliedly warranted at the time of sale that the subject battery was fit, safe, in good condition, of merchantable quality, and was fit for a particular purpose, namely a safe vaporizer battery, when in fact, the subject battery was unfit, unsafe, not of merchantable quality, and was not fit or suited for its particular purpose.

28. By reason of and in consequence of Defendants' breach of express and implied warranties, Plaintiff suffered the injuries and damages as set forth herein, for which the Defendants are liable.

29. In order to investigate this claim, Plaintiff will need access to certain information concerning the design and manufacture of the subject battery including, but not limited to, design specifications with change histories, design evaluations, chemistry, materials, and manufacture process. Some or all of this information may fall subject to a claim of trade secret. Without access to this information, Plaintiff will be substantially prejudiced in her investigation and proof of defect herein. Plaintiff believes that access to this information will likely lead to admissible evidence at the trial of this case.

WHEREFORE, Plaintiff prays for judgement against the Defendants for actual damages, together with punitive damages in an appropriate amount, for the costs of this action, and for such other and further relief as the Court may deem just and proper.

*-signature page to follow-*

Alexander P. Lewis  
SC Bar No. 78991  
W. Blake Cummings  
SC Bar No. 80067  
Cummings & Lewis, LLC  
Post Office Box 5766  
Spartanburg, South Carolina 29304  
Phone: (864) 573-9688  
[alex.lewis@cummingslewis.com](mailto:alex.lewis@cummingslewis.com)  
[blake.cummings@cummingslewis.com](mailto:blake.cummings@cummingslewis.com)

-and-

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

BY: s/Austin H. Crosby  
Ronnie L. Crosby  
SC Bar No. 66481  
Austin H. Crosby  
SC Bar No. 80161  
101 Mulberry Street East  
P.O. Box 457  
Hampton, SC 29924  
(803) 943-2111  
[rcrosby@pmped.com](mailto:rcrosby@pmped.com)  
[acrosby@pmped.com](mailto:acrosby@pmped.com)  
ATTORNEYS FOR PLAINTIFF

March 4, 2019  
Hampton, South Carolina



EXHIBIT "B"

State of South Carolina  
Office of the Secretary of State  
The Honorable Mark Hammond

1205 PENDLETON STREET, SUITE 525  
COLUMBIA, SC 29201



803-734-2170  
www.sos.sc.gov

March 25, 2019

ELECTRONIC CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

LG Chem, Ltd.  
LG Twin Towers 128 Yeoui-daero  
Yeongdeungpo-gu, Seoul 07336  
Korea  
RE: LG Chem, Ltd., 2019-CP-44-00054

Dear Madam/Sir:

In accordance with South Carolina Code § 15-9-245, we are enclosing herewith a copy of the Summons and Complaint in the above-entitled case. Service was accepted on March, 22 2019 and a copy has been duly filed in our office as of this date. The fee of \$10.00 has been paid

Yours very truly,

A handwritten signature in blue ink that reads "Allyson Green".

Allyson Green  
South Carolina Secretary of State's Office

Enclosures

cc: Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A.  
Austin H. Crosby  
P.O. Box 457  
Hampton, SC 29924

ELECTRONICALLY FILED - 2019 Sep 18 2:08 PM - UNION - COMMON PLEAS - CASE#2019CP4400054

|                                 |   |                                         |
|---------------------------------|---|-----------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS            |
|                                 | ) |                                         |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2019-CP-44-00054      |
|                                 | ) |                                         |
| DWAYNE THOMPSON,                | ) |                                         |
|                                 | ) |                                         |
| Plaintiff,                      | ) |                                         |
|                                 | ) |                                         |
| v.                              | ) | <b>PLAINTIFF'S MEMORANDUM OF LAW</b>    |
|                                 | ) | <b>IN OPPOSITION TO LG CHEM, LTD.'S</b> |
|                                 | ) | <b>MOTION TO QUASH SERVICE OF</b>       |
| LG CHEM, LTD., LG CHEM AMERICA, | ) | <b>PROCESS AND DISMISS FOR LACK OF</b>  |
| INC., and ROLLING FOG VAPOR     | ) | <b>PERSONAL JURISDICTION</b>            |
| COMPANY, LLC,                   | ) |                                         |
|                                 | ) |                                         |
| Defendants.                     | ) |                                         |
|                                 | ) |                                         |

PLEASE TAKE NOTICE that the Plaintiff, Dwayne Thompson, submits this memorandum of law in opposition to Defendant, LG Chem, Ltd.'s ("LG Chem") Motion to Quash Service of Process and Dismiss for Lack of Personal Jurisdiction.

### **FACTS**

This case arises out of serious burn injuries that Thompson sustained from an e-cigarette ("e-cig") lithium ion rechargeable battery ("Subject Battery") manufactured by LG that ignited in Thompson's pocket. (Compl.). The Complaint alleges that Thompson visited a Rolling Fog Vapor Company, LLC store on East Main Street in Spartanburg, South Carolina, and purchased the Subject Battery. (Compl. ¶ 9). While at his place of employment on July 27, 2018, the Subject Battery suddenly exploded and burst into flames that resulted in third degree burns to numerous portions of his body requiring skin grafts. (Compl. ¶ 12). The Complaint alleges negligence, strict liability, and breach of warranty allegations against the Defendants.

On March 22, 2019, LG Chem was served through the South Carolina Secretary of State pursuant to S.C. Cod Ann § 15-9-245. (Ex. 1.). On April 11, 2019, Plaintiff filed the letter from the Secretary of State addressed to LG Chem that stated the Secretary of State accepted service on



that date. (Ex. 2). This letter was e-filed with the Union County Clerk of Court and became part of the public index. On April 24, 2019, thirteen days after the filing of service letter from the Secretary of State, LG Chem filed its Motion to Quash Service of Process and Dismiss for Lack of Personal Jurisdiction. Counsel for LG Chem is with the law firm of Lewis Brisbois Bisgaard & Smith LLP, a national law firm that, as will be explained below, represents LG Chem across the country.

### **ARGUMENT**

#### **I. LG CHEM WAS SERVED IN COMPLIANCE WITH LG CHEM'S WAIVER OF SUMMONS IN OTHER CASES**

In numerous cases across the country, Lewis Brisbois on behalf of LG Chem has waived service despite arguing in this case that the Hague Convention is the exclusive method to serve LG Chem. In a federal court case in South Carolina – Jeff Dietrich v. LG Chem, LTD., 3-17-cv-120-TLW (D.S.C.), Sheri Bagheri with Lewis Brisbois in Atlanta waived service of the summons on behalf of LG Chem. (Ex. 3). In another federal court case in Maryland – McDonald v. LG Chem, LTD. – 1:16-cv-01093-RDB – LG Chem agreed to accept service through its counsel and not require service under the Hague Convention. (Ex. 4). In state court for Lee County Florida – McDonough v. LG Chem, LTD, 12-CA-000630 – LG Chem agreed to withdraw its Motion to Quash Service of Process. (Ex. 5). LG Chem agreed for counsel to accept service in a case pending in Delaware. Lewis Brisbois has represented LG Chem across the country including South Carolina, Texas, and California. (Ex. 6).

#### **II. LG CHEM WAS PROPERLY SERVED THROUGH THE SOUTH CAROLINA SECRETARY OF STATE**

LG Chem argues that the Hague Convention preempts S.C. Code Ann § 15-9-245 rendering Plaintiff's service improper. Plaintiff disagrees with this analysis and contends LG Chem was

properly served with a copy of the Summons and Complaint as required by applicable law under S.C. Code Ann. § 15-9-245(a) which states:

Every foreign business or nonprofit corporation which is not authorized to do business in this State, by doing in this State, either itself or through an agent, any business, including any business activity for which authority need not be obtained as provided by S.C. Code Ann. 33-15-101, *is considered to have designated the Secretary of State as its agent upon whom process against it may be served in any action or proceeding arising in any court in this State out of or in connection with the doing of any business in this State.*

(emphasis added)

A corporation that that is not authorized to do business in this State is considered to have designated the Secretary of State as its agent. LG Chem does not possess a certificate of authority from the Secretary of State to do business in South Carolina. The Reporter's comments to S.C. Code Ann. 33-15-110, which addresses service on foreign corporations, confirms that service pursuant to § 15-9-245 is proper. "If a corporation has never been qualified in South Carolina, the proper method of service is set forth in Section 15-9-245." South Carolina Reporter's Comments to S.C. Code Ann. § 33-15-110.

Article 1 of the Hague Service Convention states that "The present Convention shall apply in all cases, in civil or commercial matters, where there is occasion to transmit a judicial or extrajudicial document for service abroad." 20 U.S.T., at 362. (emphasis added). The Convention does not identify the instances in which there is "occasion to transmit" a complaint for service abroad. Volkswagenwerk Aktiengesellschaft v. Schlunk, 486 U.S. 694, 108 S. Ct. 2104 (1988). Because the Convention does not identify a standard to review the legal sufficiency of the service of process, the law of the forum state must be accessed. Id. If the law of the forum state is that the proper method of serving process is requiring the documents to be served abroad, then the Hague Convention applies. Id. The internal law of the forum, S.C. Code Ann. § 15-9-245, designates the



Secretary of State as an agent for service of process rather than requiring service abroad.

An important objective of the Convention was to provide means to facilitate service of process abroad. Volkswagenwerk, 486 U.S. at 694. S.C. Code Ann. § 15-9-245 does just that. By designating the Secretary of State as the agent of a foreign business who conducts unauthorized business in the State, S.C. Code Ann. § 15-9-245 provides the means for a party to serve process abroad in an organized and efficient manner.

In Volkswagenwerk, 486 U.S. at 706, the court held that the Hague Convention did not apply and service was proper because the Illinois long-arm statute authorized the plaintiff to serve the defendant's domestic subsidiary, via substituted service on the defendant, without having to send the service abroad. The court found that "where service on a domestic agent is valid and complete under both state law and the Due Process Clause, our inquiry ends and the Convention has no further implications." Id. at 707. The court also stated that the Due Process Clause does not require an official transmittal of documents abroad every time there is service on a foreign national. Id. at 707. In Holman v. Warwick Furnace Co., 318 S.C. 201, 456 S.E.2d 894 (1995), the court held that the plaintiffs' service of process on a foreign defendant via the Secretary of State was proper. Service under S.C. Code Ann. § 15-9-245 is complete once the papers have been delivered to the Secretary of State. Hammond v. Honda Motor Co., 128 F.R.D. 638 (D.S.C. 1989).

Pursuant to S.C. Code Ann. § 15-9-245, a corporation that is not authorized to do business in this State is considered to have designated the Secretary of State as its agent. Because LG Chem is not authorized to conduct business in South Carolina, it has designated the Secretary of State as its agent, therefore, Plaintiff's service on the Secretary of State, as LG Chem's agent is valid and complete under both state law and the Due Process Clause. To this end, S.C. Code Ann. § 33-15-102 specifically provides "the failure of a foreign corporation to obtain a certificate of authority

does...prevent it from defending a proceeding in this State.”

Plaintiff’s service of pleadings upon the South Carolina Secretary of State clearly meets the requirements of the South Carolina Rules of Civil Procedure, South Carolina statutory law, specifically S.C. Code Ann. §15-9-245 and § 33-15-110, and therefore service was proper.

### **III. LG CHEM IS SUBJECT TO THIS COURT’S JURISDICTION**

#### **a. THIS COURT HAS JURISDICTION OVER LG CHEM PURSUANT TO SOUTH CAROLINA’S LONG ARM STATUTE**

LG Chem possesses minimum contacts so as to not offend traditional notions of fair play and substantial justice. In ruling on a motion to dismiss for lack of personal jurisdiction, all factual disputes are resolved in the plaintiff’s favor, and the party asserting jurisdiction under the long-arm statute meets his burden of proof by making a *prima facie* showing of jurisdiction. Taking all facts and inferences in Plaintiff’s favor, he makes a *prima facie* case showing specific personal jurisdiction as to LG Chem.

Despite conceding that LG Chem generates revenue and conducts business in South Carolina, it tries to limit the Court’s jurisdiction to specifically this product. This narrow interpretation is contrary to South Carolina and federal law. LG Chem and LGCAI import its products into the United States through the Port of Charleston and other ports with South Carolina as the final destination. (Ex. 7 – Import Data). The US Customs data starts from November 1, 2006. (Ex. 7 – Import Data). The data for all imports from LG Chem to South Carolina ports show 984 shipments from LG Chem through the Port of Charleston. (Ex. 7 – Import Data). Of these shipments 818 were cosigned by LGCAI. (Ex. 7 – Import Data). The import data indicates shipments to Carolina Coverttech in North Augusta, Continental Tire in Sumter, Covidien in Greenwood, Fitesa Simpsonville in Simpsonville, Flex in West Columbia, Milliken Company in Spartanburg, and Volvo Car US Operations, Inc. in Ridgeville. (Ex. 7 – Import Data).



LG Chem has established minimum contacts with South Carolina by satisfying its long-arm statute by directing its activities at South Carolina through the intentional placement of its products into the stream of commerce using nationwide distributors. “Specific jurisdiction over a cause of action arising from a defendant’s contacts with the state is granted pursuant to the long-arm statute.” State of South Carolina v. NV Sumatra Tobacco Trading Co., 666 S.E.2d 218, 222 (2008). The applicable section of the long-arm statute provides as follows:

**§36-2-803. Personal Jurisdiction based upon conduct.**

- (A) A court may exercise personal jurisdiction over a person who acts directly or by an agent as to a cause of action arising from the person’s: (8) **production, manufacture, or distribution of goods with the reasonable expectation that those goods are to be used or consumed in this State and are so used or consumed.**

LG Chem’s conduct satisfies subsection (8) of the long-arm statute because it produced and manufactured a good with the reasonable expectation that it would be used or purchased in South Carolina, and the Subject Battery was purchased, used, and caused damage in South Carolina. Therefore, LG Chem had a reasonable expectation that its products would be used or purchased in South Carolina.

**b. LG CHEM’S CONTACTS WITH SOUTH CAROLINA ARE SUFFICIENT TO SATISFY DUE PROCESS**

LG Chem knowingly placed its products into the stream of commerce with the expectation that they would be used in South Carolina. The foreseeability that is critical to due process analysis is not the mere likelihood that a product will find its way into the forum state. Rather, it is that the defendant’s conduct and connection with the forum state are such that he should reasonably anticipate being haled into court there. This theory of personal jurisdiction is known as the “stream of commerce” theory. Southern Plastics Co., supra citing World-Wide Volkswagen Corp., 444 U.S. at 297. The stream of commerce theory is the law in this state as to personal jurisdiction.

State v. NV Sumatra Tobacco Trading, Co., 379 S.C. 81 n.5, 89, 666 S.E.2d 218, 222 (2008). Trial courts in South Carolina are required to apply the stream of commerce test when assessing whether due process is afforded in exercising jurisdiction over a foreign manufacturer. In Asahi Metal Ind. Co., Ltd. v. Superior Court of California, 480 U.S. 102, 107 S.Ct. 1026, 94 L.Ed.2d 92 (1987), Justice Brennan describes the stream of commerce as follows:

The stream of commerce refers not to unpredictable currents or eddies, but to the regular and anticipated flow of products from manufacture to distribution to retail sale. As long as the participant in this process is aware that the final product is being marketed in the Forum State, the possibility of a lawsuit there cannot come as a surprise. Asahi, 480 U. S. at 117.

The purpose of the stream of commerce theory is to hold a manufacturer “amenable to process in a forum in which its products are sold, even if the products were sold indirectly through importers or distributors with independent sales and marketing schemes.” DeJames v. Magnificence Carriers, Inc., 654 F.2d 280, 285 (3d Cir.) cert. denied, 454 U.S. 1085 (1981). In NV Sumatra, Sumatra, an Indonesian corporation, sold United brand cigarettes to UNICO Trading Pte., Ltd., a Singapore corporation, who in turn sold them to Silmar Trading, Ltd., a British Virgin Islands corporation, who then contracted with F.T.S. Distributors, a United States importer, to distribute the United brand cigarettes throughout the United States. NV Sumatra, 379 S.C. at 85-6. Despite the various layers between NV Sumatra and South Carolina, the South Carolina Supreme Court found the exercise of jurisdiction proper. In NV Sumatra, several facts led the court to determine that Sumatra had sufficient contacts with South Carolina: (1) Sumatra admitted that it manufactured the United brand cigarettes, (2) Sumatra admitted that it owned the United States trademark for that brand, (3) per the Department of Revenue, 6,868,000 United brand cigarettes were sold in South Carolina in 2001, (4) Sumatra, either on its own or by someone else on its behalf, filed an ingredient report for the cigarettes with the Center for Disease Control, (5)



Sumatra admitted that it packaged its cigarettes in a way that displayed the United States-required health warnings, and (6) the United brand cigarette packaging identified the cigarettes as an “American blend,” had a Surgeon General’s warning, and showed an eagle and striped packaging. Id. at 90.

Like Sumatra, LG Chem has sufficient contacts with South Carolina. The South Carolina Supreme Court held that Sumatra was subject to personal jurisdiction on the basis that given the volume of cigarettes sold within South Carolina, it was reasonable for the tobacco company to have been haled into a South Carolina court. NV Sumatra, 379 S.C. at 91. The web of corporations in NV Sumatra is far more complex than in the present case.

In Asahi, 480 U. S. at 117, Justice Brennan explained “that a defendant who places goods, in the stream of commerce purposefully avails itself of a forum state because it benefits economically from the retail sale of the final product...and indirectly benefits from the [s]tate’s laws that regulate and facilitate commercial activity.” In Align Corp. v. Boustred, 2017 CO 103, ¶ 33, 405 P.3d 1148, the Colorado Supreme Court found jurisdiction over Align given that Align placed its products into the stream of commerce by using distributors, Align’s products were distributed throughout the United States, including Colorado, and Align placed no geographic limitation on distribution. The Court held on these facts that Align should have reasonably anticipated being haled into court in Colorado. Align had no physical presence in the United States, instead it used U.S.-based distributors to sell its products to retailers. Id. at ¶ 2. Here, LG Chem uses U.S.-based importers/distributors to sell its products. The Boustred Court explained the consequences of allowing a foreign manufacturer to escape jurisdiction as follows:

We reject Align’s argument that selling its products through a distributor somehow turns the distribution and sale of its products into the unilateral activity of a third party that cannot properly be considered in the minimum contacts analysis. Adopting such a position would render foreign manufacturers immune from suit in

the United States so long as they sell their products in the United States through separately incorporated U.S.-based distributors. Such a result would be inequitable, as it would allow foreign manufacturers to receive the substantial economic benefit from sales to the U.S. market without incurring resulting liabilities and costs. Align Corp. at ¶ 34.

Because LG Chem manufactured and sold the Subject Battery with the reasonable expectation that it would be purchased and used in the United States, specifically knew it was being shipped to South Carolina, and this action arises from its sale and/or use in South Carolina, it has sufficient contacts such that the exercise of jurisdiction complies with Due Process. LG Chem's motion should be dismissed on this ground alone.

**c. THE COURT EXERCISING JURISDICTION OVER LG CHEM IS BOTH REASONABLE AND FAIR**

In addition to LG Chem having sufficient contacts with South Carolina to satisfy due process, the exercise of jurisdiction by this Court is reasonable and fair. The U.S. Supreme Court has previously stated that the exercise of jurisdiction is not unreasonable where it is based on the efforts of the manufacturer to serve, either directly or indirectly, the market for its product. World-Wide Volkswagen, 444 U.S. at 297-98. "Where the component allegedly fails and causes injury in the very market in which the product was expected to be sold, it is not unreasonable or unfair to require the defendant to be subject to suit in that forum." Rockwell International Corp. v. Construzioni Aeronautiche Giovanni Agusta, S.P.A., 553 F.Supp. 328 (E.D.Pa. 1982). Here, LG Chem specifically sought to serve the market in South Carolina where the Subject Battery was purposefully shipped by LG Chem. Requiring LG Chem to defend its product in South Carolina is both fair and reasonable.

Nearly the same issue as presented in this case was addressed by our Circuit Court in 2012 in a case filed in Orangeburg County. In the Estate of Arthur Benjamin Sheppard, II v. Mercedes-Benz USA, LLC, Daimler AG, et. al. (2010-CP-38-1558), Daimler AG filed a motion to dismiss



pursuant to SCRCP 12(b)(2). Daimler contended that by virtue of being a foreign manufacturer they did not serve the market for Mercedes vehicles in South Carolina and therefore did not possess the requisite minimum contacts with South Carolina. The court rejected this argument and found that the exercise of personal jurisdiction over Daimler AG was proper under the long-arm statute and consistent with due process. (Ex. 8, Order from the Honorable Diane S. Goodstein) (In Sheppard, the sale of the vehicle took place in Germany to Daimler's subsidiary Mercedes Benz USA). Here, LG Chem makes a similar argument made by Daimler i.e. that it does not sell products in South Carolina related to e-cig batteries.

In Roberts v. Owens-Corning Fiberglass Corp., 101 F.Supp.2nd 1076 (S.D.Ind. 1999), the court noted that the point of sale is not controlling when the defendant, like LG Chem in the present case, affirmatively seeks to have its products reach the forum:

Personal jurisdiction does not depend on a mechanical or formalistic test, such as where title passes, but on a practical and realistic approach to determining the purpose of a defendant's conduct. *See North Am. Philips v. American Vending Sales, Inc.*, 35 F.3d 1576, 1579-80 (C.A.Fed. (III.) 1994) (no policy would be furthered by according "controlling significance" to the passage of legal title). The appearance of Bell's asbestos in this state was not random or fortuitous, but was the result of a conscious effort by Bell to exploit a chain of distribution so entrenched that it embraced all of the major trading areas of the United States...Id. at 1083.

To argue that point of "sale" insulates LG Chem flies in the face of both logic and law. Benitez-Allende, et. al., v. Alcan Aluminio Do Brazil, 857 F.2d 26 (1st Cir. 1998) (fact that title to pressure cookers manufactured in Brazil passed in Brazil was irrelevant to question of manufacturer's susceptibility to jurisdiction); Hanson v. John Blue, 389 N.W.2d 523, 526 (Minn. Ct. App. 1986), overruled on other grounds (the "fairness requirement of due process does not extend so far as to permit a manufacturer to insulate itself from the reach of the forum state's long-arm rule by using an intermediary or by professing ignorance of the ultimate destination for its products.").

In addressing this issue in the context of product distribution, the Seventh Circuit held that a critical fact in determining jurisdiction is: “Whether those defendants were aware of [the] distribution system. *If they were aware*, they were indirectly serving and deriving economic benefits from the national retail market . . . and *they should reasonably anticipate being subject to suit in any forum within that market* where the product caused injury.” Nelson by Carson v. Park Industries, 717 F.2d 1120, 1126 (7th Cir. 1983), *cert denied*, 465 U.S. 1024 (1984) (emphasis added). The exercise of jurisdiction under these circumstances is reasonable, as the Supreme Court noted in World-Wide Volkswagen:

[I]f the sale of a product of a manufacturer or distributor such as Audi or Volkswagen is not simply an isolated occurrence, but arises from the efforts of the manufacturer or distributor to serve, *directly or indirectly*, the market for its product in other States, it is not unreasonable to subject it to suit in one of those States if its allegedly defective merchandise has been the source of the injury . . . The forum State does not exceed its powers under the Due Process Clause if it asserts personal jurisdiction over a corporation that delivers its products into the stream of commerce *with the expectation that they will be purchased by consumers* in the Forum State. 444 U.S. 286, 297 (emphasis added).

The burden of LG Chem litigating in South Carolina is minimal. As a foreign defendant whose product has injured a U.S. citizen, LG Chem will suffer no greater burden in defending this suit in South Carolina than it would in any other state. As such, it is capable of litigating in South Carolina. For these reasons, exercising jurisdiction over LG Chem is fair and does not offend traditional notions of fair play and substantial justice and, therefore, comports with due process.

### **CONCLUSION**

Based on the foregoing, this Court should deny LG Chem’s motion to quash service of process and their motion to dismiss for lack of personal jurisdiction.

(Signature Page to Follow)



Alexander P. Lewis  
SC Bar No. 78991  
W. Blake Cummings  
SC Bar No. 80067  
Cummings & Lewis, LLC  
Post Office Box 5766  
Spartanburg, South Carolina 29304  
Phone: (864) 573-9688  
[alex.lewis@cummingslewis.com](mailto:alex.lewis@cummingslewis.com)  
[blake.cummings@cummingslewis.com](mailto:blake.cummings@cummingslewis.com)

-AND-

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

BY: s/Austin H. Crosby  
Ronnie L. Crosby, SC Bar No. 66481  
Austin H. Crosby, SC Bar No. 80161  
101 Mulberry Street East  
P.O. Box 457  
Hampton, SC 29924  
(803) 943-2111  
[rcrosby@pmped.com](mailto:rcrosby@pmped.com)  
[acrosby@pmped.com](mailto:acrosby@pmped.com)  
ATTORNEYS FOR PLAINTIFF

September 20, 2019  
Hampton, SC

STATE OF SOUTH CAROLINA )

COUNTY OF UNION )

DWAYNE THOMPSON, )

Plaintiff, )

v. )

LG CHEM, LTD., LG CHEM AMERICA, )  
 INC., and ROLLING FOG VAPOR )  
 COMPANY, LLC, )

Defendants. )

IN THE COURT OF COMMON PLEAS

CIVIL ACTION NO.: 2018-CP-44-00054

**CERTIFICATE OF SERVICE**



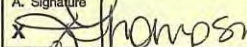
Service of the Summons and Complaint in the above captioned action was effected on Defendant LG Chem, Ltd. through the South Carolina Secretary of State's Office on March 22, 2019, by certified mail as evidenced by the attached U.S. Postal Domestic Return Receipt and service acceptance letter from the South Carolina Secretary of State's Office

Alexander P. Lewis, SC Bar No. 78991  
 W. Blake Cummings, SC Bar No. 80067  
 CUMMINGS & LEWIS, LLC  
 Post Office Box 5766  
 Spartanburg, South Carolina 29304  
[alex.lewis@cummingslewis.com](mailto:alex.lewis@cummingslewis.com)  
[blake.cummings@cummingslewis.com](mailto:blake.cummings@cummingslewis.com)  
 P: (864) 573-9688

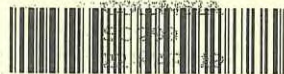
-and-

s/Austin H. Crosby  
 Ronnie L. Crosby, SC Bar No. 66481  
 Austin H. Crosby, SC Bar No. 80161  
 PETERS, MURDAUGH, PARKER,  
 ELTZROTH & DETRICK, P.A.  
 Post Office Box 457  
 Hampton, South Carolina 29924  
[rcrosby@pmped.com](mailto:rcrosby@pmped.com)  
[acrosby@pmped.com](mailto:acrosby@pmped.com)  
 P: (803) 943-2111 / F: (803) 943-3943

April 11, 2019  
 Hampton, South Carolina

|                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| <b>SENDER: COMPLETE THIS SECTION</b>                                                                                                                                                                                                                                     | <b>COMPLETE THIS SECTION ON DELIVERY</b>                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                  |
| <ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul> | A. Signature<br>                                                                                                                                                                                                                                                                                                                                                                                     | B. Received by (Printed Name)<br>J. Thompson<br>C. Date of Delivery<br>3/22/2019 |
| 1. Article Addressed to:                                                                                                                                                                                                                                                 | D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br>If YES, enter delivery address below:                                                                                                                                                                                                                                                                                                                             |                                                                                  |
| SC Secretary of State's Office<br>Attn: Service of Process Division<br>1205 Pendleton Street, Suite 525<br>Columbia, SC 29201                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                  |
| <br>9590 9402 3980 8079 5529 07                                                                                                                                                        | 3. Service Type<br><input type="checkbox"/> Adult Signature<br><input checked="" type="checkbox"/> Adult Signature Restricted Delivery<br><input type="checkbox"/> Certified Mail®<br><input checked="" type="checkbox"/> Certified Mail Restricted Delivery<br><input type="checkbox"/> Collect on Delivery<br><input type="checkbox"/> Collect on Delivery Restricted Delivery<br><input type="checkbox"/> Insured Mail<br><input type="checkbox"/> Insured Mail Restricted Delivery |                                                                                  |
| 2. Article Number (Transfer from service label)<br>7016 0680 0000 7440 4702                                                                                                                                                                                              | <input type="checkbox"/> Priority Mail Express®<br><input type="checkbox"/> Registered Mail™<br><input checked="" type="checkbox"/> Registered Mail Restricted Delivery<br><input type="checkbox"/> Return Receipt for Merchandise<br><input type="checkbox"/> Signature Confirmation™<br><input type="checkbox"/> Signature Confirmation Restricted Delivery                                                                                                                          |                                                                                  |

USPS TRACKING #



9590 9402 3480 8079 5529 07



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-16

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box.

**PMPED**  
**P.O. BOX 457**  
**Hampton, SC 29924**

*cmg 016141-019901*

Appendix\_00152

ELECTRONICALLY FILED - 2019 Apr 11 1:06 PM - I  
ELECTRONICALLY FILED - 2019 Sep 20 5:01 PM - I



State of South Carolina  
Office of the Secretary of State  
The Honorable Mark Hammond

1205 PENDLETON STREET, SUITE 525  
COLUMBIA, SC 29201



803-734-2158  
WWW.SOS.SC

ELECTRONICALLY FILED - 2019 Apr 11 1:06 PM - UNION - COMMON PLEAS - CASE#2019CP4400054  
ELECTRONICALLY FILED - 2019 Sep 20 5:01 PM - UNION - COMMON PLEAS - CASE#2019CP4400054

March 25, 2019

ELECTRONIC CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

LG Chem, Ltd.  
LG Twin Towers 128 Yeoui-daero  
Yeongdeungpo-gu, Seoul 07336  
Korea  
RE: LG Chem, Ltd., 2019-CP-44-00054

Dear Madam/Sir:

In accordance with South Carolina Code § 15-9-245, we are enclosing herewith a copy of the Summons and Complaint in the above-entitled case. Service was accepted on March, 22 2019 and a copy has been duly filed in our office as of this date. The fee of \$10.00 has been paid

Yours very truly,

A handwritten signature in blue ink that reads "Allyson Green".

Allyson Green  
South Carolina Secretary of State's Office

Enclosures

cc: Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A.  
Austin H. Crosby  
P.O. Box 457  
Hampton, SC 29924



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

Jeff Dietrich,

Plaintiff,

C/A no. 3:17-120-TLW

v.

LG Chem, Ltd.; MYVAPORSTORE, LLC; &  
MV Store, Inc.,

Defendants.

**WAIVER OF SERVICE EXECUTED**

DEFENDANT LG CHEM, LTD. has waived service of the summons in this action. Plaintiff has attached to this pleading the executed waiver of service form, executed by counsel for LG Chem, Ltd. on March 15, 2017.

Respectfully,

**RICHARDSON, PATRICK, WESTBROOK  
& BRICKMAN, LLC**

By: s/Chris Moore

Terry E. Richardson, Jr.  
Chris Moore (SCB 77934)  
1730 Jackson Street  
Barnwell, South Carolina 29812  
T: 803.541.7857  
F. 803.541.9625

**BROWN & BREHMER**

Karl S. Brehmer (SC Bar # 12849)  
1720 Main Street, Suite 201  
Post Office Box 7966  
Columbia, South Carolina 29202  
(803) 771-6600  
ksb@brownandbrehmer.com

Dated: March 15, 2017

**Attorneys for plaintiff**





AO 399 (01/09) Waiver of the Service of Summons

# UNITED STATES DISTRICT COURT

for the  
District of South Carolina



Jeff Dietrich

Plaintiff

v.

LG Chem, Ltd., et al.

Defendant

Civil Action No. 3:17-cv-120-TLW

## WAIVER OF THE SERVICE OF SUMMONS

To: Chris Moore, attorney for plaintiff

(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

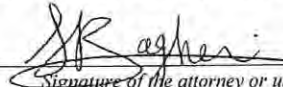
I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from \_\_\_\_\_, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: 3/15/17

LG Chem, Ltd.

Printed name of party waiving service of summons



Signature of the attorney or unrepresented party

Sheri Bagheri

Printed name

Lewis Brisbois Bisgaard & Smith, LLP  
1180 Peachtree Street NE  
Atlanta, Georgia 30309

Address

sheri.bagheri@lewisbrisbois.com

E-mail address

(404) 991-2167

Telephone number

## Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

"Good cause" does not include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

RYAN MCDONALD, \* IN THE  
Plaintiff, \* UNITED STATES DISTRICT COURT  
v. \* FOR THE  
LG CHEM LTD, LG CHEM AMERICA, \* DISTRICT OF MARYLAND  
INC. and AMAZON.COM, INC., \* Civil Action No.: 1:16-cv-01093-RDB  
Defendants. \*  
\* \* \* \* \*

**STIPULATION**

IT IS HEREBY STIPULATED AND AGREED by and between Shani Dinovitz and the Law Office of Shani Dinovitz, LLC, counsel for Plaintiff, and Lisa C. McLaughlin and Phillips, Goldman, McLaughlin & Hall, P.A., counsel for Defendants LG Chem, Ltd. and LG Chem America, Inc. that:

LG Chem, Ltd. will agree to accept service through its counsel and file an answer to the First Amended Complaint. Plaintiff will not be required to serve LG Chem, Ltd. under the terms of The Hague Convention. By waiving service of process, LG Chem, Ltd. does not generally waive any other right or protection afforded it under the terms of the Hague Convention, and further;

Plaintiff agrees to dismiss without prejudice and/or not name any other LG entity as a Defendant. LG Chem, Ltd. agrees that plaintiff will have the right to bring another LG entity into the case if it later appears that entity is a necessary party. LG Chem, Ltd. agrees that formal service of process will not be required as to any such LG entity and that it will accept service on its counsel of a Doe amendment as proper service of the First Amended Complaint, and further;

Plaintiff agrees to cooperate in making the involved battery and vaping equipment



available for initial non-invasive inspection and testing by LG Chem, Ltd.'s expert at a facility the parties agree to, and will agree to cooperate in making such items available on more than one occasion in the event that is reasonably necessary (due to a change in or addition of experts, or for different types of inspection that may be agreed to between the parties – i.e. non-destructive versus destructive, etc.), and further;

The Summons and First Amended Complaint will be deemed formally served on LG Chem, Ltd. upon plaintiff returning the signed stipulation to LG Chem, Ltd.'s counsel.

LAW OFFICES OF SHANI DINOVITZ, LLC

PHILLIPS, GOLDMAN, MCLAUGHLIN  
& HALL, P.A.

/s/ Shani Dinovitz, Esquire

Shani Dinovitz, Esquire  
2910 W. Strathmore Avenue  
Baltimore, Maryland 21209  
Phone: 410-963-5804  
Fax: 480-247-4270

*Attorney for Plaintiff*

/s/ Lisa C. McLaughlin

Lisa C. McLaughlin, Esquire  
(MD Bar ID #25529)  
1200 North Broom Street  
Wilmington, Delaware  
Phone: 302-655-4200  
Fax: 302-655-4210  
E-Mail: lcm@pgmhlaw.com

*Attorneys for Defendants,  
LG Chem, Ltd. and LG Chem America, Inc.*



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and accurate copy of the foregoing Stipulation was filed electronically via the Court's CM/ECF system, which caused an electronic copy to be sent this 20<sup>th</sup> day of February, 2017, to:

Shani Dinovitz, Esquire  
Law Offices of Shani Dinovitz, LLC  
2910 W. Strathmore Avenue  
Baltimore, MD 21209  
*Attorney for Plaintiff*

Brian A. Cafritz, Esquire  
Kalbaugh Pfund & Messersmith, P.C.  
901 Moorefield Park Drive, Suite 200  
Richmond, VA 23236

-and-

Rachel L. Stewart, Esquire  
Kalbaugh Pfund & Messersmith, P.C.  
3950 University Drive, Suite 204  
Fairfax, VA 22030  
*Attorneys for Amazon.com, Inc.*

/s/ Lisa C. McLaughlin  
LISA C. McLAUGHLIN, ESQ.  
MD Bar ID #25529  
Phillips, Goldman, McLaughlin & Hall, P.A.  
1200 North Broom Street  
Wilmington, DE 19806  
Phone: 302-655-4200  
Fax: 302-655-4210  
E-Mail: lcm@pgmhlaw.com  
*Attorneys for Defendants,  
LG Chem, Ltd., and LG Chem America, Inc.*

IN THE CIRCUIT COURT OF THE  
20TH JUDICIAL CIRCUIT IN AND  
FOR LEE COUNTY, FLORIDA

CASE NO. 12-CA-000630

**TAMAR MCDONOUGH**, as Personal  
Representative of the estate of  
**ALBERT GOLDMAN**, deceased,

Plaintiffs,

vs.

**DELL INC.**, a Delaware corporation;  
**SIMPLO TECHNOLOGY USA LOGISTIC  
COMPANY, LTD.**, a foreign corporation;  
**SIMPLO TECHNOLOGY CO., LTD.**,  
a foreign corporation; **LG CHEM, LTD.**,  
a foreign corporation; **LG CHEM AMERICA,  
INC.**, a Delaware corporation; **SANYO  
ELECTRIC CO., LTD.**, a foreign corporation;  
**PANASONIC CORPORATION**, a  
foreign corporation; **PANASONIC  
CORPORATION OF NORTH AMERICA**, a  
Delaware corporation; **SAMSUNG  
ELECTRONICS CO., LTD.**, a foreign  
Corporation; **SAMSUNG ELECTRONICS  
AMERICA, INC.**, a New York corporation;  
**WALTER KIDDE PORTABLE EQUIPMENT INC.**,  
a Delaware corporation, **KIDDE, INC.**, a Delaware  
corporation; **BRK BRANDS, INC.**, a Delaware  
corporation; **FIRST ALERT, INC.**, an Illinois  
corporation; **CAROLYN PHILLIPS**, an individual;  
**CAROLYN PHILLIPS**, trustee of the Robert  
B. Harris, Jr. Revocable Living Trust; and  
**RYAN HARRIS**, an individual,

Defendants.



**AGREED ORDER ON DEFENDANT LG CHEM, LTD.'S MOTION TO DISMISS  
PLAINTIFF'S SECOND AMENDED COMPLAINT AND OBJECTIONS TO  
PLAINTIFF'S DISCOVERY**

**THIS CAUSE** having come before this Court upon the agreement of the parties, Dan Cytryn, Esquire, attorney for Plaintiff **TAMAR MCDONOUGH, as Personal Representative of the Estate of ALBERT GOLDMAN**, deceased, and Jon Hernan, Esquire, attorney for Defendant **LG CHEM, LTD.** on Defendant **LG CHEM, LTD.'s**: Motion to Quash Service of Process and Motion to Dismiss Plaintiff's Second Amended Complaint and Objections to Plaintiff's Discovery, and the Court having been duly advised in the premises, it is

**ORDERED AND ADJUDGED:**

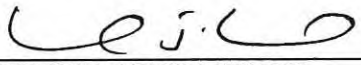
1. Defendant **LG CHEM, LTD.** has agreed to withdraw its Motion to Quash Service of Process and Motion to Dismiss Plaintiff's Second Amended Complaint.
2. Defendant **LG CHEM, LTD.** shall serve an Answer to Plaintiff's Second Amended Complaint within twenty (30) days of the date of this order.
3. Defendant **LG CHEM, LTD.** has agreed to withdraw its jurisdictional objections to Plaintiff's discovery, and shall otherwise serve responses to all of Plaintiff's discovery propounded upon Defendant **LG CHEM, LTD.** to date by Plaintiff. Defendant **LG CHEM, LTD.'S** objections to discovery based upon other non-jurisdictional grounds have not been waived or withdrawn. Defendant **LG CHEM, LTD.** shall serve responses, on or before April 4, 2014, to:
  - a. General Interrogatories propounded by Plaintiff with service of the Summons and Second Amended Complaint;
  - b. Request for Production propounded by Plaintiff with service of the Summons and Second Amended Complaint;



- c. Request for Admissions propounded by Plaintiff with service of the Summons and Second Amended Complaint;
- d. Supplemental Request for Admissions propounded on 11/21/2013.

**DONE AND ORDERED** in Chambers, Fort Myers, Lee County, Florida this

17<sup>th</sup> day of Feb., 2014.

  
\_\_\_\_\_  
CIRCUIT COURT JUDGE

c: Dan Cytryn, Esquire  
Scott A. Bassman, Esquire  
Mark R. Kapusta, Esquire  
Kendra B. Therrell, Esquire  
Ryan Pierce, Esquire  
Nicholas Freeman, Esquire  
Glen Goldsmith, Esquire  
Jon Hernan, Esquire  
Abby L. Sacunas, Esquire  
Michael J. Corso, Esquire  
Mark Bideau, Esquire

1 LEWIS BRISBOIS BISGAARD & SMITH LLP  
2 ANTHONY E. SONNETT, SB# 163182  
3 TREVOR J. INGOLD, SB# 193227  
4 LIANA J. YOON, SB# 299121  
5 633 West 5<sup>th</sup> Street, Suite 4000  
6 Los Angeles, California 90071  
7 Telephone: 213.250.1800  
8 Facsimile: 213.250.7900  
9  
10 Attorneys for Defendant  
11 LG CHEM, LTD.

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE  
CENTRAL JUSTICE CENTER

**DEC 13 2016**

DAVID H. YAMASAKI, Clerk of the Court

BY: \_\_\_\_\_, DEPUTY

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF ORANGE - CENTRAL JUSTICE CENTER**

11 DANIEL CALIFF, an individual,  
12 Plaintiff,  
13 vs.

14 R& D CREATIONS, INC. a California  
15 corporation; 32<sup>nd</sup> STREET VAPORS, INC., a  
16 California corporation, erroneously sued as  
17 DOE 1; NEWPORT VAPOR ROM, a  
18 business entity, form unknown, erroneously  
19 sued as DOE 2; UVAPER, INC., a  
20 Washington corporation; VAPING  
21 AMERICAN MADE PRODUCTS, LLC,  
22 erroneously identified as DOE 3; and DOES 4  
23 -100, inclusive,  
24 Defendants.

CASE NO. 30-2015-00821272-CU-PL-CJC  
[The Hon. James Di Cesare, Dept. C-16]

**[PROPOSED] ORDER RE STIPULATION  
TO ACCEPT SERVICE ON DEFENDANT  
LG CHEM, LTD. AND DISMISS  
PLAINTIFF'S CLAIM AND PRAYER  
FOR PUNITIVE DAMAGES AGAINST  
DEFENDANT LG CHEM, LTD.**

[Filed concurrently with Stipulation]

Action Filed: November 19, 2015  
Trial Date: July 17, 2017

21 AND RELATED CROSS-ACTIONS.

**EXHIBIT**

**6**

LEWIS  
BRISBOIS  
BISGAARD & SMITH LLP

4833-3689-1709.1

**[PROPOSED] ORDER RE STIPULATION**

PROPOSED ORDER

Based on the Stipulation by and between plaintiff Daniel Califf and defendant LG Chem, Ltd., it is ordered that plaintiff's claim and prayer for punitive damages as to LG Chem, Ltd. are hereby dismissed, without prejudice. The references which appear at paragraph 63 of the Second Amended Complaint and paragraph 4 of the Prayer for Relief, are stricken.

IT IS SO ORDERED.

DATED: \_\_\_\_\_, 2016

By: \_\_\_\_\_

Honorable James Di Cesare

LEWIS  
S  
BRISBOIS

4833-3689-1709.1

2

[PROPOSED] ORDER RE STIPULATION

|                      | CONSIGNEE                       | SHIPPER       | ARRIVAL<br>DATE | GROSS<br>WEIGHT<br>(LB) | GROSS<br>WEIGHT<br>(KG) | FOREIGN PORT | US PORT                       | VESSEL NAME     | COUNTRY OF<br>ORIGIN | MARKS & AMP;<br>NUMBERS | CONSIGNEE ADDRESS                                                                                       | SHIPPER ADDRESS                                     |
|----------------------|---------------------------------|---------------|-----------------|-------------------------|-------------------------|--------------|-------------------------------|-----------------|----------------------|-------------------------|---------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
| P/O :<br>IE R<br>REN |                                 |               |                 |                         |                         |              |                               |                 |                      |                         |                                                                                                         |                                                     |
| M<br>186 6           | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 02/08/2019      | 43254                   | 19661                   | Pusan        | Charleston, South<br>Carolina | ZIM CHICAGO     | South Korea          | AS PER LABEL            | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA 1-5742394090                              | LG TWIN TC<br>DAERO, YEO<br>SEOUL 073:<br>553206012 |
| HS                   | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 02/05/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | YM UTOPIA       | South Korea          | NO MARKS . . .          | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA ATTN BONA<br>CHANG /<br>BCHANGLGCHEMXXXX   | LG TWIN TC<br>DAERO, YO<br>SEOUL, KOI<br>07336      |
| CODE                 | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD.  | 02/05/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | YM UTOPIA       | South Korea          | NO MARKS . .            | 15 FOREST STREET<br>CLOSTER, NJ 07624 TEL 1-<br>201-364-4923                                            | LG TWIN TC<br>DAERO, YO<br>SEOUL, KOI<br>07336      |
| HS                   | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 02/05/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | YM UTOPIA       | South Korea          | NO MARKS . . . .        | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA ATTN BONA<br>CHANG /<br>BCHANGLGCHEMXXXX   | LG TWIN TC<br>DAERO, YO<br>SEOUL, KOI<br>07336      |
| (Cid)<br>116.11      | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 02/05/2019      | 46200                   | 21000                   | Pusan        | Charleston, South<br>Carolina | YM UTOPIA       | South Korea          | NO MARKS . . . .        | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL 1-404-400-<br>6125<br>BCHANGLGCHEM.COM | LG TWIN TC<br>DAERO, YO<br>SEOUL, KOI<br>07336      |
| HYL<br>916.12        | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD.  | 02/05/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | YM UTOPIA       | South Korea          | NO MARKS . . .          | 15 FOREST STREET<br>CLOSTER, NJ 07624 TEL 1-<br>201-364-4923                                            | LG TWIN TC<br>DAERO, YO<br>SEOUL, KOI<br>07336      |
| HS                   | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 01/29/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | HANOVER EXPRESS | South Korea          | NO MARKS . . . .        | 3475 PIEDMONT ROAD,<br>NESTE 1200, ATLANTA, GA<br>30305, USA TEL 1-404-400-<br>6125<br>BCHANGLGCHEM.COM | LG TWIN TC<br>DAERO, YE<br>SEOUL POS<br>KOREA       |
| CODE                 | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 01/29/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | MOL MODERN      | South Korea          | NO MARKS . .            | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL 1-404-400-<br>6125 BCHANGLGCHEM.COM    | LG TWIN TC<br>DAERO, YE<br>SEOUL, KC<br>COSE.07336  |
| HYL<br>HS            | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 01/29/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | MOL MODERN      | South Korea          | N/M . .                 | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL 1-404-400-<br>6125<br>BCHANGLGCHEM.COM | LG TWIN TC<br>DAERO, YO<br>SEOUL, KOI<br>07336      |

**EXHIBIT**

**7**

|                                                                       |                                 |               |            |        |        |        |                               |                  |             |                                                                                                                                |                                                                                                                                      |                                          |
|-----------------------------------------------------------------------|---------------------------------|---------------|------------|--------|--------|--------|-------------------------------|------------------|-------------|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| METHYL<br>SS 3 HS<br>HYL<br>ACRYLATE)<br>DE 2916.12                   | LG CHEM AMERICA<br>INC.         | LG CHEM , LTD | 01/29/2019 | 88000  | 40000  | Pusan  | Charleston, South<br>Carolina | MOL MODERN       | South Korea | NO MARKS . . . . NO<br>MARKS . . . .                                                                                           | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA,<br>30305 USA TEL 1-404-400-<br>6125<br>BCHANGLGCHEM.COM                             | LG TW<br>DAER<br>SEOUI<br>07336          |
| TEL :336-<br>(T) ONAL<br>E A 5<br>ATTN :<br>43-501 -<br>H, KLINE      | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 01/25/2019 | 222666 | 101212 | Ningpo | Charleston, South<br>Carolina | NORTHERN JASPER  | China       | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL                                                      | 243 WOODBINE ST.HIGH<br>POINT, .NORTH CAROLINA--<br>- 1-3368784207 TEL EX 53                                                         | LG TW<br>DONG<br>SEOUI<br>TEL E)         |
|                                                                       | VOLVO CAR US<br>OPERATIONS INC  | LG CHEM       | 01/24/2019 | 26752  | 12160  | Pusan  | Charleston, South<br>Carolina | NORTHERN JASPER  | South Korea | VOLVO CARS<br>CHARLESTON                                                                                                       | 1801 VOLVO CAR DR<br>RIDGEVILLE SC 29472 US                                                                                          | 20 YOI<br>YOUNI<br>TOWE                  |
| METHYL<br>SS 3 HS<br>HYL<br>ACRYLATE)<br>DE 2916.12                   | LG CHEM AMERICA<br>INC.         | LG CHEM , LTD | 01/21/2019 | 88000  | 40000  | Pusan  | Charleston, South<br>Carolina | MOL MAGNIFICENCE | South Korea | NO MARKS . . . . NO<br>MARKS . . . .                                                                                           | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA,<br>30305 USA ATTN JEENY<br>CHO/JENNYCHO1LGCHEM.<br>COM TEL 404-400-6114 EXT<br>6125 | LG TW<br>DAER<br>SEOUI<br>07336          |
| LIC ACID)<br>DE 2916.11                                               | LG CHEM AMERICA<br>INC.         | LG CHEM , LTD | 01/21/2019 | 46200  | 21000  | Pusan  | Charleston, South<br>Carolina | MOL MAGNIFICENCE | South Korea | NO MARKS . . . .                                                                                                               | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA,<br>30305 USA ATTN JEENY<br>CHO/JENNYCHO1LGCHEM.<br>COM TEL 404-400-6114 EXT<br>6125 | LG TW<br>DAER<br>SEOUI<br>07336          |
| TEL:336-<br>ATIONAL<br>E A5<br>ATTN :<br>43-501-0464<br>INE TEL:336-  | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 01/20/2019 | 222666 | 101212 | Ningpo | Charleston, South<br>Carolina | ZIM ROTTERDAM    | China       | N/M N/M N/M N/M N/M                                                                                                            | 243 WOODBINE ST.HIGH<br>POINT, NORTH CAROLINA---<br>- 1-3368784207 TEL EX 53                                                         | LG TW<br>DONG<br>SEOUI<br>EX 82-         |
| HYL                                                                   | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 01/13/2019 | 88000  | 40000  | Pusan  | Charleston, South<br>Carolina | ZIM NINGBO       | South Korea | SEAL NO.: 09476 IN ISO<br>TANK SEAL NO.: 109496<br>IN ISO TANK                                                                 | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA<br>ATLANTA US US                                                                         | LG TW<br>DAER<br>YOUNI                   |
| P/O :<br>ATE, INHI<br>PACKAG<br>2916-12 -<br>3A(BU TYL<br>3A (BUT, YL | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 01/08/2019 | 220462 | 100210 | Pusan  | Charleston, South<br>Carolina | MSC CHICAGO      | South Korea | 1566/011600 RF<br>CU8210591/010719/0107<br>54/010758 ITTU<br>1055141/010221/010223/<br>010242 SEGU80<br>36009/008106/008115/00 | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA ATTN:BONA<br>CHANG / 1-4044006125                                       | LG TW<br>DAER<br>SEOUI<br>07336<br>32555 |
| TEL :336-<br>(T) ONAL<br>E A 5<br>ATTN :<br>43-501 -<br>H, KLINE      | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 01/06/2019 | 222666 | 101212 | Ningpo | Charleston, South<br>Carolina | ZIM ANTWERP      | China       | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL                                                      | 243 WOODBINE ST.HIGH<br>POINT, .NORTH CAROLINA--<br>- 1-3368784207 TEL EX 53                                                         | LG TW<br>DONG<br>SEOUI<br>TEL E)         |



|                                                                       |                                 |               |            |        |        |        |                               |                       |             |                                                                           |                                                                                                         |                                     |
|-----------------------------------------------------------------------|---------------------------------|---------------|------------|--------|--------|--------|-------------------------------|-----------------------|-------------|---------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|-------------------------------------|
| MER P/O :<br>RUBBE R<br>-- KAREN<br>EXT.<br>@ARM<br>210-086 6         | LG CHEM AMERICA,                | LG CHEM, LTD. | 01/03/2019 | 43254  | 19661  | Ningpo | Charleston, South<br>Carolina | TIANJIN               | China       | AS PER LABEL                                                              | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA 1-5742394090                              | LG TW<br>DAER<br>SEOUI<br>553206    |
| MER P/O :<br>RUBBE R<br>-- KAREN<br>EXT.<br>@ARM<br>210-086 6         | LG CHEM AMERICA,                | LG CHEM, LTD. | 01/03/2019 | 43254  | 19661  | Ningpo | Charleston, South<br>Carolina | TIANJIN               | China       | AS PER LABEL                                                              | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA 1-5742394090                              | LG TW<br>DAER<br>SEOUI<br>553206    |
| HYL                                                                   | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 01/03/2019 | 88000  | 40000  | Pusan  | Charleston, South<br>Carolina | TIANJIN               | South Korea | SEAL NO.: 132586 IN ISO<br>TANK SEAL NO.: 132568<br>IN ISO TANK           | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA<br>ATLANTA US US                                            | LG TW<br>DAER<br>YOUNG              |
| YSON@C<br>: 352 -225-<br>@GMA<br>10-017 SAP                           | ECOMIRAE<br>TECHNOLOGIES LLC    | LG CHEM, LTD. | 12/22/2018 | 117638 | 53472  | Pusan  | Charleston, South<br>Carolina | ZIM ALABAMA           | South Korea | N/M N/M N/M                                                               | 2445 NW 38TH STREET,<br>GAINESVILLE, FL 32605,<br>USA ATTN: SEUNGKOO<br>KANG--- 1-6786913927            | 128 YE<br>YEON<br>721, KC<br>82-325 |
| ( FLEXIBLE<br>VER SMPS<br>M TO BPU<br>XIBLE<br>VER SMPS<br>M TO BPU   | EATON POWER                     | LG CHEM LTD   | 12/21/2018 | 92633  | 42106  | Pusan  | Charleston, South<br>Carolina | LOS ANGELES<br>TRADER | South Korea | ..... NM                                                                  | 8380 CAPITAL BLVD<br>RALEIGH NC 27616 US                                                                | 128 YE<br>YEON<br>07336             |
| ULE<br>ULE<br>ULE                                                     | EATON POWER                     | LG CHEM LTD   | 12/21/2018 | 88055  | 40025  | Pusan  | Charleston, South<br>Carolina | LOS ANGELES<br>TRADER | South Korea | NM NM NO MARK                                                             | 8380 CAPITAL BLVD<br>RALEIGH NC 27616 US                                                                | 128 YE<br>YEON<br>07336             |
| HYL                                                                   | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 12/16/2018 | 88000  | 40000  | Pusan  | Charleston, South<br>Carolina | MAERSK<br>SHEERNESS   | South Korea | SEAL NO.: 005860 IN ISO<br>TANK SEAL NO.: 005821<br>IN ISO TANK           | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA<br>ATLANTA US US                                            | LG TW<br>DAER<br>YOUNG              |
| TEL:3 36-<br>TION AL<br>E AS<br>ATTN : M<br>3-501-0 464<br>E TEL:336- | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 12/16/2018 | 222666 | 101212 | Pusan  | Charleston, South<br>Carolina | MAERSK<br>SHEERNESS   | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE ST.HIGH<br>POINT, . NORTH CAROLINA-<br>-- 1-3368784207 TEL EX 53                           | LG TW<br>DONG<br>SEOUI<br>TEL E)    |
| 'S OWN ISO<br>YL HEXYL<br>16.12<br>VK<br>XL<br>16.12                  | LG CHEM AMERICA,<br>INC         | LG CHEM LTD.  | 12/16/2018 | 267859 | 121754 | Pusan  | Charleston, South<br>Carolina | MAERSK<br>SHEERNESS   | South Korea | N/M N/M N/M N/M N/M<br>##                                                 | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA ATTN: BONA<br>CHANG /<br>BCHANG@LGCHEM.COM | LG TW<br>DAER<br>SEOUI<br>07336     |

|                                                     |                           |               |            |        |       |       |                            |                 |             |                                                           |                                                                                                |                             |
|-----------------------------------------------------|---------------------------|---------------|------------|--------|-------|-------|----------------------------|-----------------|-------------|-----------------------------------------------------------|------------------------------------------------------------------------------------------------|-----------------------------|
| HYL                                                 | LG CHEM AMERICA, INC.     | LG CHEM LTD.  | 12/15/2018 | 88000  | 40000 | Pusan | Charleston, South Carolina | AMERICA         | South Korea | SEAL NO.: 131599 IN ISO TANK SEAL NO.: 131594 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                         | LG TW DAER( YOUNI           |
| 00 750 KG KG S AP I BAG 1 0 900 K G KG SA P 0 KG,   | ECOMIRAE TECHNOLOGIES LLC | LG CHEM, LTD. | 12/10/2018 | 217814 | 99006 | Pusan | Charleston, South Carolina | NORTHERN JULIE  | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL       | 2445 NW 38TH STREET, GAINESVILLE, FL 32605, USA ATTN: SEUNGKOO KANG---                         | 128 YE YEONI 721, KC 82-325 |
| HYL                                                 | LG CHEM AMERICA, INC.     | LG CHEM LTD.  | 12/10/2018 | 88000  | 40000 | Pusan | Charleston, South Carolina | NORTHERN JULIE  | South Korea | SEAL NO.: 002644 IN ISO TANK SEAL NO.: 002640 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                         | LG TW DAER( YOUNI           |
| MER P/O : RUBBER BR ODE :                           | LG CHEM AMERICA, INC.     | LG CHEM, LTD  | 12/10/2018 | 50992  | 23178 | Pusan | Charleston, South Carolina | NORTHERN JULIE  | South Korea | AS PER LABEL                                              | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA                                         | 128, YI YEONI KORE,         |
| MER P/O : RUBBE R -- KAREN EXT. @ARM 210-086 6      | LG CHEM AMERICA, INC.     | LG CHEM, LTD. | 12/04/2018 | 43254  | 19661 | Pusan | Charleston, South Carolina | MAERSK SEMARANG | South Korea | AS PER LABEL                                              | INC. 2400 LAKEVIEW PKWY STE 580 ALPHARETTA GA 30009 USA 1-5742394090                           | LG TW DAER( SEQUI 553206    |
| HYL                                                 | LG CHEM AMERICA, INC.     | LG CHEM LTD.  | 12/01/2018 | 88000  | 40000 | Pusan | Charleston, South Carolina | EVER LEADING    | South Korea | SEAL NO.: 941399 IN ISO TANK SEAL NO.: 941357 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                         | LG TW DAER( YOUNI           |
|                                                     | LG CHEM AMERICA           | LG CHEM LTD.  | 12/01/2018 | 44000  | 20000 | Pusan | Charleston, South Carolina | EVER LEADING    | South Korea | SEAL NO.: 174599 IN ISO TANK                              | 3475 PIEDMONT RD NE, SUITE 1200 ATLANTA ATLANTA US US                                          | LG TW DAER( YOUNI           |
| P/O : PACK DE:2916-1 2-VA(M ETYL 4A (ME 10,000,000, | LG CHEM AMERICA, INC.     | LG CHEM LTD.  | 11/26/2018 | 88184  | 40084 | Pusan | Charleston, South Carolina | MAERSK TAIKUNG  | South Korea | N/M N/M                                                   | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:404-400-6101 EXT. 6114 1-4044006125 | LG TW DAER( SEQUI EX 82-    |
| P/O : 4 218 PA :ODE:2916 - 88 A RYLIC A ALLNE, X    | LG CHEM AMERICA, INC.     | LG CHEM LTD.  | 11/26/2018 | 138891 | 63132 | Pusan | Charleston, South Carolina | MAERSK TAIKUNG  | South Korea | N/M N/M N/M                                               | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA BCHANGE@LGCHEM.COM 1-4044006125         | LG TW DAER( SEQUI EX 82-    |

|                          |                              |               |            |        |        |       |                            |                |             |                                                     |                                                                                                                      |                                                     |
|--------------------------|------------------------------|---------------|------------|--------|--------|-------|----------------------------|----------------|-------------|-----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
| 16-12-1 ETYL 1E 0,000,   | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 11/26/2018 | 88184  | 40084  | Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | N/M N/M                                             | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:404-400-6101 EXT. 1-4044006125                            | LG TWIN T( DAERO, YC SEOUL, KO 07336 82-37 32555 04 |
| 16-12-1 ETYL 1E 0,000,   | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 11/26/2018 | 88184  | 40084  | Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | N/M N/M                                             | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:404-400-6101 EXT. 6114 1-4044006125                       | LG TWIN T( DAERO, YC SEOUL, KO 07336 82-37 32555 04 |
| 16-12-1 ETYL 1E 0,000,   | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 11/26/2018 | 88184  | 40084  | Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | N/M N/M                                             | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:404-400-6101 EXT. 6114 1-4044006125                       | LG TWIN T( DAERO, YC SEOUL, KO 07336 82-37 32555 04 |
| 16-12-THYL T HYL KG DL-A | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 11/26/2018 | 88184  | 40084  | Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | N/M N/M                                             | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA ATTN:BONA CHANG/BCHANG@LGCHEM.COM 1-4044006125                | LG TWIN T( DAERO, YC SEOUL, KO 07336 82-37 32555 04 |
|                          | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 11/26/2018 | 267859 | 121754 | Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL | 243 WOODBINE ST. HIGH POINT, NORTH CAROLINA 27261 ATTN: BETH KLINE TEL:336-878-4269/336-878-4223                     | LG TWIN T( DAERO, YC SEOUL, KO 07336 82-37 32555 05 |
| 16-12-THYL T HYL KG DL-A | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 11/16/2018 | 37037  | 16835  | Pusan | Charleston, South Carolina | ZIM SAN DIEGO  | South Korea | AS PER LABEL                                        | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA, GA 30305 BCHANG@LGCHEM.COM 1-4044006125                                     | LG TWIN T( DAERO, YC SEOUL, KO 07336 82-37 32555 05 |
| 10 KG                    | LG CHEM AMERICA, INC.        | LG CHEM, LTD  | 11/16/2018 | 46032  | 20924  | Pusan | Charleston, South Carolina | ZIM SAN DIEGO  | South Korea | AS PER LABEL                                        | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA 1-4044006125                                                  | 128, YEOUI DAERO, YC SEOUL KO EX 82-3255            |
| 3                        | CHEMBANK INTERNATIONAL, INC. | LG CHEM , LTD | 11/14/2018 | 44000  | 20000  | Pusan | Charleston, South Carolina | MOL MODERN     | South Korea | NO MARKS . .                                        | 15 FOREST STREET CLOSTER, NJ 07624 TEL 1-201-364-4923                                                                | LG TWIN T( DAERO, YC SEOUL, KO 07336                |
| HS                       | LG CHEM AMERICA INC.         | LG CHEM , LTD | 11/14/2018 | 44000  | 20000  | Pusan | Charleston, South Carolina | MOL MODERN     | South Korea | NO MARKS . . . .                                    | 3475 PIEDMONT RD. NE, SUITE 1200 ATLANTA, GA, 30305 USA ATTN JEENY CHO/JENNYCHO1LGCHEM.COM TEL 404-400-6114 EXT 6125 | LG TWIN T( DAERO, YC SEOUL, KO 07336                |

|                                                           |                                 |               |            |        |        |       |                               |                     |             |                                                                                                                                    |                                                                                                               |                          |
|-----------------------------------------------------------|---------------------------------|---------------|------------|--------|--------|-------|-------------------------------|---------------------|-------------|------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|--------------------------|
| OUNT SAID<br>25880<br>1689<br>1280 35KG                   | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD  | 11/12/2018 | 45936  | 20880  | Pusan | Charleston, South<br>Carolina | MSC RANIA           | South Korea | AS PER LABEL                                                                                                                       | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA                                                  | 128, YI<br>DAER<br>SEOUI |
| IBITED N-<br>ITED N-<br>ITED<br>19884<br>4747 HS<br>R401- | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 11/12/2018 | 176000 | 80000  | Pusan | Charleston, South<br>Carolina | MSC RANIA           | South Korea | SEAL NO.: 032428 IN ISO<br>TANK SEAL NO.: 032409<br>IN ISO TANK SEAL NO.:<br>032436 IN ISO TANK<br>SEAL NO.: 032479 IN ISO<br>TANK | 3475 PIEDMONT RD NE,<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                   | LG TW<br>DAER<br>YOUN    |
| ENE-                                                      | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 11/12/2018 | 35361  | 16073  | Pusan | Charleston, South<br>Carolina | MSC RANIA           | South Korea | AS PER LABEL                                                                                                                       | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA                                                  | LG TW<br>DONG<br>SEOUI   |
| ENOL-A<br>:<br>A<br>:<br>A<br>:                           | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 11/12/2018 | 267859 | 121754 | Pusan | Charleston, South<br>Carolina | MSC RANIA           | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL                                                          | 243 WOODBINE ST, HIGH<br>POINT, NORTH CAROLINA<br>27261 ATTN: BETH KLINE<br>TEL:336-878-4269/336-878-<br>4223 | LG TW<br>DONG<br>SEOUI   |
| IF1C3                                                     | EATON POWER                     | LG CHEM LTD   | 11/11/2018 | 10318  | 4690   | Pusan | Charleston, South<br>Carolina | MOL MAGNIFICENCE    | South Korea | AS PER LABEL                                                                                                                       | 8380 CAPITAL BLVD<br>RALEIGH NC 27616 US                                                                      | 128 YE<br>YEON<br>07336  |
|                                                           | LG CHEM AMERICA,<br>INC         | LG CHEM LTD.  | 11/11/2018 | 46200  | 21000  | Pusan | Charleston, South<br>Carolina | EVER LENIENT        | South Korea | SEAL NO.: 928516 IN ISO<br>TANK                                                                                                    | 3475 PIEDMONT RD NE,<br>SUITE 1200 ATLANTA,<br>ATLANTA, US US                                                 | LG TW<br>DAER<br>YOUN    |
|                                                           | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 11/11/2018 | 46200  | 21000  | Pusan | Charleston, South<br>Carolina | EVER LENIENT        | South Korea | SEAL NO.: 928526 IN ISO<br>TANK                                                                                                    | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA,<br>ATLANTA, US US                                                | LG TW<br>DAER<br>YOUN    |
| 19875<br>4747 HS<br>R401-                                 | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 11/09/2018 | 35361  | 16073  | Pusan | Charleston, South<br>Carolina | MSC LISBON          | South Korea | AS PER LABEL                                                                                                                       | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA                                                  | LG TW<br>DONG<br>SEOUI   |
| HYL                                                       | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 10/30/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | SEAL NO.: 032378 IN ISO<br>TANK SEAL NO.: 032346<br>IN ISO TANK                                                                    | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA<br>ATLANTA US US                                                  | LG TW<br>DAER<br>YOUN    |

|                                                                   |                              |               |            |        |        |       |                            |                  |             |                                                           |                                                                                                |                               |
|-------------------------------------------------------------------|------------------------------|---------------|------------|--------|--------|-------|----------------------------|------------------|-------------|-----------------------------------------------------------|------------------------------------------------------------------------------------------------|-------------------------------|
| HYL                                                               | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 10/30/2018 | 88000  | 40000  | Pusan | Charleston, South Carolina | MAERSK STRALSUND | South Korea | SEAL NO.: 109294 IN ISO TANK SEAL NO.: 109275 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                         | LG TW DAER( YOUN              |
| HENOL-A<br>10 KG HS<br>HENOL-A<br>10 KG HS<br>HENOL-A<br>10 KG HS | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 10/23/2018 | 267859 | 121754 | Pusan | Charleston, South Carolina | COLUMBINE MAERSK | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL       | 243 WOODBINE ST. HIGH POINT, NORTH CAROLINA 27261 ATTN: BETH KLINE TEL: 336-878-4269           | LG TW DONG SEQUI              |
| P/O :<br>3<br>S<br>O.450<br>ID) H IGH<br>RUM,                     | FNS INC ATL                  | LG CHEM LTD.  | 10/23/2018 | 37037  | 16835  | Pusan | Charleston, South Carolina | COLUMBINE MAERSK | South Korea | AS PER LABEL                                              | 5550 TRIANGLE PARKWAY STE 390 NORCROSS, GA 30092 1-6786913927                                  | LG TW DAER( SEQUI 07336-32555 |
| 700 850 KG<br>KG -<br>TEL :<br>MDY<br>1 --- TEL:<br>OMIRAE,       | ECOMIRAE TECHNOLOGIES LLC    | LG CHEM, LTD. | 10/23/2018 | 175438 | 79745  | Pusan | Charleston, South Carolina | COLUMBINE MAERSK | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL       | 2445 NW 38TH STREET, GAINESVILLE, FL 32605, USA ATTN: SEUNGKOO KANG---- 1-4047666441 TEL EX 64 | 128 YE YEON( 721.KC 82-325    |
| P/O :<br>3<br>S<br>O.450<br>ID) H IGH<br>RUM,                     | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 10/23/2018 | 37037  | 16835  | Pusan | Charleston, South Carolina | COLUMBINE MAERSK | South Korea | AS PER LABEL                                              | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA RPASHAK@LGCHEM.COM--- -1-4044006125     | LG TW DAER( SEQUI 07336-32555 |
| TE<br>19875<br>4747 HS<br>R401-                                   | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 10/21/2018 | 44000  | 20000  | Pusan | Charleston, South Carolina | MSC ROMA         | South Korea | SEAL NO.: 032392 IN ISO TANK                              | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                         | LG TW DAER( YOUN              |
| ENE-                                                              | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 10/21/2018 | 35361  | 16073  | Pusan | Charleston, South Carolina | MSC ROMA         | South Korea | AS PER LABEL                                              | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA                                         | LG TW DONG SEQUI              |
| HIBITE D<br>HENOL-A<br>:<br>A<br>:<br>A<br>:                      | LG CHEM AMERICA, INC         | LG CHEM LTD.  | 10/21/2018 | 44000  | 20000  | Pusan | Charleston, South Carolina | EVER LAUREL      | South Korea | SEAL NO.: 032793 IN ISO TANK                              | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                         | LG TW DAER( YOUN              |
|                                                                   | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 10/19/2018 | 264552 | 120251 | Pusan | Charleston, South Carolina | TIANJIN          | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL       | 243 WOODBINE ST. HIGH POINT, NORTH CAROLINA 27261 ATTN: BETH KLINE TEL: 336-878-4269           | LG TW DONG SEQUI              |



|                                               |                       |               |            |        |       |        |                            |               |             |                                                           |                                                                                                     |                                |
|-----------------------------------------------|-----------------------|---------------|------------|--------|-------|--------|----------------------------|---------------|-------------|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------|
| IBITED                                        | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 10/18/2018 | 44000  | 20000 | Pusan  | Charleston, South Carolina | CMA CGM NORMA | South Korea | SEAL NO.: 005593 IN ISO TANK                              | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                              | LG TW DAER( YOUN               |
|                                               | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 10/12/2018 | 46200  | 21000 | Pusan  | Charleston, South Carolina | ZIM ANTWERP   | South Korea | SEAL NO.: 630191 IN ISO TANK                              | 3475 PIEDMONT RD NE, SUITE 1200 ATLANTA ATLANTA US US                                               | LG TW DAER( YOUN               |
| HYL                                           | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 10/12/2018 | 88000  | 40000 | Pusan  | Charleston, South Carolina | ZIM ANTWERP   | South Korea | SEAL NO.: 928967 IN ISO TANK SEAL NO.: 008097 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                              | LG TW DAER( YOUN               |
| HYL                                           | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 10/12/2018 | 88000  | 40000 | Pusan  | Charleston, South Carolina | ZIM ANTWERP   | South Korea | SEAL NO.: 005588 IN ISO TANK SEAL NO.: 005541 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                              | LG TW DAER( YOUN               |
| 100000 ABS 3 ENE - P/O : P/O : 100000 ABS     | LG CHEM AMERICA, INC. | LG CHEM, LTD. | 10/07/2018 | 177176 | 80535 | Ningpo | Charleston, South Carolina | MAERSK UTAH   | China       | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL       | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL: 678-984-5714 1-4044006125               | 20 YOI YOUN( TOWE 150-72 32555 |
| METYL JN 1919 12 S.O.C METYL JN 1919 12 S.O.C | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 10/05/2018 | 88000  | 40000 | Pusan  | Charleston, South Carolina | YM UBIQUITY   | South Korea | NO MARKS . . . . NO MARKS . . . .                         | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL 404-400-6101 EXT. 6114 RPASHAKLGCHEM.COM | LG TW DAER( SEQUI              |
| YL HEXYL 6.12 S.O.C                           | LG CHEM AMERICA, INC. | LG CHEM LRD.  | 10/03/2018 | 44000  | 20000 | Pusan  | Charleston, South Carolina | MOL MAESTRO   | South Korea | NO MARKS . . .                                            | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA RPASHAKLGCHEM.COMXX XX                       | LG TW DAER( GU, SE CODE        |
| JTYL 3 HS                                     | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 10/03/2018 | 44000  | 20000 | Pusan  | Charleston, South Carolina | MOL MAESTRO   | South Korea | NO MARKS . . . .                                          | 3475 PIEDMONT ROAD, NE STE 1200, ATLANTA, GA 30305, USA ATTN SEA GUN LEEXXX                         | LG TW DAER( SEQUI 07336        |
| MONOMER RYLATE 16.12 S.O.C                    | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 09/29/2018 | 44000  | 20000 | Pusan  | Charleston, South Carolina | MOL MISSION   | South Korea | NO MARKS . . .                                            | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA RPASHAKLGCHEM.COMXX XX                       | LG TW DAER( SEQUI 07336        |

|                                                                          |                                 |               |            |        |        |                    |                               |                       |             |                                                                           |                                                                                                         |                                 |
|--------------------------------------------------------------------------|---------------------------------|---------------|------------|--------|--------|--------------------|-------------------------------|-----------------------|-------------|---------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|---------------------------------|
| IMER<br>ONOMER)<br>DE 2916.12                                            | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 09/29/2018 | 44000  | 20000  | Pusan              | Charleston, South<br>Carolina | MOL MISSION           | South Korea | NO MARKS . . . .                                                          | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA<br>RPASHAK@LGCHEM.COM<br>TEL 248-289-5795  | LG TW<br>DAER<br>SEOUI<br>07336 |
| ...-A<br>TN:BETH<br>, 2.BDP<br>RINA DRIVE<br>SC 29492<br>EL : 1-843-     | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 09/28/2018 | 222200 | 101000 | Pusan              | Charleston, South<br>Carolina | MAERSK SURABAYA       | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE ST.HIGH<br>POINT, . NORTH CAROLINA                                                         | LG TW<br>DONG<br>SEOUI          |
| ...-A<br>TN:BETH<br>, 2.BDP<br>RINA DRIVE<br>SC 29492<br>EL : 1-843-     | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 09/28/2018 | 222200 | 101000 | Pusan              | Charleston, South<br>Carolina | MAERSK SURABAYA       | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE ST.HIGH<br>POINT, . NORTH CAROLINA                                                         | LG TW<br>DONG<br>SEOUI          |
| IBITED                                                                   | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 09/28/2018 | 44000  | 20000  | Pusan              | Charleston, South<br>Carolina | EVER LEADING          | South Korea | SEAL NO.: 930514 IN ISO<br>TANK                                           | 3475 PIEDMONT RD NE,<br>SUITE 1200, 30305<br>ATLANTA ATLANTA US<br>30305 US                             | LG TW<br>DAER<br>07336          |
|                                                                          | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 09/28/2018 | 44000  | 20000  | Pusan              | Charleston, South<br>Carolina | EVER LEADING          | South Korea | SEAL NO.: 005387 IN ISO<br>TANK                                           | 3475 PIEDMONT RD NE,<br>SUITE 1200, 30305<br>ATLANTA ATLANTA US<br>30305 US                             | LG TW<br>DAER<br>GU YC<br>KR    |
| NHIBITED<br>GING<br>-11-1000 LG<br>(LIC ACID)<br>(CID DRUM<br>2916111000 | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 09/27/2018 | 42020  | 19100  | Pusan              | Charleston, South<br>Carolina | E. R. TIANPING        | South Korea | AS PER LABEL                                                              | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30350 USA<br>RPASHAK@LGCHEM.COM<br>TEL: 248-289-5795 | LG TW<br>DAER<br>SEOUI<br>07336 |
| 00993<br>4747 HS<br>R401-                                                | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 09/25/2018 | 35361  | 16073  | Pusan              | Charleston, South<br>Carolina | NORTHERN JULIE        | South Korea | AS PER LABEL                                                              | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA                                            | LG TW<br>DONG<br>SEOUI          |
| (METHYL<br>SS 3 HS<br>(HYL<br>ACRYLATE)<br>DE 2916.12                    | LG CHEM<br>AMERICA, INC         | LG CHEM LTD   | 09/25/2018 | 88000  | 40000  | Pusan              | Charleston, South<br>Carolina | YM UNIFORMITY         | South Korea | NO MARKS . . . . NO<br>MARKS . . . .                                      | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL 404-400-<br>6101 EXT. 6114             | LG TW<br>DAER<br>GU, SE<br>CODE |
| 00993<br>4747 HS<br>R401-                                                | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 09/24/2018 | 35361  | 16073  | South Riding Point | Charleston, South<br>Carolina | SEALAND<br>WASHINGTON | Bahamas     | AS PER LABEL                                                              | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA                                            | LG TW<br>DONG<br>SEOUI          |

|                                                                                                                                                                                                                                                 |                                 |                        |            |        |        |         |                               |                       |             |                                                                                      |                                                                                                            |                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|------------------------|------------|--------|--------|---------|-------------------------------|-----------------------|-------------|--------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| MONOMER<br>POLYMER<br>16.12 S.O.C                                                                                                                                                                                                               | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.           | 09/17/2018 | 44000  | 20000  | Pusan   | Charleston, South<br>Carolina | HARBOUR BRIDGE        | South Korea | NO MARKS . . .                                                                       | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL 1-404-400-<br>6125<br>JENNYCHO1LGCHEM.COM | LG TW<br>DAER<br>SEOUI<br>07336<br>NO      |
| HYL                                                                                                                                                                                                                                             | LG CHEM AMERICA<br>INC          | LG CHEM LTD.           | 09/16/2018 | 88000  | 40000  | Pusan   | Charleston, South<br>Carolina | ZIM DJIBOUTI          | South Korea | SEAL NO.: 128739 IN ISO<br>TANK SEAL NO.: 128558<br>IN ISO TANK                      | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                               | LG TW<br>DAER<br>YOUNG                     |
| HYL                                                                                                                                                                                                                                             | LG CHEM AMERICA,<br>INC.,       | LG CHEM LTD.           | 09/07/2018 | 88000  | 40000  | Pusan   | Charleston, South<br>Carolina | PARSIFAL              | South Korea | SEAL NO.: 005371 IN ISO<br>TANK SEAL NO.: 032270<br>IN ISO TANK                      | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA<br>ATLANTA US US                                                | LG TW<br>DAER<br>YOUNG                     |
| 100000 ABS<br>KG<br>ENE -<br>P/O :<br>100000 ABS                                                                                                                                                                                                | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD.          | 09/04/2018 | 222200 | 101000 | Pusan   | Charleston, South<br>Carolina | MAERSK TAIKUNG        | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL            | 243 WOODBINE ST.HIGH<br>POINT, . NORTH CAROLINA                                                            | LG TW<br>DONG<br>SEOUI                     |
| STIC<br>3901900000                                                                                                                                                                                                                              | SEALED AIR<br>CORPORATION       | LG CHEM<br>EUROPE GMBH | 08/30/2018 | 1164   | 529    | Antwerp | Charleston, South<br>Carolina | CHARLESTON<br>EXPRESS | Belgium     | SEALED AIR<br>CORPORATION 100<br>ROGERS BRIDGE ROAD<br>BUILDING A 29334<br>DUNCAN US | 100 ROGERS BRIDGE<br>ROAD BUILDING A<br>DUNCAN, OK 29334 US                                                | LYONE<br>FRANCE                            |
| GS-2700 85<br>0.000 KG -<br>MT 1805-<br>10 --- E-<br>CORP.COM<br>MAIL :<br>P/O :<br>P/O : 57<br>000 A BS<br>KG .<br>ENE-<br>P/O :<br>P/O :<br>P/O : 57<br>000 A BS<br>KG .<br>ENE-<br>P/O :<br>100000 ABS<br>KG<br>ENE -<br>P/O :<br>100000 ABS | ECOMIRAE<br>TECHNOLOGIES LLC    | LG CHEM LTD.           | 08/28/2018 | 38360  | 17436  | Pusan   | Charleston, South<br>Carolina | ANNA MAERSK           | South Korea | AS PER LABEL                                                                         | 2445 NW 38TH STREET,<br>GAINESVILLE, FL 32605,<br>USA ATTN: SEUNGKOO<br>KANG---- 1-3106674852 TEL<br>EX 33 | LG TW<br>DAER<br>SEOUI<br>37731            |
|                                                                                                                                                                                                                                                 | FNS INC ATL                     | LG CHEM, LTD.          | 08/28/2018 | 141741 | 64428  | Pusan   | Charleston, South<br>Carolina | ANNA MAERSK           | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL                            | 5550 TRIANGLE PARKWAY<br>STE 390 NORCROSS, GA<br>30092 1-6786913927                                        | 20 YOI<br>YOUNG<br>TOWE<br>150-72<br>32555 |
|                                                                                                                                                                                                                                                 | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD.          | 08/28/2018 | 141741 | 64428  | Pusan   | Charleston, South<br>Carolina | ANNA MAERSK           | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL                            | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL: 678-984-<br>5714 1-4044006125            | 20 YOI<br>YOUNG<br>TOWE<br>150-72<br>32555 |
|                                                                                                                                                                                                                                                 | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.           | 08/28/2018 | 141741 | 64428  | Pusan   | Charleston, South<br>Carolina | ANNA MAERSK           | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL                            | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL: 678-984-<br>5714 1-4044006125            | LG TW<br>DAER<br>SEOUI<br>37731            |

|                                                              |                                 |               |            |        |       |       |                               |                |             |                                                           |                                                                                                                  |                                           |
|--------------------------------------------------------------|---------------------------------|---------------|------------|--------|-------|-------|-------------------------------|----------------|-------------|-----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| MONOMER<br>YLATE<br>16.12 S.O.C                              | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD.  | 08/25/2018 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | HOUSTON BRIDGE | South Korea | NO MARKS . . .                                            | 15 FOREST STREET<br>CLOSTER, NJ 07624 TEL 1-<br>201-364-4923                                                     | LG TW<br>DAER<br>SEOUI<br>07336           |
| .HEXYL<br>IS CODE                                            | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 08/25/2018 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | HOUSTON BRIDGE | South Korea | NO MARKS . . .                                            | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA<br>RPASHAKLGCHEM.COM<br>TEL 248-289-5795            | LG TW<br>DAER<br>SEOUI<br>07336<br>NO     |
| 1919 CLASS<br>METHYL<br>SS 3 HS                              | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 08/25/2018 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | HOUSTON BRIDGE | South Korea | NO MARKS . . . NO<br>MARKS . . .                          | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL 404-400-<br>6101 EXT. 6114<br>RPASHAKLGCHEM.COM | LG TW<br>DAER<br>SEOUI<br>07336<br>NO     |
| METYL<br>JN 1919<br>12 S.O.C<br>METYL<br>JN 1919<br>12 S.O.C | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 08/25/2018 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | HOUSTON BRIDGE | South Korea | NO MARKS . . . . NO<br>MARKS . . . .                      | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL 404-400-<br>6101 EXT. 6114<br>RPASHAKLGCHEM.COM | LG TW<br>DAER<br>SEOUI<br>07336           |
| 00404<br>ACRYLIC,<br>3, UN2218,<br>03-990-0099               | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 08/23/2018 | 36960  | 16800 | Pusan | Charleston, South<br>Carolina | MSC RANIA      | South Korea | AS PER LABEL                                              | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA RPASHAK<br>LGCHEM.COM                               | LG TW<br>DAER<br>SEOUI<br>07336           |
| 0367<br>5 HS<br>R461-NP<br>I-N P 12,80<br>E-BUTA,<br>ESIN    | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 08/23/2018 | 30567  | 13894 | Pusan | Charleston, South<br>Carolina | MSC RANIA      | South Korea | AS PER LABEL                                              | 3475 PIEDMONT ROAD, NE<br>STE 1200, ATLANTA, GA<br>30305, USA TEL: 678-984-<br>5714 1-4044006125                 | 20 YOI<br>YOUN<br>TOWE<br>150-72<br>32555 |
| 30.0000 ABS<br>KG<br>E NE-<br>P/O :                          | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 08/23/2018 | 70870  | 32214 | Pusan | Charleston, South<br>Carolina | MSC RANIA      | South Korea | AS PER LABEL AS PER<br>LABEL                              | 3475 PIEDMONT ROAD, NE<br>STE 1200, ATLANTA, GA<br>30305, USA TEL: 678-984-<br>5714 1-4044006125                 | 20 YOI<br>YOUN<br>TOWE<br>150-72<br>32555 |
| 30.0000 ABS<br>KG<br>E NE-<br>P/O :                          | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 08/23/2018 | 70870  | 32214 | Pusan | Charleston, South<br>Carolina | MSC RANIA      | South Korea | AS PER LABEL AS PER<br>LABEL                              | 3475 PIEDMONT ROAD, NE<br>STE 1200, ATLANTA, GA<br>30305, USA TEL: 678-984-<br>5714 1-4044006125                 | 20 YOI<br>YOUN<br>TOWE<br>150-72<br>32555 |
| 100000 ABS<br>3<br>ENE -<br>P/O :                            | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 08/23/2018 | 177176 | 80535 | Pusan | Charleston, South<br>Carolina | MSC RANIA      | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL AS PER<br>LABEL | 3475 PIEDMONT ROAD, NE<br>STE 1200, ATLANTA, GA<br>30305, USA TEL: 678-984-<br>5714 1-4044006125                 | 20 YOI<br>YOUN<br>TOWE<br>150-72<br>32555 |

|                                            |                              |               |            |        |        |        |                            |                   |             |                                                                                                                     |                                                                                                       |                                                   |
|--------------------------------------------|------------------------------|---------------|------------|--------|--------|--------|----------------------------|-------------------|-------------|---------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| 10 ABS                                     | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 08/23/2018 | 70870  | 32214  | Pusan  | Charleston, South Carolina | MSC RANIA         | South Korea | AS PER LABEL AS PER LABEL                                                                                           | 3475 PIEDMONT ROAD, NE STE 1200, ATLANTA, GA 30305, USA TEL: 678-984-5714 1-4044006125                | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721 82-32555 04 |
| 00.000 :9 00.000 :9 00.000                 | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 08/22/2018 | 222666 | 101212 | Ningpo | Charleston, South Carolina | SAFMARINE MAFADI  | China       | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                                                 | 243 WOODBINE ST.HIGH POINT,, NORTH CAROLINA 27261 ATTN:BETH KLINE 336-878-4269 1-3368784207 TEL EX 53 | LG TWIN TONG, YO SEOUL, KO EX 82-3255             |
| 10 KG<br>-<br>AIL:<br>I P/O :<br>P17-<br>3 | TO ORDER                     | LG CHEM,LTD.  | 08/15/2018 | 421964 | 191802 | Ningpo | Charleston, South Carolina | SAFMARINE MULANJE | China       | N/M N/M N/M N/M N/M N/M N/M N/M N/M                                                                                 | OF LG CHEM AMERICA, INC 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA 1-4044006125           | 128 YEOUI-YEONGDEL 721,KOREA 82-32555 04          |
|                                            | CHEMBANK INTERNATIONAL, INC. | LG CHEM LTD.  | 08/14/2018 | 44000  | 20000  | Pusan  | Charleston, South Carolina | MSC LISBON        | South Korea | SEAL NO.: 005226 IN ISO TANK                                                                                        | 15 FOREST STREET CLOSTER CLOSTER US US                                                                | LG TWIN TONG DAERO, YC YOUNGDUI                   |
|                                            | LG CHEM AMERICA, INC.,       | LG CHEM LTD.  | 08/06/2018 | 176000 | 80000  | Pusan  | Charleston, South Carolina | MAERSK STRALSUND  | South Korea | SEAL NO.: 005197 IN ISO TANK SEAL NO.: 005162 IN ISO TANK SEAL NO.: 005137 IN ISO TANK SEAL NO.: 005179 IN ISO TANK | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA ATLANTA US US                                                 | LG TWIN TONG DAERO, YC YOUNGDUI                   |
|                                            | LG CHEM AMERICA, INC.,       | LG CHEM LTD.  | 08/03/2018 | 88000  | 40000  | Pusan  | Charleston, South Carolina | TIANJIN           | South Korea | SEAL NO.: 166347 IN ISO TANK SEAL NO.: 166390 IN ISO TANK                                                           | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA ATLANTA US US                                                 | LG TWIN TONG DAERO, YC YOUNGDUI                   |
| 3 D                                        | LG CHEM AMERICA, INC.,       | LG CHEM LTD.  | 08/03/2018 | 44000  | 20000  | Pusan  | Charleston, South Carolina | TIANJIN           | South Korea | SEAL NO.: 128100 IN ISO TANK                                                                                        | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA ATLANTA US US                                                 | LG TWIN TONG DAERO, YC YOUNGDUI                   |
| CON<br>E<br>105-016<br>ER<br>CON<br>E      | ECOMIRAE TECHNOLOGIES LLC    | LG CHEM,LTD.  | 08/01/2018 | 523796 | 238089 | Ningpo | Charleston, South Carolina | GRASMERE MAERSK   | China       | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL             | 2445 NW 38TH STREET, GAINESVILLE, FL 32605, USA ATTN: SEUNGKOO KANG----- 1-6786913927                 | 128 YEOUI-YEONGDEL 721,KOREA 82-32555 04          |
| OMER<br>850KG<br>-<br>AIL:<br>A<br>:R      | TO ORDER                     | LG CHEM,LTD.  | 08/01/2018 | 268523 | 122056 | Ningpo | Charleston, South Carolina | GRASMERE MAERSK   | China       | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                                    | OF LG CHEM AMERICA, INC 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA 1-4044006125           | 128 YEOUI-YEONGDEL 721,KOREA 82-32555 04          |



|                                             |                              |            |        |        |        |                            |                 |             |                                                                                                                     |                                                                                                                            |                                                                                             |                                          |
|---------------------------------------------|------------------------------|------------|--------|--------|--------|----------------------------|-----------------|-------------|---------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|------------------------------------------|
| COMER<br>J<br>300 KG                        |                              |            |        |        |        |                            |                 |             |                                                                                                                     | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                                           | 5550 TRIANGLE PARKWAY STE 390 NORCROSS, GA 30092 1-6786913927                               | 128 YEOUI-YEONGDEI 721,KOREA 82-32555 04 |
| P/O :<br>FNS INC ATL                        | LG CHEM,LTD.                 | 08/01/2018 | 230162 | 104619 | Ningpo | Charleston, South Carolina | GRASMERE MAERSK | China       |                                                                                                                     |                                                                                                                            |                                                                                             |                                          |
| COMER<br>J<br>300 KG<br>AIL:<br>A<br>R      |                              |            |        |        |        |                            |                 |             |                                                                                                                     | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                                           | OF LG CHEM AMERICA, INC 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA 1-4044006125 | 128 YEOUI-YEONGDEI 721,KOREA 82-32555 04 |
| TO ORDER                                    | LG CHEM,LTD.                 | 08/01/2018 | 230162 | 104619 | Ningpo | Charleston, South Carolina | GRASMERE MAERSK | China       |                                                                                                                     |                                                                                                                            |                                                                                             |                                          |
|                                             | LG CHEM AMERICA, INC.,       | 07/30/2018 | 176000 | 80000  | Pusan  | Charleston, South Carolina | MSC ROMA        | South Korea | SEAL NO.: 005199 IN ISO TANK SEAL NO.: 005096 IN ISO TANK SEAL NO.: 005188 IN ISO TANK SEAL NO.: 005166 IN ISO TANK | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA ATLANTA US US                                                                      | LG TWIN T DAERO, YC YOUNGDU                                                                 |                                          |
|                                             | LG CHEM AMERICA, INC.,       | 07/28/2018 | 44000  | 20000  | Pusan  | Charleston, South Carolina | ZIM ANTWERP     | South Korea | SEAL NO.: 128084 IN ISO TANK                                                                                        | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA ATLANTA US US                                                                      | LG TWIN T DAERO, YC YOUNGDU                                                                 |                                          |
| DRIVE<br>9492,<br>I-843-<br>ND              | KAO SPECIALTIES AMERICAS LLC | 07/24/2018 | 222200 | 101000 | Pusan  | Charleston, South Carolina | MSC MAXINE      | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                                    | 243 WOODBINE ST.HIGH POINT,. NORTH CAROLINA 27261 ATTN:BETH KLINE TE 336-878-4269                                          | LG TWIN T DAERO, YC YOUNGDU                                                                 |                                          |
| OMER<br>850KG<br>-<br>IDE:                  |                              |            |        |        |        |                            |                 |             |                                                                                                                     | LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL | OF LG CHEM AMERICA, INC 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA 1-4044006125 | 128 YEOUI-YEONGDEI 721,KOREA 82-32555 04 |
| M                                           | TO ORDER                     | 07/24/2018 | 460325 | 209239 | Pusan  | Charleston, South Carolina | MSC MAXINE      | South Korea |                                                                                                                     |                                                                                                                            |                                                                                             |                                          |
|                                             | CHEMBANK INTERNATIONAL, INC  | 07/13/2018 | 44000  | 20000  | Pusan  | Charleston, South Carolina | AMERICA         | South Korea | SEAL NO.: 005051 IN ISO TANK                                                                                        | 15 FOREST STREET CLOSTER CLOSTER US US                                                                                     | LG TWIN T DAERO, YC YOUNGDU                                                                 |                                          |
| ITED<br>G<br>000 LG<br>LIC<br>ACID<br>IN ER | LG CHEM AMERICA, INC.        | 07/10/2018 | 37037  | 16835  | Pusan  | Charleston, South Carolina | MAERSK SURABAYA | South Korea | AS PER LABEL                                                                                                        | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:1-404-400-6125-- 1-2018162000 TEL EX 09                         | LG TWIN T DAERO, YC YOUNGDU                                                                 |                                          |
| ITED<br>G<br>1000<br>RYLIC<br>ACID<br>NER   | LG CHEM AMERICA, INC.        | 07/10/2018 | 37037  | 16835  | Pusan  | Charleston, South Carolina | MAERSK SURABAYA | South Korea | AS PER LABEL                                                                                                        | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:1-404-400-6125-- 1-4044006125                                   | LG TWIN T DAERO, YC YOUNGDU                                                                 |                                          |

|                                             |                                 |               |            |        |        |       |                               |                    |             |                                                                                                                                     |                                                                                                   |                                                                |
|---------------------------------------------|---------------------------------|---------------|------------|--------|--------|-------|-------------------------------|--------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| ITEM<br>G<br>000 LG<br>LIC<br>ACID<br>HT    | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 07/10/2018 | 37037  | 16835  | Pusan | Charleston, South<br>Carolina | MAERSK SURABAYA    | South Korea | AS PER LABEL                                                                                                                        | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL:1-404-400-<br>6125- 1-4044006125 | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-37<br>32555 04 |
| ITEM<br>G<br>000 LG<br>LIC<br>ACID<br>IN ER | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 07/10/2018 | 37037  | 16835  | Pusan | Charleston, South<br>Carolina | MAERSK SURABAYA    | South Korea | AS PER LABEL                                                                                                                        | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL:1-404-400-<br>6125- 1-4044006125 | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-37<br>32555 04 |
| N :<br>69 .<br>F SAID                       | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 07/10/2018 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | MAERSK SURABAYA    | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL                                                           | 243 WOODBINE ST.HIGH<br>POINT, . NORTH CAROLINA                                                   | LG TWIN T<br>DONG, YO<br>SEOUL, KO                             |
|                                             | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 07/07/2018 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | E.R. TIANPING      | South Korea | SEAL NO.: 027192 IN ISO<br>TANK                                                                                                     | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                      | LG TWIN T<br>DAERO, YC<br>YOUNGDU                              |
|                                             | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 07/06/2018 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | NORTHERN JULIE     | South Korea | SEAL NO.: 027859 IN ISO<br>TANK                                                                                                     | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                      | LG TWIN T<br>DAERO YO<br>YOUNGDU                               |
| ITEM<br>G<br>000 LG<br>LIC<br>ACID<br>IN ER | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 06/26/2018 | 37037  | 16835  | Pusan | Charleston, South<br>Carolina | MAERSK<br>SEMARANG | South Korea | AS PER LABEL                                                                                                                        | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL:1-404-400-<br>6125- 1-4044006125 | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-37<br>32555 04 |
| :291 6-<br>5<br>RITY<br>000 KG              | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 06/26/2018 | 37037  | 16835  | Pusan | Charleston, South<br>Carolina | MAERSK<br>SEMARANG | South Korea | AS PER LABEL                                                                                                                        | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL:1-404-400-<br>6125- 1-4044006125 | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-37<br>32555 04 |
| G<br>S<br>(SAP)-<br>ICE                     | LG CHEM AMERICA,<br>INC.        | LG CHEM,LTD.  | 06/26/2018 | 460325 | 209239 | Pusan | Charleston, South<br>Carolina | MAERSK<br>SEMARANG | South Korea | LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA 1-4044006125                         | 128 YEOUI-<br>YEONGDEL<br>721,KOREA<br>82-32555 04             |
| G<br>S<br>(SAP)-<br>ICE                     | LG CHEM AMERICA,<br>INC.        | LG CHEM,LTD.  | 06/26/2018 | 230162 | 104619 | Pusan | Charleston, South<br>Carolina | MAERSK<br>SEMARANG | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL AS PER LABEL                                              | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA 1-4044006125                         | 128 YEOUI-<br>YEONGDEL<br>721,KOREA<br>82-32555 04             |

|                                                                      |                                 |               |            |        |        |       |                               |                     |             |                                                                           |                                                                                                                 |                                          |
|----------------------------------------------------------------------|---------------------------------|---------------|------------|--------|--------|-------|-------------------------------|---------------------|-------------|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|------------------------------------------|
| HYL                                                                  | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 06/21/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | PARSIFAL            | South Korea | SEAL NO.: 934964 IN ISO<br>TANK SEAL NO.: 934971<br>IN ISO TANK           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                    | LG TW<br>DAER<br>YOUN                    |
| 378-<br>EDITORS,<br>SUITE<br>028<br>R CHRIS                          | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 06/19/2018 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | MAERSK<br>SKARSTIND | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER                                 | LG TW<br>DONG<br>SEOUI                   |
| 378-<br>EDITORS,<br>SUITE<br>028<br>R CHRIS                          | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 06/19/2018 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | MAERSK<br>SKARSTIND | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER                                 | LG TW<br>DONG<br>SEOUI                   |
| NHI BITED<br>G ING<br>-11- 1000<br>R YLIC<br>YLIC ACID<br>R : 1-248- | LG CHEM<br>AMERICA, INC.        | LG CHEM LTD.  | 06/19/2018 | 37037  | 16835  | Pusan | Charleston, South<br>Carolina | MAERSK<br>SKARSTIND | South Korea | AS PER LABEL                                                              | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA, GA<br>30305<br>RPASHAK@LGCHEM.COM-<br>1-4044006125                  | LG TW<br>DAER<br>SEOUI<br>07336<br>32555 |
| INHIBITED<br>AGING<br>-11-1000<br>A(ACRYLIC<br>YLIC ACID<br>RRENER   | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 06/19/2018 | 37037  | 16835  | Pusan | Charleston, South<br>Carolina | MAERSK<br>SKARSTIND | South Korea | AS PER LABEL                                                              | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL:1-404-400-<br>6125- 1-4044006125               | LG TW<br>DAER<br>SEOUI<br>07336<br>32555 |
| HYL                                                                  | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 06/17/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | ZIM CHICAGO         | South Korea | SEAL NO.: 171395 IN ISO<br>TANK SEAL NO.: 002389<br>IN ISO TANK           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                    | LG TW<br>DAER<br>YOUN                    |
| TE 2-                                                                | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD.  | 06/17/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | ZIM CHICAGO         | South Korea | SEAL NO.: 002987 IN ISO<br>TANK SEAL NO.: 002961<br>IN ISO TANK           | 15 FOREST STREET<br>CLOSTER CLOSTER US US                                                                       | LG TW<br>DAER<br>YOUN                    |
| HYL                                                                  | LG CHEM AMERICA<br>INC          | LG CHEM LTD   | 06/07/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | ZIM SAN DIEGO       | South Korea | SEAL NO.: 164767 IN ISO<br>TANK SEAL NO.: 126714<br>IN ISO TANK           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                    | LG TW<br>DAER<br>YOUN                    |
| Y P/O :<br>P/O :<br>E,<br>919 HS<br>CODE:<br>N. NO.:                 | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 05/22/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | NO MARKS AND<br>NUMBERS NO MARKS<br>AND NUMBERS                           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL:404-400-6101<br>EXT. 6114 TE<br>RPASHAK@LGCHEM.COM | LG TW<br>DAER<br>SEOUI<br>07336          |

|                                                          |                                 |                                 |            |        |        |       |                               |                     |             |                                                                           |                                                                                                                     |                                                                |
|----------------------------------------------------------|---------------------------------|---------------------------------|------------|--------|--------|-------|-------------------------------|---------------------|-------------|---------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| ORS,<br>TE                                               | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD.                   | 05/22/2018 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER                                     | LG TWIN T<br>DONG, YO<br>SEOUL, KO                             |
|                                                          | LG CHEM AMERICA<br>INC          | LG CHEM LTD.                    | 05/18/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | ZIM NINGBO          | South Korea | SEAL NO.: 918278 IN ISO<br>TANK SEAL NO.: 918299<br>IN ISO TANK           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                        | LG TWIN T<br>DAERO, YC<br>YOUNGDUI                             |
| P/O :<br>IG<br>ESIN<br>3<br>S                            | LG CHEM AMERICA                 | LG CHEM, LTD.                   | 05/16/2018 | 33230  | 15105  | Pusan | Charleston, South<br>Carolina | MAERSK SAIGON       | South Korea | N/M                                                                       | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 1-4044006125                                               | 128, YEOUI<br>YEONGDEU<br>REPUBLIC<br>EX 82-3255               |
| ORS,<br>TE                                               | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD.                   | 05/15/2018 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | MAERSK SAIGON       | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER                                     | LG TWIN T<br>DONG, YO<br>SEOUL, KO                             |
|                                                          | LG CHEM AMERICA<br>INC          | LG CHEM LTD.                    | 05/10/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | MSC MAXINE          | South Korea | SEAL NO.: 125338 IN ISO<br>TANK SEAL NO.: 004216<br>IN ISO TANK           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                        | LG TWIN T<br>DAERO YO<br>YOUNGDUI                              |
| 010<br>ATE M<br>E BUL,<br>INH<br>KING<br>1000<br>L<br>KG | LG CHEM AMERICA<br>INC          | LG CHEM LTD.                    | 05/10/2018 | 88184  | 40084  | Pusan | Charleston, South<br>Carolina | MSC MAXINE          | South Korea | N/M N/M                                                                   | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL:1-404-400-612<br>JENNYCHO1@LGCHEM.CO<br>M 1-4044006125 | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-37<br>32555 04 |
|                                                          | LG CHEM AMERICA<br>INC 3475     | LG CHEM LTD. LG<br>TWIN TOWERS, | 05/10/2018 | 132277 | 60126  | Pusan | Charleston, South<br>Carolina | MSC MAXINE          | South Korea | N/M N/M N/M                                                               | PIEDMONT ROAD NE SUITE<br>1200 ATLANTA GA, 30305 1-<br>4044006125                                                   | 128, YEOUI<br>YOUNGDUI<br>KOREA PO:<br>553206012               |
|                                                          | LG CHEM AMERICA<br>INC          | LG CHEM LTD.                    | 05/04/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | MSC ROMA            | South Korea | SEAL NO.: 925486 IN ISO<br>TANK SEAL NO.: 925463<br>IN ISO TANK           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                        | LG TWIN T<br>DAERO, YC<br>YOUNGDUI                             |
|                                                          | LG CHEM AMERICA<br>INC          | LG CHEM LTD.                    | 05/04/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | MSC ROMA            | South Korea | SEAL NO.: 918952 IN ISO<br>TANK SEAL NO.: 918994<br>IN ISO TANK           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                        | LG TWIN T<br>DAERO, YC<br>YOUNGDUI                             |

|                        |                                 |               |            |        |        |       |                               |                 |             |                                                                                                                                                   |                                                                                 |                                                 |
|------------------------|---------------------------------|---------------|------------|--------|--------|-------|-------------------------------|-----------------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|-------------------------------------------------|
|                        | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 05/04/2018 | 264000 | 120000 | Pusan | Charleston, South<br>Carolina | MSC ROMA        | South Korea | TANK SEAL NO.: 004792<br>IN ISO TANK SEAL NO.:<br>004785 IN ISO TANK<br>SEAL NO.: 004794 IN ISO<br>TANK SEAL NO.: 004790<br>IN ISO TANK SEAL NO.: | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                    | LG TWIN T<br>DAERO YO<br>YOUNGDU                |
| P/O :<br>07AT<br>0.000 | LG CHEM AMERICA                 | LG CHEM, LTD. | 04/28/2018 | 33230  | 15105  | Pusan | Charleston, South<br>Carolina | MAERSK SURABAYA | South Korea | AS PER LABEL                                                                                                                                      | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 1-4044006125           | 128, YEOUI<br>YEONGDEL<br>REPUBLIC<br>553206012 |
|                        | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 04/28/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | MAERSK SURABAYA | South Korea | SEAL NO.: 125796 IN ISO<br>TANK SEAL NO.: 125775<br>IN ISO TANK                                                                                   | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                    | LG TWIN T<br>DAERO, SE                          |
| TORS,<br>TE<br>RIS     | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 04/26/2018 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | MAERSK SURABAYA | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL                                                                         | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER | LG TWIN T<br>DONG, YOL<br>SEOUL, KO             |
|                        | VOLVO CAR US<br>OPERATIONS INC  | LG CHEM       | 04/21/2018 | 26752  | 12160  | Pusan | Charleston, South<br>Carolina | E. R. TIANPING  | South Korea | 41050411607                                                                                                                                       | 1801 VOLVO CAR DR<br>RIDGEVILLE SC 29472 US                                     | 20 YOIDO-I<br>YOUNGDU<br>TOWERS S               |
|                        | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 04/08/2018 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | PARSIFAL        | South Korea | SEAL NO.: 004178 IN ISO<br>TANK                                                                                                                   | 3475 PIEDMONT ROAD NE<br>SUITE 120 ATLANTA<br>ATLANTA US US                     | 128, YEOUI<br>DAERO, YO<br>SEOUL SE             |
|                        | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 04/08/2018 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | PARSIFAL        | South Korea | SEAL NO.: 004000 IN ISO<br>TANK                                                                                                                   | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                    | 128, YEOUI<br>DAERO, YO<br>SEOUL SE             |
|                        | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 04/08/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | PARSIFAL        | South Korea | SEAL NO.: 123966 IN ISO<br>TANK SEAL NO.: 918087<br>IN ISO TANK                                                                                   | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                    | 128, YEOUI<br>DAERO, YO<br>SEOUL SE             |
|                        | LG CHEM AMERICA,<br>INC.,       | LG CHEM LTD.  | 04/08/2018 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | PARSIFAL        | South Korea | SEAL NO.: 004576 IN ISO<br>TANK                                                                                                                   | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA<br>ATLANTA US US                     | 128, YEOUI<br>DAERO, YO<br>SEOUL SE             |

|                              |                        |               |            |       |       |       |                            |                   |             |                                                           |                                                                          |                         |
|------------------------------|------------------------|---------------|------------|-------|-------|-------|----------------------------|-------------------|-------------|-----------------------------------------------------------|--------------------------------------------------------------------------|-------------------------|
| TE                           | LG CHEM AMERICA, INC   | LG CHEM LTD.  | 04/08/2018 | 44000 | 20000 | Pusan | Charleston, South Carolina | PARSIFAL          | South Korea | SEAL NO.: 004597 IN ISO TANK                              | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA, ATLANTA, US US                  | 128, YI DAER( SEQUI     |
| TE                           | LG CHEM AMERICA, INC., | LG CHEM LTD.  | 04/08/2018 | 44000 | 20000 | Pusan | Charleston, South Carolina | PARSIFAL          | South Korea | SEAL NO.: 004594 IN ISO TANK                              | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA ATLANTA US US                    | LG TW DAER(             |
| HYL                          | LG CHEM AMERICA INC    | LG CHEM LTD.  | 04/08/2018 | 88000 | 40000 | Pusan | Charleston, South Carolina | PARSIFAL          | South Korea | SEAL NO.: 931894 IN ISO TANK SEAL NO.: 931855 IN ISO TANK | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                   | LG TW DAER(             |
| ENE<br>10<br>747 HS<br>R401- | LG CHEM AMERICA INC    | LG CHEM LTD.  | 04/08/2018 | 44000 | 20000 | Pusan | Charleston, South Carolina | PARSIFAL          | South Korea | SEAL NO.: 003990 IN ISO TANK                              | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                   | LG TW DAER(             |
| DIENE-                       | LG CHEM AMERICA, INC.  | LG CHEM. LTD. | 04/05/2018 | 35361 | 16073 | Pusan | Charleston, South Carolina | MOL. MAGNIFICENCE | South Korea | AS PER LABEL . . . . .                                    | 3475 PIEDMONT ROAD, NESTE 1200, ATLANTA, GA 30305, USA 1-404-400-6112XXX | 20 YO YOUN: TOWE 150-72 |
| HYL                          | LG CHEM AMERICA INC    | LG CHEM LTD.  | 04/01/2018 | 88000 | 40000 | Pusan | Charleston, South Carolina | MSC ANTIGUA       | South Korea | SEAL NO.: 931295 IN ISO TANK SEAL NO.: 931278 IN ISO TANK | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                   | 128, YI DAER( SEQUI     |
| HYL                          | LG CHEM AMERICA INC    | LG CHEM LTD.  | 04/01/2018 | 88000 | 40000 | Pusan | Charleston, South Carolina | MSC ANTIGUA       | South Korea | SEAL NO.: 931879 IN ISO TANK SEAL NO.: 931873 IN ISO TANK | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                   | ,128, Y DAER( SEQUI     |
|                              | LG CHEM AMERICA INC    | LG CHEM LTD.  | 04/01/2018 | 44000 | 20000 | Pusan | Charleston, South Carolina | MSC ANTIGUA       | South Korea | SEAL NO.: 001389 IN ISO TANK                              | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                   | 128, YI DAER( SEQUI     |
| HYL                          | LG CHEM AMERICA INC    | LG CHEM LTD.  | 04/01/2018 | 88000 | 40000 | Pusan | Charleston, South Carolina | ANNA MAERSK       | South Korea | SEAL NO.: 931371 IN ISO TANK SEAL NO.: 931366 IN ISO TANK | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                   | 128, YI DAER( SEQUI     |



|                                                                   |                           |               |            |       |       |       |                            |                      |             |                                                                                                 |                                                                                                                                  |                                   |
|-------------------------------------------------------------------|---------------------------|---------------|------------|-------|-------|-------|----------------------------|----------------------|-------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| 4501036650<br>14747 HS<br>R401-                                   | LG CHEM AMERICA,          | LG CHEM, LTD. | 03/26/2018 | 35361 | 16073 | Pusan | Charleston, South Carolina | EVER LIFTING         | South Korea | AS PER LABEL                                                                                    | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 1-404-400-6112                                                          | 20 YOI<br>YOUNI<br>TOWE<br>150-72 |
| 4501026889<br>14747 HS<br>LONITRILE<br>R401-<br>- 780-431-        | LG CHEM AMERICA,          | LG CHEM, LTD. | 03/22/2018 | 35361 | 16073 | Pusan | Charleston, South Carolina | CMA CGM<br>MELISANDE | South Korea | AS PER LABEL                                                                                    | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 1-404-400-6112                                                          | 20 YOI<br>YOUNI<br>TOWE<br>150-72 |
| 36242<br>ACRYLIC,<br>3, UN2218,<br>248-289-<br>CAL Y<br>180205B Y | LG CHEM<br>AMERICA, INC.  | LG CHEM LTD.  | 03/15/2018 | 36960 | 16800 | Pusan | Charleston, South Carolina | NORTHERN<br>JAMBOREE | South Korea | AS PER LABEL                                                                                    | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA, GA<br>30305 RPASHAK<br>LGCHEM.COM                                                    | LG TW<br>DAER<br>SEQUI<br>07336   |
| HYL                                                               | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 03/11/2018 | 88000 | 40000 | Pusan | Charleston, South Carolina | MSC LISBON           | South Korea | SEAL NO.: 001879 IN ISO<br>TANK SEAL NO.: 001119<br>IN ISO TANK                                 | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                                     | 128, YI<br>DAER<br>SEQUI          |
| E, INH<br>PACKING<br>-12-1000 LG<br>/L<br>EA (ETHYL<br>000 KG     | LG CHEM AMERICA,<br>INC., | LG CHEM LTD.  | 03/11/2018 | 44000 | 20000 | Pusan | Charleston, South Carolina | MSC LISBON           | South Korea | IN ISO TANK<br>BAFU8899248<br>S/122942.12295<br>7.122958.030084 TARE<br>WT : 3,93 0 KGS         | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA, GA<br>30305 , USA TEL: 248-289-<br>5795 TE ATTN:DONGWON<br>LEE/DWLEE1@LGCHEM.CO<br>M | LG TW<br>DAER<br>SEQUI<br>07336   |
| CRYLATE,<br>E LIQUID,<br>G GROUP:III<br>G<br>THYLHEXYL<br>ETHYL   | LG CHEM AMERICA,<br>INC., | LG CHEM LTD.  | 03/11/2018 | 44000 | 20000 | Pusan | Charleston, South Carolina | MSC LISBON           | South Korea | IN ISO TANK<br>BLKU2511383<br>S/122927.12295 5.122980<br>TARE WT : 3,65 0 KGS                   | STE. 1200, ATLANTA, GA<br>30305 , USA<br>ATTN:DONGWON<br>LEE/DWLEE1@LGCHEM.CO<br>M TE TEL:404-400-6101<br>EXT. 6114              | LG TW<br>DAER<br>SEQUI<br>07336   |
| CRYLATE,<br>E LIQUID,<br>G GROUP:III<br>G<br>THYLHEXYL<br>ETHYL   | LG CHEM AMERICA,<br>INC., | LG CHEM LTD.  | 03/11/2018 | 44000 | 20000 | Pusan | Charleston, South Carolina | MSC LISBON           | South Korea | IN ISO TANK<br>BLKU2511383<br>S/122927.12295 5.122980<br>TARE WT : 3,65 0 KGS                   | STE. 1200, ATLANTA, GA<br>30305 , USA<br>ATTN:DONGWON<br>LEE/DWLEE1@LGCHEM.CO<br>M TE TEL:404-400-6101<br>EXT. 6114              | LG TW<br>DAER<br>SEQUI<br>07336   |
| MER P/O :<br>E, INH<br>PACKING<br>-12-1000 LG<br>CRYLATE,<br>1917 | LG CHEM AMERICA,<br>INC., | LG CHEM LTD.  | 03/11/2018 | 44000 | 20000 | Pusan | Charleston, South Carolina | MSC LISBON           | South Korea | IN ISO TANK<br>BAFU8899248<br>S/122942.12295<br>7.122958.03008 4.030081<br>TARE WT : 3,93 0 KGS | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA, GA<br>30305 , USA TEL: 248-289-<br>5795 TE ATTN:DONGWON<br>LEE/DWLEE1@LGCHEM.CO<br>M | LG TW<br>DAER<br>SEQUI<br>07336   |
|                                                                   | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 03/08/2018 | 46200 | 21000 | Pusan | Charleston, South Carolina | ZIM ROTTERDAM        | South Korea | SEAL NO.: 930978 IN ISO<br>TANK                                                                 | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                                     | 128, YI<br>DAER<br>SEQUI          |

|                                                                   |                           |               |            |       |       |       |                               |                     |             |                                                                 |                                                                               |                                  |
|-------------------------------------------------------------------|---------------------------|---------------|------------|-------|-------|-------|-------------------------------|---------------------|-------------|-----------------------------------------------------------------|-------------------------------------------------------------------------------|----------------------------------|
|                                                                   | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 03/08/2018 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | ZIM ROTTERDAM       | South Korea | SEAL NO.: 123196 IN ISO<br>TANK                                 | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                  | 128, YI<br>DAER<br>SEOUI         |
| HYL                                                               | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 03/05/2018 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | SEAL NO.: 121824 IN ISO<br>TANK SEAL NO.: 123385<br>IN ISO TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                  | 128, YI<br>DAER<br>SEOUI         |
| 26889<br>4747 HS<br>R401-<br>P TO: 4028<br>V, AB,<br>431-2112     | LG CHEM AMERICA,          | LG CHEM, LTD. | 03/02/2018 | 35361 | 16073 | Pusan | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | AS PER LABEL                                                    | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 1-404-400-6112       | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| HYL                                                               | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 02/26/2018 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | MAERSK SAIGON       | South Korea | SEAL NO.: 002982 IN ISO<br>TANK SEAL NO.: 003692<br>IN ISO TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                  | 128, Y<br>DAER<br>SEOUI          |
|                                                                   | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 02/20/2018 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | ZIM ANTWERP         | South Korea | SEAL NO.: 120263 ISO<br>TANK                                    | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                  | 128, YI<br>YOUN<br>SEOUI         |
|                                                                   | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 02/20/2018 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | ZIM ANTWERP         | South Korea | SEAL NO.: 100189 ISO<br>TANK                                    | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                  | 28, YE<br>DUNG                   |
| MER P/O :<br>3ER NBR<br>DX<br>4002590000                          | CHANNEL PRIME<br>ALLIANCE | LG CHEM, LTD. | 02/20/2018 | 48347 | 21976 | Pusan | Charleston, South<br>Carolina | ZIM ANTWERP         | South Korea | AS PER LABEL                                                    | 1803 HULL AVE DES<br>MOINES, IA 50313                                         | 128, YI<br>YEON<br>KOER          |
| 28303<br>ACRYLIC,<br>9, UN2218,<br>248-289-<br>CAL Y<br>180116B Y | LG CHEM<br>AMERICA, INC.  | LG CHEM LTD.  | 02/20/2018 | 36960 | 16800 | Pusan | Charleston, South<br>Carolina | MAERSK SAIGON       | South Korea | AS PER LABEL                                                    | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA, GA<br>30305 RPASHAK<br>LGCHEM.COM | LG TW<br>DAER<br>SEOUI<br>07336  |
| 26889<br>4747 HS<br>R401-<br>P TO: 4028<br>V, AB,<br>431-2112     | LG CHEM AMERICA,          | LG CHEM, LTD. | 02/20/2018 | 35361 | 16073 | Pusan | Charleston, South<br>Carolina | MAERSK SAIGON       | South Korea | AS PER LABEL                                                    | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 1-404-400-6112       | 20 YOI<br>YOUN<br>TOWE<br>150-72 |

|                                                         |                                     |               |            |        |       |       |                               |                  |             |                                                                                                                           |                                                                                            |                                            |
|---------------------------------------------------------|-------------------------------------|---------------|------------|--------|-------|-------|-------------------------------|------------------|-------------|---------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|--------------------------------------------|
| HYL                                                     | LG CHEM AMERICA<br>INC              | LG CHEM LTD.  | 02/16/2018 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | MSC MAXINE       | South Korea | SEAL NO.: 100277 IN ISO<br>TANK SEAL NO.: 001320<br>IN ISO TANK                                                           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                               | 128, YI<br>DAER<br>SEOUI                   |
| DMER P/O :<br>RUBBER<br>EN BOX<br>:                     | TO THE ORDER OF LG<br>CHEM AMERICA, | LG CHEM, LTD. | 02/16/2018 | 43386  | 19721 | Pusan | Charleston, South<br>Carolina | MSC MAXINE       | South Korea | AS PER LABEL                                                                                                              | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA 1-5742394090                 | 128, YI<br>YEON<br>KORE/<br>32555          |
| 5072<br>R 2875<br>,900.000 KG<br>:XT- 111900            | LG CHEM AMERICA,                    | LG CHEM, LTD. | 02/06/2018 | 43296  | 19680 | Pusan | Charleston, South<br>Carolina | EVER LEADER      | South Korea | AS PER LABEL                                                                                                              | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA                              | 128, YI<br>YEON<br>KORE/<br>32555          |
| ACELL.COM                                               | LG CHEM AMERICA,                    | LG CHEM, LTD. | 02/06/2018 | 43296  | 19680 | Pusan | Charleston, South<br>Carolina | EVER LEADER      | South Korea | AS PER LABEL                                                                                                              | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA                              | 128, YI<br>YEON<br>KORE/<br>32555          |
| HYL                                                     | LG CHEM AMERICA<br>INC              | LG CHEM LTD.  | 02/04/2018 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | ASKLIPIOS        | South Korea | SEAL NO.: 122380 IN ISO<br>TANKS SEAL NO.:<br>122379 IN ISO TANKS                                                         | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                               | YEOUNI<br>GU, SE                           |
| HYL                                                     | LG CHEM AMERICA<br>INC              | LG CHEM LTD.  | 01/30/2018 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | MSC ROMA         | South Korea | SEAL NO.: 929373 IN ISO<br>TANKS SEAL NO.:<br>926293 IN ISO TANKS                                                         | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                               | 128, YI<br>YOUNI<br>SEOUI                  |
| MER P/O :<br>35000 ABS<br>)                             | LG CHEM AMERICA,<br>INC             | LG CHEM, LTD. | 01/30/2018 | 35435  | 16107 | Pusan | Charleston, South<br>Carolina | MSC ROMA         | South Korea | AS PER LABEL                                                                                                              | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 TEL:678-984-5714 1-<br>4044006125 | 20 YOI<br>YOUNI<br>TOWE<br>150-72<br>32555 |
| HYL                                                     | LG CHEM AMERICA<br>INC              | LG CHEM LTD.  | 01/27/2018 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | E R TIANPING     | South Korea | SEAL NO.: 123182 IN ISO<br>TANKS SEAL NO.:<br>123188 IN ISO TANKS                                                         | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                               | ,128, Y<br>DAER<br>SEOUI                   |
| 1 PP H7914<br>DERED<br>C_ HEATH<br>096 /<br>M HS<br>IX_ | LG CHEM<br>AMERICA, INC.            | LG CHEM, LTD  | 01/26/2018 | 129877 | 59035 | Pusan | Charleston, South<br>Carolina | MOL MAGNIFICENCE | South Korea | 4501017114 CUSTOMER<br>P/O _ 508904 PP H7914<br>58,800.000 KG<br>_SURRENDERED<br>POLYPROPYLENE _<br>PIC_ HEATH WILLIAMS / | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA,<br>30305                                 | LG TW<br>DAER<br>SEOUI                     |
| HYL                                                     | LG CHEM AMERICA<br>INC              | LG CHEM LTD.  | 01/25/2018 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | MAERSK SURABAYA  | South Korea | SEAL NO.: 003998 IN ISO<br>TANKS SEAL NO.:<br>003984 IN ISO TANKS                                                         | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                               | YEOUNI<br>GU, SE                           |

|                                              |                                     |               |            |       |       |        |                               |                    |             |                                                                                                                         |                                                                                                      |                                                                |
|----------------------------------------------|-------------------------------------|---------------|------------|-------|-------|--------|-------------------------------|--------------------|-------------|-------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| 8<br>75<br>000 KG                            | TO THE ORDER OF LG<br>CHEM AMERICA, | LG CHEM, LTD. | 01/25/2018 | 43386 | 19721 | Pusan  | Charleston, South<br>Carolina | MAERSK SURABAYA    | South Korea | AS PER LABEL                                                                                                            | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA 1-5742394090                           | 128, YEOUI<br>YEONGDEI<br>KOREA 82-<br>32555 04                |
| P/O :<br>00 ABS                              | LG CHEM AMERICA,<br>INC             | LG CHEM, LTD. | 01/15/2018 | 35435 | 16107 | Pusan  | Charleston, South<br>Carolina | MAERSK<br>SEMARANG | South Korea | AS PER LABEL                                                                                                            | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 TEL:678-984-5714 1-<br>3106674852 TEL EX 33 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>32555 07 |
|                                              | LG CHEM AMERICA<br>INC              | LG CHEM LTD.  | 01/15/2018 | 88000 | 40000 | Pusan  | Charleston, South<br>Carolina | MAERSK<br>SEMARANG | South Korea | SEAL NO.: 100268 IN ISO<br>TANKS SEAL NO.:<br>100266 IN ISO TANKS                                                       | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                         | YEOUI-DAE<br>GU, SEOUL                                         |
|                                              | LG CHEM AMERICA<br>INC              | LG CHEM LTD.  | 01/15/2018 | 88000 | 40000 | Pusan  | Charleston, South<br>Carolina | MAERSK<br>SEMARANG | South Korea | SEAL NO.: 004175 IN ISO<br>TANKS SEAL NO.:<br>004184 IN ISO TANKS                                                       | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA GE                                            | 128, YEOUI<br>DAERO, YO<br>SEOUL SEC                           |
| E-ST<br><br>IP 16,0<br>00 0                  | LG CHEM AMERICA,<br>INC.            | LG CHEM, LTD. | 01/14/2018 | 35435 | 16107 | Ningpo | Charleston, South<br>Carolina | KAETHE P           | China       | AS PER LABEL                                                                                                            | 3475 PIEDMONT RD.NE<br>STE.1200 ATLANTA, GA<br>30305 ATTN: SEA GUN LEE<br>-- 1-4044006125            | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>15 721 82-5<br>32555 05 |
| 75<br>000 K<br>TEL_                          | LG CHEM AMERICA,<br>INC             | LG CHEM, LTD  | 01/12/2018 | 43296 | 19680 | Pusan  | Charleston, South<br>Carolina | MOL MANEUVER       | South Korea | 4501012737 CUSTOMER<br>P/O _ 4501012737<br>SYNTHETIC RUBBER<br>NBR 2875 35KG SR<br>GREEN BOX 18,900.000<br>K G H.S CODE | 2400 LAKEVIEW PKWY STE<br>580 ALPHARET 30009 USA                                                     | 128, YEOUI<br>YEONGDEI                                         |
|                                              | LG CHEM AMERICA<br>INC              | LG CHEM LTD.  | 01/08/2018 | 88000 | 40000 | Pusan  | Charleston, South<br>Carolina | MSC ANTIGUA        | South Korea | SEAL NO.: 001340 IN ISO<br>TANKS SEAL NO.:<br>001339 IN ISO TANKS                                                       | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                         | 128, YEOUI<br>DAERO, YO<br>SEOUL SEC                           |
|                                              | LG CHEM AMERICA<br>INC              | LG CHEM LTD.  | 01/08/2018 | 88000 | 40000 | Pusan  | Charleston, South<br>Carolina | MSC ANTIGUA        | South Korea | SEAL NO.: 004395 IN ISO<br>TANKS SEAL NO.:<br>004316 IN ISO TANKS                                                       | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                         | 128, YEOUI<br>DAERO, YO<br>SEOUL SEC                           |
| 5<br>OP HS<br>4-NP<br>4 TEL:<br>E-<br>RESIN. | LG CHEM AMERICA,<br>INC.            | LG CHEM, LTD. | 01/05/2018 | 70721 | 32146 | Pusan  | Charleston, South<br>Carolina | MSC ANTIGUA        | South Korea | AS PER LABEL AS PER<br>LABEL                                                                                            | 3475 PIEDMONT RD.NE<br>STE.1200 ATLANTA, GA<br>30305 ATTN: SEA GUN LEE                               | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |

|                                                    |                       |               |            |        |       |        |                            |                   |             |                                                             |                                                                                   |                            |
|----------------------------------------------------|-----------------------|---------------|------------|--------|-------|--------|----------------------------|-------------------|-------------|-------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------|
|                                                    | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 12/29/2017 | 44000  | 20000 | Pusan  | Charleston, South Carolina | NORTHERN JAMBOREE | South Korea | SEAL NO.: 801693 IN ISO TANK                                | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA ATLANTA US US                             | YOUNG KOREA                |
| HYL                                                | LG CHEM AMERICA INC   | LG CHEM LTD.  | 12/29/2017 | 88000  | 40000 | Pusan  | Charleston, South Carolina | NORTHERN JAMBOREE | South Korea | SEAL NO.: 004349 IN ISO TANKS SEAL NO.: 004331 IN ISO TANKS | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                            | YOUNG KOREA                |
| II121H -NP 10993265 3-000-OP H II121H -NP 10993265 | LG CHEM AMERICA, INC. | LG CHEM, LTD. | 12/22/2017 | 141741 | 64428 | Ningpo | Charleston, South Carolina | SAFMARINE MAKUTU  | China       | AS PER LABEL AS PER LABEL AS PER LABEL                      | 3475 PIEDMONT RD. NE STE. 1200 ATLANTA, GA 30305 ATTN: SEA GUN LEE-- 1-4044006125 | 20 YOUNG TOWE 150-72 32555 |
| HYL                                                | LG CHEM AMERICA INC   | LG CHEM LTD.  | 12/21/2017 | 88000  | 40000 | Pusan  | Charleston, South Carolina | MSC LISBON        | South Korea | SEAL NO.: 031949 IN ISO TANKS SEAL NO.: 031945 IN ISO TANKS | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                            | LG TW DAER                 |
|                                                    | LG CHEM AMERICA INC   | LG CHEM LTD.  | 12/12/2017 | 46200  | 21000 | Pusan  | Charleston, South Carolina | MAERSK STRALSUND  | South Korea | SEAL NO.: 118845 IN ISO TANK                                | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                            | LG TW DAER                 |
|                                                    | LG CHEM AMERICA INC   | LG CHEM LTD.  | 12/12/2017 | 46200  | 21000 | Pusan  | Charleston, South Carolina | MAERSK STRALSUND  | South Korea | SEAL NO.: 120596 IN ISO TANK                                | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                            | LG TW DAER                 |
|                                                    | LG CHEM AMERICA INC   | LG CHEM LTD.  | 12/12/2017 | 46200  | 21000 | Pusan  | Charleston, South Carolina | MAERSK STRALSUND  | South Korea | SEAL NO.: 120569 IN ISO TANK                                | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                            | LG TW DAER                 |
|                                                    | LG CHEM AMERICA INC   | LG CHEM LTD.  | 12/12/2017 | 46200  | 21000 | Pusan  | Charleston, South Carolina | MAERSK STRALSUND  | South Korea | SEAL NO.: 118899 IN ISO TANK                                | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                            | LG TW DAER                 |
|                                                    | LG CHEM AMERICA INC   | LG CHEM LTD.  | 12/12/2017 | 46200  | 21000 | Pusan  | Charleston, South Carolina | MAERSK STRALSUND  | South Korea | SEAL NO.: 118886 IN ISO TANK                                | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                            | LG TW DAER                 |

|                                                                       |                                 |                          |            |        |        |             |                               |                     |             |                                                                           |                                                                                                     |                                           |
|-----------------------------------------------------------------------|---------------------------------|--------------------------|------------|--------|--------|-------------|-------------------------------|---------------------|-------------|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------|
| HYL                                                                   | LG CHEM AMERICA<br>INC          | LG CHEM LTD.             | 12/12/2017 | 88000  | 40000  | Pusan       | Charleston, South<br>Carolina | MAERSK<br>STARLSUND | South Korea | SEAL NO.: 921764 IN ISO<br>TANKS SEAL NO.:<br>119096 IN ISO TANKS         | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                        | LG TW<br>DAER                             |
|                                                                       | LG CHEM AMERICA<br>INC          | LG CHEM LTD.             | 12/12/2017 | 44000  | 20000  | Pusan       | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | SEAL NO.: 926561 IN ISO<br>TANK                                           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                        | LG TW<br>DAER                             |
| YMER P/O :<br>05000 ABS<br>0 KG -<br>EN E-                            | LG CHEM AMERICA<br>INC.         | LG CHEM, LTD.            | 12/12/2017 | 35435  | 16107  | Pusan       | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | AS PER LABEL                                                              | 2400 LAKEVIEW PKWY,<br>SUITE 580 ALPHARETTA, GA<br>30009 U.S.A ATTN: SEA<br>GUN LEE--- 1-5742394090 | 20 YOI<br>YOUN<br>TOWE<br>150-72<br>32555 |
|                                                                       | NYPRO ASHEVILLE                 | LG CHEM POLAND<br>SP ZOO | 12/12/2017 | 45320  | 20600  | Bremerhaven | Charleston, South<br>Carolina | HS ROME             | Germany     | N/M                                                                       | 100 VISTA BLVD ARDEN NC<br>28704 US EM<br>RHONDA.RUTH@NYPRO.C<br>OM                                 | UL. LG<br>KOBIE                           |
| IBITED                                                                | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD.             | 12/06/2017 | 44000  | 20000  | Pusan       | Charleston, South<br>Carolina | MAERSK SAIGON       | South Korea | SEAL NO.: 121036 IN ISO<br>TANK                                           | CHEMBANK<br>INTERNATIONAL, INC.<br>CLOSTER, CLOSTER, US<br>US                                       | LG TW<br>DAER                             |
| YMER P/O :<br>05000 ABS<br>0 KG -<br>EN E-                            | LG CHEM AMERICA                 | LG CHEM, LTD.            | 12/01/2017 | 35435  | 16107  | Pusan       | Charleston, South<br>Carolina | MSC MAXINE          | South Korea | AS PER LABEL                                                              | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA GA<br>30305 TEL:678-984-5714 1-<br>4044006125           | 20 YOI<br>YOUN<br>TOWE<br>150-72<br>32555 |
| 93263<br>-000-OP HS<br>1121H-NP<br>RILE-<br>(BS) RESIN<br>78-984-5714 | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD.            | 11/30/2017 | 106084 | 48220  | Pusan       | Charleston, South<br>Carolina | MSC MAXINE          | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL                                 | 3475 PIEDMONT RD.NE<br>STE.1200 ATLANTA, GA<br>30305 ATTN: SEA GUN LEE                              | 20 YOI<br>YOUN<br>TOWE<br>150-72          |
| 378-<br>EDITORS,<br>SUITE<br>028<br>R CHRIS                           | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD.            | 11/30/2017 | 222200 | 101000 | Pusan       | Charleston, South<br>Carolina | MSC MAXINE          | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER                     | LG TW<br>DONG<br>SEOUI                    |
| P/O :<br>P/O : 7<br>3903300 000<br>10 KG .<br>ENE-<br>P/O :           | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD.            | 11/21/2017 | 106306 | 48321  | Ningpo      | Charleston, South<br>Carolina | ALS CERES           | China       | AS PER LABEL AS PER<br>LABEL AS PER LABEL                                 | 3475 PIEDMONT RD. NE<br>STE.1200 ATLANTA, GA<br>30305 1-3106674852 TEL EX<br>33                     | 20 YOI<br>YOUN<br>TOWE<br>82-325          |



|                               |                                 |               |            |        |        |        |                               |                |             |                                                                           |                                                                                              |                                                                |
|-------------------------------|---------------------------------|---------------|------------|--------|--------|--------|-------------------------------|----------------|-------------|---------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| ORS,<br>TE                    | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 11/16/2017 | 222200 | 101000 | Pusan  | Charleston, South<br>Carolina | CONTI MAKALU   | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER              | LG TWIN T<br>DONG, YOU<br>SEOUL, KO                            |
| RIS                           | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 11/14/2017 | 46200  | 21000  | Pusan  | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | SEAL NO.: 120870 IN ISO<br>TANK                                           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                 | LG TWIN T<br>DAERO, SE                                         |
|                               | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 11/14/2017 | 46200  | 21000  | Pusan  | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | SEAL NO.: 120887 IN ISO<br>TANK                                           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                 | LG TWIN T<br>DAERO, SE                                         |
|                               | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 11/14/2017 | 46200  | 21000  | Pusan  | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | SEAL NO.: 120893 IN ISO<br>TANK                                           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                 | LG TWIN T<br>DAERO, SE                                         |
|                               | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 11/14/2017 | 46200  | 21000  | Pusan  | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | SEAL NO.: 120893 IN ISO<br>TANK                                           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                 | LG TWIN T<br>DAERO, SE                                         |
| YLIC,<br>12218,               | LG CHEM<br>AMERICA, INC.        | LG CHEM LTD.  | 11/14/2017 | 36960  | 16800  | Pusan  | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | AS PER LABEL                                                              | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA, GA<br>30305 DONGWON<br>LEE(DWLEE1<br>LGCHEM.COM) | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336                   |
| 12627 Y<br>JC                 | LG CHEAM AMERICA<br>INC         | LG CHEM.LTD   | 11/14/2017 | 35499  | 16136  | Pusan  | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | AS PER LABEL                                                              | 3475 PIEDMONT RD. NE<br>STE.1200 ATLANTA<br>GA30305 ATTN:SEA GUN<br>LEE--- 1-4044006125      | 20 YOIDO-<br>DONG,YOU<br>TWIN TOWI<br>KOREA 150<br>TEL EX 82-  |
| OP HS<br>B985<br>1<br>714 --- | LG CHEM AMERICA<br>INC          | LG CHEM, LTD. | 11/07/2017 | 35435  | 16107  | Pusan  | Charleston, South<br>Carolina | MSC ROMA       | South Korea | AS PER LABEL                                                              | 3475 PIEDMONT RD. NE,<br>SUITE 1200 TEL:678-984-<br>5714 1-4044006125                        | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>32555 04 |
| 174 565<br>1-<br>3            | LG CHEM, LTD                    | LG CHEM, LTD  | 11/07/2017 | 45804  | 20820  | Pusan  | Charleston, South<br>Carolina | MSC ROMA       | South Korea | AS PER LABEL                                                              | 128, YEOUI-<br>DAERO,YEONGDEUNGPO-<br>GU, SEOUL KOREA                                        | 128, YEOUI<br>DAERO,YE/<br>SEOUL KOI                           |
| 051018<br>J                   | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 11/01/2017 | 141741 | 64428  | Ningpo | Charleston, South<br>Carolina | KAETHE P       | China       | N/M N/M N/M N/M                                                           | 3475 PIEDMONT RD.NE<br>STE.1200 ATLANTA, GA<br>30305 ATTN: SEA GUN LEE-<br>- 1-4044006125    | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>TEL EX 82-              |

|                                                    |                         |               |            |       |       |       |                               |                    |             |                                                                   |                                                                                           |                                           |
|----------------------------------------------------|-------------------------|---------------|------------|-------|-------|-------|-------------------------------|--------------------|-------------|-------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-------------------------------------------|
| HYL                                                | LG CHEM AMERICA<br>INC  | LG CHEM LTD.  | 10/27/2017 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | PARSIFAL           | South Korea | SEAL NO.: 219861 IN ISO<br>TANKS SEAL NO.:<br>107386 IN ISO TANKS | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                              | LG TW<br>DAER                             |
|                                                    | LG CHEM AMERICA<br>INC  | LG CHEM LTD.  | 10/27/2017 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | PARSIFAL           | South Korea | SEAL NO.: 219883 IN ISO<br>TANK                                   | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                              | LG TW<br>DAER                             |
| YMER P/O :<br>05000 ABS<br>0 KG<br>ENE -           | LG CHEM AMERICA         | LG CHEM, LTD. | 10/24/2017 | 35499 | 16136 | Pusan | Charleston, South<br>Carolina | MAERSK<br>SEMARANG | South Korea | AS PER LABEL                                                      | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA GA<br>30305 TEL:678-984-5714 1-<br>4044006125 | 20 YOI<br>YOUN<br>TOWE<br>150-72<br>32555 |
| HYL                                                | LG CHEM AMERICA<br>INC  | LG CHEM LTD   | 10/24/2017 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | ZIM DJIBOUTI       | South Korea | SEAL NO.: 028014 IN ISO<br>TANKS SEAL NO.:<br>028240 IN ISO TANKS | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                              | LG TW<br>DAER                             |
|                                                    | LG CHEM AMERICA<br>INC  | LG CHEM LTD.  | 10/24/2017 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | ZIM DJIBOUTI       | South Korea | SEAL NO.: 218650 IN ISO<br>TANK                                   | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                              | LG TW<br>DAER                             |
| 52790<br>623<br>TYRENE<br>SBS<br>G<br>PERSON : JIM | LG CHEM AMERICA<br>INC. | LG CHEM, LTD. | 10/24/2017 | 43881 | 19946 | Pusan | Charleston, South<br>Carolina | MAERSK<br>SEMARANG | South Korea | AS PER LABEL                                                      | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA,<br>30305 USA CONTACT : SAM<br>PYUN       | 20 YOI<br>YOUN<br>TOWE<br>150-07          |
|                                                    | LG CHEM AMERICA<br>INC  | LG CHEM LTD.  | 10/17/2017 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | ZIM CHICAGO        | South Korea | SEAL NO.: 927266,30636<br>IN ISO TANK                             | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                              | LG TW<br>DAER                             |
|                                                    | LG CHEM AMERICA<br>INC  | LG CHEM LTD.  | 10/17/2017 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | ZIM CHICAGO        | South Korea | SEAL NO.: 925166 IN ISO<br>TANK                                   | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                              | LG TW<br>DAER                             |
| HYL                                                | LG CHEM AMERICA<br>INC  | LG CHEM LTD.  | 10/17/2017 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | ZIM CHICAGO        | South Korea | SEAL NO.: 120166 IN ISO<br>TANKS SEAL NO.:<br>120192 IN ISO TANKS | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                              | LG TW<br>DAER                             |

|                                                         |                                 |               |            |        |        |        |                               |                      |             |                                                                           |                                                                                          |                                           |
|---------------------------------------------------------|---------------------------------|---------------|------------|--------|--------|--------|-------------------------------|----------------------|-------------|---------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------------------------------------------|
| 378-<br>3 MARINA<br>ESTON, SC<br>INT.COM                | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 10/11/2017 | 44000  | 20000  | Pusan  | Charleston, South<br>Carolina | NORTHERN<br>JAMBOREE | South Korea | SEAL NO.:<br>001815,1704211 IN ISO<br>TANK                                | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                             | LG TW<br>DAER                             |
|                                                         | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 10/10/2017 | 222200 | 101000 | Pusan  | Charleston, South<br>Carolina | NORTHERN<br>JAMBOREE | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER          | LG TW<br>DONG<br>SEOUI                    |
| HYL                                                     | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 10/07/2017 | 88000  | 40000  | Pusan  | Charleston, South<br>Carolina | ZIM SAN DIEGO        | South Korea | SEAL NO.: 134274 IN ISO<br>TANKS SEAL NO.:<br>132270 IN ISO TANKS         | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                             | LG TW<br>DAER                             |
| HYL                                                     | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 10/02/2017 | 88000  | 40000  | Pusan  | Charleston, South<br>Carolina | ZIM ROTTERDAM        | South Korea | SEAL NO.: 024893 IN ISO<br>TANKS SEAL NO.:<br>024898 IN ISO TANKS         | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                             | LG TW<br>DAER                             |
| HYL<br>P/O : 7<br>3903300 000<br>10 KG<br>ENE-<br>P/O : | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 09/28/2017 | 106306 | 48321  | Ningpo | Charleston, South<br>Carolina | MAERSK<br>GATESHEAD  | China       | AS PER LABEL AS PER<br>LABEL AS PER LABEL                                 | 3475 PIEDMONT RD.NE<br>STE.1200 ATLANTA, GA<br>30305 ATTN: SEA GUN LEE-<br>-1-4044006125 | 20 YOI<br>YOUN<br>TOWE<br>150-72<br>23773 |
| HYL                                                     | LG CHEM AMERICA<br>INC          | LG CHEM, LTD. | 09/23/2017 | 88000  | 40000  | Pusan  | Charleston, South<br>Carolina | ZIM NINGBO           | South Korea | SEAL NO.: 218693,30531<br>IN ISO TANKS SEAL NO.:<br>218627 IN ISO TANKS   | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                             | 128, YI<br>YEON<br>SEOUI                  |
| HYL                                                     | LG CHEM AMERICA<br>INC          | LG CHEM, LTD. | 09/20/2017 | 88000  | 40000  | Pusan  | Charleston, South<br>Carolina | ARISTOMENIS          | South Korea | SEAL NO.: 107296 ISO<br>TANKS SEAL NO.:<br>924881 ISO TANKS               | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                             | 128, YI<br>YEON<br>SEOUI                  |
| HYL<br>P.O -<br>CUSTOMER<br>CODE-<br>ABS XR401-         | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 09/09/2017 | 35424  | 16102  | Pusan  | Charleston, South<br>Carolina | EVER LEGION          | South Korea | AS PER LABEL                                                              | 3475 PIEDMONT RD.NE<br>STE.1200 ATLANTA, GA<br>30305 ATTN SEA GUN LEE                    | 20 YOI<br>YOUN<br>TOWE<br>150-72          |
| HYL                                                     | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 09/03/2017 | 88000  | 40000  | Pusan  | Charleston, South<br>Carolina | HYUNDAI MERCURY      | South Korea | SEAL NO.: 924895 IN ISO<br>TANKS SEAL NO.:<br>924882 IN ISO TANKS         | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                             | LG TW<br>DAER                             |

|                                      |                                      |               |            |        |       |       |                               |                |             |                                                                                                                             |                                                                                                                                    |                                                                |
|--------------------------------------|--------------------------------------|---------------|------------|--------|-------|-------|-------------------------------|----------------|-------------|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| 4-N P<br>4-5714                      | LG CHEM AMERICA<br>INC.              | LG CHEM LTD   | 08/28/2017 | 70870  | 32214 | Pusan | Charleston, South<br>Carolina | CONTI MAKALU   | South Korea | AS PER LABEL AS PER<br>LABEL                                                                                                | 3475 PIEDMONT RD. NE<br>STE.1200ATLANTA, GA<br>30305 ATTN: SEA GUN LEE<br>1-4044006125                                             | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>TEL EX 82-              |
| IYL                                  | LG CHEM AMERICA,<br>INC.,            | LG CHEM LTD.  | 08/19/2017 | 53572  | 24351 | Pusan | Charleston, South<br>Carolina | E. R. TIANPING | South Korea | IN ISO TANK                                                                                                                 | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>ATTN : ESTHER LE TEL :<br>404-400-6125           | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336                   |
| IYL                                  | LG CHEM AMERICA,<br>INC.,            | LG CHEM LTD.  | 08/11/2017 | 107144 | 48702 | Pusan | Charleston, South<br>Carolina | PARSIFAL       | South Korea | IN ISO TANKS IN ISO<br>TANKS                                                                                                | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>ATTN : ESTHER LE TEL :<br>404-400-6125           | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336                   |
| P<br>: P-O<br>4-5714,<br>P           | LG CHEM AMERICA,<br>INC.             | LG CHEM, LTD. | 08/06/2017 | 70721  | 32146 | Pusan | Charleston, South<br>Carolina | EVER LUCID     | South Korea | MARKS AND NUMBERS<br>WITH CONTAINER<br>APZU390761 AS PER<br>LABEL                                                           | 3475 PIEDMONT RD. NE<br>STE.1200 ATLANTA, GA<br>30305 ATTN SEA GUN LEE                                                             | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| 7/ ON<br>11, -3<br>P/O :             | LG CHEM AMERICA,<br>INC.,            | LG CHEM LTD.  | 08/03/2017 | 107144 | 48702 | Pusan | Charleston, South<br>Carolina | ZIM DJIBOUTI   | South Korea | IN ISO TANKS IN ISO<br>TANKS                                                                                                | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>ATTN : ESTHER LE TEL :<br>404-400-6125           | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336                   |
| DE<br>73, .                          | LG CHEM AMERICA,<br>INC.,            | LG CHEM LTD.  | 08/01/2017 | 88184  | 40084 | Pusan | Charleston, South<br>Carolina | MSC ANTIGUA    | South Korea | N/M N/M                                                                                                                     | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S<br>ATTN : ESTHER LE, TEL :<br>404-400-612 1-4044006125 | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-37<br>32555 04 |
| H7914<br>:NE<br>3.3329<br>H7914<br>7 | LG CHEM AMERICA,<br>INC., 910 SYLVAN | LG CHEM, LTD  | 07/26/2017 | 129877 | 59035 | Pusan | Charleston, South<br>Carolina | MOL MISSION    | South Korea | 4500955392 CUSTOMER<br>P/O _ 507459 PP H7914<br>58,800.000 KG<br>POLYPROPYLENE H.S<br>CODE 3902100000<br>FAX _ 213.623.3329 | 910 SYLVAN AVE.,<br>ENGLEWOOD CLIFFS N                                                                                             | LG TWIN T<br>DAERO YE<br>SEOUL, 150                            |
| -                                    | LG CHEM AMERICA                      | LG CHEM, LTD. | 07/25/2017 | 35361  | 16073 | Pusan | Charleston, South<br>Carolina | ATHOS          | South Korea | AS PER LABEL                                                                                                                | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA GA<br>30305 TEL:678-984-5714                                                           | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| 39 734<br>OME R)                     | LG CHEM AMERICA,<br>INC.,            | LG CHEM LTD.  | 07/25/2017 | 88184  | 40084 | Pusan | Charleston, South<br>Carolina | ATHOS          | South Korea | N/M N/M                                                                                                                     | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S<br>ATTN : ESTHER LE 1-<br>4044006125                   | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-5<br>32555 05  |

|                                                          |                           |               |            |       |       |       |                               |                     |             |                                 |                                                                                                                     |                                            |
|----------------------------------------------------------|---------------------------|---------------|------------|-------|-------|-------|-------------------------------|---------------------|-------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| 4500939731<br>3 METHYL<br>LASS 3,<br>OUP-II HS           | LG CHEM AMERICA<br>INC.   | LG CHEM LTD.  | 07/18/2017 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MSC LISBON          | South Korea | SEAL NO.: 133586 IN ISO<br>TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                        | YOUNG<br>KOREA                             |
| 45087<br>4 HS<br>R401-                                   | LG CHEM AMERICA,<br>INC., | LG CHEM LTD.  | 07/18/2017 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MSC LISBON          | South Korea | MARK & NO. IN ISO<br>TANK       | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>ATTN : ESTHER LE 1-<br>4044006125 | LG TW<br>DAER<br>SEOUI<br>07336<br>32555   |
| ENE-                                                     | LG CHEM AMERICA           | LG CHEM, LTD. | 07/11/2017 | 35361 | 16073 | Pusan | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | AS PER LABEL                    | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA GA<br>30305 TEL:678-984-5714                                            | 20 YOI<br>YOUNG<br>TOWE<br>150-72          |
| TE, IN<br>9 PACK<br>JE:2916-1 2-<br>VA(M<br>JMER)<br>K   | LG CHEM AMERICA,<br>INC., | LG CHEM LTD.  | 07/11/2017 | 88184 | 40084 | Pusan | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | N/M N/M                         | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S<br>ATTN : ESTHER LE 1-<br>4044006125    | LG TW<br>DAER<br>SEOUI<br>07336<br>32555   |
| ATE,<br>919<br>S CO<br>1500939 738<br>MONOME R)<br>K 4,  | LG CHEM AMERICA,<br>INC., | LG CHEM LTD.  | 07/06/2017 | 88184 | 40084 | Pusan | Charleston, South<br>Carolina | MAERSK SAIGON       | South Korea | N/M N/M                         | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S<br>ATTN : ESTHER LE 1-<br>4044006125    | LG TW<br>DAER<br>SEOUI<br>07336<br>32555   |
| 45087<br>4 HS<br>R401-                                   | LG CHEM AMERICA           | LG CHEM, LTD. | 06/28/2017 | 35361 | 16073 | Pusan | Charleston, South<br>Carolina | MSC MAXINE          | South Korea | AS PER LABEL                    | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA GA<br>30305 TEL:678-984-5714                                            | 20 YOI<br>YOUNG<br>TOWE<br>150-72          |
| ATE,<br>919<br>S CO<br>1500939 739<br>MONOME R)<br>K 4,  | LG CHEM AMERICA,<br>INC., | LG CHEM LTD.  | 06/28/2017 | 88184 | 40084 | Pusan | Charleston, South<br>Carolina | MSC MAXINE          | South Korea | N/M N/M                         | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S<br>ATTN : ESTHER LE 1-<br>4044006125    | LG TW<br>DAER<br>SEOUI<br>07336<br>23773   |
| MER PIO<br>109000<br>1,000 KG<br>78-9 84-                | LG CHEM AMERICA,<br>INC.  | LG CHEM, LTD. | 06/28/2017 | 35435 | 16107 | Pusan | Charleston, South<br>Carolina | MSC MAXINE          | South Korea | AS PER LABEL                    | 3475 PIEDMONT ROAD, NE<br>STE 1200, ATLANTA, GA<br>30305, USA ATIN: SEA GUN<br>LEE — 1-4044006125                   | 20 YOI<br>YOUNG<br>TOWE<br>150-72<br>32555 |
| ATE,<br>919<br>S CO<br>1500939 740<br>MONOME R)<br>K 40, | LG CHEM AMERICA,<br>INC., | LG CHEM LTD.  | 06/28/2017 | 88184 | 40084 | Pusan | Charleston, South<br>Carolina | MSC MAXINE          | South Korea | N/M N/M                         | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S<br>ATTN : ESTHER LE 1-<br>4044006125    | LG TW<br>DAER<br>SEOUI<br>07336<br>32555   |

|                                                     |                           |               |            |       |       |       |                               |                      |             |                                 |                                                                                                                           |                                                                |
|-----------------------------------------------------|---------------------------|---------------|------------|-------|-------|-------|-------------------------------|----------------------|-------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| 10 ABS<br>IX: 310-<br>4 P/O :<br>10 ABS<br>IX: 310- | LG CHEM AMERICA,<br>INC.  | LG CHEM, LTD. | 06/20/2017 | 70999 | 32272 | Pusan | Charleston, South<br>Carolina | MAERSK SEOUL         | South Korea | AS PER LABEL AS PER<br>LABEL    | 3475 PIEDMONT ROAD, NE<br>STE 1200, ATLANTA, GA<br>30305, USA ATTN: SEA GUN<br>LEE--- 1-4044006125                        | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>32555 04 |
| ED<br>ED                                            | LG CHEM AMERICA,<br>INC., | LG CHEM LTD.  | 06/15/2017 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | CMA CGM<br>MELISANDE | South Korea | IN ISO TANKS NO<br>MARKS        | 3475 PIEDMONT RD. NE,<br>SUITE 1200,,F<br>ULTON,GEORGIA,UNITED<br>STATES, ATLANT A GA,<br>UNITED STATES - - TELEX:<br>POS | LG TWIN T<br>DAERO, YC<br>GU,SEOUL,<br>UL , SOUTH<br>POSTAL    |
|                                                     | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 06/07/2017 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MEMPHIS              | South Korea | SEAL NO.: 117735 IN ISO<br>TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                              | LG TWIN T<br>DAERO, SE                                         |
|                                                     | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 05/30/2017 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MAERSK SURABAYA      | South Korea | SEAL NO.: 117879 IN ISO<br>TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                              | YOUNGDUI<br>KOREA SE                                           |
|                                                     | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 05/23/2017 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | MAERSK<br>SEMARANG   | South Korea | SEAL NO.: 121092 IN ISO<br>TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                              | LG TWIN T<br>DAERO, SE                                         |
|                                                     | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 05/23/2017 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | MAERSK<br>SEMARANG   | South Korea | SEAL NO.: 128100 IN ISO<br>TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                              | LG TWIN T<br>DAERO, SE                                         |
|                                                     | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 05/23/2017 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MAERSK<br>SEMARANG   | South Korea | SEAL NO.: 115734 IN ISO<br>TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                              | LG TWIN T<br>DAERO, SE                                         |
| CLASS<br>!                                          | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 04/29/2017 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL MODERN           | South Korea | N/M . . .                       | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL 404-400-6125<br>EMAIL<br>ESTHERLELGCHEM.COM                  | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336                   |
| CLASS                                               | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 04/29/2017 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL MODERN           | South Korea | N/M . .                         | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL 404-400-6125<br>EMAIL<br>ESTHERLELGCHEM.COM                  | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336                   |



|                                                                 |                              |               |            |        |       |       |                            |                  |             |                                                                                                        |                                                                                                                        |                                 |
|-----------------------------------------------------------------|------------------------------|---------------|------------|--------|-------|-------|----------------------------|------------------|-------------|--------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 22948 HS R401-                                                  | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 04/27/2017 | 35435  | 16107 | Pusan | Charleston, South Carolina | SAFMARINE MAKUTU | South Korea | AS PER LABEL                                                                                           | 3475 PIEDMONT ROAD, NE STE 1200, ATLANTA, GA 30305, USA ATTN: SEA GUN LEE                                              | 20 YOI DONG TWIN TOWER EX 82-   |
| ENE-                                                            | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 04/12/2017 | 35361  | 16073 | Pusan | Charleston, South Carolina | MOL MAXIM        | South Korea | AS PER LABEL                                                                                           | 3475 PIEDMONT RD. NE, SUITE 1200 ATLANTA, GA 30305 TEL: 678-984-5714                                                   | 20 YOI YOUNG TOWNE 150-72       |
| -000-OP HS II121H-NP -75412 -8N8, 20 -8N821 -94541              | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 04/05/2017 | 35499  | 16136 | Pusan | Charleston, South Carolina | KAETHE P         | South Korea | AS PER LABEL                                                                                           | 3475 PIEDMONT RD. NE STE. 1200 ATLANTA, GA 30305 AUN: SEA GUN LEE                                                      | 20 YOI YOUNG TOWNE 150-72 32555 |
| USTOMER GS OF 914 P O P O 506659                                | FITESA SIMPSONVILLE INC      | LG CHEM, LTD. | 03/28/2017 | 129875 | 59034 | Pusan | Charleston, South Carolina | GRASMERE MAERSK  | South Korea | HQX3 CONTAINER ONLY. . . AS PER LABEL 40 HQX3 CONTAINER ONLY. . . AS PER LABEL 40 HQX3 CONTAINER ONLY. | 840 SE MAIN ST SIMPSONVILLE, SC 29681 US                                                                               | 128, YI YEONI 07336             |
| 914 P O (7) ON E, 3, II, -3 ME R P/O : T E, 919 S CODE:2 18906, | LG CHEM AMERICA, INC.,       | LG CHEM LTD.  | 03/28/2017 | 44092  | 20042 | Pusan | Charleston, South Carolina | GRASMERE MAERSK  | South Korea | N/M                                                                                                    | 3475 PIEDMONT RD. NE, SUITE 1200, ATLANTA, GA 30305 (12TH FLOOR), U.S ATTN : ESTHER LE, TEL : 404-400-612 1-4044006125 | LG TW DAER( SEOUI 07336 32555   |
| TO MER P/O ATE, 919 S CODE 091890 7 MONOMER),                   | LG CHEM AMERICA, INC.,       | LG CHEM LTD.  | 03/28/2017 | 44092  | 20042 | Pusan | Charleston, South Carolina | GRASMERE MAERSK  | South Korea | N/M                                                                                                    | 3475 PIEDMONT RD. NE, SUITE 1200, ATLANTA, GA 30305 (12TH FLOOR), U.S ATTN : ESTHER LE 1-4044006125                    | LG TW DAER( SEOUI 07336 27579   |
| ABILIZED 1919 CLASS UNK 1612 TARE T 23,740 3                    | LG CHEM AMERICA INC          | LG CHEM LTD.  | 03/17/2017 | 44000  | 20000 | Pusan | Charleston, South Carolina | MOL MATRIX       | South Korea | N/M . . . . .                                                                                          | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA GA, 30305 TE 404-400-6125 EMAIL ESTHERLELGCHEM.COM                            | LG TW DAER( SEOUI 07336         |
|                                                                 | LG CHEM AMERICA INC          | LG CHEM LTD.  | 03/14/2017 | 46200  | 21000 | Pusan | Charleston, South Carolina | SEA LAND METEOR  | South Korea | SEAL NO.: 134957 IN ISO TANK                                                                           | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                                                                 | LG TW DAER(                     |
| P/O : 2003 36 TE, INH QUID, NO S OUP: III HS O. YLHEXYL, O      | CHEMBANK INTERNATIONAL, INC. | LG CHEM LTD.  | 03/14/2017 | 44092  | 20042 | Pusan | Charleston, South Carolina | SEA LAND METEOR  | South Korea | N/M                                                                                                    | 15 FOREST STREET CLOSTER, NJ 07624 1-7326750773                                                                        | LG TW DAER( SEOUI 07336 32555   |

|                                              |     |                                 |              |            |       |       |       |                               |                        |             |                                                 |                                                                                                                      |                                                                |
|----------------------------------------------|-----|---------------------------------|--------------|------------|-------|-------|-------|-------------------------------|------------------------|-------------|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| 7701<br>H<br>KA<br>16-12-                    | ER) | LG CHEM AMERICA<br>INC          | LG CHEM LTD. | 03/14/2017 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA LAND METEOR        | South Korea | IN ISO TANK                                     | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>GA,30305 TEL: 404-400-<br>6125, EMAIL:ESTHERLE@L<br>1-4044006125      | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-37<br>32555 04 |
| 7701<br>H<br>KA<br>16-12-                    | ER) | LG CHEM AMERICA<br>INC          | LG CHEM LTD. | 03/14/2017 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA LAND METEOR        | South Korea | IN ISO TANK                                     | 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT 30305 TEL:<br>404-400-6125,<br>EMAIL:ESTHERLE@LGCHE<br>M.COM 1-4044006125     | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-37<br>32555 04 |
| 2003 36<br>JH<br>I, NO S<br>III HS<br>XYL, O |     | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD. | 03/14/2017 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA LAND METEOR        | South Korea | N/M                                             | 15 FOREST STREET<br>CLOSTER, NJ 07624 1-<br>7326750773                                                               | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-55<br>32555 05 |
|                                              |     | LG CHEM AMERICA<br>INC          | LG CHEM LTD. | 03/12/2017 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | MOL MISSION            | South Korea | SEAL NO.: 113676 IN ISO<br>TANK                 | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                         | LG TWIN T<br>DAERO, SE                                         |
|                                              |     | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD. | 03/09/2017 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | COSCO NINGBO           | South Korea | SECOND SEAL NO:<br>117052/117070 IN ISO<br>TANK | 15 FOREST<br>STREET,BERGEN,NEW<br>JERSEY, UNITED STATES,<br>CLOSTER NJ, UNITED S<br>TATES -- TELEX: POSTAL:<br>07624 | LG TWIN T<br>DAERO, YC<br>GU,SEOUL,<br>UL , SOUTH<br>POSTAL    |
|                                              |     | LG CHEM AMERICA<br>INC          | LG CHEM LTD. | 02/24/2017 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | HENRY HUDSON<br>BRIDGE | South Korea | NO MARKS                                        | 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT LANTA GA,<br>UNITED STATES<br>POSTAL:303 05                                   | LG TWIN T<br>DAERO, YC<br>SEOUL , SC<br>POSTAL:07              |
|                                              |     | LG CHEM AMERICA<br>INC          | LG CHEM LTD. | 02/16/2017 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | COSCO<br>GUANGZHOU     | South Korea | NO MARKS                                        | 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT LANTA GA,<br>30305 ATLANTA GA,<br>UNITED STATES 404-400-<br>6125 POSTAL:30305 | LG TWIN T<br>DAERO, SE<br>POSTAL:07                            |
|                                              |     | LG CHEM AMERICA,<br>INC.,       | LG CHEM LTD. | 02/12/2017 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | HANNOVER BRIDGE        | South Korea | IN ISO TANK                                     | 3475 PIEDMONT RD. NE,<br>SUITE 1200, A TLANTA GA,<br>UNITED STATES<br>POSTAL:30 305                                  | LG TWIN T<br>DAERO,YO<br>SEOUL , SC<br>OSTAL:073               |
|                                              |     | LG CHEM AMERICA,<br>INC.,       | LG CHEM LTD. | 02/12/2017 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | HANNOVER BRIDGE        | South Korea | IN ISO TANK                                     | 3475 PIEDMONT RD. NE,<br>SUITE 1200, A TLANTA GA,<br>UNITED STATES<br>POSTAL:30 305                                  | LG TWIN T<br>DAERO,YO<br>SEOUL , SC<br>OSTAL:073               |

|                                                                          |                            |               |            |        |       |       |                            |                     |             |                                                                                                              |                                                                                       |                                          |
|--------------------------------------------------------------------------|----------------------------|---------------|------------|--------|-------|-------|----------------------------|---------------------|-------------|--------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|------------------------------------------|
|                                                                          | LG CHEM AMERICA, INC.,     | LG CHEM LTD.  | 02/12/2017 | 46200  | 21000 | Pusan | Charleston, South Carolina | HANNOVER BRIDGE     | South Korea | IN ISO TANK                                                                                                  | 3475 PIEDMONT RD. NE, SUITE 1200, ATLANTA GA, UNITED STATES<br>POSTAL:30 305          | LG TW<br>DAER<br>SEOUI<br>POST/          |
|                                                                          | LG CHEM AMERICA, INC.,     | LG CHEM LTD.  | 02/12/2017 | 46200  | 21000 | Pusan | Charleston, South Carolina | HANNOVER BRIDGE     | South Korea | IN ISO TANK                                                                                                  | 3475 PIEDMONT RD. NE, SUITE 1200, ATLANTA GA, UNITED STATES<br>POSTAL:30 305          | LG TW<br>DAER<br>SEOUI<br>POST/          |
|                                                                          | LG CHEM AMERICA INC        | LG CHEM LTD.  | 02/12/2017 | 44000  | 20000 | Pusan | Charleston, South Carolina | HANNOVER BRIDGE     | South Korea | NO MARKS                                                                                                     | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA GA, UNITED STATES<br>4044006125 POSTAL:30354 | LG TW<br>DAER<br>SEOUI<br>POST/          |
| COMER P O<br>AMS . . 84<br>INE P O NO.<br>P O 506333<br>84 BAGS OF<br>O. | FITESA<br>SIMPSONVILLE INC | LG CHEM, LTD. | 02/11/2017 | 129875 | 59034 | Pusan | Charleston, South Carolina | MOL MAJESTY         | South Korea | HQX3 CONTAINER ONLY. . . AS PER LABEL<br>40 HQX3 CONTAINER ONLY. . . AS PER LABEL<br>40 HQX3 CONTAINER ONLY. | 840 SE MAIN ST<br>SIMPSONVILLE, SC 29681<br>US                                        | 128, YI<br>YEON<br>07336                 |
| 97383<br>9460<br>CE16051018<br>1280                                      |                            |               |            |        |       |       |                            |                     |             |                                                                                                              |                                                                                       |                                          |
| CONTI-                                                                   | LG CHEM AMERICA,           | LG CHEM, LTD  | 02/10/2017 | 45804  | 20820 | Pusan | Charleston, South Carolina | MOL MAJESTY         | South Korea | AS PER LABEL                                                                                                 | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA                         | 128, YI<br>DAER<br>SEOUI                 |
| E, INH<br>PACKA<br>E:2916-12 -<br>VA(ME<br>IER)<br>K                     | LG CHEM AMERICA<br>INC     | LG CHEM LTD.  | 01/19/2017 | 44092  | 20042 | Pusan | Charleston, South Carolina | MAERSK UTAH         | South Korea | PARTY 2 LG CHEM AMERICA INC 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA GA, 30305 TEL:404-400-6125,             | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA GA, 30305 TEL:404-400-6125, 1-4044006125     | LG TW<br>DAER<br>SEOUI<br>07336<br>32555 |
| 94308<br>2100<br>E16051018<br>R 1783<br>DER BL -<br>CONTI-               | LG CHEM AMERICA,           | LG CHEM, LTD  | 01/16/2017 | 45804  | 20820 | Pusan | Charleston, South Carolina | MOL MOTIVATOR       | South Korea | AS PER LABEL                                                                                                 | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA                         | 128, YI<br>DAER<br>SEOUI                 |
| 94308<br>2100<br>E16051018<br>R 1783<br>DER BL -<br>CONTI-               | LG CHEM AMERICA,           | LG CHEM, LTD  | 01/16/2017 | 45804  | 20820 | Pusan | Charleston, South Carolina | MOL MOTIVATOR       | South Korea | AS PER LABEL                                                                                                 | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA                         | 128, YI<br>DAER<br>SEOUI                 |
| NHI BITED<br>G ING<br>3.11 .1000<br>CRYLIC<br>BULK<br>ER, B/L            | LG CHEM AMERICA<br>INC     | LG CHEM LTD.  | 12/21/2016 | 46297  | 21044 | Pusan | Charleston, South Carolina | SEA LAND<br>MERCURY | South Korea | IN ISO TANK                                                                                                  | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA GA, 30305 TEL: 404-400-6125 1-0000000000     | LG TW<br>DAER<br>SEOUI<br>07336<br>32555 |

|                                                                                |                           |               |            |       |       |       |                               |                     |             |                                                                                                                        |                                                                                                                                 |                                          |
|--------------------------------------------------------------------------------|---------------------------|---------------|------------|-------|-------|-------|-------------------------------|---------------------|-------------|------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| CLASS 8(3)<br>W/CONTAINER                                                      | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 12/21/2016 | 46297 | 21044 | Pusan | Charleston, South<br>Carolina | SEA LAND<br>MERCURY | South Korea | N/M                                                                                                                    | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL: 404-400-6125 1-<br>0000000000                                     | LG TW<br>DAER<br>SEOUI<br>07336<br>32555 |
| 1<br>E, INH<br>PACKA<br>E: 2916.1<br>1 EA(<br>MER)<br>20,000.000               | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 12/21/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA LAND<br>MERCURY | South Korea | IN ISO TANK                                                                                                            | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL: 404-400-6125 1-<br>0000000000                                     | LG TW<br>DAER<br>SEOUI<br>07336<br>32555 |
| MER P/O :<br>BER NBR<br>OX                                                     | CHANNEL PRIME<br>ALLIANCE | LG CHEM, LTD. | 12/06/2016 | 43386 | 19721 | Pusan | Charleston, South<br>Carolina | SEA-LAND COMET      | South Korea | AS PER LABEL                                                                                                           | BROWN DISTRIBUTION<br>CENTERS 9551 WILLIAM<br>AIKEN AVE LADSON,<br>SOUTH CAROLINA 29456 1-<br>5152644110 TEL EX 1-<br>515264 41 | 128, YI<br>YEON<br>KORE/<br>32555        |
| E, INH<br>PACKA<br>E: 2916-12 -<br>VA(ME<br>MER)<br>K                          | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 12/06/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND COMET      | South Korea | IN ISO TANK                                                                                                            | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305, TEL: 404-400-6125<br>EMAIL: ESTHERLE@LGCHE<br>M.COM 1-0000000000      | LG TW<br>DAER<br>SEOUI<br>07336<br>26317 |
| NHI BITED<br>G ING<br>3.11 .1000<br>CRYLIC<br>BULK<br>ER, B/L                  | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 11/24/2016 | 46297 | 21044 | Pusan | Charleston, South<br>Carolina | SEA-LAND INTREPID   | South Korea | AMERICA INC 3475<br>PIEDMONT ROAD NE<br>SUITE 1200 AT LANTA<br>GA, 30305 TEL: 404-400-<br>6125,<br>EMAIL: ESTHERLE@LGC | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305, TEL: 404-400-612<br>EMAIL: ESTHERLE@LGCHE<br>M.COM 1-0000000000       | LG TW<br>DAER<br>SEOUI<br>07336<br>32555 |
| CLASS 8<br>W/CONTAINER<br>XFU0536<br>4                                         | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 11/24/2016 | 46297 | 21044 | Pusan | Charleston, South<br>Carolina | SEA-LAND INTREPID   | South Korea | N/M                                                                                                                    | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL: 404-400-6125 1-<br>0000000000                                     | LG TW<br>DAER<br>SEOUI<br>07336<br>32555 |
| NTYL<br>000.000 KG<br>E:<br>PREPAID                                            | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 11/24/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL MAXIM           | South Korea | AS PER LABEL                                                                                                           | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.                                                  | 128, YI<br>YOUN<br>KORE/<br>32555        |
| 014/116028<br>NHI BITED<br>A GING<br>3.11.1000<br>CRYLIC<br>BULK<br>E, RED B/L | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 11/08/2016 | 46297 | 21044 | Pusan | Charleston, South<br>Carolina | SEA-LAND<br>CHARGER | South Korea | IN ISO TANK                                                                                                            | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL: 404-400-6125 1-<br>0000000000                                     | LG TW<br>DAER<br>SEOUI<br>07336<br>32555 |
| MER P/O :<br>NTYL G<br>0.000 KG -<br>E: 032<br>EPAID                           | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 11/08/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND<br>CHARGER | South Korea | N/M                                                                                                                    | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>1-0000000000                                  | 128, YI<br>YOUN<br>KORE/<br>000000       |

|                                                                     |                           |               |            |       |       |       |                               |                     |             |                                                                                                                                            |                                                                                                                           |                                          |
|---------------------------------------------------------------------|---------------------------|---------------|------------|-------|-------|-------|-------------------------------|---------------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| MER P/O :<br>NTYL G<br>00.000 KG<br>E: 0328<br>PAID                 | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 11/08/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND<br>CHARGER | South Korea | N/M                                                                                                                                        | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>1-0000000000                            | 128, Y<br>YOUNG<br>KOREA<br>000000       |
| MER P/O :<br>NTYL G<br>00.000 KG -<br>E: 032<br>EPAID               | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 11/08/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND<br>CHARGER | South Korea | N/M                                                                                                                                        | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>1-0000000000                            | 128, Y<br>YOUNG<br>KOREA<br>37731        |
| MER P/O :<br>NTYL G<br>00.000 KG -<br>E: 032<br>EPAID               | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 11/08/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND<br>CHARGER | South Korea | N/M                                                                                                                                        | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>1-0000000000                            | 128, Y<br>YOUNG<br>KOREA<br>237736       |
| INHIBITED<br>AGING<br>0.11.1000<br>CRYLIC<br>ACID)                  | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 11/02/2016 | 46297 | 21044 | Pusan | Charleston, South<br>Carolina | SEA LAND RACER      | South Korea | N/M                                                                                                                                        | 3475 PIEDMONT ROAD NE<br>SUITE 1200, ATLANTA GA,<br>30305 TEL: 404-400-6125 1-<br>0000000000                              | LG TW<br>DAER<br>SEOUL<br>07336<br>32555 |
| INHIBITED<br>AGING<br>0.11.1000<br>CRYLIC<br>(Y LIC ACID)<br>RENDER | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 10/25/2016 | 46297 | 21044 | Pusan | Charleston, South<br>Carolina | GRASMERE<br>MAERSK  | South Korea | AMERICA INC 3475<br>PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>GA, 30305 ATTN: 404-<br>400-6 125, EMAIL:<br>ESTHERLE@LGCHEM.C               | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL: 404-400-6125 1-<br>0000000000                               | LG TW<br>DAER<br>SEOUL<br>07336<br>32555 |
| INHIBITED<br>AGING<br>0.11.1000<br>CRYLIC<br>(Y LIC ACID)<br>RENDER | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 10/25/2016 | 46297 | 21044 | Pusan | Charleston, South<br>Carolina | GRASMERE<br>MAERSK  | South Korea | N/M                                                                                                                                        | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL: 404-400-6125 1-<br>0000000000                               | LG TW<br>DAER<br>SEOUL<br>07336<br>26317 |
| 17 CLASS 3<br>JK CONT<br>GESU80<br>672                              | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 10/18/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA LAND METEOR     | South Korea | N/M                                                                                                                                        | 3475 PIEDMONT ROAD NE<br>STE 1200 ATLANTA GA,<br>30305 ATTN: 404-400-6125 1-<br>0000000000                                | LG TW<br>DAER<br>SEOUL<br>07336<br>32555 |
| INHIBITED<br>AGING<br>0.11.1000<br>CRYLIC<br>(Y LIC ACID)<br>RENDER | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 10/18/2016 | 46297 | 21044 | Pusan | Charleston, South<br>Carolina | SEA LAND METEOR     | South Korea | AMERICA INC 3475<br>PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 ATTN: 404-400-612<br>EMAIL:<br>ESTHERLE@LGCHEM.COM<br>1-0000000000 | 3475 PIEDMONT ROAD NE<br>STE 1200 ATLANTA GA,<br>30305 ATTN: 404-400-612<br>EMAIL:<br>ESTHERLE@LGCHEM.COM<br>1-0000000000 | LG TW<br>DAER<br>SEOUL<br>07336<br>32555 |
| (INNER) CY /<br>STOMER<br>EOPENTYL<br>000.000 KG<br>E:<br>PREPAID   | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 10/12/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL MARVEL          | South Korea | AS PER LABEL                                                                                                                               | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>TEATTN : ESTHER LE                      | 128, Y<br>YOUNG<br>KOREA                 |

|                                   |                           |               |            |       |       |       |                               |                 |             |              |                                                                                                                                |                                                              |
|-----------------------------------|---------------------------|---------------|------------|-------|-------|-------|-------------------------------|-----------------|-------------|--------------|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|
| 3) CY /<br>IER<br>ENTYL<br>100 KG | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 10/12/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL MARVEL      | South Korea | AS PER LABEL | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>TEATTN : ESTHER LE                           | 128, YEOUI<br>YOUNGDUI<br>KOREA(ZIP                          |
| PAID                              |                           |               |            |       |       |       |                               |                 |             |              |                                                                                                                                |                                                              |
| CLASS<br>CON                      | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 10/02/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND COMET  | South Korea | N/M          | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL:404-400-6125, 1-<br>0000000000                                    | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-5<br>3255505 |
| CLASS<br>CON<br>FCU<br>8          | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 10/02/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND COMET  | South Korea | N/M          | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL:404-400-6125, 1-<br>0000000000                                    | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-5<br>3255505 |
| CLASS<br>CON<br>SU8<br>.16        | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 10/02/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND COMET  | South Korea | N/M          | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL:404-400-6125, 1-<br>0000000000                                    | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-5<br>3255505 |
| CLASS<br>CON<br>TU2<br>.46        | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 10/02/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND COMET  | South Korea | N/M          | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL:404-400-6125, 1-<br>0000000000                                    | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 82-5<br>3255505 |
| P/O :<br>. G<br>0 KG -            | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 10/02/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND COMET  | South Korea | AS PER LABEL | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>ATTN : ESTHER LE TEL :<br>404-4 1-5742394090 | 128, YEOUI<br>YOUNGDUI<br>KOREA(ZIP<br>553206012             |
| P/O :<br>. G<br>0 KG -            | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 10/02/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND COMET  | South Korea | AS PER LABEL | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>ATTN : ESTHER LE TEL :<br>404-4 1-5742394090 | 128, YEOUI<br>YOUNGDUI<br>KOREA(ZIP<br>553206012             |
|                                   | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 09/22/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | HANNOVER BRIDGE | South Korea | NO MARKS     | 3475 PIEDMONT RD. NE,<br>SUITE 1200, A .                                                                                       | 128, YEOL<br>YOUNGDUI                                        |
|                                   | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 09/22/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | HANNOVER BRIDGE | South Korea | NO MARKS     | 3475 PIEDMONT RD. NE,<br>SUITE 1200, A .                                                                                       | 128, YEOL<br>YOUNGDUI                                        |



|                                                              |                           |               |            |       |       |       |                               |                     |             |              |                                                                                                                                    |                                     |
|--------------------------------------------------------------|---------------------------|---------------|------------|-------|-------|-------|-------------------------------|---------------------|-------------|--------------|------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| MER P/O :<br>NTYL G<br>00.000<br>LNEX<br>-000                | LG CHEM AMERICA,<br>INC.  | LG CHEM LTD.  | 09/18/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND INTREPID   | South Korea | N/M          | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305, (12TH FLOOR),<br>U.S.A. 1-5742394090                                    | 128, YI<br>YOUNG<br>KOREA<br>553206 |
| NTYL G<br>0.000 KG -<br>PRODUCT<br>HT<br>NO.                 | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 09/18/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND INTREPID   | South Korea | N/M          | 3475 PIEDMONT RD. NE,<br>SUITE 1200. ATLANTA, GA<br>30305(12TH FLOOR),U.S.A<br>ATTN : ESTHER LE TEL:404-<br>400-6125 1-5742394090  | 128, YI<br>YOUNG<br>KOREA<br>553206 |
|                                                              | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 09/15/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | YM UTOPIA           | South Korea | NO MARKS     | . 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 TH FLOOR), U.S. TE<br>ATTN ESTHER LE TEL 404-<br>400-6125              | . 128, YI<br>YEON<br>KOREA          |
|                                                              | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 09/15/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | YM UTOPIA           | South Korea | NO MARKS     | . 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 TH FLOOR), U.S. TE<br>ATTN ESTHER LE TEL 404-<br>400-6125              | . 128, YI<br>YEON<br>KOREA          |
| 61953<br>0109-4<br>E16051018<br>R 1783<br>DER BL -<br>CONTI- | LG CHEM AMERICA,          | LG CHEM, LTD  | 09/14/2016 | 45804 | 20820 | Pusan | Charleston, South<br>Carolina | MOL MAXIM           | South Korea | AS PER LABEL | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA                                                                      | 128, YI<br>DAER<br>SEOUL            |
| 61954<br>6803-1<br>E16051018<br>R 1783<br>DER BL -<br>CONTI- | LG CHEM AMERICA,          | LG CHEM, LTD  | 09/14/2016 | 45804 | 20820 | Pusan | Charleston, South<br>Carolina | MOL MAXIM           | South Korea | AS PER LABEL | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA                                                                      | 128, YI<br>DAER<br>SEOUL            |
| MER P/O :<br>NTYL G<br>00.000 KG -<br>PRODUCT<br>HT          | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 09/11/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | AUGUSTA KONTOR      | South Korea | AS PER LABEL | 3475 PIEDMONT RD. NE,<br>SUITE 1200. ATLANTA, GA<br>30305 (12TH FLOOR), U.S<br>ATTN : ESTHER LEE TEL :<br>404-400-61 1-5742394090  | 128, YI<br>YOUNG<br>KOREA<br>553206 |
| MER P/O :<br>NTYL G<br>00.000 KG -<br>PRODUCT<br>HT          | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 09/11/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | AUGUSTA KONTOR      | South Korea | AS PER LABEL | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S<br>ATTN : ESTHER LEE TEL :<br>404-400-61 1-5742394090  | 128, YI<br>YOUNG<br>KOREA<br>553206 |
| MER P/O :<br>NTYL G<br>00.000 KG -<br>PRODUCT<br>HT          | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 09/07/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND<br>CHARGER | South Korea | AS PER LABEL | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S<br>ATTN : ESTHER LEE TEL :<br>404-400-612 1-5742394090 | 128, YI<br>YOUNG<br>KOREA<br>553206 |

|                                                            |                           |               |            |       |       |       |                               |                     |             |              |                                                                                                                                   |                                     |
|------------------------------------------------------------|---------------------------|---------------|------------|-------|-------|-------|-------------------------------|---------------------|-------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| MER P/O :<br>NTYL G<br>0.000 KG -<br>PRODUCT<br>3HT        | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 09/07/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA-LAND<br>CHARGER | South Korea | AS PER LABEL | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S<br>ATTN : ESTHER LEE TEL :<br>404-400-61 1-5742394090 | 128, YI<br>YOUNG<br>KOREA<br>553206 |
| MER P/O :<br>NTYL G<br>0.000K G -<br>PR ODUCT<br>iH T      | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 08/28/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA LAND RACER      | South Korea | N/M          | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>1-5742394090                                    | 128, YI<br>YOUNG<br>KOREA<br>553206 |
| MER P/O :<br>NTYL G<br>0.000K G -<br>PR ODUCT<br>iH T      | LG CHEM AMERICA,<br>INC., | LG CHEM, LTD. | 08/28/2016 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA LAND RACER      | South Korea | N/M          | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR), U.S.A.<br>1-5742394090                                    | 128, YI<br>YOUNG<br>KOREA<br>553206 |
|                                                            | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 08/25/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | YM UTMOST           | South Korea | NO MARKS     | . 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT .                                                                                        | . LG TI<br>DAER                     |
|                                                            | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 08/25/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | YM UTMOST           | South Korea | NO MARKS     | . 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT .                                                                                        | . LG TI<br>DAER                     |
|                                                            | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 08/25/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | YM UTMOST           | South Korea | NO MARKS     | . 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT .                                                                                        | . LG TI<br>DAER                     |
| 50370<br>0109<br>E16051018<br>R 1783<br>DER BL -<br>CONTI- | LG CHEM AMERICA,<br>INC.  | LG CHEM, LTD  | 08/24/2016 | 45804 | 20820 | Pusan | Charleston, South<br>Carolina | MOL MOTIVATOR       | South Korea | AS PER LABEL | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA                                                                     | 128, YI<br>YOUNG<br>KOREA<br>553206 |
|                                                            | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 08/19/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | COSCO BEIJING       | South Korea | NO MARKS     | . 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT .                                                                                        | . LG TI<br>DAER                     |
|                                                            | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 08/19/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | COSCO BEIJING       | South Korea | NO MARKS     | . 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT .                                                                                        | . LG TI<br>DAER                     |

|                                                            |                          |              |            |       |       |       |                               |                 |             |              |                                                                                                                      |                                 |
|------------------------------------------------------------|--------------------------|--------------|------------|-------|-------|-------|-------------------------------|-----------------|-------------|--------------|----------------------------------------------------------------------------------------------------------------------|---------------------------------|
|                                                            | LG CHEM AMERICA<br>INC   | LG CHEM LTD. | 08/19/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | COSCO BEIJING   | South Korea | NO MARKS     | . 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT LANTA GA,<br>30305 USA TEL 404-400-612<br>TE5, EMAIL<br>ESTHERLE@LGCHEM.COM | . LG T<br>DAER                  |
|                                                            | LG CHEM AMERICA<br>INC   | LG CHEM LTD. | 08/19/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | COSCO BEIJING   | South Korea | NO MARKS     | . 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT LANTA GA,<br>30305 USA TEL 404-400-612<br>TE5, E                            | . LG T<br>DAER<br>TEODI         |
| 50370<br>0109<br>E16051018<br>R 1783<br>DER BL -<br>CONTI- | LG CHEM AMERICA,         | LG CHEM, LTD | 08/17/2016 | 45804 | 20820 | Pusan | Charleston, South<br>Carolina | MOL MATRIX      | South Korea | AS PER LABEL | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA                                                        | 128, YI<br>DAER<br>SEOUI        |
| 50370<br>0109<br>E16051018<br>R 1783<br>DER BL -<br>CONTI- | LG CHEM AMERICA,         | LG CHEM, LTD | 08/17/2016 | 45804 | 20820 | Pusan | Charleston, South<br>Carolina | MOL MATRIX      | South Korea | AS PER LABEL | INC. 2400 LAKEVIEW PKWY<br>STE 580 ALPHARETTA GA<br>30009 USA                                                        | 128, YI<br>DAER<br>SEOUI        |
| : METHYL<br>UN<br>_ASS: 3 -<br>> -----<br>-----1           | LG CHEMAMERICA,<br>INC., | LG CHEM LTD. | 07/27/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | DEIRA           | South Korea | NO MARKS     | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA, GA<br>30305, USA ATTN: SEA GUN<br>LEE TEL:678-708-6074                   | LG TW<br>DAER<br>SEOUI<br>07336 |
| PPERS<br>V: METHYL<br>UN<br>_ASS: 3 -<br>> -----<br>-----1 | LG CHEMAMERICA,<br>INC., | LG CHEM LTD. | 07/17/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | CPO NORFOLK     | South Korea | NO MARKS     | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA, GA<br>30305, USA ATTN: SEA GUN<br>LEE TEL:678-708-6074                   | LG TW<br>DAER<br>SEOUI<br>07336 |
| PPERS<br>V: METHYL<br>UN<br>_ASS: 3 -<br>> -----<br>-----1 | LG CHEMAMERICA,<br>INC., | LG CHEM LTD. | 07/17/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | CPO NORFOLK     | South Korea | NO MARKS     | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA, GA<br>30305, USA ATTN: SEA GUN<br>LEE TEL:678-708-6074                   | LG TW<br>DAER<br>SEOUI<br>07336 |
| ID                                                         | LG CHEMAMERICA,<br>INC., | LG CHEM LTD. | 07/14/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | HANNOVER BRIDGE | South Korea | NO MARKS     | . 3475 PIEDMONT RD. NE<br>STE. 1200, ATL .                                                                           | . LG T<br>DAER                  |
|                                                            | LG CHEMAMERICA,<br>INC., | LG CHEM LTD. | 07/14/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | HANNOVER BRIDGE | South Korea | NO MARKS     | . 3475 PIEDMONT RD. NE<br>STE. 1200, ATL .                                                                           | . LG T<br>DAER                  |

|              |                           |              |            |       |       |       |                               |               |             |                                 |                                                                                                        |                                              |
|--------------|---------------------------|--------------|------------|-------|-------|-------|-------------------------------|---------------|-------------|---------------------------------|--------------------------------------------------------------------------------------------------------|----------------------------------------------|
| 3S<br>:THYL  | LG CHEMAMERICA,<br>INC.,  | LG CHEM LTD. | 07/03/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | CPO MIAMI     | South Korea | NO MARKS                        | 2400 LAKEVIEW PARKWAY<br>SUITE 580, ALPHARETTA,<br>GA 30009, USA ATTN: SEA<br>GUN LEE TEL: 678-984-714 | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 |
| 3 -<br>:THYL | LG CHEMAMERICA,<br>INC.,  | LG CHEM LTD. | 07/03/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | CPO MIAMI     | South Korea | NO MARKS                        | 2400 LAKEVIEW PARKWAY<br>SUITE 580, ALPHARETTA,<br>GA 30009, USA ATTN: SEA<br>GUN LEE TEL: 678-984-714 | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 |
| 3 -<br>:THYL | LG CHEMAMERICA,<br>INC.,  | LG CHEM LTD. | 07/03/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | CPO MIAMI     | South Korea | NO MARKS                        | 2400 LAKEVIEW PARKWAY<br>SUITE 580, ALPHARETTA,<br>GA 30009, USA ATTN: SEA<br>GUN LEE TEL: 678-984-714 | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>07336 |
|              | LG CHEM AMERICA,<br>INC., | LG CHEM LTD. | 07/01/2016 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | YM SEATTLE    | South Korea | SEAL NO.: 002994 IN ISO<br>TANK | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA,<br>ATLANTA, US US                                          | LG TWIN T<br>DAERO SE                        |
|              | LG CHEM AMERICA,<br>INC., | LG CHEM LTD. | 07/01/2016 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | YM SEATTLE    | South Korea | SEAL NO.: 011640 IN ISO<br>TANK | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA,<br>ATLANTA, US US                                          | LG TWIN T<br>DAERO, SE                       |
|              | LG CHEM AMERICA<br>INC    | LG CHEM LTD  | 06/26/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | CUCKOO HUNTER | South Korea | NM                              | 3475 PIEDMONT RD NE<br>SUITE 1200 ATLANTA GA<br>30305 12TH FLOOR USA<br>TE404 400 6125                 | 128 YEOUI<br>YOUNGDUI<br>KOREA 073           |
|              | LG CHEM AMERICA<br>INC    | LG CHEM LTD  | 06/26/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | CUCKOO HUNTER | South Korea | NM                              | 3475 PIEDMONT RD NE<br>SUITE 1200 ATLANTA GA<br>30305 12TH FLOOR USA<br>TE404 400 6125                 | 128 YEOUI<br>YOUNGDUI<br>KOREA 073           |
|              | LG CHEM AMERICA<br>INC    | LG CHEM LTD  | 06/26/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | CUCKOO HUNTER | South Korea | NM                              | 3475 PIEDMONT RD NE<br>SUITE 1200 ATLANTA GA<br>30305 12TH FLOOR USA<br>TE404 400 6125                 | 128 YEOUI<br>YOUNGDUI<br>KOREA 073           |
|              | LG CHEM AMERICA<br>INC    | LG CHEM LTD  | 06/26/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | CUCKOO HUNTER | South Korea | NM                              | 3475 PIEDMONT RD NE<br>SUITE 1200 ATLANTA GA<br>30305 12TH FLOOR USA<br>TE404 400 6125                 | 128 YEOUI<br>YOUNGDUI<br>KOREA 073           |
|              | LG CHEM AMERICA<br>INC    | LG CHEM LTD  | 06/26/2016 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | CUCKOO HUNTER | South Korea | NM                              | 3475 PIEDMONT RD NE<br>SUITE 1200 ATLANTA GA<br>30305 12TH FLOOR USA<br>TE404 400 6125                 | 128 YEOUI<br>YOUNGDUI<br>KOREA 073           |

|                                          |                         |               |            |        |        |       |                            |                  |             |                                                              |                                                                                            |                       |
|------------------------------------------|-------------------------|---------------|------------|--------|--------|-------|----------------------------|------------------|-------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------------|-----------------------|
|                                          | LG CHEM AMERICA INC     | LG CHEM LTD   | 06/26/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | CUCKOO HUNTER    | South Korea | NM                                                           | 3475 PIEDMONT RD NE SUITE 1200 ATLANTA GA 30305 12TH FLOOR USA TE404 400 6125              | 128 YE YOUNG KOREA    |
|                                          | LG CHEM AMERICA INC     | LG CHEM LTD   | 06/26/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | CUCKOO HUNTER    | South Korea | NM                                                           | 3475 PIEDMONT RD NE SUITE 1200 ATLANTA GA 30305 12TH FLOOR USA TE404 400 6125              | 128 YE YOUNG KOREA    |
|                                          | LG CHEM AMERICA INC     | LG CHEM LTD   | 06/26/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | CUCKOO HUNTER    | South Korea | NM                                                           | 3475 PIEDMONT RD NE SUITE 1200 ATLANTA GA 30305 12TH FLOOR USA TE404 400 6125              | 128 YE YOUNG KOREA    |
| 35449 ETHYL LASS 3.2, OUP:II (ONOMER) IM | LG CHEM AMERICA, INC.,  | LG CHEM LTD.  | 06/14/2016 | 34848  | 15840  | Pusan | Charleston, South Carolina | ZIM ONTARIO      | South Korea | AS PER LABEL                                                 | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA, GA 30305, USA ATTN: SEA GUN LEE                   | LG TW DAER SEOU 07336 |
| 3 BAGS OF BTADIENE-S 1287 COLLECT L      | FIAMM TECHNOLOGIES, LLC | LG CHEM LTD   | 06/12/2016 | 37561  | 17073  | Pusan | Charleston, South Carolina | CAP HUDSON       | South Korea | NO MARKS                                                     | ONE FIAMM WAY WAYNESBORO, GA 30830 UNITED STATES                                           | LG TW DONG SEOU       |
| PPERS V: ETHYL UN JASS: 3 - 1            | LG CHEM AMERICA, INC.,  | LG CHEM LTD.  | 06/05/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | BOX QUEEN        | South Korea | NO MARKS                                                     | 3475 PIEDMONT RD. NE STE. 1200 ATLANTA, GA 30305, U.S.A. ATTN:SEA GUN LEE TEL:678-984-5714 | LG TW DAER SEOU 07336 |
| 29553 8459 PP SHIPPER'S TO 53 8459 PP    | BWAY CORPORATION        | LG CHEM LTD.  | 05/31/2016 | 303048 | 137749 | Pusan | Charleston, South Carolina | HYUNDAI GOODWILL | South Korea | AS PER LABELAS PER LABELAS PER LABELAS PER LABELAS PER LABEL | 8607 ROBERTS DRIVE, SUITE 250, ATLANTA GA 30350, USA                                       | LG TW DAER GU,SE      |
| COUNT SAID 30228                         | CHANNEL PRIME ALLIANCE  | LG CHEM, LTD. | 05/29/2016 | 43296  | 19680  | Pusan | Charleston, South Carolina | ERNEST HEMINGWAY | South Korea | AS PER LABEL                                                 | BROWN DISTRIBUTION CENTERS 9551 WILLIAM AIKEN AVE LADSON, SOUTH CAROLINA 29456             | 128, YI YEON KOREA    |
| R 6240 ,900.0 KG 4-4128                  | LG CHEM AMERICA, INC.   | LG CHEM LTD.  | 05/26/2016 | 46200  | 21000  | Pusan | Charleston, South Carolina | APL TURQUOISE    | South Korea | SEAL NO.: 013986 IN ISO TANK                                 | 2400 LAKEVIEW PARKWAY SUITE 580, ALPHARETTA ALPHARETTA US US                               | LG TW DAER            |

|         |                       |              |            |       |       |       |                            |             |             |                              |                                                              |              |
|---------|-----------------------|--------------|------------|-------|-------|-------|----------------------------|-------------|-------------|------------------------------|--------------------------------------------------------------|--------------|
| ACRYLIC | LG CHEMAMERICA, INC.  | LG CHEM LTD. | 05/26/2016 | 44000 | 20000 | Pusan | Charleston, South Carolina | YM ELIXIR   | South Korea | NO MARKS                     | . 2400 LAKEVIEW PARKWAY SUITE 580,ALP .                      | . LG T1 DAER |
|         | LG CHEMAMERICA, INC.  | LG CHEM LTD. | 05/26/2016 | 44000 | 20000 | Pusan | Charleston, South Carolina | YM ELIXIR   | South Korea | NO MARKS                     | . 2400 LAKEVIEW PARKWAY SUITE 580,ALP .                      | . LG T1 DAER |
|         | LG CHEMAMERICA, INC.  | LG CHEM LTD. | 05/26/2016 | 44000 | 20000 | Pusan | Charleston, South Carolina | YM ELIXIR   | South Korea | NO MARKS                     | . 2400 LAKEVIEW PARKWAY SUITE 580,ALP .                      | . LG T1 DAER |
| ACRYLIC | LG CHEMAMERICA, INC.  | LG CHEM LTD. | 05/26/2016 | 44000 | 20000 | Pusan | Charleston, South Carolina | YM ELIXIR   | South Korea | NO MARKS                     | . 2400 LAKEVIEW PARKWAY SUITE 580,ALP .                      | . LG T1 DAER |
|         | LG CHEM AMERICA, INC. | LG CHEM LTD. | 05/19/2016 | 46200 | 21000 | Pusan | Charleston, South Carolina | YM EMINENCE | South Korea | SEAL NO.: 013925 IN ISO TANK | 2400 LAKEVIEW PARKWAY SUITE 580, ALPHARETTA ALPHARETTA US US | LG TW DAER   |
|         | LG CHEM AMERICA, INC. | LG CHEM LTD. | 05/19/2016 | 46200 | 21000 | Pusan | Charleston, South Carolina | YM EMINENCE | South Korea | SEAL NO.: 013943 IN ISO TANK | 2400 LAKEVIEW PARKWAY SUITE 580 ALPHARETTA ALPHARETTA US US  | LG TW DAER   |
|         | LG CHEMAMERICA, INC.  | LG CHEM LTD. | 05/19/2016 | 44000 | 20000 | Pusan | Charleston, South Carolina | YM EMINENCE | South Korea | NO MARKS                     | . 2400 LAKEVIEW PARKWAY SUITE 580,ALP .                      | . LG T1 DAER |
| ACRYLIC | LG CHEMAMERICA, INC.  | LG CHEM LTD. | 05/19/2016 | 44000 | 20000 | Pusan | Charleston, South Carolina | YM EMINENCE | South Korea | NO MARKS                     | . 2400 LAKEVIEW PARKWAY SUITE 580,ALP .                      | . LG T1 DAER |
| ACRYLIC | LG CHEMAMERICA, INC.  | LG CHEM LTD. | 05/19/2016 | 44000 | 20000 | Pusan | Charleston, South Carolina | YM EMINENCE | South Korea | NO MARKS                     | . 2400 LAKEVIEW PARKWAY SUITE 580,ALP .                      | . LG T1 DAER |



|                                        |                              |               |            |        |        |       |                            |                    |             |                                                  |                                                                                                  |                        |
|----------------------------------------|------------------------------|---------------|------------|--------|--------|-------|----------------------------|--------------------|-------------|--------------------------------------------------|--------------------------------------------------------------------------------------------------|------------------------|
| ACRYLIC                                | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 05/19/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | YM EMINENCE        | South Korea | NO MARKS                                         | 2400 LAKEVIEW PARKWAY SUITE 580, ALPHARETTA, GA 30009, USA ATTN SEA GUN                          | LG TW DAER( SEOU       |
| BTADIENE-                              | FIAMM TECHNOLOGIES, LLC      | LG CHEM       | 05/17/2016 | 37561  | 17073  | Pusan | Charleston, South Carolina | SEA-LAND LIGHTNING | South Korea | AS PER LABEL                                     | 1 FIAMM WAY WAYNESBORO GA 30830 US                                                               | 20 YOI YOUN( TOWE      |
| OF ACRYLIC IS CODE IGH T 21,000 ) KGS  | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 05/17/2016 | 46200  | 21000  | Pusan | Charleston, South Carolina | HYUNDAI VOYAGER    | South Korea | NO MARKS . . . . .                               | 2400 LAKEVIEW PARKWAY SUITE 580, ALPHARETTA, GA 30009 , U.S.A. ATTN SEA GUN LEE TEL 678-984-5714 | LG TW DAER( SEOU 07336 |
| OF ACRYLIC IS CODE IGH T 21,000 ) KGS  | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 05/17/2016 | 46200  | 21000  | Pusan | Charleston, South Carolina | HYUNDAI VOYAGER    | South Korea | NO MARKS . . . . .                               | 2400 LAKEVIEW PARKWAY SUITE 580, ALPHARETTA, GA 30009 , U.S.A. ATTN SEA GUN LEE TEL 678-984-5714 | LG TW DAER( SEOU 07336 |
| MONOMER) CLASS: 3                      | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 05/12/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | APL OMAN           | South Korea | SEAL NO.: 001844 IN ISO TANK                     | 2400 LAKEVIEW PARKWAY SUITE 580 ALPHARETTA ALPHARETTA US US                                      | LG TW DAER(            |
| UNDER BL - 3-4223 2. 2. . JUNT SAID -A | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 04/29/2016 | 222200 | 101000 | Pusan | Charleston, South Carolina | MOL EMPIRE         | South Korea | AS PER LABELAS PER LABELAS PER LABELAS PER LABEL | 243 WOODBINE STREET HIGH POINT NC 27261 ATTN : BETH KLINE/LINDA GARNER                           | LG TW DONG SEOU        |
| MONOMER) CLASS: 3                      | LG CHEMAMERICA, INC.         | LG CHEM LTD.  | 04/15/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | NYK DAEDALUS       | South Korea | N/M                                              | 2400 LAKEVIEW PARKWAY SUITE 580, ALPHARETTA, GA 30009, USA ATTN: SEA GUN LEE TEL:678-708-6074    | LG TW DAER( SEOU 07336 |
| MONOMER) CLASS: 3                      | LG CHEMAMERICA, INC.         | LG CHEM LTD.  | 04/15/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | NYK DAEDALUS       | South Korea | N/M                                              | 2400 LAKEVIEW PARKWAY SUITE 580, ALPHARETTA, GA 30009, USA ATTN: SEA GUN LEE TEL:678-708-6074    | LG TW DAER( SEOU 07336 |
| MONOMER) CLASS: 3                      | LG CHEMAMERICA, INC.         | LG CHEM LTD.  | 04/15/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | NYK DAEDALUS       | South Korea | N/M                                              | 2400 LAKEVIEW PARKWAY SUITE 580, ALPHARETTA, GA 30009, USA ATTN: SEA GUN LEE TEL:678-708-6074    | LG TW DAER( SEOU 07336 |

|                                                                 |                              |               |            |        |        |       |                            |                 |             |                                                  |                                                                                                        |                              |
|-----------------------------------------------------------------|------------------------------|---------------|------------|--------|--------|-------|----------------------------|-----------------|-------------|--------------------------------------------------|--------------------------------------------------------------------------------------------------------|------------------------------|
|                                                                 | FIAMM TECHNOLOGIES, LLC      | LG CHEM       | 04/09/2016 | 37561  | 17073  | Pusan | Charleston, South Carolina | MOL EXPRESS     | South Korea | AS PER LABEL                                     | 1 FIAMM WAY<br>WAYNESBORO GA 30830<br>US                                                               | 20 YOUNG TOWNE               |
| IONOMER)<br>CLASS: 3<br>CRYLATE,<br>1919                        | LG CHEMAMERICA, INC.         | LG CHEM LTD.  | 04/06/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | ZIM ONTARIO     | South Korea | N/M                                              | 2400 LAKEVIEW PARKWAY<br>SUITE 580, ALPHARETTA,<br>GA 30009, USA ATTN: SEA<br>GUN LEE TEL:678-708-6074 | LG TW DAER<br>SEOUI<br>07336 |
| IONOMER)<br>CLASS: 3                                            | LG CHEMAMERICA, INC.         | LG CHEM LTD.  | 04/06/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | ZIM ONTARIO     | South Korea | N/M                                              | 2400 LAKEVIEW PARKWAY<br>SUITE 580, ALPHARETTA,<br>GA 30009, USA ATTN: SEA<br>GUN LEE TEL:678-708-6074 | LG TW DAER<br>SEOUI<br>07336 |
| IONOMER)                                                        | LG CHEMAMERICA, INC.         | LG CHEM LTD.  | 04/06/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | ZIM ONTARIO     | South Korea | N/M                                              | 2400 LAKEVIEW PARKWAY<br>SUITE 580, ALPHARETTA,<br>GA 30009, USA ATTN: SEA<br>GUN LEE TEL:678-708-6074 | LG TW DAER<br>SEOUI<br>07336 |
| CLASS 3,<br>ISO TANK<br>291612<br>1919                          | LG CHEMAMERICA, INC.         | LG CHEM LTD.  | 03/29/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | KAETHE P        | South Korea | N/M                                              | 2400 LAKEVIEW PARKWAY<br>SUITE 580, ALPHARETTA,<br>GA 30009, USA ATTN: SEA<br>GUN LEE TEL:678-708-6074 | LG TW DAER<br>SEOUI<br>07336 |
| TE<br>K<br>291612                                               | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 03/29/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | KAETHE P        | South Korea | N/M                                              | 2400 LAKEVIEW PARKWAY<br>SUITE 580, ALPHARETTA,<br>GA 30009, U.S.A ATTN:SEA<br>GUN LEE                 | LG TW DAER<br>SEOUI<br>07336 |
| SS 3,<br>ISOTANK<br>291612<br>1919                              | LG CHEMAMERICA, INC.         | LG CHEM LTD.  | 03/29/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | KAETHE P        | South Korea | N/M                                              | 2400 LAKEVIEW PARKWAY<br>SUITE 580, ALPHARETTA,<br>GA 30009, USA ATTN: SEA<br>GUN LEE TEL:678-708-6074 | LG TW DAER<br>SEOUI<br>07336 |
| 57<br>-001<br>DL)90 90.0<br>1379-001<br>E: S0168-000<br>NG SEAL | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 03/25/2016 | 44000  | 20000  | Pusan | Charleston, South Carolina | MOL EXPERIENCE  | South Korea | AS PER LABEL                                     | 2400 LAKEVIEW PARKWAY,<br>STE 580, ALPHARETTA, GA<br>30009 U.S.A. ATTN : SEA<br>GUN LEE                | 128, YOUNG<br>KOREA          |
| -A<br>378-<br>EDITORS,<br>SUITE<br>AND COUNT<br>ENOL-A          | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 03/10/2016 | 222200 | 101000 | Pusan | Charleston, South Carolina | HYUNDAI VOYAGER | South Korea | AS PER LABELAS PER LABELAS PER LABELAS PER LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER                        | LG TW DONG<br>SEOUI          |

|                                     |                         |              |            |       |       |                 |                            |                |             |                  |                                                                                                |                                     |
|-------------------------------------|-------------------------|--------------|------------|-------|-------|-----------------|----------------------------|----------------|-------------|------------------|------------------------------------------------------------------------------------------------|-------------------------------------|
| 7<br>ITEM<br>C<br>KG -              |                         |              |            |       |       |                 |                            |                |             |                  |                                                                                                |                                     |
| FI-                                 | CONTINENTAL TIRE        | LG CHEM, LTD | 02/13/2016 | 45804 | 20820 | Pusan           | Charleston, South Carolina | APL TOURMALINE | South Korea | AS PER LABEL     | 1805 HWY 521 SOUTH SUMTER, SC 29153 JON HOLLIFIELD                                             | 128, YEOUI DAERO, YEI SEOUL KOI     |
| 5<br>ITEM<br>C<br>KG -              |                         |              |            |       |       |                 |                            |                |             |                  |                                                                                                |                                     |
| FI-                                 | CONTINENTAL TIRE        | LG CHEM, LTD | 02/13/2016 | 45804 | 20820 | Pusan           | Charleston, South Carolina | APL TOURMALINE | South Korea | AS PER LABEL     | 1805 HWY 521 SOUTH SUMTER, SC 29153 JON HOLLIFIELD                                             | 128, YEOUI DAERO, YEI SEOUL KOI     |
| 5<br>ITEM<br>C<br>KG -              |                         |              |            |       |       |                 |                            |                |             |                  |                                                                                                |                                     |
| FI-                                 | CONTINENTAL TIRE        | LG CHEM, LTD | 02/13/2016 | 45804 | 20820 | Pusan           | Charleston, South Carolina | APL TOURMALINE | South Korea | AS PER LABEL     | 1805 HWY 521 SOUTH SUMTER, SC 29153 JON HOLLIFIELD                                             | 128, YEOUI DAERO, YEI SEOUL KOI     |
|                                     |                         |              |            |       |       |                 |                            |                |             |                  |                                                                                                |                                     |
|                                     | FIAMM TECHNOLOGIES, LLC | LG CHEM      | 02/05/2016 | 37561 | 17073 | Pusan           | Charleston, South Carolina | MOL EXCELLENCE | South Korea | AS PER LABEL     | 1 FIAMM WAY WAYNESBORO GA 30830 US                                                             | 20 YOIDO-D YOUNGDUI TOWERS S        |
|                                     |                         |              |            |       |       |                 |                            |                |             |                  |                                                                                                |                                     |
|                                     | TRIBUTE ENERGY, INC.    | LG CHEM LTD. | 02/05/2016 | 86143 | 39156 | Pusan           | Charleston, South Carolina | MOL EXCELLENCE | South Korea | NO MARKSNO MARKS | . 2100 WEST LOOP SOUTH, SUITE 1220 HO USTON, TX 77027 USA                                      | . LG TWIN T DAERO, YEI SEOUL, KO    |
|                                     |                         |              |            |       |       |                 |                            |                |             |                  |                                                                                                |                                     |
|                                     | LG CHEMAMERICA, INC.    | LG CHEM LTD. | 01/29/2016 | 44000 | 20000 | Pusan           | Charleston, South Carolina | VECCHIO BRIDGE | South Korea | NO MARKS         | . 2400 LAKEVIEW PARKWAY SUITE 580, AL HARETTA, GA 30009, USA ATTN SEA G                        | . LG TWIN T DAERO, YC SEOUL, KO     |
|                                     |                         |              |            |       |       |                 |                            |                |             |                  |                                                                                                |                                     |
|                                     | LG CHEMAMERICA, INC.    | LG CHEM LTD. | 01/29/2016 | 44000 | 20000 | Pusan           | Charleston, South Carolina | VECCHIO BRIDGE | South Korea | NO MARKS         | . 2400 LAKEVIEW PARKWAY SUITE 580, AL HARETTA, GA 30009, USA ATTN SEA G                        | . LG TWIN T DAERO, YC SEOUL, KO     |
| 9 HS<br>OWN<br>3HT<br>CO<br>I       |                         |              |            |       |       |                 |                            |                |             |                  |                                                                                                |                                     |
|                                     | LG CHEM AMERICA, INC.   | LG CHEM LTD. | 01/27/2016 | 44092 | 20042 | Port Bustamante | Charleston, South Carolina | ZIM ONTARIO    | Jamaica     | N/M              | 2400 LAKEVIEW PARKWAY SUITE 580, AL PHARETTA, GA 30009, USA ATTN:SEA GU N LEE TEL:678-984-5714 | LG TWIN T DAERO, YC SEOUL ,KO 07336 |
| LATE<br>9 HS<br>OWN<br>81-0250<br>I |                         |              |            |       |       |                 |                            |                |             |                  |                                                                                                |                                     |
|                                     | LG CHEM AMERICA, INC.   | LG CHEM LTD. | 01/27/2016 | 44092 | 20042 | Port Bustamante | Charleston, South Carolina | ZIM ONTARIO    | Jamaica     | N/M              | 2400 LAKEVIEW PARKWAY SUITE 580, AL PHARETTA, GA 30009, USA ATTN:SEA GU N LEE TEL:678-984-5714 | LG TWIN T DAERO, YC SEOUL ,KO 07336 |

|                            |                                 |               |            |        |        |                 |                               |                      |             |                                                                       |                                                                                                        |                                               |
|----------------------------|---------------------------------|---------------|------------|--------|--------|-----------------|-------------------------------|----------------------|-------------|-----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| 007457<br>250-26<br>FLASH  | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 01/22/2016 | 44092  | 20042  | Port Bustamante | Charleston, South<br>Carolina | KAETHE P             | Jamaica     | N/M                                                                   | 2400 LAKEVIEW PARKWAY<br>SUITE 580, AL PHARETTA,<br>GA 300009, USA ATTN:SEA<br>GUN LEE TEL:678-984-714 | LG TWIN T<br>DAERO, Y (<br>SEOUL, KO<br>07336 |
| 713-861<br>O:191           | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 01/22/2016 | 44092  | 20042  | Port Bustamante | Charleston, South<br>Carolina | KAETHE P             | Jamaica     | N/M                                                                   | 2400 LAKEVIEW PARKWAY<br>SUITE 580, AL PHARETTA,<br>GA 300009, USA ATTN:SEA<br>GUN LEE TEL:678-984-714 | LG TWIN T<br>DAERO, Y (<br>SEOUL, KO<br>07336 |
|                            | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 01/09/2016 | 222200 | 101000 | Pusan           | Charleston, South<br>Carolina | YM ELIXIR            | South Korea | NO MARKSNO<br>MARKSNO MARKSNO<br>MARKSNO MARKS                        | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN BETH KLINE LINDA<br>GARNER                          | LG TWIN T<br>DONG, YOI<br>SEOUL, KO           |
|                            | FIAMM<br>TECHNOLOGIES, LLC      | LG CHEM       | 12/27/2015 | 37561  | 17073  | Pusan           | Charleston, South<br>Carolina | HYUNDAI VOYAGER      | South Korea | AS PER LABEL                                                          | 1 FIAMM WAY<br>WAYNESBORO GA 30830<br>US                                                               | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS S            |
| 10KGS<br>4YL               | LG CHEMAMERICA,<br>INC.         | LG CHEM , LTD | 12/27/2015 | 88000  | 40000  | Pusan           | Charleston, South<br>Carolina | MOL EXPEDITOR        | South Korea | N/M . . . . .N/M . . . . .                                            | 2400 LAKEVIEW PARKWAY<br>SUITE 580, ALPHARETTA,<br>GA 30009, USA ATTN SEA<br>GUN LEE TEL 678-984-714   | LG TWIN T<br>DAERO, YE<br>SEPUL, KO           |
| ORS,<br>TE<br>COUNT<br>L-A | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 12/17/2015 | 222200 | 101000 | Pusan           | Charleston, South<br>Carolina | APL OMAN             | South Korea | AS PER LABELAS PER<br>LABELAS PER LABELAS<br>PER LABELAS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER                        | LG TWIN T<br>DONG, YOI<br>SEOUL, KO           |
|                            | TRIBUTE ENERGY,<br>INC.         | LG CHEM LTD.  | 12/10/2015 | 43072  | 19578  | Pusan           | Charleston, South<br>Carolina | ALEXANDRIA<br>BRIDGE | South Korea | NO MARKS                                                              | . 2100 WEST LOOP SOUTH,<br>SUITE 1220 HO USTON, TX<br>77027 USA                                        | . LG TWIN T<br>DAERO, YE<br>SEOUL, KO         |
| ORS,<br>TE<br>COUNT<br>L-A | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 11/12/2015 | 222200 | 101000 | Pusan           | Charleston, South<br>Carolina | MOL EXCELLENCE       | South Korea | AS PER LABELAS PER<br>LABELAS PER LABELAS<br>PER LABELAS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER                        | LG TWIN T<br>DONG, YOI<br>SEOUL, KO           |
|                            | FIAMM<br>TECHNOLOGIES, LLC      | LG CHEM       | 11/11/2015 | 37561  | 17073  | Pusan           | Charleston, South<br>Carolina | MAERSK GEORGIA       | South Korea | AS PER LABEL                                                          | 1 FIAMM WAY<br>WAYNESBORO GA 30830<br>US                                                               | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS S            |

|                                                                                                                                               |                                 |               |            |        |        |       |                               |               |             |                                                                       |                                                                                                  |                                 |
|-----------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------|------------|--------|--------|-------|-------------------------------|---------------|-------------|-----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------|
| SS 3,<br>ISOTANK                                                                                                                              | LG CHEMAMERICA,<br>INC.         | LG CHEM LTD.  | 10/29/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | HYUNDAI UNITY | South Korea | N/M . .                                                               | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>SEOUI<br>07336 |
| SS 3,<br>ISOTANK                                                                                                                              | LG CHEM AMERICA<br>INC.         | LG CHEM LTD   | 10/29/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | HYUNDAI UNITY | South Korea | N/M . .                                                               | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>GU, SE         |
| SS 3,<br>ISOTANK                                                                                                                              | LG CHEMAMERICA,<br>INC.         | LG CHEM LTD.  | 10/29/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | HYUNDAI UNITY | South Korea | N/M . .                                                               | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>SEOUI<br>07336 |
| SS 3,<br>ISOTANK<br>-A BPA<br>378-<br>EDITORS,<br>ND COUNT<br>ENOL-A<br>336-878-<br>79572<br>3881<br>R 1783<br>S LOAD<br>NTAIN P/O :<br>P/O : | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 10/29/2015 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | HYUNDAI UNITY | South Korea | AS PER LABELAS PER<br>LABELAS PER LABELAS<br>PER LABELAS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER                  | LG TW<br>DONG<br>SEOUI          |
|                                                                                                                                               | LG CHEM, LTD                    | LG CHEM, LTD  | 10/22/2015 | 91608  | 41640  | Pusan | Charleston, South<br>Carolina | MOL EMINENCE  | South Korea | AS PER LABELAS PER<br>LABEL                                           | 128, YEQUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                           | 128, YI<br>DAER<br>SEOUI        |
| SS 3 UN<br>TANK                                                                                                                               | LG CHEMAMERICA,<br>INC.         | LG CHEM LTD.  | 10/22/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | MOL EMINENCE  | South Korea | N/M . .                                                               | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>SEOUI<br>07336 |
| SS 3 UN<br>TANK                                                                                                                               | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 10/22/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | MOL EMINENCE  | South Korea | N/M . .                                                               | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>SEOUI<br>CODE  |
| SS 3 UN<br>TANK<br>P/O 28885                                                                                                                  | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD   | 10/15/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR | South Korea | N/M . . . .                                                           | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFS, NJ<br>07632 U.S.A., ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>SEOUI<br>07336 |
| SS 3 UN<br>TANK                                                                                                                               | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD   | 10/15/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR | South Korea | N/M . .                                                               | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFS, NJ<br>07632 U.S.A., ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>SEOUI<br>07336 |

|                                                     |                              |               |            |        |        |       |                            |                |             |                                                  |                                                                                                  |                          |
|-----------------------------------------------------|------------------------------|---------------|------------|--------|--------|-------|----------------------------|----------------|-------------|--------------------------------------------------|--------------------------------------------------------------------------------------------------|--------------------------|
|                                                     | FIAMM TECHNOLOGIES, LLC      | LG CHEM       | 10/07/2015 | 37561  | 17073  | Pusan | Charleston, South Carolina | NORTHERN GUARD | South Korea | AS PER LABEL                                     | 1 FIAMM WAY<br>WAYNESBORO GA 30830<br>US                                                         | 20 YOUNG TOWNE           |
| SS 3 UN<br>TANK<br>RYLATE<br>ERS OWN                | LG CHEM AMERICA INC          | LG CHEM , LTD | 10/02/2015 | 88000  | 40000  | Pusan | Charleston, South Carolina | MOL EMPIRE     | South Korea | N/M . .N/M . .                                   | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>SEPUL   |
| SS 3 UN<br>TANK<br>RYLATE<br>ERS OWN                | LG CHEM AMERICA, INC.        | LG CHEM LTD . | 09/26/2015 | 88000  | 40000  | Pusan | Charleston, South Carolina | APL TOURMALINE | South Korea | NO MARKS . .N/M . .                              | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968  | LG TW<br>DAER<br>SEOUL   |
| SS 3,<br>ISOTANK<br>RYLATE<br>ERS OWN               | LG CHEM AMERICA INC.         | LG CHEM ,LTD. | 09/17/2015 | 88000  | 40000  | Pusan | Charleston, South Carolina | MOL EXCELLENCE | South Korea | N/M . .N/M . .                                   | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968  | LG TW<br>DONG<br>SEOUL   |
| '2043<br>9360<br>1280<br>R BL -<br>CONTI-           | LG CHEM, LTD                 | LG CHEM, LTD  | 09/10/2015 | 45804  | 20820  | Pusan | Charleston, South Carolina | MOL EXPRESS    | South Korea | AS PER LABEL                                     | 128, YEOUI-<br>DAERO,YEONGDEUNGPO-<br>GU, SEOUL KOREA                                            | 128, YI<br>DAER<br>SEOUL |
| '6061<br>9418-1<br>R 1783<br>ER BL -<br>CONTI-      | LG CHEM, LTD                 | LG CHEM, LTD  | 09/10/2015 | 45804  | 20820  | Pusan | Charleston, South Carolina | MOL EXPRESS    | South Korea | AS PER LABEL                                     | 128, YEOUI-<br>DAERO,YEONGDEUNGPO-<br>GU, SEOUL KOREA                                            | 128, YI<br>DAER<br>SEOUL |
| '2044<br>9418-2<br>R 1783<br>ER BL -<br>CONTI-      | LG CHEM, LTD                 | LG CHEM, LTD  | 09/10/2015 | 45804  | 20820  | Pusan | Charleston, South Carolina | MOL EXPRESS    | South Korea | AS PER LABEL                                     | 128, YEOUI-<br>DAERO,YEONGDEUNGPO-<br>GU, SEOUL KOREA                                            | 128, YI<br>DAER<br>SEOUL |
| '2045<br>5238<br>R 1783<br>ER BL -<br>CONTI-        | LG CHEM, LTD                 | LG CHEM, LTD  | 09/10/2015 | 45804  | 20820  | Pusan | Charleston, South Carolina | MOL EXPRESS    | South Korea | AS PER LABEL                                     | 128, YEOUI-<br>DAERO,YEONGDEUNGPO-<br>GU, SEOUL KOREA                                            | 128, YI<br>DAER<br>SEOUL |
| 378-<br>EDITORS,<br>SUITE<br>328 100<br>BPA<br>378- | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 09/03/2015 | 222200 | 101000 | Pusan | Charleston, South Carolina | APL QATAR      | South Korea | AS PER LABELAS PER LABELAS PER LABELAS PER LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER                  | LG TW<br>DONG<br>SEOUL   |



|                           |               |            |       |       |       |                               |              |             |                                 |                                                    |                        |
|---------------------------|---------------|------------|-------|-------|-------|-------------------------------|--------------|-------------|---------------------------------|----------------------------------------------------|------------------------|
| FITESA<br>SIMPSONVILLE    | LG CHEM LTD   | 09/03/2015 | 98956 | 44980 | Pusan | Charleston, South<br>Carolina | APL QATAR    | South Korea | AS PER LABELAS PER<br>LABEL     | 840 SE MAIN STREET<br>SIMPSONVILLE, SC 29681<br>US | LG TW<br>DONG<br>SEOUI |
| FITESA<br>SIMPSONVILLE    | LG CHEM LTD   | 09/03/2015 | 49478 | 22490 | Pusan | Charleston, South<br>Carolina | APL QATAR    | South Korea | AS PER LABEL                    | 840 SE MAIN STREET<br>SIMPSONVILLE, SC 29681<br>US | LG TW<br>DONG<br>SEOUI |
| FITESA<br>SIMPSONVILLE    | LG CHEM LTD   | 09/03/2015 | 49478 | 22490 | Pusan | Charleston, South<br>Carolina | APL QATAR    | South Korea | AS PER LABEL                    | 840 SE MAIN STREET<br>SIMPSONVILLE, SC 29681<br>US | LG TW<br>DONG<br>SEOUI |
| LG CHEMAMERICA,<br>INC.   | LG CHEM LTD.  | 08/30/2015 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | EVER DELIGHT | South Korea | NO MARKS                        | . 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFF .         | . LG TI<br>DAER        |
| LG CHEMAMERICA,<br>INC.   | LG CHEM LTD.  | 08/30/2015 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | EVER DELIGHT | South Korea | NO MARKS                        | . 920 SYLVAN<br>AVENUE.,ENGLEWOOD<br>CLIFFS .      | . LG TI<br>DAER        |
| LG CHEMAMERICA,<br>INC.   | LG CHEM LTD.  | 08/27/2015 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | ALM WODONGA  | South Korea | NO MARKS                        | . 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFF .         | . LG TI<br>DAER        |
| LG CHEMAMERICA,<br>INC.   | LG CHEM LTD.  | 08/27/2015 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | ALM WODONGA  | South Korea | NO MARKS                        | . 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFF .         | . LG TI<br>DAER        |
| ALAC INTERNATIONAL<br>INC | LG CHEM, LTD. | 07/26/2015 | 41800 | 19000 | Pusan | Charleston, South<br>Carolina | EVER DIVINE  | South Korea | NO MARKS                        | . 55 BROAD ST. 17TH<br>FLOOR NEW YORK, N .         | . 20 YC<br>YOUNG       |
| LG CHEM AMERICA,<br>INC.  | LG CHEM LTD.  | 07/23/2015 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENCORE   | South Korea | SEAL NO.: 206392 IN ISO<br>TANK | 920 SYLVAN AVENUE FORT<br>MILL FORT MILL US US     | LG TW<br>DAER          |

|                        |                                 |               |            |        |        |       |                               |                     |             |                                                                                                       |                                                                                 |                                                 |
|------------------------|---------------------------------|---------------|------------|--------|--------|-------|-------------------------------|---------------------|-------------|-------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|-------------------------------------------------|
| ORS,<br>TE<br>00       | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 07/23/2015 | 444400 | 202000 | Pusan | Charleston, South<br>Carolina | MOL ENCORE          | South Korea | LABELAS PER LABELAS<br>PER LABELAS PER<br>LABELAS PER LABELAS<br>PER LABELAS PER LABELAS<br>PER LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER | LG TWIN T<br>DONG, YO<br>SEOUL, KO              |
|                        | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 07/19/2015 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | YM NEW JERSEY       | South Korea | NO MARKSNO<br>MARKSNO MARKSNO<br>MARKSNO MARKS                                                        | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN BETH KLINE LINDA<br>GARNER   | LG TWIN T<br>DONG, YO<br>SEOUL, KO              |
|                        | LG CHEMAMERICA,<br>INC.         | LG CHEM LTD.  | 07/16/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | APL GARNET          | South Korea | SEAL NO.: 001340 IN ISO<br>TANK                                                                       | 920 SYLVAN AVENUE.,<br>FORT MILL FORT MILL US<br>US                             | LG TWIN T<br>DAERO SEI                          |
| ORS,<br>TE<br>00       | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 07/16/2015 | 444400 | 202000 | Pusan | Charleston, South<br>Carolina | APL GARNET          | South Korea | LABELAS PER LABELAS<br>PER LABELAS PER<br>LABELAS PER LABELAS<br>PER LABELAS PER LABELAS<br>PER LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN : BETH KLINE/LINDA<br>GARNER | LG TWIN T<br>DONG, YO<br>SEOUL, KO              |
|                        | LG CHEMAMERICA,<br>INC.         | LG CHEM LTD.  | 07/09/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | MOL EXCELLENCE      | South Korea | SEAL NO.: 206374 IN ISO<br>TANK                                                                       | 920 SYLVAN AVENUE.,<br>FORT MILL FORT MILL US<br>US                             | LG TWIN T<br>DAERO, SE                          |
| 752160<br>EPC<br>0.000 | LG CHEM<br>AMERICA, INC.        | LG CHEM, LTD. | 07/08/2015 | 35361  | 16073  | Pusan | Charleston, South<br>Carolina | APL TURQUOISE       | South Korea | AS PER LABEL . . . . .                                                                                | 910 SYLVAN AVE<br>ENGLEWOOD CLIFFS, NJ<br>07632.                                | 20 YOIDO-<br>DONG, YOU<br>TWIN TOW<br>KOREA 150 |
|                        | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 06/26/2015 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | YM PORTLAND         | South Korea | NO MARKSNO<br>MARKSNO MARKSNO<br>MARKSNO MARKS                                                        | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN BETH KLINE LINDA<br>GARNER   | LG TWIN T<br>DONG, YO<br>SEOUL, KO              |
|                        | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 06/21/2015 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | HANJIN MALTA        | South Korea | NO MARKSNO<br>MARKSNO MARKSNO<br>MARKSNO MARKS                                                        | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN BETH KLINE LINDA<br>GARNER   | LG TWIN T<br>DONG, YO<br>SEOUL, KO              |
| P/O :<br>3ER BR        |                                 |               |            |        |        |       |                               |                     |             |                                                                                                       |                                                                                 |                                                 |
| VTI-<br>DE:            | LG CHEM, LTD                    | LG CHEM, LTD  | 06/10/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | HYUNDAI<br>GOODWILL | South Korea | NO MARKS AND<br>NUMBERS                                                                               | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                          | 128, YEOUI<br>DAERO, YE<br>SEOUL KOI            |

|                                                      |                                 |               |            |        |        |       |                               |                     |             |                                                |                                                                                                   |                       |
|------------------------------------------------------|---------------------------------|---------------|------------|--------|--------|-------|-------------------------------|---------------------|-------------|------------------------------------------------|---------------------------------------------------------------------------------------------------|-----------------------|
| MER P/O :<br>RUBBER<br>++<br>CONTI-<br>S. CODE:      | LG CHEM, LTD                    | LG CHEM, LTD  | 06/10/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | HYUNDAI<br>GOODWILL | South Korea | NO MARKS AND<br>NUMBERS                        | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                            | 128, YI<br>DAER( SEOU |
| BISPHENOL                                            | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 06/08/2015 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | COSCO SANTOS        | South Korea | NO MARKSNO<br>MARKSNO MARKSNO<br>MARKSNO MARKS | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN BETH KLINE LINDA<br>GARNER                     | LG TW<br>DONG<br>SEOU |
| XL-A<br>XL-A                                         | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 06/08/2015 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | COSCO SANTOS        | South Korea | NO MARKSNO<br>MARKSNO MARKSNO<br>MARKSNO MARKS | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN BETH KLINE LINDA<br>GARNER                     | LG TW<br>DONG<br>SEOU |
| MER P/O :<br>C RUBBER<br>++<br>CONTI-<br>S. CODE:    | LG CHEM, LTD                    | LG CHEM, LTD  | 05/28/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR       | South Korea | NO MARKS AND<br>NUMBERS                        | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                            | 128, YI<br>DAER( SEOU |
| MER P/O :<br>RUBBER<br>null<br>CONTI-<br>S. CODE:    | LG CHEM, LTD                    | LG CHEM, LTD  | 05/28/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR       | South Korea | NO MARKS AND<br>NUMBERS                        | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                            | 128, YI<br>DAER( SEOU |
| MER P/O :<br>C RUBBER<br>null<br>CONTI-<br>S. CODE:  | LG CHEM, LTD                    | LG CHEM, LTD  | 05/28/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR       | South Korea | NO MARKS AND<br>NUMBERS                        | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                            | 128, YI<br>DAER( SEOU |
| MER P/O :<br>RUBBER BR<br>CONTI-<br>S. CODE:         | LG CHEM, LTD                    | LG CHEM, LTD  | 05/14/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | HYUNDAI FORWARD     | South Korea | NO MARKS AND<br>NUMBERS                        | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                            | 128, YI<br>DAER( SEOU |
| 0 MT OF<br>IBITED<br>DE 2916.12-<br>,000 KGS<br>TARE | LG CHEMAMERICA.<br>INC ..       | LG CHEM LTD.  | 05/05/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | HYUNDAI DYNASTY     | South Korea | NO MARKS .....                                 | 920 SYLVAN AVENUE ..<br>ENGLEWOOD CLIFFS. NJ<br>07632 U.S.A. ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER( SEOU   |
| 0 MT OF<br>IBITED<br>DE 2916.12-<br>,000 KGS<br>TARE | LG CHEMAMERICA.<br>INC ..       | LG CHEM LTD.  | 05/05/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | HYUNDAI DYNASTY     | South Korea | NO MARKS .....                                 | 920 SYLVAN AVENUE ..<br>ENGLEWOOD CLIFFS. NJ<br>07632 U.S.A. ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER( SEOU   |

|                                                                                                                                                |                                 |               |            |        |        |        |                               |                 |             |                                         |                                                                                                                                            |                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------|------------|--------|--------|--------|-------------------------------|-----------------|-------------|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| 0 MT OF<br>IBITED<br>DE 2916.12-<br>.000 KGS<br>TARE                                                                                           | LG CHEMAMERICA,<br>INC.         | LG CHEM LTD.  | 05/05/2015 | 44000  | 20000  | Pusan  | Charleston, South<br>Carolina | HYUNDAI DYNASTY | South Korea | NO MARKS . . . . .                      | 920 SYLVAN AVENUE ..<br>ENGLEWOOD CLIFFS. NJ<br>07632 U.S.A. ATTN AARON<br>WEISS TEL 201-816-2968                                          | LG TW<br>DAERK<br>SEOUL           |
| DL-A<br>DL-A                                                                                                                                   | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 05/01/2015 | 222200 | 101000 | Pusan  | Charleston, South<br>Carolina | HONGKONG BRIDGE | South Korea | NO MARKSN<br>MARKSN<br>MARKSN<br>MARKSN | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN BETH KLINE LINDA<br>GARNER                                                              | LG TW<br>DONG<br>SEOUL            |
| DL-A<br>DL-A                                                                                                                                   | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 05/01/2015 | 222200 | 101000 | Pusan  | Charleston, South<br>Carolina | HONGKONG BRIDGE | South Korea | NO MARKSN<br>MARKSN<br>MARKSN<br>MARKSN | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN BETH KLINE LINDA<br>GARNER                                                              | LG TW<br>DONG<br>SEOUL            |
| 0 MT OF<br>IBITED<br>DE 2916.12-<br>.000 KGS<br>TARE                                                                                           | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 04/30/2015 | 44000  | 20000  | Pusan  | Charleston, South<br>Carolina | ZIM BARCELONA   | South Korea | NO MARKS . . . . .                      | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968                                           | LG TW<br>DAERK<br>SEOUL           |
| 0 MT OF<br>IBITED<br>DE 2916.12-<br>.000 KGS<br>TARE                                                                                           | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 04/30/2015 | 44000  | 20000  | Pusan  | Charleston, South<br>Carolina | ZIM BARCELONA   | South Korea | NO MARKS . . . . .                      | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968                                           | LG TW<br>DAERK<br>SEOUL           |
| 0 MT OF<br>IBITED<br>DE 2916.12-<br>.000 KGS<br>TARE                                                                                           | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 04/30/2015 | 44000  | 20000  | Pusan  | Charleston, South<br>Carolina | ZIM BARCELONA   | South Korea | NO MARKS . . . . .                      | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968                                           | LG TW<br>DAERK<br>SEOUL           |
| MERTIC<br>L AC<br>SS 3, UN<br>P-II MA(M<br>MER)<br>.K<br>PREPAID -<br>IBITED<br>.GING GR<br>(LATE MON<br>.TE BULK 20<br>REPAID -<br>F ISOTA NK | LG CHEMAMERICA,<br>INC.         | LG CHEM LTD.  | 04/28/2015 | 44092  | 20042  | Ningpo | Charleston, South<br>Carolina | MAERSK SANA     | China       | N/M                                     | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | LG TW<br>DAERK<br>SEOUL<br>553206 |
| MER P/O :<br>PIC RUBBER<br>+<br>CONTI-<br>S. CODE:                                                                                             | LG CHEM, LTD                    | LG CHEM, LTD  | 04/28/2015 | 45804  | 20820  | Pusan  | Charleston, South<br>Carolina | MOL EXPRESS     | South Korea | NO MARKS AND<br>NUMBERS                 | 128, YEQUI-<br>DAERO,YEONGDEUNGPO-<br>GU, SEOUL KOREA                                                                                      | 128, YI<br>DAERK<br>SEOUL         |

|                                                                                                                                                        |                                      |              |            |       |       |        |                               |                      |             |                         |                                                                                                                                            |                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------|------------|-------|-------|--------|-------------------------------|----------------------|-------------|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| MER P/O :<br>C RUBBER<br>++<br>CONTI-<br>S. CODE:                                                                                                      | LG CHEM, LTD                         | LG CHEM, LTD | 04/28/2015 | 45804 | 20820 | Pusan  | Charleston, South<br>Carolina | MOL EXPRESS          | South Korea | NO MARKS AND<br>NUMBERS | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                                                                     | 128, YI<br>DAER( SEOU           |
| MER P/O :<br>TIC RUBBER<br>JII<br>CONTI-<br>S. CODE:                                                                                                   | LG CHEM, LTD                         | LG CHEM, LTD | 04/21/2015 | 45804 | 20820 | Pusan  | Charleston, South<br>Carolina | HYUNDAI GLORY        | South Korea | NO MARKS AND<br>NUMBERS | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                                                                     | 128, YI<br>DAER( SEOU           |
| BTADIENE-S<br>287 17                                                                                                                                   | TO THR ORDER OF<br>FIAMM ENERGY, LLC | LG CHEM LTD  | 04/20/2015 | 37639 | 17109 | Ningpo | Charleston, South<br>Carolina | ANNA MAERSK          | China       | AS PER LABEL            | ONE FIAMM WAY<br>WAYNESBORO, GA 30830<br>(US) 1-4042600400 TEL EX 1-<br>404366 53                                                          | LG TW<br>DONG<br>SEOU<br>237806 |
| MER P/O :<br>C RUBBER<br>null<br>CONTI-<br>S. CODE:                                                                                                    | LG CHEM, LTD                         | LG CHEM, LTD | 04/15/2015 | 45804 | 20820 | Pusan  | Charleston, South<br>Carolina | ZIM COLOMBO          | South Korea | NO MARKS AND<br>NUMBERS | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                                                                     | 128, YI<br>DAER( SEOU           |
| MER P/O :<br>C RUBBER<br>JII<br>CONTI-<br>S. CODE:                                                                                                     | LG CHEM, LTD                         | LG CHEM, LTD | 04/15/2015 | 45804 | 20820 | Pusan  | Charleston, South<br>Carolina | ZIM COLOMBO          | South Korea | NO MARKS AND<br>NUMBERS | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                                                                     | 128, YI<br>DAER( SEOU           |
| MER P/O :<br>L AC<br>SS 3, UN<br>P:II MA(M<br>)MER)<br>.K<br>PLACARDS                                                                                  | LG CHEM AMERICA,<br>INC.             | LG CHEM LTD. | 04/14/2015 | 44092 | 20042 | Ningpo | Charleston, South<br>Carolina | CLEMENTINE<br>MAERSK | China       | N/M                     | 920 SYLVAN AVENUE,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN: AARON<br>WEISS TEL: 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09  | LG TW<br>DAER( SEOU<br>37731    |
| MER P/O :<br>L AC<br>SS 3, UN<br>P:II MA(M<br>)MER)<br>.K<br>PLACARDS                                                                                  | LG CHEMAMERICA,<br>INC.              | LG CHEM LTD. | 04/14/2015 | 44092 | 20042 | Ningpo | Charleston, South<br>Carolina | CLEMENTINE<br>MAERSK | China       | N/M                     | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN: AARON<br>WEISS TEL: 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | LG TW<br>DAER( SEOU<br>553206   |
| MER P/O :<br>L<br>LASS 3,<br>CUP:II<br>MONOMER)<br>EE TANK<br>S 14DAY -<br>(07/08/09)<br>7325 38<br>PO# 27324<br>IBI TED<br>GIN G<br>CRYLATE<br>RYLATE | LG CHEMAMERICA,<br>INC.              | LG CHEM LTD. | 04/14/2015 | 44092 | 20042 | Ningpo | Charleston, South<br>Carolina | CLEMENTINE<br>MAERSK | China       | AS PER LABEL            | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN: AARON<br>WEISS TEL: 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | LG TW<br>DAER( SEOU<br>37731    |
|                                                                                                                                                        | L LG CHEMAMERICA,<br>INC.            | LG CHEM LTD. | 04/14/2015 | 44092 | 20042 | Ningpo | Charleston, South<br>Carolina | CLEMENTINE<br>MAERSK | China       | AS PER LABEL            | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN: AARON<br>WEISS TEL: 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | LG TW<br>DAER( SEOU<br>553206   |

|                                                               |                                 |               |            |        |        |       |                               |                     |             |                                                                                                                |                                                                                                  |                          |
|---------------------------------------------------------------|---------------------------------|---------------|------------|--------|--------|-------|-------------------------------|---------------------|-------------|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|--------------------------|
| MER P/O :<br>RUBBER<br>++<br>CONTI-<br>S. CODE:               | LG CHEM, LTD                    | LG CHEM, LTD  | 04/02/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | KAETHE P            | South Korea | NO MARKS AND<br>NUMBERS                                                                                        | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                           | 128, YI<br>DAER<br>SEOUL |
| MER P/O :<br>RUBBER BR                                        | LG CHEM, LTD                    | LG CHEM, LTD  | 04/02/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | KAETHE P            | South Korea | NO MARKS AND<br>NUMBERS                                                                                        | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                           | 128, YI<br>DAER<br>SEOUL |
| LIBILIZED<br>RYLATE,<br>1919 HS<br>SS WEIGHT<br>16,500<br>KGS | LG CHEM AMERICA<br>INC.         | LG CHEM LTD   | 03/27/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | HYUNDAI<br>GOODWILL | South Korea | NO MARKS . . . . .                                                                                             | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>GU, SE  |
| IBITED<br>IDE 2916.12-<br>000 KGS<br>TARE                     | LG CHEM AMERICA<br>INC.         | LG CHEM LTD   | 03/27/2015 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | HYUNDAI<br>GOODWILL | South Korea | NO MARKS . . . . .                                                                                             | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>GU, SE  |
| MER P/O :<br>RUBBER<br>null<br>CONTI-<br>S. CODE:             | LG CHEM, LTD                    | LG CHEM, LTD  | 03/17/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | OOCL HALIFAX        | South Korea | NO MARKS AND<br>NUMBERS                                                                                        | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                           | 128, YI<br>DAER<br>SEOUL |
| MER P/O :<br>RUBBER<br>H.S. CODE:<br>7309.00-                 | LG CHEM, LTD                    | LG CHEM, LTD  | 03/11/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | HYUNDAI VOYAGER     | South Korea | NO MARKS AND<br>NUMBERS                                                                                        | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                           | 128, YI<br>DAER<br>SEOUL |
| MER P/O :<br>RUBBER<br>H.S. CODE:<br>7309.00-                 | LG CHEM, LTD                    | LG CHEM, LTD  | 03/11/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | HYUNDAI VOYAGER     | South Korea | NO MARKS AND<br>NUMBERS                                                                                        | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                           | 128, YI<br>DAER<br>SEOUL |
| MER P/O :<br>RUBBER<br>null<br>CONTI-<br>S. CODE:             | LG CHEM, LTD                    | LG CHEM, LTD  | 02/27/2015 | 45804  | 20820  | Pusan | Charleston, South<br>Carolina | APL GARNET          | South Korea | NO MARKS AND<br>NUMBERS                                                                                        | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                           | 128, YI<br>DAER<br>SEOUL |
| XL-<br>IOL-A<br>L-A<br>XL-<br>IOL-A<br>XL-A                   | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 01/28/2015 | 888800 | 404000 | Pusan | Charleston, South<br>Carolina | VECCHIO BRIDGE      | South Korea | MARKSNO MARKSNO<br>MARKSNO MARKSNO<br>MARKSNO MARKSNO<br>MARKSNO MARKSNO<br>MARKSNO MARKSNO<br>MARKSNO MARKSNO | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN BETH KLINE LINDA<br>GARNER                    | LG TW<br>DONG<br>SEOUL   |



|                                                                                         |                                 |              |            |       |       |                 |                               |                 |             |                         |                                                                                                  |                                   |
|-----------------------------------------------------------------------------------------|---------------------------------|--------------|------------|-------|-------|-----------------|-------------------------------|-----------------|-------------|-------------------------|--------------------------------------------------------------------------------------------------|-----------------------------------|
| MER P/O :<br>3 RUBBER<br>null<br>CONTI-<br>S. CODE:                                     | LG CHEM, LTD                    | LG CHEM, LTD | 01/20/2015 | 39697 | 18044 | Pusan           | Charleston, South<br>Carolina | KAETHE P        | South Korea | NO MARKS AND<br>NUMBERS | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                           | 128, YI<br>DAER( SEOU             |
| MER P/O :<br>RUBBER<br>null<br>CONTI-<br>S. CODE:                                       | LG CHEM, LTD                    | LG CHEM, LTD | 01/20/2015 | 39697 | 18044 | Pusan           | Charleston, South<br>Carolina | KAETHE P        | South Korea | NO MARKS AND<br>NUMBERS | 128, YEOUI-<br>DAERO, YEONGDEUNGPO-<br>GU, SEOUL KOREA                                           | 128, YI<br>DAER( SEOU             |
| ABILIZED<br>RYLATE,<br>1919 HS<br>SS WEIGHT<br>16,260<br>KGS                            | LG CHEM AMERICA<br>INC.         | LG CHEM LTD  | 12/30/2014 | 44000 | 20000 | Port Bustamante | Charleston, South<br>Carolina | HYUNDAI VOYAGER | Jamaica     | NO MARKS . . . . .      | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER( GU, SE             |
| ABILIZED<br>RYLATE,<br>1919 HS<br>SS WEIGHT<br>16,540<br>KGS                            | LG CHEM AMERICA<br>INC.         | LG CHEM LTD  | 12/30/2014 | 44000 | 20000 | Port Bustamante | Charleston, South<br>Carolina | HYUNDAI VOYAGER | Jamaica     | NO MARKS . . . . .      | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER( GU, SE             |
| ABILIZED<br>RYLATE,<br>1919 HS<br>SS WEIGHT<br>16,550<br>KGS                            | LG GLOBAL CHEM<br>AMERICA, INC. | LG CHEM LTD. | 12/16/2014 | 44000 | 20000 | Pusan           | Charleston, South<br>Carolina | HYUNDAI DYNASTY | South Korea | NO MARKS . . . . .      | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER( SEOU               |
| ABILIZED<br>RYLATE,<br>1919 HS<br>SS WEIGHT<br>16,440<br>KGS                            | LG GLOBAL CHEM<br>AMERICA, INC. | LG CHEM LTD. | 12/16/2014 | 44000 | 20000 | Pusan           | Charleston, South<br>Carolina | HYUNDAI DYNASTY | South Korea | NO MARKS . . . . .      | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER( SEOU               |
| 1919<br>A(METHYL<br>1,000.000 KG<br>1422.110461<br>iHT<br>NOTIABLE<br>VOL 19.00<br>BAFU | LG CHEM AMERICA                 | LG CHEM LTD. | 12/13/2014 | 44000 | 20000 | Pusan           | Charleston, South<br>Carolina | MOL EFFICIENCY  | South Korea | NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                | 20 YOI<br>YOUNI<br>TOWE<br>150-72 |
| 110449.1104<br>PAID COPY<br>RELEASE                                                     | ALAC<br>INTERNATIONAL, INC.     | LG CHEM LTD. | 12/13/2014 | 41800 | 19000 | Pusan           | Charleston, South<br>Carolina | MOL EFFICIENCY  | South Korea | NO MARKS AND<br>NUMBERS | 55 BROAD ST, 17TH FLOOR<br>NEW YORK, NY 10004 USA                                                | 20 YOI<br>YOUNI<br>TOWE<br>150-72 |
| ABILIZED<br>RYLATE,<br>1919 HS<br>SS WEIGHT<br>16,255<br>KGS                            | LG CHEMAMERICA,<br>INC.         | LG CHEM LTD. | 12/11/2014 | 44000 | 20000 | Pusan           | Charleston, South<br>Carolina | ZIM ONTARIO     | South Korea | NO MARKS . . . . .      | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER( SEOU               |

|                                                 |                                    |              |            |       |       |       |                               |                |             |                         |                                                                                                  |                                  |
|-------------------------------------------------|------------------------------------|--------------|------------|-------|-------|-------|-------------------------------|----------------|-------------|-------------------------|--------------------------------------------------------------------------------------------------|----------------------------------|
| UN 2218<br>ARINE<br>><br>J 8883200<br>117343 HS | LG CHEM AMERICA                    | LG CHEM LTD. | 11/28/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | ZIM ONTARIO    | South Korea | NO MARKS                | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>SEOUI           |
| UN 2218<br>ARINE<br>><br>J 8883200<br>117343 HS | LG CHEM AMERICA                    | LG CHEM LTD. | 11/28/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| UN 2218<br>ARINE<br>><br>J 8883200<br>117343 HS | LG CHEM AMERICA                    | LG CHEM LTD. | 11/28/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| UN 2218<br>ARINE<br>><br>J 8883200<br>117343 HS | LG CHEM AMERICA                    | LG CHEM LTD. | 11/28/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| UN 2218<br>ARINE<br>><br>J 8883200<br>117343 HS | LG CHEM AMERICA                    | LG CHEM LTD. | 11/28/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| UN 2218<br>ARINE<br>><br>J 8883200<br>117343 HS | LG CHEM AMERICA                    | LG CHEM LTD. | 11/28/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| UN 2218<br>ARINE<br>><br>J 8883200<br>117343 HS | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM, LTD | 11/26/2014 | 45804 | 20820 | Pusan | Charleston, South<br>Carolina | YM ELIXIR      | South Korea | NO MARKS                | INC. 750 THE CITY<br>DR.SOUTH SUITE 300<br>ORANGE, CA 92868                                      | 128, YI<br>DAER<br>SEOUI         |
| UN 2218<br>ARINE<br>><br>J 8883200<br>117343 HS | LG CHEM AMERICA                    | LG CHEM LTD. | 11/20/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL TOURMALINE | South Korea | NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| UN 2218<br>ARINE<br>><br>J 8883200<br>117343 HS | LG CHEM AMERICA                    | LG CHEM LTD. | 11/20/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL TOURMALINE | South Korea | NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |

|                                |                                    |               |            |       |       |           |                               |                  |             |                         |                                                                                                 |                                                |
|--------------------------------|------------------------------------|---------------|------------|-------|-------|-----------|-------------------------------|------------------|-------------|-------------------------|-------------------------------------------------------------------------------------------------|------------------------------------------------|
| 9<br>THYL<br>000 KG            | LG CHEM AMERICA                    | LG CHEM LTD.  | 11/20/2014 | 44000 | 20000 | Pusan     | Charleston, South<br>Carolina | APL TOURMALINE   | South Korea | NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                               | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| 8<br>E<br>D)                   | LG CHEM AMERICA                    | LG CHEM LTD.  | 11/20/2014 | 44000 | 20000 | Pusan     | Charleston, South<br>Carolina | APL TOURMALINE   | South Korea | NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                               | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
|                                | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM, LTD  | 11/19/2014 | 45804 | 20820 | Pusan     | Charleston, South<br>Carolina | VECCHIO BRIDGE   | South Korea | NO MARKS                | INC. 750 THE CITY<br>DR.SOUTH SUITE 300<br>ORANGE, CA 92868                                     | 128, YEOUI<br>DAERO, YE<br>SEOUL KOI           |
| 9<br>THYL<br>000 KG<br>.110464 | LG CHEM AMERICA                    | LG CHEM LTD.  | 11/12/2014 | 44000 | 20000 | Pusan     | Charleston, South<br>Carolina | MOL ENCORE       | South Korea | NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                               | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| ITE<br>S OWN                   | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD.  | 11/05/2014 | 44000 | 20000 | Hong Kong | Charleston, South<br>Carolina | MOL MAGNIFICENCE | Hong Kong   | NO MARKS . . .          | 920 SYLAN AVENUE.,<br>ENGLEWOOD CLIFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968  | LG TWIN TC<br>DAERO, YC<br>SEOUL, KO           |
| ITE<br>S OWN                   | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD.  | 11/05/2014 | 44000 | 20000 | Hong Kong | Charleston, South<br>Carolina | MOL MAGNIFICENCE | Hong Kong   | N/M . . .               | 920 SYLAN AVENUE.,<br>ENGLEWOOD CLIFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968  | LG TWIN TC<br>DAERO, YC<br>SEOUL, KO           |
| ITE<br>S OWN                   | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD.  | 11/05/2014 | 44000 | 20000 | Hong Kong | Charleston, South<br>Carolina | MOL MAGNIFICENCE | Hong Kong   | N/M . . .               | 920 SYLAN AVENUE.,<br>ENGLEWOOD CLIFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968  | LG TWIN TC<br>DAERO, YC<br>SEOUL, KO           |
| ITE<br>S OWN                   | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD . | 11/05/2014 | 44000 | 20000 | Hong Kong | Charleston, South<br>Carolina | MOL MAGNIFICENCE | Hong Kong   | N/M . . .               | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TWIN TC<br>DAERO, YC<br>SEOUL, KO           |
| ITE<br>S OWN                   | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD . | 11/05/2014 | 44000 | 20000 | Hong Kong | Charleston, South<br>Carolina | MOL MAGNIFICENCE | Hong Kong   | N/M . . .               | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFS, NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968 | LG TWIN TC<br>DAERO, YC<br>SEOUL, KO           |

|                                                                     |                             |              |            |       |       |          |                               |                 |             |                         |                                                                                                                                            |                                 |
|---------------------------------------------------------------------|-----------------------------|--------------|------------|-------|-------|----------|-------------------------------|-----------------|-------------|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| VER P/O:<br>HIBIT ED<br>GIN G<br>(CID) HIGH<br>ULK 20,              | LG CHEM AMERICA<br>INC.     | LG CHEM LTD. | 10/30/2014 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | DS KINGDOM      | China       | IN BULK                 | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN:AARON<br>WEISS TEL:201-816-2968 1-<br>2818531000 TEL EX 1-<br>281853 11   | LG TW<br>DAER<br>SEOU<br>251847 |
| ISS 3, UN<br>OTANK                                                  | LG CHEM AMERICA<br>INC.     | LG CHEM LTD  | 10/29/2014 | 44000 | 20000 | Yantian  | Charleston, South<br>Carolina | MOL MOTIVATOR   | China       | N/M . .                 | 920 SYLVAN AVENUE.<br>ENGLEWOOD CLIFS. NJ<br>07632 U.S.A, ATTN AARON<br>WEISS TEL 201-816-2968                                             | LG TW<br>DAER<br>SEOU           |
| 18 PAC<br>YLIC AC ID)<br>(CID BULK<br>K HIRE<br>S - UN&IMO<br>ALL 4 | LG CHEM AMERICA<br>INC.     | LG CHEM LTD. | 10/23/2014 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | NORTHERN JASPER | China       | N/M                     | 920 SYLVAN AVENUE.,<br>STREET. RANCHO<br>DOMINGUEZ, CA 90220<br>TEL: 310-667-4800, FAX: 310-<br>667-488 1-2018162000 TEL<br>EX 1-201816 09 | LG TW<br>DAER<br>SEOU<br>37731' |
| 2ETHYL<br>ODE<br>0<br>REIGHT<br>GOTIABLE<br>RES                     | ALAC<br>INTERNATIONAL, INC. | LG CHEM LTD. | 10/23/2014 | 41800 | 19000 | Pusan    | Charleston, South<br>Carolina | MOL EXCELLENCE  | South Korea | NO MARKS AND<br>NUMBERS | 55 BROAD ST, 17TH FLOOR<br>NEW YORK , NY 10004 USA<br>TEL:+1 (212)742-0235 EXT.<br>102                                                     | 20 YO<br>YOUN<br>TOWE<br>150-72 |
|                                                                     | LG CHEM AMERICA<br>INC.     | LG CHEM LTD. | 10/15/2014 | 44000 | 20000 | Pusan    | Charleston, South<br>Carolina | VIRGINIA BRIDGE | South Korea | NO MARKS                | . 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFF S, NJ<br>07632 U.S.A. ATTN AARON<br>WEIS                                                          | LG TI<br>DAER<br>SEOU           |
| ISS 3, UN<br>OTANK                                                  | LG CHEM AMERICA .,<br>INC.  | LG CHEM LTD. | 10/14/2014 | 44000 | 20000 | Yantian  | Charleston, South<br>Carolina | MOL PARTNER     | China       | N/M . .                 | 920 SYLVAN AVENUE.<br>ENGLEWOOD CLIFS. NJ<br>07632 U.S.A , AITN AARON<br>WEISS TEL 201-8 16-2968                                           | LG TW<br>DAER<br>SEOU           |
| ISS 3, UN<br>OTANK                                                  | LG CHEM AMERICA,<br>INC.    | LG CHEM LTD. | 10/14/2014 | 44000 | 20000 | Yantian  | Charleston, South<br>Carolina | MOL PARTNER     | China       | N/M . .                 | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN AARON<br>WEISS TEL 201-816-2968                                           | LG TW<br>DAER<br>SEOU           |
| IBILIZED<br>ISS 3, UN<br>OTANK                                      | LG CHEM AMERICA .,<br>INC.  | LG CHEM LTD. | 10/14/2014 | 44000 | 20000 | Yantian  | Charleston, South<br>Carolina | MOL PARTNER     | China       | N/M . . .               | 920 SYLVAN AVENUE.<br>ENGLEWOOD CLIFS. NJ<br>07632 U.S.A , AITN AARON<br>WEISS TEL 201-8 16-2968                                           | LG TW<br>DAER<br>SEOU           |
| HAZ<br>ISS 3, UN<br>OTANK                                           | LG CHEM AMERICA .,<br>INC.  | LG CHEM LTD. | 10/14/2014 | 44000 | 20000 | Yantian  | Charleston, South<br>Carolina | MOL PARTNER     | China       | NO MARKS . . .          | 920 SYLVAN AVENUE.<br>ENGLEWOOD CLIFS. NJ<br>07632 U.S.A , AITN AARON<br>WEISS TEL 201-8 16-2968                                           | LG TW<br>DAER<br>SEOU           |

|                                                                  |                                 |               |            |        |        |         |                               |                |             |                                                                                                       |                                                                                                 |                                  |
|------------------------------------------------------------------|---------------------------------|---------------|------------|--------|--------|---------|-------------------------------|----------------|-------------|-------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|----------------------------------|
| ED<br>, UN 2218)<br>K                                            | LG CHEM<br>AMERICA, INC.        | LG CHEM LTD.  | 10/14/2014 | 44000  | 20000  | Yantian | Charleston, South<br>Carolina | MOL PARTNER    | China       | N/M . . .                                                                                             | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFS, NJ<br>07632 U.S.A ATTN ARRON<br>WEISS TEL 201-816-2968  | LG TW<br>DAER<br>GU, SE          |
| POLARIZER<br>POLARIZER<br>POLARIZER                              | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 10/08/2014 | 444400 | 202000 | Pusan   | Charleston, South<br>Carolina | YM ETERNITY    | South Korea | NO MARKS NO MARKS<br>NO MARKS NO MARKS<br>NO MARKS NO MARKS<br>NO MARKS NO MARKS<br>NO MARKS NO MARKS | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN BETH KLINE LINDA<br>GARNER                   | LG TW<br>DONG<br>SEOUI           |
| HAZ<br>MONOMER)<br>(ING<br>N ISOTANK                             | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 09/22/2014 | 44000  | 20000  | Yantian | Charleston, South<br>Carolina | MOL MAESTRO    | China       | N/M . . . .                                                                                           | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFS, NJ<br>07632 U.S.A. ATTN AARON<br>WEISS TEL 201-816-2968 | LG TW<br>DAER<br>SEOUI           |
| ASS 3, UN<br>-2000<br>K<br>03959,<br>3M)                         | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 09/04/2014 | 44000  | 20000  | Pusan   | Charleston, South<br>Carolina | APL OAKLAND    | South Korea | N/M                                                                                                   | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFS, NJ<br>07632 U.S.A. ATTN:AARON<br>WEISS                  | LG TW<br>DAER<br>SEOUI           |
| 6<br>I METHYL<br>LASS 3.2,<br>IP:II<br>MONOMER)<br>IS CODE ;     | LG CHEM AMERICA                 | LG CHEM LTD.  | 09/04/2014 | 44000  | 20000  | Pusan   | Charleston, South<br>Carolina | APL OAKLAND    | South Korea | NO MARKS AND<br>NUMBERS                                                                               | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                               | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| POLARIZER<br>POLARIZER<br>POLARIZER                              | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 08/28/2014 | 444400 | 202000 | Pusan   | Charleston, South<br>Carolina | YM EMINENCE    | South Korea | NO MARKS NO MARKS<br>NO MARKS NO MARKS<br>NO MARKS NO MARKS<br>NO MARKS NO MARKS<br>NO MARKS NO MARKS | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN BETH KLINE LINDA<br>GARNER                   | LG TW<br>DONG<br>SEOUI           |
| 6<br>I METHYL<br>LASS 3.2,<br>IP:II<br>MONOMER)<br>IS CODE ;     | LG CHEM AMERICA                 | LG CHEM LTD.  | 08/27/2014 | 44000  | 20000  | Pusan   | Charleston, South<br>Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND<br>NUMBERS                                                                               | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                               | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| LATE,<br>I 1919<br>A(METHYL<br>,000.000 KG<br>'541.107572<br>IHT | LG CHEM AMERICA                 | LG CHEM LTD.  | 08/20/2014 | 44000  | 20000  | Pusan   | Charleston, South<br>Carolina | APL TOURMALINE | South Korea | NO MARKS AND<br>NUMBERS                                                                               | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                               | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| LATE,<br>I 1919<br>A(METHYL<br>,000.000 KG<br>'530.107533<br>IHT | LG CHEM AMERICA                 | LG CHEM LTD.  | 08/20/2014 | 44000  | 20000  | Pusan   | Charleston, South<br>Carolina | APL TOURMALINE | South Korea | NO MARKS AND<br>NUMBERS                                                                               | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                               | 20 YOI<br>YOUN<br>TOWE<br>150-72 |

|                                       |                                    |               |            |        |        |          |                               |                  |             |                                                                                  |                                                                                                                                              |                                                  |
|---------------------------------------|------------------------------------|---------------|------------|--------|--------|----------|-------------------------------|------------------|-------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 9<br>THYL<br>000 KG<br>107573         | LG CHEM AMERICA                    | LG CHEM LTD.  | 08/10/2014 | 44000  | 20000  | Pusan    | Charleston, South<br>Carolina | MOL EXPRESS      | South Korea | NO MARKS AND<br>NUMBERS                                                          | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                                            | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721   |
| IF S<br>L<br>IDES                     | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD.  | 07/24/2014 | 44092  | 20042  | Shanghai | Charleston, South<br>Carolina | SEALAND ILLINOIS | China       | N/M                                                                              | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL:201-8162968 1-<br>2018162000 TEL EX 1-<br>201816 09 | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>237733928 |
| 061-680<br>19.00<br>CU<br>576<br>V-   | ALAC INTERNATIONAL<br>INC          | LG CHEM LTD   | 07/23/2014 | 41800  | 19000  | Pusan    | Charleston, South<br>Carolina | MOL EXCELLENCE   | South Korea | NO MARKS AND<br>NUMBERS                                                          | 55 BROAD ST 17TH FLOOR<br>NEW YORK NH 10004 USA                                                                                              | 20 YOIDO I<br>YOUNGDEI<br>TOWER                  |
| 0516<br>9<br>THYL<br>000 KG<br>107598 | LG CHEM AMERICA                    | LG CHEM LTD.  | 07/23/2014 | 44000  | 20000  | Pusan    | Charleston, South<br>Carolina | MOL EXCELLENCE   | South Korea | NO MARKS AND<br>NUMBERS                                                          | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                                            | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721   |
| ARIZER<br>ARIZER<br>ARIZER            | KAO SPECIALTIES<br>AMERICAS LLC    | LG CHEM, LTD. | 07/23/2014 | 444400 | 202000 | Pusan    | Charleston, South<br>Carolina | VALENCIA BRIDGE  | South Korea | NO MARKS NO MARKS<br>NO MARKS NO MARKS<br>NO MARKS NO MARKS<br>NO MARKS NO MARKS | 243 WOODBINE STREET<br>HIGH POINT NC 27261<br>ATTN STEVE WOOSLEY<br>ANDREW LUND TEL 336-<br>878-4212                                         | LG TWIN T<br>DONG, YOL<br>SEOUL, KO              |
| HYL<br>3.2,<br>OMER)<br>DE ;          | LG CHEM AMERICA                    | LG CHEM LTD.  | 07/17/2014 | 44000  | 20000  | Pusan    | Charleston, South<br>Carolina | APL TURQUOISE    | South Korea | NO MARKS AND<br>NUMBERS                                                          | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                                            | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721   |
| 9<br>THYL<br>000 KG<br>303990         | LG CHEM AMERICA                    | LG CHEM LTD.  | 07/10/2014 | 44000  | 20000  | Pusan    | Charleston, South<br>Carolina | MOL ENDEAVOR     | South Korea | NO MARKS AND<br>NUMBERS                                                          | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                                            | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721   |
|                                       | LG CHEM AMERICA                    | LG CHEM, LTD. | 07/10/2014 | 35361  | 16073  | Pusan    | Charleston, South<br>Carolina | YM KAOHSIUNG     | South Korea | NO MARKS                                                                         | INC., 910 SYLVAN AVE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN ALICE<br>LEUNG TEL 201-816-2097                                          | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721   |
| ED CL<br>GROUP<br>OMER                | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD.  | 07/06/2014 | 44092  | 20042  | Shanghai | Charleston, South<br>Carolina | MAERSK KOBE      | China       | N/M                                                                              | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN : AARON<br>WEISS 1-2018162000 TEL<br>EX 1-201816 09                         | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>553206012 |



|                                                                |                                    |              |            |       |       |          |                               |                     |             |                                                                 |                                                                                                                                              |                                  |
|----------------------------------------------------------------|------------------------------------|--------------|------------|-------|-------|----------|-------------------------------|---------------------|-------------|-----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| METHYL AC<br>S 3.2, UN<br>HIMA(MET<br>ER)METHYL<br>.000 KG-    | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 06/26/2014 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | HYUNDAI PATRIOT     | China       | N/M                                                             | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL:201-8162968 1-<br>3106674852 TEL EX 1-<br>213623 33 | LG TW<br>DAER<br>SEOUI<br>553206 |
| NG GROUP<br>E MONOME<br>ULK<br>VCY<br>82 -061-680<br>650-0315  | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 06/26/2014 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | HYUNDAI PATRIOT     | China       | N/M                                                             | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN : AARON<br>WEISS 1-2018162000 TEL<br>EX 1-201816 09                         | LG TW<br>DAER<br>SEOUI<br>553206 |
| LATE,<br>1 1919<br>METHYL<br>9.5 MIN<br>; 291612<br>512.107517 | LG CHEM AMERICA                    | LG CHEM LTD. | 06/25/2014 | 44000 | 20000 | Pusan    | Charleston, South<br>Carolina | APL GARNET          | South Korea | NO MARKS AND<br>NUMBERS                                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                                            | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| LATE,<br>1 1919<br>METHYL<br>9.5 MIN<br>; 291612<br>213.109289 | LG CHEM AMERICA                    | LG CHEM LTD. | 06/19/2014 | 44000 | 20000 | Pusan    | Charleston, South<br>Carolina | APL EGYPT           | South Korea | NO MARKS AND<br>NUMBERS                                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                                            | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| METHYL<br>LASS 3.2,<br>IP:II<br>MONOMER)<br>IS CODE ;          | LG CHEM AMERICA                    | LG CHEM LTD. | 06/10/2014 | 44000 | 20000 | Pusan    | Charleston, South<br>Carolina | HYUNDAI<br>GOODWILL | South Korea | NO MARKS AND<br>NUMBERS                                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                                            | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| YLS (N-<br>NE) EMPTY<br><br>239 FP-17<br>Y<br>OUS WHEN         | FMC LITHIUM                        | LG CHEM, LTD | 06/07/2014 | 11185 | 5084  | Pusan    | Charleston, South<br>Carolina | NYK DEMETER         | South Korea | NO MARKS . . . . .                                              | 1115 BESSEMER CITY,<br>KINGS MTN HWY<br>BESSEMER CITY, N.C.<br>28016 U.S.A.                                                                  | 679 D/<br>SEOS/<br>CHUN          |
| ATE,<br>N1919<br>A( METHYL<br>METH YL<br>000 KG<br>EIGHT       | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 06/05/2014 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | CSAV PIRQUE         | China       | EXFU0605645 SEAL NO:<br>107523, 10754 5, 107538                 | 920 SYLVAN AVENUE,<br>ENGLEWOOD CLIFFS, NJ<br>07630 U.S.A. ATTN : AARON<br>WEISS 1-2018162000 TEL<br>EX 1-201816 09                          | LG TW<br>DAER<br>SEOUI<br>553206 |
| IBITED CL<br>NG GROUP<br>E MONOME<br>ULK                       | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 06/05/2014 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | CSAV PIRQUE         | China       | N/M                                                             | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN : AARON<br>WEISS 1-2018162000 TEL<br>EX 1-201816 09                         | LG TW<br>DAER<br>SEOUI<br>553206 |
| ATE, I<br>1919 P<br>(METHYL A<br>ETHYL<br>.000 KG<br>EE TABK   | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 05/29/2014 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | CSAV PETORCA        | China       | AS PER LABEL<br>EXFU0606467 SEAL NO:<br>000648, 0006 60, 000694 | 925 SYLVAN AVENUE,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN : AARON<br>WEISS 1-2018162000 TEL<br>EX 1-201816 09                          | LG TW<br>DAER<br>SEOUI<br>553206 |

|                                       |                                    |              |            |        |       |                 |                               |                 |             |                                                                         |                                                                                                                      |                                                                |
|---------------------------------------|------------------------------------|--------------|------------|--------|-------|-----------------|-------------------------------|-----------------|-------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| CK<br>ACRY                            |                                    |              |            |        |       |                 |                               |                 |             |                                                                         | 925 SYLVAN AVENUE,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN : AARON<br>WEISS 1-2018162000 TEL<br>EX 1-201816 09  | LG TWIN T<br>DAERO, YC<br>SEOUL KOI<br>553206012               |
| KG<br>ANK                             | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 05/29/2014 | 44092  | 20042 | Shanghai        | Charleston, South<br>Carolina | CSAV PETORCA    | China       | TIFU1500405 SEAL NO:<br>905620, 905621, 9 05682                         |                                                                                                                      |                                                                |
| IN<br>A<br>IYL AC                     |                                    |              |            |        |       |                 |                               |                 |             |                                                                         | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN : AARON<br>WEISS 1-2018162000 TEL<br>EX 1-201816 09 | LG TWIN T<br>DAERO, YC<br>SEOUL, KO<br>553206012               |
| KG<br>IT                              | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 05/23/2014 | 44092  | 20042 | Shanghai        | Charleston, South<br>Carolina | MAERSK KURE     | China       | AS PER APPENDIX AS<br>PER LABEL                                         |                                                                                                                      |                                                                |
| THYL<br>S 3,<br>:II<br>%MIN           |                                    |              |            |        |       |                 |                               |                 |             |                                                                         |                                                                                                                      |                                                                |
| 107592                                | LG CHEM AMERICA                    | LG CHEM LTD. | 05/23/2014 | 44000  | 20000 | Pusan           | Charleston, South<br>Carolina | APL TOURMALINE  | South Korea | NO MARKS AND<br>NUMBERS                                                 | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                    | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| IBD 2-<br>IBITED<br>A 1993<br>TE      |                                    |              |            |        |       |                 |                               |                 |             |                                                                         |                                                                                                                      |                                                                |
| G                                     | LG CHEM LTD.                       | LG CHEM LTD. | 05/16/2014 | 132000 | 60000 | Pusan           | Charleston, South<br>Carolina | MOL ENCORE      | South Korea | NO MARKS AND<br>NUMBERS NO MARKS<br>AND NUMBERS NO<br>MARKS AND NUMBERS | LG TWIN<br>TOWERS,128,YEOUNI-<br>DAERO, YOUNGDUNGPO-<br>GU,SEOUL,KOREA 150-721                                       | LG TWIN T<br>DAERO, YC<br>GU,SEOUL,                            |
| THYL<br>000 KG<br>107543              | LG CHEM AMERICA                    | LG CHEM LTD. | 05/13/2014 | 44000  | 20000 | Pusan           | Charleston, South<br>Carolina | HYUNDAI DYNASTY | South Korea | NO MARKS AND<br>NUMBERS                                                 | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                    | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| THYL<br>000 KG<br>108338              | LG CHEM AMERICA                    | LG CHEM LTD. | 05/10/2014 | 44000  | 20000 | Pusan           | Charleston, South<br>Carolina | NYK RIGEL       | South Korea | NO MARKS AND<br>NUMBERS                                                 | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                    | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| THYL<br>000 KG<br>304587              | LG CHEM AMERICA                    | LG CHEM LTD. | 05/05/2014 | 44000  | 20000 | Pusan           | Charleston, South<br>Carolina | ZIM ONTARIO     | South Korea | NO MARKS AND<br>NUMBERS                                                 | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                    | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| 9<br>HYL<br>IYL<br>GS<br>TO           | LG CHEM<br>AMERICA,INC.            | LG CHEM.LTD  | 05/05/2014 | 20000  | 9091  | Port Bustamante | Charleston, South<br>Carolina | ZIM ONTARIO     | Jamaica     | ISO TANK                                                                | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFF S, NJ<br>07632 U.S.A. ATTN:ARRON<br>WEISS TEL:201 816 2968                    | LG TWIN T<br>DAERO, YC<br>GU,SEOUL,                            |
| THYL<br>S 3.2,<br>:II<br>MER )<br>000 | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 05/02/2014 | 44092  | 20042 | Shanghai        | Charleston, South<br>Carolina | MARY            | China       | AS PER APPENDIX                                                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A--- 1-2018162000<br>TEL EX 1-201816 09               | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>32555 05 |

|                                                        |                                       |              |            |        |       |                 |                               |                       |             |                               |                                                                                                                                                |                                                                |
|--------------------------------------------------------|---------------------------------------|--------------|------------|--------|-------|-----------------|-------------------------------|-----------------------|-------------|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| RS<br>-<br>2B 2-<br>IBITED<br>A 1993                   | LG CHEM AMERICA,<br>INC.              | LG CHEM LTD. | 04/25/2014 | 88000  | 40000 | Pusan           | Charleston, South<br>Carolina | CMA CGM NEW<br>JERSEY | South Korea | NO MARKS NO MARKS             | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632                                                                                             | LG TWIN T<br>DAERO, YC<br>GU, SEOUL,                           |
| ATE,<br>J<br>YL<br>4YL<br>G U N<br>D ALL               | LG CHEM<br>AMERICA, INC.              | LG CHEM. LTD | 04/20/2014 | 20000  | 9091  | Port Bustamante | Charleston, South<br>Carolina | HYUNDAI INTEGRAL      | Jamaica     | AS PER LABEL                  | 920 SYLVAN<br>AVENUE, ENGLEWOOD<br>CLIFFS, NJ 07632<br>U.S. ATTN: ARRON WEISS<br>TEL: 201-816-2968 .                                           | LG TWIN T<br>DAERO, YC<br>GU, SEOUL,                           |
| ATE,<br>J<br>HYL<br>4YL<br>GS<br>TO                    | LG CHEM<br>AMERICA, INC.              | LG CHEM .LTD | 04/20/2014 | 20000  | 9091  | Port Bustamante | Charleston, South<br>Carolina | HYUNDAI INTEGRAL      | Jamaica     | AS PER LABEL                  | 920 SYLVAN<br>AVENUE., ENGLEWOOD<br>CLIFFS NJ 07632<br>U.S.A. ATTN: ARRON WEISS<br>TE L: 201-816-2968                                          | LG TWIN T<br>DAERO, YC<br>GU, SEOUL,                           |
|                                                        | TO THE ORDER OF LG<br>CHEM AMERICAN   | LG CHEM, LTD | 04/18/2014 | 44321  | 20146 | Pusan           | Charleston, South<br>Carolina | COSCO JEDDAH          | South Korea | NO MARKS                      | INC. 750 THE CITY<br>DR. SOUTH SUITE 300<br>ORANGE, CA 92868 .                                                                                 | 128, YEOUI<br>DAERO, YE<br>SEOUL KOI                           |
| RS<br>-<br>-----2-                                     | TO THE ORDER LG<br>CHEM AMERICA, INC. | LG CHEM LTD. | 04/11/2014 | 132000 | 60000 | Pusan           | Charleston, South<br>Carolina | CMA CGM TARPON        | South Korea | NO MARKS NO MARKS<br>NO MARKS | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632                                                                                             | LG TWIN T<br>DAERO, YC<br>GU, SEOUL,                           |
| 3D CL<br>GRO<br>IONOM<br>(                             | TO THE ORDER OF LG<br>CHEM AMERICA    | LG CHEM LTD. | 04/03/2014 | 44092  | 20042 | Shanghai        | Charleston, South<br>Carolina | NORTHERN JUBILEE      | China       | N/M                           | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN: AARON<br>WEISS TEL: 201-8162968 1-<br>2018162000 TEL EX 1-<br>201816 09 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>32555 05 |
| RS<br>-<br>-----3                                      | LG CHEM AMERICA,<br>INC.              | LG CHEM LTD. | 03/28/2014 | 132000 | 60000 | Pusan           | Charleston, South<br>Carolina | CMA CGM MARLIN        | South Korea | NO MARKS NO MARKS<br>NO MARKS | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632                                                                                             | LG TWIN T<br>DAERO YO<br>SEOUL, KO                             |
| 13H 2-<br>IBITED<br>S<br>9<br>THYL<br>000 KG<br>107566 | LG CHEM AMERICA                       | LG CHEM LTD. | 03/26/2014 | 44000  | 20000 | Pusan           | Charleston, South<br>Carolina | APL GARNET            | South Korea | NO MARKS AND<br>NUMBERS       | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                                              | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| 9<br>THYL<br>000 KG<br>107759                          | LG CHEM AMERICA                       | LG CHEM LTD. | 03/20/2014 | 44000  | 20000 | Pusan           | Charleston, South<br>Carolina | APL EGYPT             | South Korea | NO MARKS AND<br>NUMBERS       | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                                                              | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |

|                                         |                          |              |            |        |       |       |                               |                 |             |                                                                                                    |                                                                                                    |                                                  |
|-----------------------------------------|--------------------------|--------------|------------|--------|-------|-------|-------------------------------|-----------------|-------------|----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 9<br>:THYL<br>000 KG<br>107749          | LG CHEM AMERICA          | LG CHEM LTD. | 03/20/2014 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL EGYPT       | South Korea | NO MARKS AND<br>NUMBERS                                                                            | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                  | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721   |
| 4YL                                     | FNS INC.                 | LG CHEM LTD  | 03/20/2014 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | ZIM VIRGINIA    | South Korea | ISO TANK ISO TANK                                                                                  | 18301 BROADWICK ST.<br>RANCHO DOMINGUEZ CA<br>90220 US                                             | LG TWIN TO<br>DONG YOU<br>SEOUL KR               |
| 9<br>:THYL<br>000 KG                    | LG CHEM AMERICA          | LG CHEM LTD. | 03/13/2014 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL EFFICIENCY  | South Korea | NO MARKS AND<br>NUMBERS                                                                            | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                  | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721   |
| 9<br>:THYL<br>000 KG<br>107719.<br>DE : | LG CHEM AMERICA          | LG CHEM LTD. | 03/13/2014 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL EFFICIENCY  | South Korea | NO MARKS AND<br>NUMBERS                                                                            | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                  | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721   |
| 9<br>:THYL<br>000 KG<br>105997          | LG CHEM AMERICA          | LG CHEM LTD. | 03/06/2014 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | HYUNDAI VOYAGER | South Korea | NO MARKS AND<br>NUMBERS                                                                            | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                  | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721   |
| 9<br>:THYL<br>000 KG<br>ODE :           | LG CHEM AMERICA          | LG CHEM LTD. | 03/06/2014 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | HYUNDAI VOYAGER | South Korea | NO MARKS AND<br>NUMBERS                                                                            | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                  | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721   |
| THIUM<br>M IN<br>BUTYL                  | FMC LITHIUM              | LG CHEM. LTD | 03/02/2014 | 13378  | 6081  | Pusan | Charleston, South<br>Carolina | HYUNDAI DYNASTY | South Korea | T/N 518555, 512665,<br>526184 T/N 518554,<br>527892 .                                              | 1115 BESSEMER CITY,<br>KINGS MTN HWY<br>BESSENER CITY, N.C.<br>28016 U.S.A.                        | 679 DAEJUI<br>SEOSAN-C<br>CHUNGCH                |
| IA 1993<br>TE                           | LG CHEM AMERICA          | LG CHEM LTD. | 03/01/2014 | 176000 | 80000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE   | South Korea | NO MARKS AND<br>NUMBERS NO MARKS<br>AND NUMBERS NO<br>MARKS AND NUMBERS<br>NO MARKS AND<br>NUMBERS | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                  | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721   |
| 9, PG<br>L<br>S 3, UN                   | LG CHEM AMERICA,<br>INC. | LG CHEM LTD. | 02/27/2014 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | NYK DENEB       | South Korea | NO MARKS AND<br>NUMBERS                                                                            | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOIDO-<br>DONG, YOU<br>TWIN TOWI<br>KOREA 150 |

|                                |                          |              |            |       |       |       |                               |                  |             |                                                 |                                                                                                    |                                                   |
|--------------------------------|--------------------------|--------------|------------|-------|-------|-------|-------------------------------|------------------|-------------|-------------------------------------------------|----------------------------------------------------------------------------------------------------|---------------------------------------------------|
| 9<br>:THYL<br>000 KG<br>304092 | LG CHEM AMERICA          | LG CHEM LTD. | 02/20/2014 | 44000 | 20000 | Tokyo | Charleston, South<br>Carolina | APL TOURMALINE   | Japan       | NO MARKS AND<br>NUMBERS                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                  | 20 YOIDO-D<br>YOUNGDUI<br>TOWERS, S<br>150-721    |
| 9<br>:THYL<br>000 KG<br>105929 | LG CHEM AMERICA          | LG CHEM LTD. | 02/20/2014 | 44000 | 20000 | Tokyo | Charleston, South<br>Carolina | APL TOURMALINE   | Japan       | NO MARKS AND<br>NUMBERS                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                  | 20 YOIDO-D<br>YOUNGDUI<br>TOWERS, S<br>150-721    |
| 9<br>:THYL<br>000 KG<br>105949 | LG CHEM AMERICA          | LG CHEM LTD. | 02/20/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL TOURMALINE   | South Korea | NO MARKS AND<br>NUMBERS                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                  | 20 YOIDO-D<br>YOUNGDUI<br>TOWERS, S<br>150-721    |
| 9, PG<br>L<br>S 3, UN<br>SS: 3 | LG CHEM AMERICA,<br>INC. | LG CHEM LTD. | 02/20/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL TOURMALINE   | South Korea | NO MARKS AND<br>NUMBERS                         | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOIDO-D<br>DONG, YOU<br>TWIN TOWI<br>KOREA 150 |
| 9<br>:THYL<br>000 KG<br>105968 | LG CHEM AMERICA          | LG CHEM LTD. | 02/15/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENCORE       | South Korea | NO MARKS AND<br>NUMBERS                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                  | 20 YOIDO-D<br>YOUNGDUI<br>TOWERS, S<br>150-721    |
| 9, PG<br>017598<br>ZED<br>0000 | LG CHEM AMERICA,<br>INC. | LG CHEM LTD. | 02/15/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENCORE       | South Korea | NO MARKS AND<br>NUMBERS                         | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOIDO-D<br>DONG, YOU<br>TWIN TOWI<br>KOREA 150 |
| 9<br>:THYL<br>000 KG<br>105988 | LG CHEM AMERICA          | LG CHEM LTD. | 01/29/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | HYUNDAI INTEGRAL | South Korea | NO MARKS AND<br>NUMBERS                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                  | 20 YOIDO-D<br>YOUNGDUI<br>TOWERS, S<br>150-721    |
| S.<br>EXYL<br>24000            | LG CHEM LTD.             | LG CHEM LTD. | 01/22/2014 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | MOL EXCELLENCE   | South Korea | NO MARKS AND<br>NUMBERS NO MARKS<br>AND NUMBERS | 20 YOIDO-D<br>DONG, YOUNGDUNGPO-GU,<br>LG TWIN TOWERS, SEOUL<br>SOUTH KOREA 150-721                | 20 YOIDO-D<br>DONG, YOU<br>TWIN TOWI<br>KOREA 150 |
| :THYL<br>IYL<br>G              | LG CHEMAMERICA,<br>INC.  | LG CHEM LTD. | 01/22/2014 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | HYUNDAI FORWARD  | South Korea | NO MARKS AND<br>NUMBERS                         | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                                        | 20 YOIDO-D<br>YOUNGDUI<br>TOWERS, S<br>150-721    |

|                                      |                          |              |            |        |        |       |                               |                     |             |                                                                                                            |                                                                                   |                                                |
|--------------------------------------|--------------------------|--------------|------------|--------|--------|-------|-------------------------------|---------------------|-------------|------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|------------------------------------------------|
| SS 3,<br>HYL<br>THYL<br>NYL<br>KG HS | LG CHEM LTD.             | LG CHEM LTD. | 01/22/2014 | 220000 | 100000 | Pusan | Charleston, South<br>Carolina | HYUNDAI FORWARD     | South Korea | NUMBERS NO MARKS<br>AND NUMBERS NO<br>MARKS AND NUMBERS<br>NO MARKS AND<br>NUMBERS NO MARKS<br>AND NUMBERS | 20 YOIDO-DONG,<br>YOUNGDUNGPO-GU, LG<br>TWIN TOWERS, SEOUL<br>SOUTH KOREA 150-721 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| UN<br>IMDG<br>NYL<br>SS 3,UN         | LG CHEM<br>AMERICA, INC. | LG CHEM LTD. | 01/22/2014 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | HYUNDAI FORWARD     | South Korea | NO MARKS AND<br>NUMBERS                                                                                    | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632, U.S.A. ATTN: AARON<br>WEISS   | 20 YOIDO-DONG, YOU<br>TWIN TOWI<br>KOREA 150   |
| 9<br>THYL<br>000 KG<br>017675        | LG CHEM AMERICA          | LG CHEM LTD. | 01/16/2014 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | HYUNDAI<br>GOODWILL | South Korea | NO MARKS AND<br>NUMBERS                                                                                    | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| UN<br>IMDG<br>NYL<br>SS 3,UN         | LG CHEM<br>AMERICA, INC. | LG CHEM LTD. | 01/16/2014 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | HYUNDAI<br>GOODWILL | South Korea | NO MARKS AND<br>NUMBERS                                                                                    | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632, U.S.A. ATTN: AARON<br>WEISS   | 20 YOIDO-DONG, YOU<br>TWIN TOWI<br>KOREA 150   |
| S.<br>EXYL<br>24000                  | LG CHEM LTD.             | LG CHEM LTD. | 01/12/2014 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | MOL ENDEAVOR        | South Korea | NO MARKS AND<br>NUMBERS NO MARKS<br>AND NUMBERS                                                            | 20 YOIDO-DONG, YOUNGDUNGPO-GU,<br>LG TWIN TOWERS, SEOUL<br>SOUTH KOREA 150-721    | 20 YOIDO-DONG, YOU<br>TWIN TOWI<br>KOREA 150   |
| 9<br>THYL<br>000 KG<br>105994        | LG CHEM AMERICA          | LG CHEM LTD. | 01/10/2014 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | NYK DEMETER         | South Korea | NO MARKS AND<br>NUMBERS                                                                                    | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| UN<br>IMDG<br>NYL<br>SS 3,UN         | LG CHEM<br>AMERICA, INC. | LG CHEM LTD. | 01/10/2014 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | NYK DEMETER         | South Korea | NO MARKS AND<br>NUMBERS                                                                                    | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632, U.S.A. ATTN: AARON<br>WEISS   | 20 YOIDO-DONG, YOU<br>TWIN TOWI<br>KOREA 150   |
| 9<br>THYL<br>000 KG<br>105951        | LG CHEM AMERICA          | LG CHEM LTD. | 01/05/2014 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | ZIM VIRGINIA        | South Korea | NO MARKS AND<br>NUMBERS                                                                                    | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| S.<br>EXYL<br>24000                  | LG CHEM LTD.             | LG CHEM LTD. | 01/03/2014 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR       | South Korea | NO MARKS AND<br>NUMBERS NO MARKS<br>AND NUMBERS                                                            | 20 YOIDO-DONG, YOUNGDUNGPO-GU,<br>LG TWIN TOWERS, SEOUL<br>SOUTH KOREA 150-721    | 20 YOIDO-DONG, YOU<br>TWIN TOWI<br>KOREA 150   |

|                                 |                  |              |            |        |       |       |                               |                 |             |                                                                         |                                                                                  |                                                 |
|---------------------------------|------------------|--------------|------------|--------|-------|-------|-------------------------------|-----------------|-------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------------|-------------------------------------------------|
| 9<br>THYL<br>000 KG<br>105986   | LG CHEM AMERICA  | LG CHEM LTD. | 12/28/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL GARNET      | South Korea | NO MARKS AND<br>NUMBERS                                                 | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
|                                 | FIAMM ENERGY LLC | LG CHEM LTD. | 12/20/2013 | 37561  | 17073 | Pusan | Charleston, South<br>Carolina | VENICE BRIDGE   | South Korea | NO MARKS                                                                | . ONE FIAMM WAY<br>WAYNESBORO GA 30830 .                                         | . LG TWIN T<br>DONG YUN<br>SEOUL SOI            |
| S.<br>EXYL<br>24000 2-<br>CODE: | LG CHEM LTD.     | LG CHEM LTD. | 12/19/2013 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | APL QATAR       | South Korea | NO MARKS AND<br>NUMBERS NO MARKS<br>AND NUMBERS NO<br>MARKS AND NUMBERS | 20 YOIDO-<br>DONG,YOUNGDUNGPO-GU,<br>LG TWIN TOWERS,SEOUL<br>SOUTH KOREA 150-721 | 20 YOIDO-<br>DONG,YOU<br>TWIN TOWI<br>KOREA 150 |
| 9<br>THYL<br>000 KG<br>105974   | LG CHEM AMERICA  | LG CHEM LTD. | 12/17/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | HYUNDAI DYNASTY | South Korea | NO MARKS AND<br>NUMBERS                                                 | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| G<br>ATE)<br><br>105995         | LG CHEM AMERICA  | LG CHEM LTD. | 12/15/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | NYK DENEB       | South Korea | NO MARKS AND<br>NUMBERS                                                 | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| 218<br>E<br>D)                  | LG CHEM AMERICA  | LG CHEM LTD. | 12/05/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL EFFICIENCY  | South Korea | NO MARKS AND<br>NUMBERS                                                 | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| RYLIC<br>I, UN<br>IARINE<br>D)  | LG CHEM AMERICA  | LG CHEM LTD. | 11/27/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE   | South Korea | NO MARKS AND<br>NUMBERS                                                 | INC., 910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| S.<br>EXYL<br>24000 2-<br>CODE: | LG CHEM LTD.     | LG CHEM LTD. | 11/27/2013 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE   | South Korea | NO MARKS AND<br>NUMBERS NO MARKS<br>AND NUMBERS NO<br>MARKS AND NUMBERS | 20 YOIDO-<br>DONG,YOUNGDUNGPO-GU,<br>LG TWIN TOWERS,SEOUL<br>SOUTH KOREA 150-721 | 20 YOIDO-<br>DONG,YOU<br>TWIN TOWI<br>KOREA 150 |
| GROUP:II<br>YLIC<br>3E)         |                  |              |            |        |       |       |                               |                 |             |                                                                         |                                                                                  |                                                 |
| 0<br>DE :                       | LG CHEM AMERICA  | LG CHEM LTD. | 11/23/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL EGYPT       | South Korea | NO MARKS AND<br>NUMBERS                                                 | INC., 910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |



|                                                                                |                         |              |            |        |       |       |                               |                        |             |                                                                         |                                                                                  |                                  |
|--------------------------------------------------------------------------------|-------------------------|--------------|------------|--------|-------|-------|-------------------------------|------------------------|-------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------------|----------------------------------|
| TE H.S.<br>1916124000 2-<br>H.S. CODE:                                         | LG CHEM LTD.            | LG CHEM LTD. | 11/23/2013 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | APL EGYPT              | South Korea | NO MARKS AND<br>NUMBERS NO MARKS<br>AND NUMBERS NO<br>MARKS AND NUMBERS | 20 YOIDO-<br>DONG,YOUNGDUNGPO-GU,<br>LG TWIN TOWERS,SEOUL<br>SOUTH KOREA 150-721 | 20 YOI<br>DONG<br>TWIN<br>KORE/  |
| PPERS<br>-----2<br>593<br>VKK8R3 2-                                            | LG CHEM<br>AMERICA,INC. | LG CHEM LTD. | 11/22/2013 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | CMA CGM NEW<br>JERSEY  | South Korea | NO MARKS NO MARKS                                                       | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632                                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| PPERS<br>-----2<br>593<br>VKK8R0 2-                                            | LG CHEM<br>AMERICA,INC. | LG CHEM LTD. | 11/08/2013 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | CMA CGM KINGFISH       | South Korea | NO MARKS NO MARKS                                                       | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632                                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| ED-0000<br>G GROUP:II<br>(ACRYLIC<br>GRADE)<br>1100.<br>3 CODE :<br>I-800-262- | LG CHEM AMERICA         | LG CHEM LTD. | 10/31/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA             | South Korea | NO MARKS AND<br>NUMBERS                                                 | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
|                                                                                | LG CHEM AMERICA<br>INC  | LG CHEM INC  | 10/28/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | HANJIN BUENOS<br>AIRES | South Korea | NO MARKS                                                                | . 910 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS J<br>07632USA                            | . LG TI<br>DONG<br>SEQUI         |
|                                                                                | LG CHEM AMERICA<br>INC  | LG CHEM INC  | 10/28/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | HANJIN BUENOS<br>AIRES | South Korea | NO MARKS                                                                | . 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS J<br>07632USA                            | . LG TI<br>DONG<br>SEQUI         |
|                                                                                | LG CHEM AMERICA<br>INC  | LG CHEM INC  | 10/28/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | HANJIN BUENOS<br>AIRES | South Korea | NO MARKS                                                                | . 910 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS J<br>07632USA                            | . LG TI<br>DONG<br>SEQUI         |
| 100000<br>SOC CNTR'<br>(BILIZED<br>AGING<br>CRYLATE)                           | LG CHEM AMERICA         | LG CHEM LTD. | 10/16/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL MALAYSIA           | South Korea | NO MARKS AND NU                                                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| 1010.903098<br>SOC CNTR'<br>(BILIZED<br>AGING<br>CRYLATE)                      | LG CHEM AMERICA         | LG CHEM LTD. | 10/16/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL MALAYSIA           | South Korea | NO MARKS AND NU                                                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| 1464.105411                                                                    | LG CHEM AMERICA         | LG CHEM LTD. | 10/16/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL MALAYSIA           | South Korea | NO MARKS AND NU                                                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |

|                                            |                                    |               |            |        |        |       |                            |                    |             |                   |                                                                          |                                                |
|--------------------------------------------|------------------------------------|---------------|------------|--------|--------|-------|----------------------------|--------------------|-------------|-------------------|--------------------------------------------------------------------------|------------------------------------------------|
| 18, PG<br>-C<br>S<br>-<br>-----2-          | LG CHEM AMERICA                    | LG CHEM LTD.  | 10/16/2013 | 44000  | 20000  | Pusan | Charleston, South Carolina | APL MALAYSIA       | South Korea | NO MARKS AND NU   | INC., 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A.              | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| A 1993                                     | LG CHEM AMERICA, INC.              | LG CHEM LTD.  | 10/12/2013 | 88000  | 40000  | Pusan | Charleston, South Carolina | CMA CGM SWORDFISH  | South Korea | NO MARKS NO MARKS | 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632                             | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| THYL<br>: 3.2,<br>OMER)<br>DE ;<br>-----2- | LG CHEM AMERICA                    | LG CHEM LTD.  | 10/02/2013 | 44000  | 20000  | Pusan | Charleston, South Carolina | MOL EXPEDITOR      | South Korea | NO MARKS AND NU   | INC., 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A.              | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| 18, PG<br>-C<br>102559.                    | LG CHEM AMERICA                    | LG CHEM LTD.  | 10/02/2013 | 44000  | 20000  | Pusan | Charleston, South Carolina | MOL EXPEDITOR      | South Korea | NO MARKS AND NU   | INC., 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A.              | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| IS<br>-<br>-----2-                         | TO THE ORDER LG CHEM AMERICA, INC. | LG CHEM LTD.  | 09/27/2013 | 88000  | 40000  | Pusan | Charleston, South Carolina | CMA CGM AMBER      | South Korea | NO MARKS NO MARKS | 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632                             | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| 218<br>RYLIC<br>DE)<br>33,1054             | ITM CORP                           | LG CHEM, LTD. | 09/27/2013 | 44748  | 20340  | Pusan | Charleston, South Carolina | HANJIN DUESSELDORF | South Korea | NO MARKS          | 515 WHARTON CIRCLE ATLANTA GA 30336 USA TEL 404-696-8087                 | LG TWIN T<br>DONG YOU<br>SEOUL 150             |
| THYL<br>MIN<br>ODE :<br>IGHT               | FNS, INC                           | LG CHEM LTD.  | 09/26/2013 | 440000 | 200000 | Pusan | Charleston, South Carolina | APL GARNET         | South Korea | NO MARKS AND NU   | LG CHEM AMERICA INC. 910 SYLVAN AVENUE., ENGLEWOOD CLIFF, NJ 07632 U.S.A | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| THYL<br>MIN<br>102557<br>CNTR              | LG CHEM AMERICA                    | LG CHEM LTD.  | 09/26/2013 | 44000  | 20000  | Pusan | Charleston, South Carolina | APL GARNET         | South Korea | NO MARKS AND NU   | INC., 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A.              | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |

|                                          |                           |              |            |        |       |        |                               |                  |             |                                            |                                                                   |                                                |
|------------------------------------------|---------------------------|--------------|------------|--------|-------|--------|-------------------------------|------------------|-------------|--------------------------------------------|-------------------------------------------------------------------|------------------------------------------------|
| 218<br>RYLIC<br>DE)<br>511<br>REPAID     | LG CHEM AMERICA           | LG CHEM LTD. | 09/18/2013 | 44000  | 20000 | Pusan  | Charleston, South<br>Carolina | APL QATAR        | South Korea | NO MARKS AND NU                            | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| 9287<br>ILL BE                           | FIAMM ENERGY, LLC         | LG CHEM LTD  | 09/12/2013 | 37561  | 17073 | Ningpo | Charleston, South<br>Carolina | MSC VITTORIA     | China       | AS PER LABEL SAME<br>SAME SAME             | ONE FIAMM WAY<br>WAYNESBORO GA 30830<br>UNITED STATES             | LG TWIN TC<br>DONG YUN<br>124 KOREA            |
| :THYL<br>.MIN<br>512<br>102555<br>REPAID | LG CHEM AMERICA           | LG CHEM LTD. | 09/06/2013 | 44000  | 20000 | Pusan  | Charleston, South<br>Carolina | MOL EFFICIENCY   | South Korea | NO MARKS AND NU                            | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| .L BE                                    | FIAMM ENERGY, LLC         | LG CHEM LTD  | 09/01/2013 | 37561  | 17073 | Ningpo | Charleston, South<br>Carolina | MSC MAEVA        | China       | AS PER LABEL SAME<br>SAME SAME             | ONE FIAMM WAY<br>WAYNESBORO GA 30830<br>UNITED STATES             | LG TWIN TC<br>DONG YUN<br>124 KOREA            |
| RS<br>--<br>-----3<br>105<br>K5 2-       | LG CHEM<br>AMERICA, INC.  | LG CHEM LTD. | 08/30/2013 | 132000 | 60000 | Pusan  | Charleston, South<br>Carolina | CMA CGM KINGFISH | South Korea | NO MARKS NO MARKS<br>NO MARKS              | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| :THYL<br>.MIN<br>102557<br>CNTR          | LG CHEM AMERICA           | LG CHEM LTD. | 08/29/2013 | 44000  | 20000 | Pusan  | Charleston, South<br>Carolina | MOL ENDURANCE    | South Korea | NO MARKS AND NU                            | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| S<br>130000<br>.Y.<br>:RE AT             | FIAMM ENERGY, LLC         | LG CHEM LTD  | 08/18/2013 | 75121  | 34146 | Ningpo | Charleston, South<br>Carolina | MSC TORONTO      | China       | NO MARKS AS PER<br>LABEL SAME SAME<br>SAME | ONE FIAMM WAY<br>WAYNESBORO GA 30830<br>UNITED STATES             | LG TWIN TC<br>DONG, YUN<br>721 KOREA           |
| -----2<br>K3 2-                          | LG CHEM<br>AMERICA, INC.  | LG CHEM LTD. | 08/15/2013 | 88000  | 40000 | Pusan  | Charleston, South<br>Carolina | CMA CGM GEORGIA  | South Korea | NO MARKS NO MARKS                          | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| S<br>130000<br>.Y.<br>:RE AT             | FIAMM<br>TECHNOLOGIES LLC | LG CHEM LTD  | 08/08/2013 | 75121  | 34146 | Ningpo | Charleston, South<br>Carolina | MSC TOMOKO       | China       | NO MARKS AS PER<br>LABEL SAME SAME<br>SAME | 1550 LEESON AVENUE<br>CADILLAC MI 49601 UNITED<br>STATES          | LG TWIN TC<br>DONG, YUN<br>124 KOREA           |

|                                                       |                                      |              |            |        |       |       |                               |                       |             |                                    |                                                                                                    |                                   |
|-------------------------------------------------------|--------------------------------------|--------------|------------|--------|-------|-------|-------------------------------|-----------------------|-------------|------------------------------------|----------------------------------------------------------------------------------------------------|-----------------------------------|
| RYLATE,<br>919 H.S.<br>G CLASS: 3<br>CRYLATE,<br>1919 | LG CHEM AMERICA,<br>INC.             | LG CHEM LTD. | 07/31/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA            | South Korea | NO MARKS AND NU                    | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YO!<br>DONG<br>TWIN *<br>KORE/ |
|                                                       | TO THE ORDER LG<br>CHEM AMERICA INC. | LG CHEM LTD. | 07/27/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | COSCO<br>WELLINGTON   | South Korea | NO MARKS                           | . 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632 U.S.AATTN AARON<br>WEISSTEL                     | . 20 YC<br>YOUN!<br>TOWE<br>KORE/ |
| RYLATE,<br>919 H.S.<br>G CLASS: 3<br>CRYLATE,<br>1919 | LG CHEM AMERICA,<br>INC.             | LG CHEM LTD. | 07/24/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXCELLENCE        | South Korea | NO MARKS AND NU                    | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YO!<br>DONG<br>TWIN *<br>KORE/ |
|                                                       | TO THE ORDER LG<br>CHEM AMERICA INC. | LG CHEM LTD. | 07/18/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | HANJIN<br>DUESSELDORF | South Korea | NO MARKS                           | . 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632 U.S.AATTN AARON<br>WEISSTEL                     | . 20 YC<br>YOUN!<br>TOWE<br>KORE/ |
| RYLATE,<br>919 H.S.<br>CLASS: 3                       | LG CHEM AMERICA,<br>INC.             | LG CHEM LTD. | 07/17/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL MALAYSIA          | South Korea | NO MARKS AND NU                    | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YO!<br>DONG<br>TWIN *<br>KORE/ |
| KYL<br>916-12-4000<br>KYL<br>916-12-4000              | TO THE ORDER OF LG<br>CHEM AMERICA   | LG CHEM LTD. | 07/17/2013 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | APL MALAYSIA          | South Korea | NO MARKS AND NU NO<br>MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                       | 20 YO!<br>DONG<br>TWIN *<br>KORE/ |
| ATE 2-<br>E 2-<br>E                                   | TO THE ORDER LG<br>CHEM AMERICA INC. | LG CHEM LTD. | 07/12/2013 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | COSCO VENICE          | South Korea | NO MARKS NO MARKS<br>NO MARKS      | . 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632                                                 | . 20 YC<br>YOUN!<br>TOWE<br>KORE/ |
|                                                       | TO THE ORDER LG<br>CHEM AMERICA INC. | LG CHEM LTD. | 07/12/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | COSCO VENICE          | South Korea | NO MARKS                           | . 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632 U.S.AATTN AARON<br>WEISSTEL                     | . 20 YC<br>YOUN!<br>TOWE<br>KORE/ |
| RYLATE<br>CODE:<br>S: 3 U.N.<br>LATE,<br>1919         | LG CHEM<br>AMERICA, INC.             | LG CHEM LTD. | 07/11/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDEAVOR          | South Korea | NO MARKS AND NU                    | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                           | 20 YO!<br>DONG<br>TWIN *<br>KORE/ |

|                                                          |                                         |               |            |       |       |          |                               |             |             |                                           |                                                                                                                                         |                                                                 |
|----------------------------------------------------------|-----------------------------------------|---------------|------------|-------|-------|----------|-------------------------------|-------------|-------------|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| NH<br>CK ING<br>_ATE<br>.000KG<br>IE<br>S ON             | LG CHEM<br>AMERICA, INC., 920<br>SYLVAN | LG CHEM LTD.  | 07/10/2013 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | FOLEGANDROS | China       | ISO TANK                                  | AVENUE., ENGLEWOOD<br>CLIFFS, NJ 07632<br>U.S.A, ATTN: AARON WEISS<br>TEL : 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09        | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 82-<br>32555 05 |
| NH<br>CK ING<br>_ATE<br>.000KG<br>IE<br>S ON             | LG CHEM<br>AMERICA, INC., 920<br>SYLVAN | LG CHEM LTD.  | 07/10/2013 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | FOLEGANDROS | China       | ISO TANK                                  | AVENUE., ENGLEWOOD<br>CLIFFS, NJ 07632<br>U.S.A, ATTN: AARON WEISS<br>TEL : 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09        | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 82-<br>32555 05 |
| 'L AC<br>ITIBLE<br>TH<br>MER) 9<br>AO<br>SID<br>CLASS    | TO THE ORDER LG<br>CHEM AMERICA, INC.   | LG CHEM LTD.  | 07/10/2013 | 88184 | 40084 | Shanghai | Charleston, South<br>Carolina | FOLEGANDROS | China       | AS PER LABEL AS PER<br>LABEL              | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632 1-3106052500 TEL EX<br>1-310605 25                                                   | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 82-<br>32555 05 |
| GENC<br>31-805-<br>150 PIC                               | LG CHEM AMERICA,<br>INC.                | LG CHEM LTD.  | 07/10/2013 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | FOLEGANDROS | China       | AS PER APPENDIX<br>000360, 000364, 000385 | 910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL:201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 82-<br>32555 05 |
| JES O<br>PAID                                            | LG CHEM AMERICA,<br>INC.                | LG CHEM LTD.  | 07/10/2013 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | FOLEGANDROS | China       | AS PER APPENDIX<br>107335, 107360, 107395 | 910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL:201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 82-<br>32555 05 |
| I,<br>F, F-E, S<br>ATION<br>E:<br>J.N.<br>E,<br>J<br>ZED | LG CHEM<br>AMERICA, INC.                | LG CHEM LTD.  | 07/03/2013 | 44000 | 20000 | Pusan    | Charleston, South<br>Carolina | MOL EXPRESS | South Korea | NO MARKS AND NU                           | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632, U.S.A                                                                               | 20 YOIDO-<br>DONG, YOU<br>TWIN TOWI<br>KOREA 150                |
| NH<br>CK ING<br>_ATE<br>.000KG<br>D TO<br>101)           | LG CHEM AMERICA,<br>INC., 920 SYLVAN    | LG CHEM LTD.  | 06/27/2013 | 44092 | 20042 | Shanghai | Charleston, South<br>Carolina | SWAZILAND   | China       | ISO TANK                                  | AVENUE., ENGLEWOOD<br>CLIFFS, NJ 07632<br>U.S.A, ATTN: AARON WEISS<br>TEL : 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09        | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 82-<br>32555 05 |
| 'L AC<br>ITIBLE<br>TH<br>MER) 9<br>TANK<br>DAYS.         | TO THE ORDER LG<br>CHEM AMERICA INC.    | LG CHEM LTD.  | 06/27/2013 | 88184 | 40084 | Shanghai | Charleston, South<br>Carolina | SWAZILAND   | China       | AS PER LABEL AS PER<br>LABEL              | 920 SYLVAN<br>AVENUE., ENGLEWOOD<br>CLIFFS, NJ 07632 1-<br>2018162000 TEL EX 1-<br>201816 09                                            | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 82-<br>32555 05 |
| 34906<br>ABS<br>G HS                                     | LG CHEM AMERICA                         | LG CHEM, LTD. | 06/19/2013 | 35361 | 16073 | Pusan    | Charleston, South<br>Carolina | APL QATAR   | South Korea | AS PER LABEL                              | INC., 910 SYLVAN AVE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: ALICE<br>LEUNG TEL:201-816-2097                                    | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721                 |

|                                                     |                                         |               |            |        |       |          |                               |                |             |                                                       |                                                                                                                                          |                                                                 |
|-----------------------------------------------------|-----------------------------------------|---------------|------------|--------|-------|----------|-------------------------------|----------------|-------------|-------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| 11) -<br>ON TEL-<br>-10-<br>AC                      | LG CHEM AMERICA,<br>INC.                | LG CHEM LTD.  | 06/05/2013 | 44092  | 20042 | Shanghai | Charleston, South<br>Carolina | SKIATHOS       | China       | AS PER APPENDIX ISO<br>TANK -----<br>-----            | 910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL:201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09  | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150 721 82-<br>32555 05  |
| CLASS<br>IP : II                                    | LG CHEM AMERICA,<br>INC.                | LG CHEM LTD.  | 05/30/2013 | 44000  | 20000 | Pusan    | Charleston, South<br>Carolina | MOL EXPEDITOR  | South Korea | NO MARKS AND NU                                       | 910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL:201-816-2968                                          | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                  |
| 2-4000                                              | TO THE ORDER OF LG<br>CHEM AMERICA      | LG CHEM LTD.  | 05/22/2013 | 132000 | 60000 | Pusan    | Charleston, South<br>Carolina | APL EGYPT      | South Korea | NO MARKS AND NU NO<br>MARKS AND NU NO<br>MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                                             | 20 YOIDO-<br>DONG,YOU<br>TWIN TOWI<br>KOREA 150                 |
| 24000 3                                             | TO THE ORDER OF LG<br>CHEM AMERICA      | LG CHEM LTD.  | 05/15/2013 | 132000 | 60000 | Pusan    | Charleston, South<br>Carolina | MOL ENCORE     | South Korea | NO MARKS AND NU NO<br>MARKS AND NU NO<br>MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                                             | 20 YOIDO-<br>DONG,YOU<br>TWIN TOWI<br>KOREA 150                 |
| 9) H.S.                                             | LG CHEM AMERICA,<br>INC.                | LG CHEM LTD.  | 05/15/2013 | 44000  | 20000 | Pusan    | Charleston, South<br>Carolina | MOL ENCORE     | South Korea | NO MARKS AND NU                                       | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                       | 20 YOIDO-<br>DONG,YOU<br>TWIN TOWI<br>KOREA 150                 |
| IS 3,UN<br>II LIZED<br>G<br>J)<br>0,<br>)*<br>ITANK | LG CHEM AMERICA,<br>INC.                | LG CHEM LTD.  | 04/24/2013 | 88184  | 40084 | Pusan    | Charleston, South<br>Carolina | MAERSK DERINCE | South Korea | ISO TANK -----<br>- ISO TANK -----<br>-----           | 910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A 1-2018162000<br>TEL EX 1-201816 09                                            | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>23773 39  |
| NH<br>CK ING<br>ATE<br>.000KG<br>D TO<br>101)       | LG CHEM AMERICA,<br>INC., 920SYLVAN     | LG CHEM, LTD. | 04/24/2013 | 44092  | 20042 | Pusan    | Charleston, South<br>Carolina | MAERSK DERINCE | South Korea | ISO TANK                                              | AVENUE., ENGLEWOOD<br>CLIFFS, NJ 07632 TEL : 201-<br>815-2958 1-2018162000 TEL<br>EX 1-201816 09                                         | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>32555 05  |
| HI<br>KI NG<br>ATE<br>000KG<br>OTANK<br>DS          | LG CHEM<br>AMERICA, INC., 920SYL<br>VAN | LG CHEM, LTD. | 04/17/2013 | 44092  | 20042 | Pusan    | Charleston, South<br>Carolina | MAERSK DELLYS  | South Korea | AS PER LABEL                                          | AVENUE.,ENGLEWOOD<br>CLIFFS,NJ 07632<br>U.S.A.ATTN: AARON WEISS<br>TEL : 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09            | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>32555 05  |
| J TO AL<br>I) *DDC<br>3- 5181<br>C :                | LG CHEM AMERICA,<br>INC.                | LG CHEM LTD.  | 04/17/2013 | 44092  | 20042 | Pusan    | Charleston, South<br>Carolina | MAERSK DELLYS  | South Korea | AS PER APPENDIX                                       | 920 SYLVAN AVENUE,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN : ARRON<br>WEISS TEL:201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | 20 YOIDO-I<br>YOUNGNDUI<br>TOWERS, S<br>150-721 82-<br>32555 05 |

|                                                         |                                          |               |            |        |       |          |                               |                |             |                                                                                                                              |                                                                                                                                 |                                                               |
|---------------------------------------------------------|------------------------------------------|---------------|------------|--------|-------|----------|-------------------------------|----------------|-------------|------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| 1107<br>NH<br>CK ING<br>_ATE<br>.000KG<br>IE<br>S.      | LG CHEM<br>AMERICA, INC., 920 SYL<br>VAN | LG CHEM, LTD. | 04/17/2013 | 44092  | 20042 | Pusan    | Charleston, South<br>Carolina | MAERSK DELLYS  | South Korea | ISO TANK                                                                                                                     | AVENUE, ENGLEWOOD<br>CLIFFS, NJ 07632<br>U.S.A, ATTN: AARON WEISS<br>TEL : 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | 20 YOIDO-I<br>YOUNGDU<br>TOWERS, S<br>150-721 82-<br>23773 39 |
| 1108<br>L AC<br>TIBLE<br>TH<br>VER) 9<br>MO<br>IS       | TO THE ORDER LG<br>CHEM AMERICA, INC     | LG CHEM, LTD  | 04/17/2013 | 132277 | 60126 | Pusan    | Charleston, South<br>Carolina | MAERSK DELLYS  | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL                                                                                    | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07532 1-2018162000 TEL EX<br>1-201816 09                                         | 20 YOIDO-I<br>YOUNGDU<br>TOWERS, S<br>150-721 82-<br>32555 05 |
| 1109<br>IZER                                            | TO THE ORDER OF<br>ICC CHEMICAL          | LG CHEM LTD.  | 04/10/2013 | 88184  | 40084 | Pusan    | Charleston, South<br>Carolina | MAERSK DRURY   | South Korea | AS PER LABEL AS PER<br>LABEL                                                                                                 | AVENUE NEW YOR NEW<br>YORK 10022, USA<br>TEL:(212)521-1759<br>FAX:(212)521-1960 1-<br>2129031700 TEL EX 1-<br>212521 17         | 20 YOIDO-I<br>YOUNGDU<br>TOWERS, S<br>150-721 82-<br>23773 39 |
| 1110<br>L AC<br>TIBLE<br>TH<br>VER) 9<br>MO<br>IS       | TO THE ORDER LG<br>CHEM AMERICA, INC     | LG CHEM, LTD  | 04/03/2013 | 88184  | 40084 | Pusan    | Charleston, South<br>Carolina | MAERSK MERLION | South Korea | AS PER LABEL AS PER<br>LABEL                                                                                                 | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 1-2018162000 TEL EX<br>1-201816 09                                         | 20 YOIDO-I<br>YOUNGDU<br>TOWER, SE<br>150-721 82-<br>32555 05 |
| 1111<br>NH<br>CK ING<br>_ATE<br>.000KG<br>E<br>S        | LG CHEM<br>AMERICA, INC., 920 SYL<br>VAN | LG CHEM, LTD. | 04/03/2013 | 44092  | 20042 | Pusan    | Charleston, South<br>Carolina | MAERSK MERLION | South Korea | ISO TANK                                                                                                                     | AVENUE, ENGLEWOOD<br>CLIFFS, NJ 07632<br>U.S.A, ATTN: AARON WEISS<br>TEL : 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | 20 YOIDO-I<br>YOUNGDU<br>TOWERS, S<br>150-721 82-<br>23773 39 |
| 1112<br>NH<br>CK ING<br>_ATE<br>.000KG<br>IE<br>S.      | LG CHEM<br>AMERICA, INC., 920 SYL<br>VAN | LG CHEM, LTD. | 04/03/2013 | 44092  | 20042 | Pusan    | Charleston, South<br>Carolina | MAERSK MERLION | South Korea | ISO TANK                                                                                                                     | AVENUE, ENGLEWOOD<br>CLIFFS, NJ 07632<br>U.S.A, ATTN: AARON WEISS<br>TEL : 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | 20 YOIDO-I<br>YOUNGDU<br>TOWERS, S<br>150-721 82-<br>23773 39 |
| 1113<br>I) +<br>ON TEL<br>2-10-<br>3                    | TO THE ORDER OF                          | LG CHEM LTD.  | 04/03/2013 | 44092  | 20042 | Pusan    | Charleston, South<br>Carolina | MAERSK MERLION | South Korea | ISO TANK<br>TIFU1 420193 SEAL<br>NO:000314 000315<br>000392                                                                  | LG CHEM AMERICA, INC.,<br>910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A 1-3106674852<br>TEL EX 1-213623 33         | 20 YOIDO-I<br>YOUNGDU<br>TOWERS, I<br>150-721 82-<br>32555 05 |
| 1114<br>L AC<br>TIBLE<br>TH<br>VER) 9<br>E TANK<br>DAYS | TO THE ORDER LG<br>CHEM AMERICA, INC.    | LG CHEM, LTD. | 04/01/2013 | 132277 | 60126 | Shanghai | Charleston, South<br>Carolina | AXEL MAERSK    | China       | & SEAL NO SI<br>MU2436530/114115/1141<br>16/114113 SIMU<br>2518433/119092/119093/<br>119094 SIMU25<br>58626/114118/114127/11 | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 1-3106674852 TEL EX<br>1-213623 33                                         | 20 YOIDO-I<br>YOUNGDU<br>TOWERS, S<br>150-721 82-<br>32555 05 |
| 1115                                                    | FMC<br>CORPORATION, LITHUI<br>M DIVISION | LG CHEM, LTD  | 03/24/2013 | 11207  | 5094  | Pusan    | Charleston, South<br>Carolina | NYK DEMETER    | South Korea | NO MARKS                                                                                                                     | HIGHWAY 161-RAP<br>60022907 BESSEMER<br>CITY, N.C. 28016 U.S.A.                                                                 | 679 DAEJUI<br>SEOSAN-C<br>CHUNGCH                             |



|                                                                         |                                        |               |            |       |       |       |                               |                 |             |                 |                                                                                                                                 |                                            |
|-------------------------------------------------------------------------|----------------------------------------|---------------|------------|-------|-------|-------|-------------------------------|-----------------|-------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| MER P/O :<br>TE,INH<br>9 PACK ING<br>CRYL ATE<br>1,000.000KG            | TO THE ORDER OF LG<br>CHEM AMERICA, IN | LG CHEM, LTD. | 03/13/2013 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MSC FIRENZE     | South Korea | AS PER LABEL    | 920SYLVAN<br>AVENUE.,ENGLEWOOD<br>CLIFFS. U.S.A.ATTN:<br>AARON WEISS TEL : 201-<br>816-2968 1-2018162000 TEL<br>EX 1-201816 09  | 20 YOI<br>YOUNI<br>TOWE<br>150-72<br>32555 |
| MER P/O :<br>E,INH<br>} PACKI NG<br>CRYLA TE<br>1,000.000KG             | LG CHEM AMERICA,<br>INC., 920SYLVAN    | LG CHEM, LTD. | 03/13/2013 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MSC FIRENZE     | South Korea | AS PER LABEL    | AVENUE., ENGLEWOOD<br>CLIFFS, NJ 07632<br>U.S.A.ATTN: AARON WEISS<br>TEL : 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | 20 YOI<br>YOUNI<br>TOWE<br>150-72<br>32555 |
| TE,INH<br>9 PACK ING<br>CRYL ATE<br>1,000.000KG<br>FIXED TO<br>K(IM101) | LG CHEM AMERICA,<br>INC., 920SYLVAN    | LG CHEM,LTD.  | 03/13/2013 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MSC FIRENZE     | South Korea | ISO TANK        | AVENUE.,ENGLEWOOD<br>CLIFFS,NJ 07632 U.S.A.<br>ATTN: AARON WEISS TEL :<br>201-816-2968 1-2018162000<br>TEL EX 1-201816 09       | 20 YOI<br>YOUNI<br>TOWE<br>150-72<br>32555 |
| E,INH<br>} PACKI NG<br>CRYLA TE<br>1,000.000KG<br>FIX ED TO<br>(IM101)  | LG CHEM AMERICA,<br>INC., 920SYLVAN    | LG CHEM,LTD.  | 03/13/2013 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MSC FIRENZE     | South Korea | AS PER LABEL    | AVENUE.,ENGLEWOOD<br>CLIFFS,NJ 07632<br>U.S.A.ATTN: AARON WEISS<br>TEL : 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09   | 20 YOI<br>YOUNI<br>TOWE<br>150-72<br>32555 |
| E,INH<br>} PACKI NG<br>CRYLA TE<br>1,000.000KG<br>FIXED TO<br>K(IM101)  | LG CHEM AMERICA,<br>INC. 920SYLVAN     | LG CHEM. LTD  | 03/06/2013 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DAMIETTA | South Korea | AS PER LABEL    | AVENUE. ENGLEWOOD<br>CLIFFS, NJ 07532 U.S.A.<br>ATTN: AARON WEISS TEL:<br>201-816-2968 1-2018162000<br>TEL EX 1-201816 09       | 20 YOI<br>YOUNI<br>TOWE<br>150-72<br>32555 |
| TE,INH<br>9 PACK ING<br>CRYL ATE<br>1,000.000KG<br>FIXED TO<br>K(IM101) | LG CHEM AMERICA,<br>INC., 920SYLVAN    | LG CHEM,LTD.  | 03/06/2013 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DAMIETTA | South Korea | ISO TANK        | AVENUE., ENGLEWOOD<br>CLIFFS, NJ 07632 U.S.A.<br>ATTN: AARON WEISS TEL :<br>201-816-2968 1-2018162000<br>TEL EX 1-201816 09     | 20 YOI<br>YOUNI<br>TOWE<br>150-72<br>32555 |
| E,INH<br>} PACKI NG<br>CRYLA TE<br>1,000.000KG<br>FIXED TO<br>K(IM101)  | LG CHEM<br>AMERICA,INC.,920SYL<br>VAN  | LG CHEM,LTD.  | 03/06/2013 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DAMIETTA | South Korea | AS PER LABEL    | AVENUE.,ENGLEWOOD<br>CLIFFS,NJ 07632<br>U.S.A,ATTN: AARON WEISS<br>TEL : 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09   | 20 YOI<br>YOUNI<br>TOWE<br>150-72<br>32555 |
| J 1919<br>A(METHYL<br>9.5%MIN<br>973.101943<br>IHT                      | FLOCRYL INC                            | LG CHEM LTD.  | 02/28/2013 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR   | South Korea | NO MARKS AND NU | PO BOX 250, RICEBORO,<br>GA 31323, TEL) 912-884-<br>3366                                                                        | 20 YOI<br>YOUNI<br>TOWE<br>150-72          |
| J 1919<br>A(METHYL<br>9.5%MIN<br>906.101990<br>IHT                      | FLOCRYL INC                            | LG CHEM LTD.  | 02/28/2013 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR   | South Korea | NO MARKS AND NU | PO BOX 250, RICEBORO,<br>GA 31323, TEL) 912-884-<br>3366                                                                        | 20 YOI<br>YOUNI<br>TOWE<br>150-72          |

|                                               |                                         |               |            |        |       |       |                               |                |             |                                           |                                                                                                                                |                                                                |
|-----------------------------------------------|-----------------------------------------|---------------|------------|--------|-------|-------|-------------------------------|----------------|-------------|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| 9<br>THYL<br>MIN<br>612<br>101911<br>V-       | FLOCRYL INC                             | LG CHEM LTD.  | 02/28/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR  | South Korea | NO MARKS AND NU                           | PO BOX 250, RICEBORO,<br>GA 31323, TEL) 912-884-<br>3366                                                                       | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| 9<br>THYL<br>MIN<br>612<br>101963<br>V-       | FLOCRYL INC                             | LG CHEM LTD.  | 02/28/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR  | South Korea | NO MARKS AND NU                           | PO BOX 250, RICEBORO,<br>GA 31323, TEL) 912-884-<br>3366                                                                       | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| 9<br>THYL<br>MIN<br>612<br>101958<br>V-       | FLOCRYL INC                             | LG CHEM LTD.  | 02/28/2013 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR  | South Korea | NO MARKS AND NU                           | PO BOX 250, RICEBORO,<br>GA 31323, TEL) 912-884-<br>3366                                                                       | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| F-3,S-<br>ATION<br>L : +82-<br>ONG            | TO THE ORDER OF                         | LG CHEM LTD.  | 02/27/2013 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DANBURY | South Korea | ISO TANK *000398                          | LG CHEM AMERICA, INC.,<br>910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A 1-2018162000<br>TEL EX 1-201816 09        | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>32555 05 |
| NH<br>CK ING<br>ATE<br>.000KG<br>D TO<br>(01) | LG CHEM AMERICA,<br>INC., 920SYLVAN     | LG CHEM, LTD. | 02/27/2013 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DANBURY | South Korea | ISO TANK                                  | AVENUE, ENGLEWOOD<br>CLIFFS, NJ 07632<br>U.S.A.ATTN: AARON WEISS<br>TEL: 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09  | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>32555 05 |
| HI<br>KI NG<br>ATE<br>.000KG<br>OTANK<br>DS   | LG CHEM<br>AMERICA, INC., 920SYL<br>VAN | LG CHEM, LTD. | 02/27/2013 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DANBURY | South Korea | AS PER LABEL                              | AVENUE, ENGLEWOOD<br>CLIFFS, NJ 07632<br>U.S.A.ATTN: AARON WEISS<br>TEL : 201-816-2968 1-<br>2018162000 TEL EX 1-<br>201816 09 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>32555 05 |
| L AC<br>ITBLE<br>TH<br>MER) 9<br>MO<br>IS     | TO THE ORDER LG<br>CHEM AMERICA. INC.   | LG CHEM. LTD. | 02/27/2013 | 132277 | 60126 | Pusan | Charleston, South<br>Carolina | MAERSK DANBURY | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL | 920 SYLVAN AVENUE.<br>ENGLEWOOD CLIFFS. NJ<br>07632 1-2018162000 TEL EX<br>1-201816 09                                         | 20 YOIDO-I<br>YOUNGDUI<br>TOWER, SI<br>150-721 82-<br>32555 05 |
| HI<br>KI NG<br>ATE<br>.000KG<br>D TO<br>(01)  | LG CHEM AMERICA<br>INC., 920SYLVAN      | LG CHEM. LTD  | 02/20/2013 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK GIRONDE | South Korea | AS PER LABEL                              | AVENUE., ENGLEWOOD<br>CLIFFS. NJ 07532 U.S.A.<br>ATTN: AARON WEISS TEL:<br>201-816-2968 1-2018162000<br>TEL EX 1-201816 09     | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721 82-<br>32555 05 |
| NH<br>CK ING<br>ATE<br>.000KG<br>D TO<br>(01) | LG CHEM<br>AMERICA. INC. 920<br>SYLVAN  | LG CHEM. LTD. | 02/20/2013 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK GIRONDE | South Korea | ISO TANK                                  | AVENUE. ENGLEWOOD<br>CLIFFS. NJ 07532 U.S.A.<br>ATTN: ARRON WEISS TEL:<br>201-816-2968 1-2018162000<br>TEL EX 1-201816 09      | 20 YOIDO-I<br>YOUNGDUI<br>TOWER, SE<br>150-721 82-<br>32555 05 |

|      |                                   |               |            |       |       |       |                            |                |             |                                                                  |                                                                                                                 |                                                   |
|------|-----------------------------------|---------------|------------|-------|-------|-------|----------------------------|----------------|-------------|------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| 13   | TO THE ORDER OF                   | LG CHEM LTD.  | 02/20/2013 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK GIRONDE | South Korea | N/M                                                              | LG CHEM AMERICA, INC., 910 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A 1-3106674852 TEL EX 1-213623 33     | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721 82-32555 05 |
| 9)   | LG CHEM AMERICA, INC.             | LG CHEM LTD.  | 01/23/2013 | 44000 | 20000 | Pusan | Charleston, South Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND NU                                                  | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968                       | 20 YOIDO-DONG, YOU TWIN TOWI KOREA 150            |
| 101) | LG CHEM AMERICA, INC., 920 SYLVAN | LG CHEM, LTD. | 01/23/2013 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK MERLION | South Korea | N/M                                                              | AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL : 201-816-2968 1-2018162000 TEL EX 1-201816 09 | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721 82-32555 05 |
|      | TO ORDER OF                       | LG CHEM LTD.  | 01/23/2013 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK MERLION | South Korea | ISO TANK **000095                                                | LG CHEM AMERICA, INC., 910 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, 1-1111111111                       | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721 82-32555 05 |
|      | LG CHEMAMERICA, INC.              | LG CHEM LTD.  | 01/09/2013 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DHAHRAN | South Korea | AS PER LABEL ----- GE SU8105506 SEAL NO: 000512, 000530, 0005 79 | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A. ATTN: AARON WEISS TEL: 201-816-2968                       | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721             |
|      | TO THE ORDER OF LG CHEM           | LG CHEM LTD.  | 01/09/2013 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DHAHRAN | South Korea | AS PER LABEL ----- TI FU1721638 SEAL NO: 000057, 000064, 0000 62 | AMERICA, INC. 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632                                                      | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721             |
|      | LG CHEM AMERICA, INC.             | LG CHEM LTD.  | 12/27/2012 | 44000 | 20000 | Pusan | Charleston, South Carolina | APL GARNET     | South Korea | NO MARKS AND NU                                                  | 920 SYLVAN AVE., ENGLEWOOD CLIFFS, NJ 07632 USA ATTN: AARON WEISS                                               | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721             |
|      | LG CHEM AMERICA, INC.             | LG CHEM LTD.  | 12/19/2012 | 44000 | 20000 | Pusan | Charleston, South Carolina | APL ARABIA     | South Korea | NO MARKS AND NU                                                  | 920 SYLVAN AVE., ENGLEWOOD CLIFFS, NJ 07632 USA ATTN: AARON WEISS                                               | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721             |
|      | TO THE ORDER OF                   | LG CHEM LTD.  | 12/19/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DANBURY | South Korea | ISO TANK                                                         | LG CHEM AMERICA, INC., 910 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A                                     | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721             |

|                                               |                                      |               |            |       |       |       |                               |                |             |                                         |                                                                                                |                                                 |
|-----------------------------------------------|--------------------------------------|---------------|------------|-------|-------|-------|-------------------------------|----------------|-------------|-----------------------------------------|------------------------------------------------------------------------------------------------|-------------------------------------------------|
| NOS<br>AC<br>IN 20<br>BLE<br>L                | TO THE ORDER OF LG<br>CHEM           | LG CHEM LTD.  | 12/12/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SCT ZURICH     | South Korea | N/M                                     | AMERICA, INC. 920 SYLVAN<br>AVENUE ENGLEWOOD<br>CLIFFS, NJ 07632                               | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 |
| 1) *DDC                                       |                                      |               |            |       |       |       |                               |                |             |                                         |                                                                                                |                                                 |
| -51 81 /<br>YOON<br>MINER<br>2994             | TO THE ORDER OF                      | LG CHEM LTD.  | 12/12/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SCT ZURICH     | South Korea | AS PER LABEL -----<br>----- EXFU8212536 | LG CHEM AMERICA, INC.,<br>910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A           | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 |
| NH<br>CK ING<br>ATE<br>.000KG<br>D TO<br>101) | LG CHEM AMERICA,<br>INC., 920SYLVAN  | LG CHEM, LTD. | 11/28/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DELLYS  | South Korea | ISO TANK                                | AVENUE., ENGLEWOOD<br>CLIFFS, NJ 07632 U.S.A.<br>ATTN: AARON WEISS TEL:<br>201-816-2968        | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 |
| ILIZED,<br>IG                                 |                                      |               |            |       |       |       |                               |                |             |                                         |                                                                                                |                                                 |
| RYLIC<br>, PG II,                             | TO THE ORDER OF                      | LG CHEM LTD.  | 11/28/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DELLYS  | South Korea | ISO TANK                                | LG CHEM AMERICA, INC.,<br>910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A           | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 |
| CK<br>AC<br>IN 20,<br>C<br>3C                 | LG CHEMAMERICA,<br>INC.              | LG CHEM. LTD. | 11/20/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DRURY   | South Korea | AS PER LABEL *000434                    | 920 SYLVAN AVENUE.<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN: AARON<br>WEISS TEL: 201-816-29 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 |
| ILIZED                                        |                                      |               |            |       |       |       |                               |                |             |                                         |                                                                                                |                                                 |
| 1) 99%<br>0.000<br>ID<br>II,                  | TO THE ORDER OF                      | LG CHEM. LTD. | 11/20/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DRURY   | South Korea | ISO TANK                                | LG CHEM AMERICA, INC.,<br>910 SYLVAN AVENUE.,<br>ENGLEWOOD CIFFS, NJ<br>07632 U.S.A            | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 |
| NH<br>CK ING<br>ATE<br>.000KG<br>E<br>S.      | LG CHEM AMERICA,<br>INC., 920 SYLVAN | LG CHEM, LTD. | 11/20/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DRURY   | South Korea | ISO TANK                                | AVENUE., ENGLEWOOD<br>CLIFFS, NJ 07632 U.S.A,<br>ATTN: AARON WEISS TEL:<br>201-816-2968        | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 |
| L AC<br>TIBLE<br>MER)<br>FAN K<br>DAYS        | TO THE ORDER OF LG<br>CHEM           | LG CHEM LTD.  | 11/14/2012 | 88184 | 40084 | Pusan | Charleston, South<br>Carolina | MAERSK MERLION | South Korea | AS PER LABEL AS PER<br>LABEL            | AMERICA, INC. 920 SYLVAN<br>AVENUE ENGLEWOOD<br>CLIFFS, NJ 07632                               | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 |
| D AY *<br>D TO<br>101) *                      |                                      |               |            |       |       |       |                               |                |             |                                         |                                                                                                |                                                 |
| 1-680-<br>24 PIC:                             | LG CHEMAMERICA,<br>INC.              | LG CHEM LTD.  | 11/14/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK MERLION | South Korea | FINAL DESTINATION<br>FORT MILL, SC      | 920 SYLVAN VENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-29  | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721 |

|            |       |       |       |                            |                 |             |                                  |                                                                                         |                                        |
|------------|-------|-------|-------|----------------------------|-----------------|-------------|----------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------|
| 11/14/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK MERLION  | South Korea | ISO TANK                         | AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A. ATTN: AARON WEISS TEL: 201-816-2968          | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721  |
| 10/31/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DIEPPE   | South Korea | FINAL DESTINATION FORT MILL, SC  | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2  | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721  |
| 10/24/2012 | 44000 | 20000 | Pusan | Charleston, South Carolina | NORTHERN HONOUR | South Korea | NO MARKS                         | . CLIFFS,NJ 07632 U S A ATTN AARON W .                                                  | . LG TWIN 1 SOUTH KOI                  |
| 10/24/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DHAHRAN  | South Korea | FINAL DESTINATION FORT MILL , SC | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-29 | 20, YOIDO-I YOUNGDUI TOWERS, S 150-721 |
| 10/24/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DHAHRAN  | South Korea | FINAL DESTINATION FORT MILL, SC  | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-29 | 20, YOIDO-I YOUNGDUI TOWERS, S 150-721 |
| 10/24/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DHAHRAN  | South Korea | FINAL DESTINATION GEORGETOWN, SC | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-29 | 20, YOIDO-I YOUNGDUI TOWERS, S 150-721 |
| 10/24/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DHAHRAN  | South Korea | FINAL DESTINATION FORT MILL, SC  | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-29 | 20, YOIDO-I YOUNGDUI TOWERS, S 150-721 |
| 10/24/2012 | 88184 | 40084 | Pusan | Charleston, South Carolina | MAERSK DHAHRAN  | South Korea | AS PER LABEL AS PER LABEL        | AMERICA, INC. 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632                              | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721  |
| 10/17/2012 | 44000 | 20000 | Pusan | Charleston, South Carolina | APL MALAYSIA    | South Korea | NO MARKS AND NU                  | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN:AARON WEISS TEL:201-816-2968 | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150  |

|                                       |                                      |                                       |            |       |       |       |                            |                  |             |                                                       |                                                                                           |                                        |
|---------------------------------------|--------------------------------------|---------------------------------------|------------|-------|-------|-------|----------------------------|------------------|-------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------------------------|
| II OTANK                              | LG CHEMAMERICA, INC.                 | LG CHEM LTD.                          | 10/17/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DAVENPORT | South Korea | SEAL NO: 000214, 000234, 000263                       | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A. ATTN: AARON WEISS TEL: 201-816-2968 | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721  |
| 1-805-50PIC :<br>132599 CLASS         | TO THE ORDER OF                      | LG CHEM LTD.                          | 10/17/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DAVENPORT | South Korea | ISO TANK EXFU8212541 SEAL NO: 10 6913, 106907, 106929 | LG CHEM AMERICA, INC., 910 SYLVAN AVENUE, ENGLEWOOD CLIFFS, NJ 07632 U.S.A.               | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721  |
| UID, OUP: Y<br>3773-024PIC<br>J276 ** | TO THE ORDER OF LG CHEM              | LG CHEM LTD.                          | 10/17/2012 | 88184 | 40084 | Pusan | Charleston, South Carolina | MAERSK DAVENPORT | South Korea | AS PER LABEL AS PER LABEL                             | AMERICA, INC. 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632 1-3106052500 TEL EX 1-310605   | 20 YOIDO-DONG, YOU TWIN TOWI KOREA 150 |
|                                       | LG CHEM AMERICA, INC 920 SYLVAN AVEN | LG CHEM LTD 20 YOIDO-DONG, YOUNGDU NG | 10/10/2012 | 44000 | 20000 | Pusan | Charleston, South Carolina | VENICE BRIDGE    | South Korea | NO MARKS                                              | . CLIFFS, NJ 07632 ATTN AARON WEISS TE .                                                  | . LG TWIN 1 SOUTH KOI                  |
| UID, +<br>ON TEL<br>82-10-<br>IK      | TO THE ORDER OF LG CHEM              | LG CHEM LTD.                          | 10/10/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DAMIETTA  | South Korea | AS PER LABEL *000273                                  | AMERICA, INC. 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632                                | 20 YOIDO-DONG, YOU TWIN TOWI KOREA 150 |
|                                       | TO THE ORDER OF LG CHEM AMERICA      | LG CHEM LTD                           | 10/03/2012 | 36960 | 16800 | Pusan | Charleston, South Carolina | COSCO FOS        | South Korea | NO MARKS                                              | INC , 920 SYLVAN AVENUE, ENGLEWOOD CLIFFS, NJ 07632 U S A ATTN AARON WEISS                | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721  |
| ZED ROUP                              | LG CHEMAMERICA, INC.                 | LG CHEM LTD.                          | 10/03/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DANBURY   | South Korea | AS PER LABEL * 000286, 000290                         | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A. ATTN:AARON WEISS TEL:201-816-2968   | 20 YOIDO-DONG, YOU TWIN TOWI KOREA 150 |
| UID, /<br>-3773-024PIC                | TO THE ORDER OF LG CHEM              | LG CHEM LTD.                          | 10/03/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DANBURY   | South Korea | AS PER LABEL                                          | AMERICA, INC. 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632                                | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721  |
| II MA R)<br>TANK<br>JAY               | LG CHEMAMERICA, INC.                 | LG CHEM LTD.                          | 09/26/2012 | 44092 | 20042 | Pusan | Charleston, South Carolina | SCT ZURICH       | South Korea | N/M                                                   | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A. ATTN: AARON WEISS TEL:201-816-2968  | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721  |

|                                                       |                                                            |                                                |            |       |       |       |                               |                 |             |                                                                                      |                                                                                                  |                                                 |
|-------------------------------------------------------|------------------------------------------------------------|------------------------------------------------|------------|-------|-------|-------|-------------------------------|-----------------|-------------|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|-------------------------------------------------|
| TE-<br>S:<br>/LATE,<br>N. NO.:                        | TO THE ORDER OF LG<br>CHEM                                 | LG CHEM LTD.                                   | 09/26/2012 | 88184 | 40084 | Pusan | Charleston, South<br>Carolina | SCT ZURICH      | South Korea | AS PER APPENDIX AS<br>PER APPENDIX                                                   | AMERICA, INC. 920 SYLVAN<br>AVENUE ENGLEWOOD<br>CLIFFS, NJ 07632                                 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| ION<br>: +82-<br>OOK+<br>ON<br>: +82-<br>OOK<br>P/O : | TO THE ORDER OF LG<br>CHEM                                 | LG CHEM LTD.                                   | 09/19/2012 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA      | South Korea | NO MARKS AND NU                                                                      | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN:AARON<br>WEISS TEL:201-816-2968 | 20 YOIDO-<br>DONG,YOU<br>TWIN TOWI<br>KOREA 150 |
| TE-<br>S:<br>/LATE,<br>N. NO.:                        | TO THE ORDER OF LG<br>CHEM                                 | LG CHEM LTD.                                   | 09/19/2012 | 88184 | 40084 | Pusan | Charleston, South<br>Carolina | MAERSK DERINCE  | South Korea | AS PER APPENDIX AS<br>PER APPENDIX                                                   | AMERICA, INC. 920 SYLVAN<br>AVENUE ENGLEWOOD<br>CLIFFS, NJ 07632                                 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| ION<br>: +82-<br>OOK+<br>ON<br>: +82-<br>OOK<br>P/O : | TO THE ORDER OF LG<br>CHEM AMERICA                         | LG CHEM LTD.                                   | 09/19/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DERINCE  | South Korea | AS PER LABEL                                                                         | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>W                 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| TE-<br>S:<br>/LATE,<br>N. NO.:                        | TO THE ORDER OF LG<br>CHEM AMERICA, INC.                   | LG CHEM LTD.                                   | 09/12/2012 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL JADE        | South Korea | NO MARKS AND NU                                                                      | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN:AARON<br>WEISS TEL:201-816-2968 | 20 YOIDO-<br>DONG,YOU<br>TWIN TOWI<br>KOREA 150 |
| ION<br>: +82-<br>OOK+<br>ON<br>: +82-<br>OOK<br>P/O : | TO THE ORDER OF                                            | LG CHEM LTD.                                   | 09/05/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DRURY    | South Korea | AS PER APPENDIX ISO<br>TANK -----<br>EXFU8212860 SEA L NO:<br>000126, 000166, 000179 | LG CHEM AMERICA, INC.,<br>920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A             | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| TE-<br>S:<br>/LATE,<br>N. NO.:                        | TO THE ORDER OF LG<br>CHEM AMERICA, INC 920<br>SYLVAN AVEN | LG CHEM LTD 20<br>YOIDO-<br>DONG,YOUNGDU<br>NG | 09/05/2012 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MARE PHOENICIUM | South Korea | NO MARKS                                                                             | . CLIFFS,NJ 07632 U S A,<br>ATTN AARON W .                                                       | . LG TWIN 1<br>SOUTH KOI                        |
| ION<br>: +82-<br>OOK+<br>ON<br>: +82-<br>OOK<br>P/O : | TO THE ORDER OF                                            | LG CHEM LTD.                                   | 08/30/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK MERLION  | South Korea | ISO TANK<br>*000138,000151                                                           | LG CHEM AMERICA, INC.,<br>920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A.            | 20 YOIDO-<br>DONG,YOU<br>TWIN TOWI<br>KOREA 150 |
| TE-<br>S:<br>/LATE,<br>N. NO.:                        | TO THE ORDER OF LG<br>CHEM AMERICA                         | LG CHEM LTD.                                   | 08/24/2012 | 20000 | 9091  | Pusan | Charleston, South<br>Carolina | MAERSK DIEPPE   | South Korea | AS PER LABEL<br>TASU2148227 (100906.7<br>7.31)                                       | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>W                 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |



|                                                   |                            |              |            |        |       |       |                               |                     |             |                                                       |                                                                                                 |                                                 |
|---------------------------------------------------|----------------------------|--------------|------------|--------|-------|-------|-------------------------------|---------------------|-------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------|
| TE,<br>I<br>3)<br>IS                              | LG CHEM AMERICA,<br>INC.   | LG CHEM LTD. | 08/24/2012 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DIEPPE       | South Korea | N/M                                                   | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN:AARON<br>WEISS                 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| 12-<br>JID,<br>XYL<br>MIN                         | LG CHEM AMERICA,<br>INC.   | LG CHEM LTD. | 08/22/2012 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | APL EGYPT           | South Korea | NO MARKS AND NU NO<br>MARKS AND NU NO<br>MARKS AND NU | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632                                              | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS S<br>150-721   |
| 3<br>3                                            | TO THE ORDER OF            | LG CHEM LTD. | 08/15/2012 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | MOL EFFICIENCY      | South Korea | NO MARKS AND NU NO<br>MARKS AND NU NO<br>MARKS AND NU | LG CHEM AMERICA, INC.,<br>920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A,           | 20 YOIDO-<br>DONG,YOU<br>TWIN TOWI<br>KOREA 150 |
| UID,<br>OUP:III<br>-3773-<br>024PIC               | TO THE ORDER OF LG<br>CHEM | LG CHEM LTD. | 08/15/2012 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DHAHRAN      | South Korea | AS PER LABEL<br>*000184,000147                        | AMERICA, INC. 920 SYLVAN<br>AVENUE ENGLEWOOD<br>CLIFFS, NJ 07632                                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| TE,<br>I<br>L<br>MIN<br>3                         | LG CHEM AMERICA,<br>INC.   | LG CHEM LTD. | 08/15/2012 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DHAHRAN      | South Korea | EXFU0706949 SEAL NO:<br>000108, 00013 9, 000197       | 920 SYLVAN AVENUE,<br>ENGLEWOOD CLIFFS,<br>NJ07632 U.S.A,<br>ATTN:AARON WEISS                   | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| +82-10-<br>JMER<br>JA 1993                        | TO THE ORDER OF LG<br>CHEM | LG CHEM LTD. | 08/15/2012 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DHAHRAN      | South Korea | EXFU0566662 SEAL NO;<br>000153, 00010 1, 000149       | AMERICA, INC. 920 SYLVAN<br>AVENUE ENGLEWOOD<br>CLIFFS, NJ07632                                 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| I<br>3) 99.5<br>OF<br>EESTO                       | LG CHEM AMERICA,<br>INC.   | LG CHEM LTD. | 08/08/2012 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK<br>DAVENPORT | South Korea | EXFU0581224 1 SEAL<br>NO: 000511, 00 0516,<br>000561  | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN : AARON<br>WEISS               | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |
| 3<br>3                                            | TO THE ORDER OF            | LG CHEM LTD. | 07/27/2012 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE       | South Korea | NO MARKS AND NU NO<br>MARKS AND NU NO<br>MARKS AND NU | LG CHEM AMERICA, INC.,<br>920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A,           | 20 YOIDO-<br>DONG,YOU<br>TWIN TOWI<br>KOREA 150 |
| 0-8440-<br>JMER<br>31427-<br>ACID)<br>ASS 8, INC. | LG CHEM AMERICA,<br>INC.   | LG CHEM LTD. | 07/25/2012 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK MALACCA      | South Korea | AS PER LABEL -----<br>-----                           | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:ARRON<br>WEISS TEL:201-816-2968 | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721  |

|                                                                                                   |                                           |                                                |            |       |       |          |                               |                |             |                                                                                                  |                                                                                                              |                                  |
|---------------------------------------------------------------------------------------------------|-------------------------------------------|------------------------------------------------|------------|-------|-------|----------|-------------------------------|----------------|-------------|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|----------------------------------|
| YL<br>NER-2<br>L<br>NER-<br>PG II,( 54<br>NT,F-E, S-C<br>ATION TEL :<br>: +82-10-<br>IN *<br>PAID | TO THE ORDER OF                           | LG CHEM LTD.                                   | 07/19/2012 | 88000 | 40000 | Pusan    | Charleston, South<br>Carolina | APL MALAYSIA   | South Korea | NO MARKS AND NU NO<br>MARKS AND NU                                                               | LG CHEM AMERICA, INC.,<br>920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A,                        | 20 YOI<br>DONG<br>TWIN<br>KORE   |
|                                                                                                   | LG CHEM AMERICA ,<br>INC.                 | LG CHEM LTD.                                   | 07/18/2012 | 44092 | 20042 | Pusan    | Charleston, South<br>Carolina | SCT ZURICH     | South Korea | AS PER LABEL                                                                                     | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN: ARRON<br>WEISS TEL: 201-86-2968             | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
|                                                                                                   | LG CHEM<br>AMERICA,INC 910<br>SYLVAN AVEN | LG CHEM LTD 20<br>YOIDO-<br>DONG,YOUNGDU<br>NG | 07/11/2012 | 44000 | 20000 | Pusan    | Charleston, South<br>Carolina | HANJIN NEWPORT | South Korea | NO MARKS                                                                                         | . CLIFFS,NJ 07632 .                                                                                          | . LG TI<br>SOUTI                 |
|                                                                                                   | LG CHEM<br>AMERICA,INC                    | LG CHEM LTD                                    | 07/11/2012 | 44000 | 20000 | Pusan    | Charleston, South<br>Carolina | HANJIN NEWPORT | South Korea | NO MARKS                                                                                         | . 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, .                                                                   | . 20 YC<br>DONG<br>TW .          |
| CANE<br>MENT                                                                                      | FMC LITHIUM                               | LG CHEM, LTD                                   | 06/26/2012 | 9042  | 4110  | Shanghai | Charleston, South<br>Carolina | VIRGINIA       | China       | NO MARKS                                                                                         | 1115 BESSOMER CITY,<br>KINGS MTN HWY<br>BESSEMER CITY, N.C.<br>28016 U.S.A. MR.BUDDY<br>JONES 1-703-527-3887 | 679 D/<br>SEOS/<br>CHUN          |
| JASS<br>ROUP :II<br>MONOMER)<br>' FREE<br>ANK IS 14                                               | LG CHEMAMERICA,<br>INC.                   | LG CHEM LTD.                                   | 06/21/2012 | 44092 | 20042 | Pusan    | Charleston, South<br>Carolina | MAERSK MERLION | South Korea | AS PER LABEL                                                                                     | 920SYLAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL : 201-816-2968              | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
|                                                                                                   | TO THE ORDER OF LG<br>CHEM AMERICA,INC    | LG CHEM LTD 20<br>YOIDO-<br>DONG,YOUNGDU<br>NG | 06/11/2012 | 44000 | 20000 | Pusan    | Charleston, South<br>Carolina | YM ELIXIR      | South Korea | NO MARKS                                                                                         | . CLIFFS,NJ 07632 .                                                                                          | . LG TI<br>SOUTI                 |
| MOBILE: +82-<br>AN WOOK<br>VER P/O:                                                               | TO THE ORDER OF LG<br>CHEM                | LG CHEM LTD.                                   | 06/06/2012 | 44092 | 20042 | Pusan    | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | AS PER APPENDIX AS<br>PER LABEL -----<br>----- EXFU0618447 SE<br>AL NO: 101575, 10156,<br>101549 | AMERICA, INC. 920 SYLAN<br>AVENUE ENGLEWOOD<br>CLIFFS, NJ 07632                                              | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| INHIBITED<br>IOS NA 1993                                                                          | TO THE ORDER OF LG<br>CHEM                | LG CHEM LTD.                                   | 06/06/2012 | 44092 | 20042 | Pusan    | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | AS PER LABEL -----<br>----- EX FU0618215 SEAL<br>NO: 101678, 101649,<br>101630                   | AMERICA, INC. 920 SYLAN<br>AVENUE ENGLEWOOD<br>CLIFFS, NJ 07632                                              | 20 YOI<br>YOUN<br>TOWE<br>160-72 |

|                            |                                      |                                       |            |        |       |       |                            |                |             |                                                 |                                                                                          |                             |
|----------------------------|--------------------------------------|---------------------------------------|------------|--------|-------|-------|----------------------------|----------------|-------------|-------------------------------------------------|------------------------------------------------------------------------------------------|-----------------------------|
| ISIN-EPS                   | LG CHEM AMERICA, INC., 910 SYLVAN    | LG CHEM, LTD                          | 05/21/2012 | 106128 | 48240 | Pusan | Charleston, South Carolina | YM PORTLAND    | South Korea | NO MARKS NO MARKS NO MARKS                      | AVENUE, ENGLEWOOD CLIFFS, NJ 07632 U S A ATTN ALICE LEUNG TEL 201-816-2097               | 20 YOI YOUNG TOWE 150-72    |
| YLLNER-3 LNER-3 LNER-3 L   | TO THE ORDER OF                      | LG CHEM LTD.                          | 05/17/2012 | 132000 | 60000 | Pusan | Charleston, South Carolina | MOL EXPERIENCE | South Korea | NO MARKS AND NU NO MARKS AND NU NO MARKS AND NU | LG CHEM AMERICA, INC., 920 SYLVAN AVENUE, ENGLEWOOD CLIFFS, NJ 07632 U.S.A.              | 20 YOI DONG TWIN TOWE KOREA |
| WN TANK                    | TO THE ORDER OF LG CHEM AMERICA      | LG CHEM LTD.                          | 05/03/2012 | 132000 | 60000 | Pusan | Charleston, South Carolina | APL SARDONYX   | South Korea | NO MARKS AND NU NO MARKS AND NU NO MARKS AND NU | INC 920 SYLVAN AVENUE, ENGLEWOOD CLIFFS, NJ 07632                                        | 20 YOI DONG TWIN TOWE KOREA |
|                            | LG CHEM AMERICA, INC                 | LG CHEM LTD                           | 04/26/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | YM EAST        | South Korea | NO MARKS                                        | 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632                                             | 20 YOI YOUNG TOWE 150-72    |
|                            | LG CHEM AMERICA, INC 920 SYLVAN AVEN | LG CHEM LTD 20 YOIDO-DONG, YOUNGDU NG | 04/26/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | YM EAST        | South Korea | NO MARKS                                        | CLIFFS, NJ 07632                                                                         | LG T SOUT                   |
|                            | LG CHEM AMERICA, INC                 | LG CHEM LTD 20 YOIDO-DONG, YOUNGDU NG | 04/26/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | YM EAST        | South Korea | NO MARKS                                        | 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, .                                                    | LG T SOUT                   |
| L WN                       | TO THE ORDER OF LG CHEM AMERICA      | LG CHEM LTD.                          | 04/25/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND NU                                 | INC 920 SYLVAN AVENUE, ENGLEWOOD CLIFFS, NJ 07632                                        | 20 YOI DONG TWIN TOWE KOREA |
| OG CLASS: ACRYLATE, O TANK | TO THE ORDER OF LG CHEM AMERICA, IN  | LG CHEM LTD.                          | 04/19/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL MALAYSIA   | South Korea | NO MARKS AND NU                                 | 920 SYLVAN AVENUE, ENGLEWOOD CLIFFS, NJ 07632 U.S.A ATTN: AARON WEISS TEL: 201-816-2968  | 20 YOI DONG TWIN TOWE KOREA |
| OG CLASS: ACRYLATE, O TANK | TO THE ORDER OF LG CHEM AMERICA, IN  | LG CHEM LTD.                          | 04/19/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL MALAYSIA   | South Korea | NO MARKS AND NU                                 | 920 SYLVAN AVENUE, ENGLEWOOD CLIFFS, NJ 07632 U.S.A. ATTN: AARON WEISS TEL: 201-816-2968 | 20 YOI DONG TWIN TOWE KOREA |

|                                           |                                      |                                       |            |        |       |       |                            |                |             |                                     |                                                                                                          |                                 |
|-------------------------------------------|--------------------------------------|---------------------------------------|------------|--------|-------|-------|----------------------------|----------------|-------------|-------------------------------------|----------------------------------------------------------------------------------------------------------|---------------------------------|
| L                                         | TO THE ORDER OF LG CHEM AMERICA      | LG CHEM LTD.                          | 04/19/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL MALAYSIA   | South Korea | NO MARKS AND NU                     | INC 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632                                                       | 20 YOI DONG TWIN T KORE/        |
| )                                         | LG CHEM AMERICA, INC 920 SYLVAN AVEN | LG CHEM LTD 20 YOIDO-DONG, YOUNGDU NG | 04/15/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | YM ENHANCER    | South Korea | NO MARKS                            | . CLIFFS, NJ 07632 .                                                                                     | . LG T1 SOUTI                   |
| TE, GROUP: II MONOMER) FREE MARKS IS ARDS | TO THE ORDER OF LG CHEM AMERICA      | LG CHEM LTD.                          | 04/11/2012 | 44092  | 20042 | Pusan | Charleston, South Carolina | MAERSK MERLION | South Korea | AS PER LABEL                        | INC., 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A ATTN: AARON W 1-3106674852 TELEX 1-2136233329 | 20 YOI YOUNI TOWE 150-72 325556 |
| STERS OF EXYL STERS OF EXYL STERS OF      | TO THE ORDER OF LG CHEM AMERICA, INC | LG CHEM LTD 20 YOIDO-DONG, YOUNGDU NG | 04/09/2012 | 176000 | 80000 | Pusan | Charleston, South Carolina | YM ELIXIR      | South Korea | NO MARKS NO MARKS NO MARKS NO MARKS | . CLIFFS, NJ 07632 .                                                                                     | . LG T1 SOUTI                   |
| ACRYLIC                                   | LG CHEM AMERICA, INC 920 SYLVAN AVEN | LG CHEM LTD 20 YOIDO-DONG, YOUNGDU NG | 04/02/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | YM EMINENCE    | South Korea | NO MARKS                            | . CLIFFS, NJ 07632 U S A, ATTN AARON .                                                                   | . LG T1 SOUTI                   |
| YL I 1919)IMDG IETHYL CLASS 3, UN         | LG CHEM AMERICA, INC.                | LG CHEM LTD.                          | 03/28/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL SPINEL     | South Korea | NO MARKS AND NU                     | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968                | 20 YOI DONG TWIN T KORE/        |
| YL I 1919)IMDG IETHYL CLASS 3, UN         | LG CHEM AMERICA, INC.                | LG CHEM LTD.                          | 03/28/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL SPINEL     | South Korea | NO MARKS AND NU                     | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968                | 20 YOI DONG TWIN T KORE/        |
| I 1919)IMDG IETHYL CLASS 3, UN            | LG CHEM AMERICA, INC.                | LG CHEM LTD.                          | 03/28/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL SPINEL     | South Korea | NO MARKS AND NU                     | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968                | 20 YOI DONG TWIN T KORE/        |
| /LATE OTANK : 3U.N. NO.: , 1919           | LG CHEM AMERICA, INC.                | LG CHEM LTD.                          | 03/22/2012 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL ARABIA     | South Korea | NO MARKS AND NU                     | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968                | 20 YOI DONG TWIN T KORE/        |

|                                                            |                                        |               |            |        |       |       |                               |                |             |                                                       |                                                                                                                                         |                                            |
|------------------------------------------------------------|----------------------------------------|---------------|------------|--------|-------|-------|-------------------------------|----------------|-------------|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| ATE                                                        |                                        |               |            |        |       |       |                               |                |             |                                                       |                                                                                                                                         |                                            |
| OTANK<br>: 3U.N. NO.:<br>1919                              | LG CHEM<br>AMERICA, INC.               | LG CHEM LTD.  | 03/22/2012 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU                                       | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                      | 20 YOI<br>DONG<br>TWIN<br>KORE/            |
| SHIPPER-S<br>ER3 TANKS<br>LATE,<br>VN ISOTANK<br>2-        | TO THE ORDER OF                        | LG CHEM LTD.  | 03/14/2012 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | APL JADE       | South Korea | NO MARKS AND NU NO<br>MARKS AND NU NO<br>MARKS AND NU | LG CHEM AMERICA, INC.,<br>920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A,                                                   | 20 YOI<br>DONG<br>TWIN<br>KORE/            |
| RYLATE<br>OTANK<br>: 3U.N. NO.:<br>TE,                     | LG CHEM<br>AMERICA, INC.               | LG CHEM LTD.  | 03/14/2012 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL JADE       | South Korea | NO MARKS AND NU                                       | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                      | 20 YOI<br>DONG<br>TWIN<br>KORE/            |
| RYLATE<br>000.000<br>E OF                                  | TO THE ORDER OF LG<br>CHEM AMERICA, IN | LG CHEM LTD.  | 03/14/2012 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL JADE       | South Korea | NO MARKS AND NU                                       | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                      | 20 YOI<br>YOUN<br>TOWE<br>150-72           |
| ASS<br>GROUP :II<br>MONOMER)<br>' FREE<br>ANK IS 14<br>TE, | LG CHEMAMERICA,<br>INC.                | LG CHEM, LTD. | 02/29/2012 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | QINGDAO TOWER  | South Korea | AS PER LABEL                                          | 920SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL :201-816-2968 1-<br>2018162000 TELEX 1-<br>2018160961 | 20, YO<br>YOUN<br>TOWE<br>150-72<br>325556 |
| RYLATE<br>000.000<br>E OF                                  | TO THE ORDER OF LG<br>CHEM AMERICA, IN | LG CHEM LTD.  | 02/23/2012 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL EGYPT      | South Korea | NO MARKS AND NU                                       | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                      | 20 YOI<br>YOUN<br>TOWE<br>150-72           |
| VN TANK<br>2-<br>SHIPPER-<br>S3 TANK                       | TO THE ORDER OF LG<br>CHEM AMERICA     | LG CHEM LTD.  | 02/23/2012 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | APL EGYPT      | South Korea | NO MARKS AND NU NO<br>MARKS AND NU NO<br>MARKS AND NU | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A,                                                                       | 20 YOI<br>DONG<br>TWIN<br>KORE/            |
| MER P/O:<br>ASS<br>GROUP :II<br>MONOMER)                   | LG CHEMAMERICA,<br>INC.                | LG CHEM, LTD. | 02/22/2012 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | SCT ZURICH     | South Korea | AS PER LABEL<br>*101227,101298                        | 920SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL :201-816-2968 1-<br>2018162000 TELEX 1-<br>2018160961 | 20, YO<br>YOUN<br>TOWE<br>150-72<br>325556 |
| 1 1919)MDG<br>IETHYL<br>CLASS 3,UN                         | LG CHEM AMERICA,<br>INC.               | LG CHEM LTD.  | 02/15/2012 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPERIENCE | South Korea | NO MARKS AND NU                                       | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                      | 20 YOI<br>DONG<br>TWIN<br>KORE/            |

|                                                                                   |                                        |               |            |       |       |       |                               |                     |             |                              |                                                                                                                                         |                                             |
|-----------------------------------------------------------------------------------|----------------------------------------|---------------|------------|-------|-------|-------|-------------------------------|---------------------|-------------|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| CRYLATE<br>(1919)IMDG<br>CLASS 3, UN<br>30.000<br>OF<br>P/O :<br>TE,              | LG CHEM AMERICA,<br>INC.               | LG CHEM LTD.  | 02/08/2012 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL EARNEST         | South Korea | NO MARKS AND NU              | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                      | 20 YOI<br>DONG<br>TWIN<br>KORE              |
| ASS<br>GROUP :II<br>MONOMER)<br>P/O :<br>P/O : 19742<br>TE,                       | LG CHEMAMERICA,<br>INC.                | LG CHEM, LTD. | 02/08/2012 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DRURY        | South Korea | AS PER LABEL                 | 920SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL : 201-816-2968 1-<br>2018162000 TELEX 1-<br>2018160961 | 20,YOI<br>YOUNI<br>TOWE<br>150-72<br>32555( |
| YLATE<br>30.000<br>OF<br>P/O :<br>TE,                                             | TO THE ORDER OF LG<br>CHEM AMERICA, IN | LG CHEM LTD.  | 02/01/2012 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL SARDONYX        | South Korea | NO MARKS AND NU              | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                      | 20 YOI<br>YOUNI<br>TOWE<br>150-72           |
| YLATE<br>30.000<br>OF<br>P/O :<br>TE,                                             | TO THE ORDER OF LG<br>CHEM AMERICA     | LG CHEM LTD   | 01/18/2012 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL MALAYSIA        | South Korea | NO MARKS AND NU              | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN:AARON<br>WEISS                                                   | 20 YOI<br>YOUNI<br>TOWE<br>150-72           |
| O TANK<br>: 3U.N. NO.:<br>,<br>1919                                               | LG CHEM AMERICA,<br>INC.               | LG CHEM LTD.  | 01/18/2012 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL MALAYSIA        | South Korea | NO MARKS AND NU              | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                      | 20 YOI<br>DONG<br>TWIN<br>KORE              |
| (1919)IMDG<br>IETHYL<br>CLASS 3,UN<br>30.000<br>OF<br>P/O :<br>P/O : 19742<br>TE, | LG CHEM AMERICA,<br>INC.               | LG CHEM LTD.  | 01/11/2012 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENCORE          | South Korea | NO MARKS AND NU              | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                      | 20 YOI<br>DONG<br>TWIN<br>KORE              |
| ASS<br>GROUP :II<br>MONOMER)<br>P/O :<br>P/O : 19742<br>TE,                       | LG CHEMAMERICA,<br>INC.                | LG CHEM. LTD. | 12/27/2011 | 88184 | 40084 | Pusan | Charleston, South<br>Carolina | MAERSK<br>DUBROVNIK | South Korea | N/M                          | 920SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN:AARON<br>WEISS TEL:201-816-2968 1-<br>2018162000 TELEX 1-<br>2018160961 | 20, YO<br>YOUNI<br>TOWE<br>150-72<br>32555( |
| ASS<br>GROUP :II<br>MONOMER)<br>P/O :<br>P/O : 19742<br>TE,                       | LG CHEMAMERICA,<br>INC.                | LG CHEM. LTD. | 12/27/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK<br>DUBROVNIK | South Korea | N/M                          | 920SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN:AARON<br>WEISS TEL:201-816-2968 1-<br>2018162000 TELEX 1-<br>2018160961 | 20, YO<br>YOUNI<br>TOWE<br>150-72<br>32555( |
| OS NA<br>ISTOMER<br>YHEXYL                                                        | LG CHEM AMERICA                        | LG CHEM LTD.  | 12/27/2011 | 88184 | 40084 | Pusan | Charleston, South<br>Carolina | MAERSK<br>DUBROVNIK | South Korea | AS PER LABEL AS PER<br>LABEL | INC. 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 ATTN:AARON WEISS<br>1-2018162000 TELEX 1-<br>2018160961                          | 20 YOI<br>YOUNI<br>TOWE<br>150-72<br>32555( |

|                                                          |                                    |               |            |       |       |       |                               |                |             |                 |                                                                                                                                           |                                             |
|----------------------------------------------------------|------------------------------------|---------------|------------|-------|-------|-------|-------------------------------|----------------|-------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| I 1919)IMDG<br>IETHYL<br>CLASS 3,UN                      | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD.  | 12/14/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL JADE       | South Korea | NO MARKS AND NU | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                        | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| I 1919)IMDG<br>IETHYL<br>CLASS 3,UN                      | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD.  | 12/14/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL JADE       | South Korea | NO MARKS AND NU | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                        | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| ASS<br>GROUP :II<br>MONOMER)<br>'FREE<br>ANK IS 14       | LG<br>CHEMAMERICA,INC.             | LG CHEM.LTD.  | 12/13/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | RHL FELICITAS  | South Korea | AS PER LABEL    | 920SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL :201-816-2968 1-<br>2018162000 TELEX 1-<br>2018160961    | 20,YOI<br>YOUNI<br>TOWE<br>150-72<br>32555( |
| ASS<br>GROUP :II<br>MONOMER)<br>'NA & 1MO<br>ALL 4 SIDES | LG CHEMAMERICA,<br>INC.            | LG CHEM,LTD.  | 12/12/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DANBURY | South Korea | AS PER LABEL    | 920SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL :201-816-2968 1-<br>2018162000 TELEX 1-<br>2018160961    | 20,YOI<br>YOUNI<br>TOWE<br>150-72<br>32555( |
| MER P/O:<br><br>ASS<br>GROUP :II<br>MONOMER)             | LG CHEMAMERICA,<br>INC.            | LG CHEM, LTD. | 11/29/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DELLYS  | South Korea | AS PER LABEL    | 920SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632, NJ 0763<br>ATTN:AARON WEISS TEL :<br>201-816-2968 1-2018162000<br>TELEX 1-2018160961 | 20,YOI<br>YOUNI<br>TOWE<br>150-72<br>32555( |
| IOUS<br>I TANK<br>AL NO                                  |                                    |               |            |       |       |       |                               |                |             |                 |                                                                                                                                           |                                             |
| FCU4850950                                               | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD.  | 11/22/2011 | 88184 | 40084 | Pusan | Charleston, South<br>Carolina | MAERSK DIEPPE  | South Korea | N/M N/M         | INC, 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632 1-3106052500 TELEX<br>1-3106052550                                                | 20 YOI<br>DONG<br>TWIN<br>KORE/<br>TELEX    |
| MER P/O:<br><br>ASS<br>GROUP :II<br>MONOMER)             | LG CHEMAMERICA,<br>INC.            | LG CHEM, LTD. | 11/22/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DIEPPE  | South Korea | AS PER LABEL    | 920SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN:AARON<br>WEISS TEL : 201-816-2968 1-<br>2018162000 TELEX 1-<br>2018160961  | 20, YO<br>YOUNI<br>TOWE<br>150-72<br>32555( |
| I 1919)IMDG                                              | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD.  | 11/17/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPERIENCE | South Korea | NO MARKS AND NU | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                        | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| I 1919)IMDG                                              | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD.  | 11/17/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPERIENCE | South Korea | NO MARKS AND NU | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                        | 20 YOI<br>DONG<br>TWIN<br>KORE/             |



|                                              |                                    |               |            |       |       |       |                               |                |             |                                    |                                                                                                                                            |                                             |
|----------------------------------------------|------------------------------------|---------------|------------|-------|-------|-------|-------------------------------|----------------|-------------|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| MER P/O:                                     |                                    |               |            |       |       |       |                               |                |             |                                    | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A. ATTN: AARON<br>WEISS TEL :201-816-2968 1-<br>2018162000 TELEX 1-<br>2018160961 | 20, YO<br>YOUN:<br>TOWE<br>150-72<br>325556 |
| ASS<br>GROUP :II<br>MONOMER)                 | LG CHEMAMERICA,<br>INC.            | LG CHEM. LTD. | 11/15/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | AS PER LABEL                       |                                                                                                                                            |                                             |
| MER                                          |                                    |               |            |       |       |       |                               |                |             |                                    |                                                                                                                                            |                                             |
| ASS 3.2<br>II<br>MONOMER)                    | LG CHEMAMERICA,<br>INC.            | LG CHEM. LTD. | 11/08/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DRYDEN  | South Korea | AS PER LABEL                       | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A ATTN: AARON<br>WEISS TEL :201-816-2968 1-<br>2018162000 TELEX 1-<br>2018160961  | 20, YO<br>YOUN:<br>TOWE<br>150-72<br>325556 |
| I 1919)IMDG                                  | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD.  | 10/26/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND NU                    | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                         | 20 YO<br>DONG<br>TWIN *<br>KORE/            |
|                                              | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD.  | 10/26/2011 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND NU NO<br>MARKS AND NU | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                         | 20 YO<br>DONG<br>TWIN *<br>KORE/            |
| YL<br>IPPER-S<br>JER2<br>L<br>IPPER-S<br>JER | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD.  | 09/21/2011 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU NO<br>MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                                               | 20 YO<br>DONG<br>TWIN *<br>KORE/            |
| I 1919)IMDG<br>/MDG CLASS:                   | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD.  | 09/21/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU                    | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                         | 20 YO<br>DONG<br>TWIN *<br>KORE/            |
| I 1919)IMDG                                  | FLOCRYL INC                        | LG CHEM LTD.  | 09/21/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU                    | PO BOX 250 RICEBOFO, GA<br>31323 TEL:912-884-3366                                                                                          | 20 YO<br>DONG<br>TWIN *<br>KORE/            |
| I 1919)IMDG                                  | FLOCRYL INC                        | LG CHEM LTD.  | 09/21/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU                    | PO BOX 250 RICEBOFO, GA<br>31323 TEL:912-884-3366                                                                                          | 20 YO<br>DONG<br>TWIN *<br>KORE/            |
| I 1919)IMDG                                  | FLOCRYL INC                        | LG CHEM LTD.  | 09/21/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU                    | PO BOX 250 RICEBOFO, GA<br>31323 TEL:912-884-3366                                                                                          | 20 YO<br>DONG<br>TWIN *<br>KORE/            |

|                                       |                                 |              |            |       |       |       |                            |                  |             |                 |                                                                                                                         |                                  |
|---------------------------------------|---------------------------------|--------------|------------|-------|-------|-------|----------------------------|------------------|-------------|-----------------|-------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| I 1919)IMDG                           | FLOCRYL INC                     | LG CHEM LTD. | 09/21/2011 | 44000 | 20000 | Pusan | Charleston, South Carolina | APL ARABIA       | South Korea | NO MARKS AND NU | PO BOX 250 RICEBOFO, GA 31323 TEL:912-884-3366                                                                          | 20 YOI DONG TWIN TOWE KORE/      |
| I 1919)IMDG IETHYL CLASS 3,UN         | FLOCRYL INC                     | LG CHEM LTD. | 09/21/2011 | 44000 | 20000 | Pusan | Charleston, South Carolina | APL ARABIA       | South Korea | NO MARKS AND NU | PO BOX 250 RICEBOFO, GA 31323 TEL:912-884-3366                                                                          | 20 YOI DONG TWIN TOWE KORE/      |
| MER P/O: E, J1919 METYL               | LG CHEM AMERICA.                | LG CHEM LTD. | 09/20/2011 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DIEPPE    | South Korea | AS PER LABEL    | INC. 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632 ATTN:AARON WEISS 1-2018162000 TELEX 1-2018160961                      | 20 YOI YOUN TOWE 82-377          |
| I 1919)IMDG ADG CLASS: ACRYLATE, 1919 | LG CHEM AMERICA, INC.           | LG CHEM LTD. | 09/14/2011 | 44000 | 20000 | Pusan | Charleston, South Carolina | APL JADE         | South Korea | NO MARKS AND NU | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A. ATTN: AARON WEISS TEL: 201-816-2968                               | 20 YOI DONG TWIN TOWE KORE/      |
| MER P/O: E 1919 A(METYL               | LG CHEM AMERICA.                | LG CHEM LTD. | 09/13/2011 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DHAHRAN   | South Korea | AS PER LABEL    | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS. NJ07632 ATTN: AARON WEISS 1-2018162000 TELEX 1-2018160961                       | 20 YOI DONG TWIN TOWE KORE/TELEX |
| MER P/O: E, J1919 IA(METYL 19.5%MIN   | LG CHEM AMERICA                 | LG CHEM LTD  | 09/13/2011 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DHAHRAN   | South Korea | AS PER LABEL    | INC 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632 ATTN:ANRON WEISS 1-2018162000 TELEX 1-2018160961                       | 20 YOI YOUN TOWE 150-72 325556   |
| IBITED 1919,3) CONTAINER              | LG CHEMAMERICA, INC.            | LG CHEM LTD. | 08/30/2011 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DAMIETTA  | South Korea | N/M             | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A. ATTN:AARON WEISS TEL:201-816-2968 1-2018162000 TELEX 1-2018160961 | 20 YOI DONG TWIN TOWE KORE/TELEX |
| I 1919)IMDG 3E, 1919 TANK AL NO       | LG CHEM AMERICA, INC.           | LG CHEM LTD. | 08/24/2011 | 44000 | 20000 | Pusan | Charleston, South Carolina | APL EGYPT        | South Korea | NO MARKS AND NU | 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A. ATTN: AARON WEISS TEL: 201-816-2968                               | 20 YOI DONG TWIN TOWE KORE/      |
|                                       | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 08/23/2011 | 44092 | 20042 | Pusan | Charleston, South Carolina | MAERSK DUBROVNIK | South Korea | N/M             | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632 1-2018162000 TELEX 1-2018160961                                        | 20 YOI YOUN TOWE 150-72 325556   |

|                                               |                                    |              |            |       |       |       |                               |                     |             |                                    |                                                                                                                                         |                                             |
|-----------------------------------------------|------------------------------------|--------------|------------|-------|-------|-------|-------------------------------|---------------------|-------------|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| MER P/O:<br>E,<br>1919<br>METYL               | LG CHEM AMERICA                    | LG CHEM LTD. | 08/23/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK<br>DUBROVNIK | South Korea | N/M                                | INC, 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632 ATTN:AARON WEISS<br>1-2018162000 TELEX 1-<br>2018160961                         | 20 YOI<br>YOUNG<br>TOWE<br>150-72<br>325556 |
| OWN<br><br>(1919)IMDG<br>IETHYL<br>CLASS 3,UN | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 08/17/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPERIENCE      | South Korea | NO MARKS AND NU                    | 920 SYLVAN AVENUE,,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                      | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| TE,<br>IOUS<br>I TANK                         | LG CHEM AMERICA                    | LG CHEM LTD. | 08/16/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK MONCTON      | South Korea | N/M                                | INC, 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632 ATTN:AARON WEISS<br>1-2018162000 TELEX 1-<br>2018160961                         | 20 YOI<br>YOUNG<br>TOWE<br>150-72<br>325556 |
| IBITED<br>19,3)<br>CONTAINER<br>2414,102415   | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 08/16/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK MONCTON      | South Korea | N/M                                | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632, U.S.A. ATTN :<br>AARON WEISS TEL: 201-<br>816-29 1-2018162000 TELEX<br>1-2018160961 | 20 YOI<br>YOUNG<br>TOWE<br>150-72<br>325556 |
| TE,<br>IOUS<br>I TANK                         | LG CHEM AMERICA                    | LG CHEM LTD. | 08/16/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK MONCTON      | South Korea | N/M                                | INC,920 SYLVAN AVENUE<br>ENGLEWOOD CLIFES, NJ<br>07632 ATTN : AARON<br>WEISS 1-2018162000 TELEX<br>1-2018160961                         | 20 YOI<br>YOUNG<br>TOWE<br>150-72<br>325556 |
| WN ISO<br>YL<br>CLASS 3,UN                    | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 07/27/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE       | South Korea | NO MARKS AND NU                    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                                            | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| WN ISO<br>YL<br>CLASS 3,UN                    | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 07/27/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE       | South Korea | NO MARKS AND NU                    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                                            | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
|                                               | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 07/20/2011 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | APL MALAYSIA        | South Korea | NO MARKS AND NU NO<br>MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                                            | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
|                                               | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 07/20/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL MALAYSIA        | South Korea | NO MARKS AND NU                    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                                            | 20 YOI<br>DONG<br>TWIN<br>KORE/             |

|                                                 |                                    |              |            |       |       |       |                               |                |             |                 |                                                                                                                 |                                             |
|-------------------------------------------------|------------------------------------|--------------|------------|-------|-------|-------|-------------------------------|----------------|-------------|-----------------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| IBITED<br>19,3)<br>CONTAINER<br>4563137 /       | LG CHEM AMERICA.                   | LG CHEM LTD. | 07/19/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DIEPPE  | South Korea | N/M             | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632 ATTN : ARON WEISS<br>1-2018162000 TELEX 1-<br>2018160961 | 20 YOI<br>YOUNG<br>TOWE<br>150-72<br>325556 |
| I<br>E,<br>ONTIANER                             | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 07/13/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENCORE     | South Korea | NO MARKS AND NU | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968              | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| WER P/O:<br>E,<br>J 1919<br>A(METYL<br>19.5%MIN | LG CHEM AMERICA.                   | LG CHEM LTD  | 07/12/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | N/M             | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 ATTN:AARON WEISS<br>1-2018162000 TELEX 1-<br>2018160961   | 20 YOI<br>DONG<br>TWIN<br>KORE/<br>TELEX    |
| L                                               | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 06/22/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                    | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| L                                               | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 06/22/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                    | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| L                                               | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 06/22/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                    | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| I<br>E,<br>1919                                 | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 06/22/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968              | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| I<br>E,<br>1919                                 | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 06/22/2011 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968              | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| WER P/O:<br>RYLATE,<br>LIQUID,                  | LG CHEM AMERICA                    | LG CHEM LTD. | 06/21/2011 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | DEVA           | South Korea | N/M             | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,<br>NJ:07632 ATTN: AARON<br>WEISS 1-2018162000 TELEX<br>1-2018160961  | 20 YOI<br>YOUNG<br>TOWE<br>150-72<br>325556 |

|                                         |                                        |              |            |        |        |       |                               |                |             |                                                    |                                                                                                                                          |                                             |
|-----------------------------------------|----------------------------------------|--------------|------------|--------|--------|-------|-------------------------------|----------------|-------------|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| IN-<br>IPPER-S<br>FREIGHT               | LG CHEM AMERICA,<br>INC.               | LG CHEM LTD. | 06/15/2011 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | APL JADE       | South Korea | NO MARKS                                           | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632                                                                                     | 20 YOI<br>YOUNI<br>TOWE<br>150-72           |
| TE                                      | TO THE ORDER OF LG<br>CHEM AMERICA     | LG CHEM LTD. | 06/15/2011 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | APL JADE       | South Korea | NO MARKS AND NU                                    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                                             | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| TE                                      | TO THE ORDER OF LG<br>CHEM AMERICA     | LG CHEM LTD. | 06/15/2011 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | APL JADE       | South Korea | NO MARKS AND NU                                    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                                                             | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| (CLASS 3,<br>ATE,<br>1919               | LG CHEM AMERICA,<br>INC.               | LG CHEM LTD. | 06/15/2011 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | APL JADE       | South Korea | NO MARKS AND NU                                    | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                       | 20 YOI<br>DONG<br>TWIN<br>KORE/             |
| TE,<br>IOUS                             | TO THE ORDER OF LG<br>CHEM AMERICA,INC | LG CHEM LTD. | 06/14/2011 | 44092  | 20042  | Pusan | Charleston, South<br>Carolina | MAERSK MONCTON | South Korea | AS PER LABEL                                       | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632, U.S.A. 1-3106674852<br>TELEX 1-2136233329                                            | 20 YOI<br>YOUNI<br>TOWE<br>150-72<br>325556 |
|                                         | OKAHA AND CO ,LTD                      | LG CHEM, LTD | 06/06/2011 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | YM SHANGHAI    | South Korea | NO MARKS NO MARKS<br>NO MARKS NO MARKS<br>NO MARKS | . TOKYO BRANCH 1-26-9,<br>SHINKAWA,CHUO- .                                                                                               | . LG TI<br>DONG<br>SEOUI                    |
| JRESIN<br>RYLATE,<br>E LIQUID,<br>36783 | TO ORDER OF KAO<br>SPECIALTIES         | LG CHEM, LTD | 05/29/2011 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | YM BUSAN       | South Korea | NO MARKS NO MARKS<br>NO MARKS NO MARKS<br>NO MARKS | AMERICAS LLC 243<br>WOODBINE STREET HIGH<br>POINT, NC 27261 USA ATTN<br>MR ROGER BUCHANAN TEL<br>+1-336-878-4207 FAX +1-336-<br>884-5375 | LG TW<br>23RD I<br>YEON<br>150-72           |
| INHIBITED<br>IOS NA                     | TO THE ORDER OF LG<br>CHEM AMERICA     | LG CHEM LTD. | 05/17/2011 | 198416 | 90189  | Pusan | Charleston, South<br>Carolina | MAERSK DIEPPE  | South Korea | N/A N/A N/A                                        | INC,920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 1-2018162000 TELEX<br>1-2018160961                                                 | 20 YOI<br>YOUNI<br>TOWE<br>150-72<br>325556 |
| (CLASS 3,<br>ATE,<br>1919               | LG CHEM AMERICA,<br>INC.               | LG CHEM LTD. | 05/11/2011 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | MOL EFFICIENCY | South Korea | NO MARKS AND NU                                    | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                                       | 20 YOI<br>DONG<br>TWIN<br>KORE/             |

|                     |                                 |              |            |        |       |       |                            |                |             |                                 |                                                                                                                         |                                 |
|---------------------|---------------------------------|--------------|------------|--------|-------|-------|----------------------------|----------------|-------------|---------------------------------|-------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| L                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 05/11/2011 | 44000  | 20000 | Pusan | Charleston, South Carolina | MOL EFFICIENCY | South Korea | NO MARKS AND NU                 | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                                                  | 20 YOI DONG TWIN * KORE/        |
| L                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 05/11/2011 | 44000  | 20000 | Pusan | Charleston, South Carolina | MOL EFFICIENCY | South Korea | NO MARKS AND NU                 | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                                                  | 20 YOI DONG TWIN * KORE/        |
| L                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 05/11/2011 | 44000  | 20000 | Pusan | Charleston, South Carolina | MOL EFFICIENCY | South Korea | NO MARKS AND NU                 | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                                                  | 20 YOI DONG TWIN * KORE/        |
| L                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 05/11/2011 | 44000  | 20000 | Pusan | Charleston, South Carolina | MOL EFFICIENCY | South Korea | NO MARKS AND NU                 | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                                                  | 20 YOI DONG TWIN * KORE/        |
| L                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 05/11/2011 | 44000  | 20000 | Pusan | Charleston, South Carolina | MOL EFFICIENCY | South Korea | NO MARKS AND NU                 | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                                                  | 20 YOI DONG TWIN * KORE/        |
| (CLASS 3, ATE, 1919 | LG CHEM AMERICA, INC.           | LG CHEM LTD. | 05/04/2011 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL SARDONYX   | South Korea | NO MARKS AND NU                 | 920 SYLVAN AVENUE,, ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968                               | 20 YOI DONG TWIN * KORE/        |
| MER P/O: E, 1919    | LG CHEM AMERICA, INC.           | LG CHEM LTD. | 05/04/2011 | 44     | 20    | Pusan | Charleston, South Carolina | MAERSK MERRITT | South Korea | N/M                             | 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL.: 201-816-296 1-2018162000 TELEX 1-2018160961 | 20 YOI YOUNI TOWE 150-72 325550 |
| (CLASS 3, ATE, 1919 | LG CHEM AMERICA                 | LG CHEM LTD. | 04/20/2011 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL MALAYSIA   | South Korea | NO MARKS AND NU                 | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968                              | 20 YOI DONG TWIN * KORE/        |
| E :XYL E :XYL E     | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 04/20/2011 | 132000 | 60000 | Pusan | Charleston, South Carolina | APL MALAYSIA   | South Korea | NO MARKS AND NU NO MARKS AND NU | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                                                  | 20 YOI DONG TWIN * KORE/        |

|                                 |                 |              |            |        |       |       |                               |                |             |                                                                                              |                                                                                                     |                                          |
|---------------------------------|-----------------|--------------|------------|--------|-------|-------|-------------------------------|----------------|-------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|------------------------------------------|
| (CLASS 3,<br>ATE,<br>1919       | LG CHEM AMERICA | LG CHEM LTD. | 04/14/2011 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENCORE     | South Korea | NO MARKS AND NU                                                                              | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE/          |
| (CLASS 3,<br>ATE,<br>1919       | LG CHEM AMERICA | LG CHEM LTD. | 04/14/2011 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENCORE     | South Korea | NO MARKS AND NU                                                                              | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE/          |
| MER<br>/LATE,                   | LG CHEM AMERICA | LG CHEM LTD. | 04/05/2011 | 44092  | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DERINCE | South Korea | N/M                                                                                          | INC.910 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632, U.S.A 1-2018162000<br>TELEX 1-2018160961    | 20 YOI<br>DONG<br>TWIN<br>KORE/<br>TELEX |
| (CLASS 3,<br>ATE,<br>CONTAINER  | LG CHEM AMERICA | LG CHEM LTD. | 03/23/2011 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL ARABIA     | South Korea | NO MARKS AND NU                                                                              | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE/          |
| IN-<br>IPPER-S<br>FREIGHT<br>2- | LG CHEM AMERICA | LG CHEM LTD. | 03/16/2011 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | APL JADE       | South Korea | NUMBERS WITH<br>CONTAINER<br>UTCU466402 MARKS<br>AND NUMBERS WITH<br>CONTAINER<br>UTCU466402 | INC. 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07832                                             | 20 YOI<br>YOUNI<br>TOWE<br>150-72        |
| (CLASS 3,<br>ATE,<br>1919       | LG CHEM AMERICA | LG CHEM LTD. | 03/16/2011 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL JADE       | South Korea | NO MARKS AND NU                                                                              | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE/          |
| (CLASS 3,<br>J.N. NO.:<br>1919  | LG CHEM AMERICA | LG CHEM LTD. | 03/10/2011 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPEDITOR  | South Korea | NO MARKS AND NU                                                                              | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE/          |
| IN-<br>IPPER-S<br>FREIGHT<br>2- | LG CHEM AMERICA | LG CHEM LTD. | 03/03/2011 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDOWMENT  | South Korea | N/M                                                                                          | INC 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632                                               | 20 YOI<br>YOUNI<br>TOWE<br>150-72        |
| IN-<br>IPPER-S<br>FREIGHT<br>2- | LG CHEM AMERICA | LG CHEM LTD. | 02/23/2011 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | APL EGYPT      | South Korea | N/M MARKS AND<br>NUMBERS WITH<br>CONTAINER BVU225105                                         | INC 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632                                               | 20 YOI<br>YOUNI<br>TOWE<br>150-72        |



|              |                                    |              |            |        |       |       |                               |                |             |                                                                                              |                                                                                                     |                                                |
|--------------|------------------------------------|--------------|------------|--------|-------|-------|-------------------------------|----------------|-------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|------------------------------------------------|
| R-S<br>RIGHT | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 02/16/2011 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | MOL EXPERIENCE | South Korea | N/M MARKS AND<br>NUMBERS WITH<br>CONTAINER<br>UTCU466004                                     | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632                                                  | 20 YOIDO-D<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
| SS 3,        | LG CHEM AMERICA                    | LG CHEM LTD. | 02/16/2011 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPERIENCE | South Korea | NO MARKS AND NU                                                                              | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOIDO-DONG,YOU<br>TWIN TOWI<br>KOREA 150    |
| SS 3,        | LG CHEM AMERICA                    | LG CHEM LTD. | 02/09/2011 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDEAVOR   | South Korea | NO MARKS AND NU                                                                              | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOIDO-DONG,YOU<br>TWIN TOWI<br>KOREA 150    |
| R-S<br>RIGHT | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 02/03/2011 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | APL SARDONYX   | South Korea | NUMBERS WITH<br>CONTAINER<br>SNTU740017 MARKS<br>AND NUMBERS WITH<br>CONTAINER<br>SNTU740017 | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632                                                  | 20 YOIDO-D<br>YOUNGDUI<br>TOWERS, S<br>150-721 |
|              | MILLIKEN COMPANY                   | LG CHEM, LTD | 01/22/2011 | 14256  | 6480  | Pusan | Charleston, South<br>Carolina | YM ANPING      | South Korea | NO MARKS                                                                                     | SYCAMORE WAREHOUSE<br>12445 HWY 56 NORTH,<br>CLINTON, SC, 29325, US<br>TEL 864-938-2502             | . LG TWIN T<br>DONG, YOU<br>SEOUL 150          |
|              | MILLKEN COMPANY                    | LG CHEM, LTD | 01/22/2011 | 1428   | 649   | Pusan | Charleston, South<br>Carolina | YM ANPING      | South Korea | NO MARKS                                                                                     | . SYCAMORE WAREHOUSE<br>12445 HWY 56 NORTH<br>CLINTON,SC,29325,US TEL<br>864-938-2502               | . 20 YOIDO                                     |
| SS 3,        | LG CHEM AMERICA                    | LG CHEM LTD. | 01/19/2011 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | APL MALAYSIA   | South Korea | NO MARKS AND NU                                                                              | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOIDO-DONG,YOU<br>TWIN TOWI<br>KOREA 150    |
| SS 3,        | LG CHEM AMERICA                    | LG CHEM LTD. | 01/14/2011 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND NU                                                                              | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOIDO-DONG,YOU<br>TWIN TOWI<br>KOREA 150    |
|              | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 01/06/2011 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | MOL EXPRESS    | South Korea | NO MARKS AND NU NO<br>MARKS AND NU                                                           | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                        | 20 YOIDO-DONG,YOU<br>TWIN TOWI<br>KOREA 150    |

|                     |                                    |              |            |       |       |       |                            |                |             |                                    |                                                                                                     |                                 |
|---------------------|------------------------------------|--------------|------------|-------|-------|-------|----------------------------|----------------|-------------|------------------------------------|-----------------------------------------------------------------------------------------------------|---------------------------------|
| (CLASS 3, ATE, 1919 | LG CHEM AMERICA                    | LG CHEM LTD. | 12/08/2010 | 44000 | 20000 | Pusan | Charleston, South Carolina | MOL EXPEDITOR  | South Korea | NO MARKS AND NU                    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE/ |
| E                   |                                    |              |            |       |       |       |                            |                |             |                                    |                                                                                                     |                                 |
| E                   | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 11/24/2010 | 88000 | 40000 | Pusan | Charleston, South Carolina | APL EGYPT      | South Korea | NO MARKS AND NU NO<br>MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                        | 20 YOI<br>DONG<br>TWIN<br>KORE/ |
| (CLASS 3, ATE, 1919 | LG CHEM AMERICA                    | LG CHEM LTD. | 11/17/2010 | 44000 | 20000 | Pusan | Charleston, South Carolina | MOL EXPERIENCE | South Korea | NO MARKS AND NU                    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE/ |
| E                   |                                    |              |            |       |       |       |                            |                |             |                                    |                                                                                                     |                                 |
| E                   | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 10/27/2010 | 88000 | 40000 | Pusan | Charleston, South Carolina | MOL EFFICIENCY | South Korea | NO MARKS AND NU NO<br>MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                        | 20 YOI<br>DONG<br>TWIN<br>KORE/ |
| E                   |                                    |              |            |       |       |       |                            |                |             |                                    |                                                                                                     |                                 |
| E                   | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 10/13/2010 | 88000 | 40000 | Pusan | Charleston, South Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND NU NO<br>MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                        | 20 YOI<br>DONG<br>TWIN<br>KORE/ |
| E                   |                                    |              |            |       |       |       |                            |                |             |                                    |                                                                                                     |                                 |
| E                   | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 10/06/2010 | 88000 | 40000 | Pusan | Charleston, South Carolina | MOL EXCELLENCE | South Korea | NO MARKS AND NU NO<br>MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                        | 20 YOI<br>DONG<br>TWIN<br>KORE/ |
| (CLASS 3, ATE,      | LG CHEM AMERICA                    | LG CHEM LTD. | 10/06/2010 | 44000 | 20000 | Pusan | Charleston, South Carolina | MOL EXCELLENCE | South Korea | NO MARKS AND NU                    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE/ |
| (CLASS 3,           | LG CHEM AMERICA                    | LG CHEM LTD. | 10/06/2010 | 44000 | 20000 | Pusan | Charleston, South Carolina | MOL EXCELLENCE | South Korea | NO MARKS AND NU                    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE/ |
| E<br>UN 19932-      |                                    |              |            |       |       |       |                            |                |             |                                    |                                                                                                     |                                 |
| E<br>UN 1993        | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 09/22/2010 | 88000 | 40000 | Pusan | Charleston, South Carolina | APL ARABIA     | South Korea | NO MARKS AND NU NO<br>MARKS AND NU | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                        | 20 YOI<br>DONG<br>TWIN<br>KORE/ |

|                                                          |                                    |              |            |        |       |       |                            |                |             |                                                          |                                                                                                     |                                  |
|----------------------------------------------------------|------------------------------------|--------------|------------|--------|-------|-------|----------------------------|----------------|-------------|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------|----------------------------------|
| (CLASS 3, ATE,                                           | LG CHEM AMERICA                    | LG CHEM LTD. | 09/15/2010 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL JADE       | South Korea | NO MARKS AND NU                                          | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE   |
| (CLASS 3, ATE,                                           | LG CHEM AMERICA                    | LG CHEM LTD. | 09/15/2010 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL JADE       | South Korea | NO MARKS AND NU                                          | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE   |
| TE2-<br>2-<br>:                                          | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD. | 08/18/2010 | 132000 | 60000 | Pusan | Charleston, South Carolina | APL EXPERIENCE | South Korea | NO MARKS AND NU NO<br>MARKS AND NU NO<br>MARKS AND NU    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                        | 20 YOI<br>DONG<br>TWIN<br>KORE   |
| (CLASS 3, ATE, 1919                                      | LG CHEM AMERICA                    | LG CHEM LTD. | 08/18/2010 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL EXPERIENCE | South Korea | NO MARKS AND NU                                          | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE   |
| (CLASS 3, ATE,                                           | LG CHEM AMERICA                    | LG CHEM LTD. | 08/11/2010 | 44000  | 20000 | Pusan | Charleston, South Carolina | MOL ENDEAVOR   | South Korea | NO MARKS AND NU                                          | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE   |
| ROUS<br>TANK<br>'REPAID AT<br>'YLHEXYL<br>ON-<br>IPPER-S | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 07/27/2010 | 88000  | 40000 | Pusan | Charleston, South Carolina | MOL EFFICIENCY | South Korea | N/M MARKS AND<br>NUMBERS WITH<br>CONTAINER<br>UTCU459048 | 920 SYLVAN AVENUE.,<br>ENGLEWOOD<br>CLIFFS,NJ07632                                                  | 20 YOI<br>YOUN<br>TOWE<br>150-72 |
| (CLASS 3, ATE, 1919                                      | LG CHEM AMERICA                    | LG CHEM LTD. | 07/19/2010 | 44000  | 20000 | Pusan | Charleston, South Carolina | APL MALAYSIA   | South Korea | NO MARKS AND NU                                          | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE   |
| (CLASS 3, ATE, 1919                                      | LG CHEM AMERICA                    | LG CHEM LTD. | 07/12/2010 | 44000  | 20000 | Pusan | Charleston, South Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND NU                                          | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE   |
| 'PERS<br>-----2<br>ACRYLATE,<br>OUS<br>IDSAY:            | LG CHEM AMERICA,<br>INC.           | LG CHEM LTD. | 07/09/2010 | 88000  | 40000 | Pusan | Charleston, South Carolina | CMA CGM TARPON | South Korea | NO MARKS NO MARKS                                        | 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632                                                | 20 YOI<br>YOUN<br>TOWE<br>150-72 |

|                                                 |                                                |              |            |       |       |       |                               |                |             |                                                                         |                                                                                                     |                                              |
|-------------------------------------------------|------------------------------------------------|--------------|------------|-------|-------|-------|-------------------------------|----------------|-------------|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|----------------------------------------------|
| FE2<br>SHIPPER-S<br>32<br>INHIBITED<br>SHIPPER- | TO THE ORDER OF                                | LG CHEM LTD. | 06/19/2010 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | EVER RESPECT   | South Korea | N/M N/M N/M THE SAME<br>THE SAME THE SAME                               | LG CHEM AMERICA, INC.<br>920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS,NJ<br>07632                        | 20 YOI<br>YOUNG<br>TOWNE<br>150-72           |
| (CLASS 3,<br>ATE,                               | TO THE ORDER OF LG<br>CHEM AMERICA             | LG CHEM LTD. | 06/14/2010 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | APL GARNET     | South Korea | NO MARKS AND NU                                                         | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968 | 20 YOI<br>DONG<br>TWIN<br>KORE               |
| (CLASS 3,<br>ATE,<br>,<br>1919                  | LG CHEM AMERICA                                | LG CHEM LTD. | 06/09/2010 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL EXPRESS    | South Korea | NO MARKS AND NU                                                         | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A ATTN:AARON<br>WEISS TEL:201-816-2968   | 20 YOI<br>DONG<br>TWIN<br>KORE               |
| DN-<br>INHIBITED<br>DS                          | TO THE ORDER OF LG<br>CHEM AMERICA,INC         | LG CHEM LTD. | 05/31/2010 | 88184 | 40084 | Pusan | Charleston, South<br>Carolina | MAERSK DANBURY | South Korea | N/M N/M                                                                 | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS. NJ<br>07632,U.S.A. 1-2818606952<br>TELEX 1-2818606925        | 20 YOI<br>DONG<br>TWIN<br>KORE<br>TELEX      |
| DN-<br>INTR/SEAL<br>42,82343                    | TO THE ORDER OF LG<br>CHEM AMERICA, IN         | LG CHEM LTD. | 05/24/2010 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | MAERSK DENVER  | South Korea | N/M                                                                     | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632, U.S.A. 1-2818606962<br>TELEX 1-2818606926       | 20 YOI<br>YOUNG<br>TOWNE<br>150-72<br>272805 |
| (CLASS 3,<br>AMERICA,INC.920<br>SYLVAN AVEN     | LG CHEM LTD.20<br>YOIDO-<br>DONG,YOUNGDU<br>NG |              | 05/21/2010 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | YM BUSAN       | South Korea | IN BULK >IN ISOTANK>                                                    | . CLIFFS, NJ 07632<br>U.S.A.ATTN:AARON W .                                                          | . LG TI<br>SOUTI                             |
| HYL<br>CLASS 3,UN                               | TO THE ORDER OF LG<br>CHEM AMERICA             | LG CHEM LTD. | 05/12/2010 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MOL ENDEAVOR   | South Korea | NO MARKS AND NU                                                         | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                        | 20 YOI<br>DONG<br>TWIN<br>KORE               |
| E<br><br>E                                      | TO THE ORDER OF LG<br>CHEM AMERICA             | LG CHEM LTD. | 05/12/2010 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | MOL ENDEAVOR   | South Korea | NO MARKS AND NU NO<br>MARKS AND NU                                      | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632, U.S.A                                        | 20 YOI<br>DONG<br>TWIN<br>KORE               |
| VER P/O :                                       |                                                |              |            |       |       |       |                               |                |             |                                                                         |                                                                                                     |                                              |
| AIDDDC                                          | TO THE ORDER OF LG<br>CHEM AMERICA             | LG CHEM LTD. | 05/12/2010 | 36960 | 16800 | Pusan | Charleston, South<br>Carolina | MOL ENDEAVOR   | South Korea | ACRYLIC ACID NET<br>WT.:200KG LG CHEM.<br>LTD. MADE IN KOREA<br>LOT NO. | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632                                               | 20 YOI<br>YOUNG<br>TOWNE<br>150-72           |

|                   |                                 |              |            |        |       |        |                            |                |             |                                                               |                                                                                        |                                                  |
|-------------------|---------------------------------|--------------|------------|--------|-------|--------|----------------------------|----------------|-------------|---------------------------------------------------------------|----------------------------------------------------------------------------------------|--------------------------------------------------|
|                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 04/16/2010 | 132000 | 60000 | Pusan  | Charleston, South Carolina | MOL ENDURANCE  | South Korea | NO MARKS AND NU NO MARKS AND NU NO MARKS AND NU               | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                 | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150            |
|                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 03/22/2010 | 88000  | 40000 | Pusan  | Charleston, South Carolina | APL ARABIA     | South Korea | NO MARKS AND NU NO MARKS AND NU                               | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                 | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150            |
|                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 03/04/2010 | 88000  | 40000 | Pusan  | Charleston, South Carolina | MOL INNOVATION | South Korea | NO MARKS AND NU NO MARKS AND NU                               | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                 | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150            |
|                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 02/17/2010 | 132000 | 60000 | Pusan  | Charleston, South Carolina | MOL ENDOWMENT  | South Korea | NO MARKS AND NU NO MARKS AND NU NO MARKS AND NU               | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                 | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150            |
| REE<br>CIS<br>AID | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 02/17/2010 | 36960  | 16800 | Pusan  | Charleston, South Carolina | MOL ENDOWMENT  | South Korea | ACRYLIC ACID NET WT:200KG LG CHEM. LTD. MADE IN KOREA LOT NO. | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632                                        | 20 YOIDO-D YOUNGDUI TOWERS, E 150-721            |
|                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 02/03/2010 | 132000 | 60000 | Pusan  | Charleston, South Carolina | APL JADE       | South Korea | NO MARKS AND NU NO MARKS AND NU NO MARKS AND NU               | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                 | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150            |
| ID<br>3.2,<br>II  | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 02/01/2010 | 44092  | 20042 | Balboa | Charleston, South Carolina | MAERSK DIEPPE  | Panama      | N/M                                                           | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A 1-7327643801 TELEX 1-7328050970 | 20YOIDO-D YOUNGDUI TOWER,SE 150-721 82-514651046 |
|                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 01/25/2010 | 88000  | 40000 | Pusan  | Charleston, South Carolina | MOL EFFICIENCY | South Korea | NO MARKS AND NU NO MARKS AND NU                               | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                 | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150            |
|                   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 12/14/2009 | 44000  | 20000 | Pusan  | Charleston, South Carolina | APL GARNET     | South Korea | NO MARKS AND NU                                               | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                 | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150            |

|                                   |                                  |               |            |        |       |       |                            |               |             |                                                       |                                                                                                 |                                       |
|-----------------------------------|----------------------------------|---------------|------------|--------|-------|-------|----------------------------|---------------|-------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------|
| FORMER                            |                                  |               |            |        |       |       |                            |               |             |                                                       |                                                                                                 |                                       |
| DC                                | TO THE ORDER OF LG CHEM AMERICA  | LG CHEM LTD.  | 11/16/2009 | 36960  | 16800 | Pusan | Charleston, South Carolina | MOL ENDEAVOR  | South Korea | ACRYLIC ACID NET WT:200KG LG CHEM.,LTD. MADE IN KOREA | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632                                                 | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721 |
| 9932-993                          | TO THE ORDER OF LG CHEM AMERICA  | LG CHEM LTD.  | 11/16/2009 | 88000  | 40000 | Pusan | Charleston, South Carolina | MOL ENDEAVOR  | South Korea | NO MARKS AND NU NO MARKS AND NU                       | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                          | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150 |
|                                   | TO THE ORDER OF LG CHEM AMERICA  | LG CHEM LTD.  | 10/19/2009 | 132000 | 60000 | Pusan | Charleston, South Carolina | MOL ENDURANCE | South Korea | NO MARKS AND NU NO MARKS AND NU                       | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                          | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150 |
| P/O :<br>ITE                      | TO THE ORDER OF: LG CHEM AMERICA | LG CHEM, LTD. | 09/28/2009 | 42451  | 19296 | Pusan | Charleston, South Carolina | APL MALAYSIA  | South Korea | AS PER LABEL                                          | INC., 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968 | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721 |
| P/O :<br>STE                      | TO THE ORDER OF: LG CHEM AMERICA | LG CHEM, LTD. | 09/28/2009 | 84905  | 38593 | Pusan | Charleston, South Carolina | APL MALAYSIA  | South Korea | AS PER LABEL AS PER LABEL                             | INC., 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968 | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721 |
| P/O :<br>STE                      | TO THE ORDER OF: LG CHEM AMERICA | LG CHEM, LTD. | 09/21/2009 | 84905  | 38593 | Pusan | Charleston, South Carolina | APL GARNET    | South Korea | AS PER LABEL AS PER LABEL                             | INC., 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968 | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721 |
| P/O :<br>LB-110                   | TO THE ORDER OF: LG CHEM AMERICA | LG CHEM, LTD. | 09/21/2009 | 42451  | 19296 | Pusan | Charleston, South Carolina | APL GARNET    | South Korea | AS PER LABEL                                          | INC., 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968 | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721 |
|                                   | TO THE ORDER OF LG CHEM AMERICA  | LG CHEM LTD.  | 09/21/2009 | 132000 | 60000 | Pusan | Charleston, South Carolina | APL GARNET    | South Korea | NO MARKS AND NU NO MARKS AND NU                       | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632, U.S.A                                          | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150 |
| OWN<br>KS2-<br>VK<br>/L<br>IPPER- | TO THE ORDER OF LG CHEM AMERICA  | LG CHEM LTD.  | 09/07/2009 | 132000 | 60000 | Pusan | Charleston, South Carolina | APL ARABIA    | South Korea | NO MARKS AND NU NO MARKS AND NU                       | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632                                                 | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150 |

|             |                                     |               |            |        |       |        |                            |                  |             |                                                                  |                                                                                                 |                                                   |
|-------------|-------------------------------------|---------------|------------|--------|-------|--------|----------------------------|------------------|-------------|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------|
| DC          | TO THE ORDER OF LG CHEM AMERICA     | LG CHEM LTD.  | 08/31/2009 | 36960  | 16800 | Pusan  | Charleston, South Carolina | MOL ENDOWMENT    | South Korea | ACRYLIC ACID NET WT.:200KG /PER DRUM LG CHEM.,LTD. MADE IN KOREA | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632                                                 | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721             |
| P/O : STE J | TO THE ORDER OF: LG CHEM AMERICA    | LG CHEM, LTD. | 08/17/2009 | 42566  | 19348 | Pusan  | Charleston, South Carolina | APL JADE         | South Korea | AS PER LABEL                                                     | INC., 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968 | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721             |
| P/O : STE   | TO THE ORDER OF: LG CHEM AMERICA    | LG CHEM, LTD. | 08/17/2009 | 42451  | 19296 | Pusan  | Charleston, South Carolina | APL JADE         | South Korea | AS PER LABEL                                                     | INC., 920 SYLVAN AVENUE., ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON WEISS TEL: 201-816-2968 | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721             |
|             | LG CHEM AMERICA,INC.                | LG CHEM LTD.  | 08/07/2009 | 132000 | 60000 | Pusan  | Charleston, South Carolina | YM BUSAN         | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL                           | . 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632                                                  | . 20 YOIDO-YOUNGDUI TOWERS, S 150-721             |
|             | TO THE ORDER OF LG CHEM AMERICA,INC | LG CHEM LTD.  | 07/26/2009 | 44092  | 20042 | Balboa | Charleston, South Carolina | MAERSK MESSOLOGI | Panama      | AS PER LABEL                                                     | 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632,U.S.A. 1-2818606962 TELEX 1-2818606924             | 20 YOIDO-DONG,YOU TWIN TOWI KOREA 150 TELEX 82-2  |
|             | LG CHEM AMERICA,INC.                | LG CHEM LTD.  | 07/25/2009 | 88000  | 40000 | Pusan  | Charleston, South Carolina | YM SHANGHAI      | South Korea | IN BULK IN BULK                                                  | . 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632                                                  | . 20 YOIDO-YOUNGDUI TOWERS, S 150-721             |
|             | LG CHEM AMERICA,INC.                | LG CHEM LTD.  | 07/10/2009 | 132000 | 60000 | Pusan  | Charleston, South Carolina | YM EMINENCE      | South Korea | IN BULK IN BULK IN BULK                                          | . 920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632                                                  | 20 YOIDO-I YOUNGDUI TOWERS, S 150-721             |
| E, J        | FNS,INC., 18301 BROADWICK STREET    | LG CHEM LTD.  | 07/06/2009 | 44092  | 20042 | Balboa | Charleston, South Carolina | MAERSK DHAHRAN   | Panama      | N/M                                                              | RANCHO DOMINGUEZ,CA 90220 TEL:310-667-4800 FAX:310-667-4889 1-2818606962 TELEX 1-2818606924     | 20 YOIDO-I YOUNGDUI TOWERS,S 150-721 82-260085850 |
|             | LG CHEM AMERICA                     | LG CHEM LTD.  | 06/12/2009 | 132000 | 60000 | Pusan  | Charleston, South Carolina | YM BUSAN         | South Korea | IN BULK IN BULK IN BULK                                          | . ENINC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS, NJ 07632                                            | . 20 YOIDO-YOUNGDUI TOWERS, S 150-721             |



|                                  |                                       |                     |            |       |       |         |                            |                    |             |                   |                                                                                                                      |                                                                |
|----------------------------------|---------------------------------------|---------------------|------------|-------|-------|---------|----------------------------|--------------------|-------------|-------------------|----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| PAID AT                          | TO THE ORDER OF LG CHEM AMERICA, INC. | LG CHEM LTD.        | 05/18/2009 | 44000 | 20000 | Pusan   | Charleston, South Carolina | MOL EFFICIENCY     | South Korea | IN BULK           | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS NJ 07632                                                                       | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS S<br>150-721                  |
|                                  | LG CHEM AMERICA, INC.                 | LG CHEM LTD.        | 05/15/2009 | 44000 | 20000 | Pusan   | Charleston, South Carolina | YM EMINENCE        | South Korea | IN BULK           | 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ 07632                                                                      | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| P/O :<br>LB-110                  | LG CHEM AMERICA                       | LG CHEM, LTD.       | 05/11/2009 | 42548 | 19340 | Pusan   | Charleston, South Carolina | APL EGYPT          | South Korea | AS PER LABEL      | INC., 910 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| P/O :<br>STE                     | LG CHEM AMERICA                       | LG CHEM, LTD.       | 04/25/2009 | 42451 | 19296 | Pusan   | Charleston, South Carolina | MOL EXCELLENCE     | South Korea | AS PER LABEL      | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| P/O :<br>STE                     | LG CHEM AMERICA                       | LG CHEM, LTD.       | 04/25/2009 | 42451 | 19296 | Pusan   | Charleston, South Carolina | MOL EXCELLENCE     | South Korea | AS PER LABEL      | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ 07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968                | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| P/O :                            | LG CHEM INDUSTRIAL MATERIALS INC      | LG CHEM EUROPE GMBH | 04/17/2009 | 5137  | 2335  | Antwerp | Charleston, South Carolina | CHARLESTON EXPRESS | Belgium     | SAME AS CONSIGNEE | 310 LG DRIVE MATERIALS<br>INC ADAIRSVILLE GA 30103<br>US                                                             | 12 AVENUE<br>1213 PETIT                                        |
| IDC                              | TO THE ORDER OF LG CHEM AMERICA       | LG CHEM LTD.        | 04/11/2009 | 36960 | 16800 | Pusan   | Charleston, South Carolina | APL MALAYSIA       | South Korea | AS PER LABEL      | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ 07632                                                                   | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, S<br>150-721                 |
| P/O:<br>YLATE,<br>JID,<br>-      | TO THE ORDER OF LG CHEM AMERICA       | LG CHEM LTD.        | 04/05/2009 | 44092 | 20042 | Balboa  | Charleston, South Carolina | MAERSK DOLORES     | Panama      | N/M               | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ 07632, U.S.A. 1-2818606962<br>TELEX 1-2818606924                        | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS,S<br>150-721 82-<br>260085850 |
| A 1993<br>R P/O:<br>2-<br>IBITED | TO ORDER                              | LG CHEM, LTD        | 02/15/2009 | 83775 | 38080 | Pusan   | Charleston, South Carolina | MAERSK DARMSTADT   | South Korea | N/M N/M           | LG CHEM, LTD LG TWIN<br>TOWERS, 20, YOIDO-DONG<br>YOUNDUNGPO*GU, 150-721<br>KOREA 1-2018162000<br>TELEX 1-2018160961 | LG TWIN T<br>DONG YOU<br>721 KOREA<br>JAYCHUNG<br>27280613 T   |

|                                                 |                                    |               |            |       |       |       |                            |                |             |              |                                                                                                               |                                   |
|-------------------------------------------------|------------------------------------|---------------|------------|-------|-------|-------|----------------------------|----------------|-------------|--------------|---------------------------------------------------------------------------------------------------------------|-----------------------------------|
| VER P/O :<br>02<br>LEATHER                      | LG CHEM AMERICA                    | LG CHEM, LTD. | 01/31/2009 | 42581 | 19355 | Pusan | Charleston, South Carolina | MOL EXCELLENCE | South Korea | AS PER LABEL | INC. 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968       | 20 YOI<br>YOUNG<br>TOWE<br>150-72 |
| VER P/O :<br>10<br>PAIDPVC                      | LG CHEM AMERICA                    | LG CHEM, LTD. | 01/31/2009 | 35750 | 16250 | Pusan | Charleston, South Carolina | MOL EXCELLENCE | South Korea | AS PER LABEL | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968      | 20 YOI<br>YOUNG<br>TOWE<br>150-72 |
| P/O :<br>P/O :<br>10<br>PAID                    | LG CHEM AMERICA                    | LG CHEM, LTD. | 01/31/2009 | 35750 | 16250 | Pusan | Charleston, South Carolina | MOL EXCELLENCE | South Korea | AS PER LABEL | INC., 920 SYLVAN AVENUE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632 U.S.A, ATTN: AARON<br>WEISS TEL: 201-816-2968      | 20 YOI<br>YOUNG<br>TOWE<br>150-72 |
| VER P/O :<br>ON-<br>IPPER-S<br>3' FREIGHT<br>3' | FNS, INC. 18301<br>BORADWICK STEET | LG CHEM LTD   | 12/27/2008 | 44000 | 20000 | Pusan | Charleston, South Carolina | APL ARABIA     | South Korea | IN BULK      | RANCHO DOMINGUEZ, CA<br>90220 TEL: 310-667-4800<br>FAX: 310-667-4889                                          | 20 YOI<br>DONG<br>TWIN<br>KOREA   |
| 8, UN2218                                       | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD.  | 12/06/2008 | 36960 | 16800 | Pusan | Charleston, South Carolina | APL JADE       | South Korea | AS PER LABEL | INC. 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632                                                       | 20 YOI<br>YOUNG<br>TOWE<br>150-72 |
| 103110000                                       | LG CHEM AMERICA,<br>INC            | LG CHEM, LTD. | 11/15/2008 | 36047 | 16385 | Pusan | Charleston, South Carolina | MOL ENDURANCE  | South Korea | AS PER LABEL | 920 SYLVAN AVE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632, USA ATTN: HANRIET<br>BARGAMIAN TEL: 201-816-<br>2311       | LG TW<br>DONG<br>SEOUL            |
| 1610A-06716                                     | LG CHEM AMERICA                    | LG CHEM, LTD. | 09/20/2008 | 35424 | 16102 | Pusan | Charleston, South Carolina | MOL ENDEAVOUR  | South Korea | AS PER LABEL | INC., 920 SYLVAN AVE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632, USA ATTN: HANRIET<br>BARGAMIAN TEL: 201-816-<br>2311 | LG TW<br>DONG<br>SEOUL            |
| 8, UN2218<br>THE DOCK                           | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD.  | 09/13/2008 | 36960 | 16800 | Pusan | Charleston, South Carolina | APL JADE       | South Korea | AS PER LABEL | INC. 920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS, NJ<br>07632                                                       | 20 YOI<br>YOUNG<br>TOWE<br>150-72 |
| 'S RESIN                                        | TO THE ORDER OF LG<br>CHEM         | LG CHEM, LTD. | 09/06/2008 | 36047 | 16385 | Pusan | Charleston, South Carolina | MOL ENTERPRISE | South Korea | AS PER LABEL | AMERICA, INC., 920<br>SYLVAN AVE.,<br>ENGLEWOOD CLIFFS, NJ<br>07632, USA ATTN: HANRIET<br>BARGAMIAN TEL: 201- | LG TW<br>DONG<br>SEOUL            |

|                               |                                   |              |            |       |       |       |                            |                |             |                                                        |                                                       |                          |
|-------------------------------|-----------------------------------|--------------|------------|-------|-------|-------|----------------------------|----------------|-------------|--------------------------------------------------------|-------------------------------------------------------|--------------------------|
| IC ACID, PAID                 | TO THE ORDER OF LG CHEM AMERICA   | LG CHEM LTD. | 07/26/2008 | 36960 | 16800 | Pusan | Charleston, South Carolina | APL BRAZIL     | South Korea | AS PER LABEL                                           | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632       | 20 YOI YOUN: TOWE 150-72 |
| IC ACID, PAID                 | TO THE ORDER OF LG CHEM AMERICA   | LG CHEM LTD. | 07/26/2008 | 36960 | 16800 | Pusan | Charleston, South Carolina | APL BRAZIL     | South Korea | AS PER LABEL                                           | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632       | 20 YOI YOUN: TOWE 150-72 |
| 8, UN2218<br>THE DOCK         | TO THE ORDER OF LG CHEM AMERICA   | LG CHEM LTD. | 06/21/2008 | 36960 | 16800 | Pusan | Charleston, South Carolina | APL JADE       | South Korea | ACRYLIC ACID NET WT.:200KG LG CHEM.,LTD. MADE IN KOREA | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632       | 20 YOI YOUN: TOWE 150-72 |
| 03300000                      | TO ORDER OF LG CHEM AMERICA, INC. | LG CHEM, LTD | 06/14/2008 | 35361 | 16073 | Pusan | Charleston, South Carolina | MOL ENTERPRISE | South Korea | AS PER LABEL                                           | 920 SYLVAN AVE., ENGLEWOOD CLIFFS, NJ 07632 USA       | 20 YOI YOUN: KORE/       |
| 03300000                      | TO ORDER OF LG CHEM AMERICA, INC. | LG CHEM, LTD | 06/14/2008 | 35361 | 16073 | Pusan | Charleston, South Carolina | MOL ENTERPRISE | South Korea | AS PER LABEL                                           | 920 SYLVAN AVE., ENGLEWOOD CLIFFS, NJ 07632 USA       | 20 YOI YOUN: KORE/       |
| 8, UN2218<br>THE DOCK         | TO THE ORDER OF LG CHEM AMERICA   | LG CHEM LTD. | 04/26/2008 | 36960 | 16800 | Pusan | Charleston, South Carolina | MOL INNOVATION | South Korea | AS PER LABEL                                           | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632       | 20 YOI YOUN: TOWE 150-72 |
| 8, UN2218<br>THE DOCK         | TO THE ORDER OF LG CHEM AMERICA   | LG CHEM LTD. | 02/18/2008 | 36960 | 16800 | Pusan | Charleston, South Carolina | APL MALAYSIA   | South Korea | AS PER LABEL                                           | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632       | 20 YOI YOUN: TOWE 150-72 |
| ASH POINT DC                  |                                   |              |            |       |       |       |                            |                |             |                                                        |                                                       |                          |
| 3, INHIBITED<br>(C.), 91C (O. | LG CHEM AMERICA                   | LG CHEM LTD. | 01/20/2008 | 88000 | 40000 | Pusan | Charleston, South Carolina | MOL ENDOWMENT  | South Korea | NO MARKS AND NU NO MARKS AND NU                        | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632 U.S.A | LG TW SOUTI SOUTI        |
| IC ACID,                      | TO THE ORDER OF LG CHEM AMERICA   | LG CHEM LTD. | 01/13/2008 | 36960 | 16800 | Pusan | Charleston, South Carolina | MOL EXPLORER   | South Korea | AS PER LABEL                                           | INC.920 SYLVAN AVENUE ENGLEWOOD CLIFFS,NJ 07632       | 20 YOI YOUN: TOWE 150-72 |

|                                         |                                    |               |            |       |       |       |                               |                        |             |                                                                    |                                                               |                                                    |
|-----------------------------------------|------------------------------------|---------------|------------|-------|-------|-------|-------------------------------|------------------------|-------------|--------------------------------------------------------------------|---------------------------------------------------------------|----------------------------------------------------|
| IBITED<br>JA 1993<br>1                  | LG CHEM AMERICA,                   | LG CHEM LTD.  | 12/29/2007 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | MOL EFFICIENCY         | South Korea | NO MARKS AND NU                                                    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A   | LG TWIN T<br>SOUTH KO<br>SOUTH KO                  |
| IBITED<br>JA 1993<br>1                  | LG CHEM AMERICA,                   | LG CHEM LTD.  | 12/15/2007 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | MOL VISION             | South Korea | NO MARKS AND NU                                                    | INC.920 SYLVAN AVENUE<br>ENGLEWOOD CLIFFS,NJ<br>07632 U.S.A   | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>150-721    |
|                                         | LG CHEM AMERICA                    | LG CHEM LTD.  | 12/01/2007 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | HANJIN<br>PHILADELPHIA | South Korea | NO MARKS                                                           | . INC. 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632 U.S.A | .20 YOIDO-<br>YOUNGDUI<br>TOWERS, \$<br>KOREA150-  |
| ED<br>3<br>-FREE<br>K IS<br>C<br>ABLE   | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD.  | 11/24/2007 | 36960 | 16800 | Pusan | Charleston, South<br>Carolina | APL MALAYSIA           | South Korea | NO MARKS AND NU                                                    | INC.920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS,NJ<br>07632          | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>KOREA150-  |
|                                         | LG CHEM AMERICA                    | LG CHEM LTD.  | 11/18/2007 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | BAUHINIA BRIDGE        | South Korea | NO MARKS                                                           | .INC. 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632 U.S.A  | .20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>KOREA150- |
| P/O :<br>JN2348<br>YL<br>CLASS<br>UP:II | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD.  | 11/10/2007 | 34848 | 15840 | Pusan | Charleston, South<br>Carolina | MOL INNOVATION         | South Korea | AS PER LABEL                                                       | INC.920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS,NJ<br>07632          | 20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>KOREA150-  |
|                                         | LG CHEM AMERICA                    | LG CHEM LTD.  | 10/22/2007 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | CHANG JIANG<br>BRIDGE  | South Korea | NO MARKS                                                           | .INC. 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632 U.S.A  | .20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>KOREA150- |
| 3 -<br>5                                | LG SOLID SOURCE,<br>LLC            | LG CHEM, LTD. | 10/20/2007 | 34540 | 15700 | Pusan | Charleston, South<br>Carolina | EVER DELIGHT           | South Korea | HI MACS   INVOICE NO  <br>SIZE   Q-TY   PATTERN  <br>MADE IN KOREA | 8009 W.OLIVE AVE.PEORIA,<br>AZ 85345 U.S.A                    | LG TWIN T<br>DONG, YO<br>GUSEOUL,                  |
|                                         | LG CHEM AMERICA                    | LG CHEM LTD.  | 10/06/2007 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | HANJIN<br>PHILADELPHIA | South Korea | NO MARKS                                                           | .INC. 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632 U.S.A  | .20 YOIDO-I<br>YOUNGDUI<br>TOWERS, \$<br>KOREA150- |

|                                                             |                                    |               |            |        |       |       |                            |                        |             |                                                                    |                                                                      |                                   |
|-------------------------------------------------------------|------------------------------------|---------------|------------|--------|-------|-------|----------------------------|------------------------|-------------|--------------------------------------------------------------------|----------------------------------------------------------------------|-----------------------------------|
| TE                                                          | LG CHEM AMERICA                    | LG CHEM LTD.  | 09/29/2007 | 88000  | 40000 | Pusan | Charleston, South Carolina | HANJIN IRENES          | South Korea | NO MARKS                                                           | .INC. 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632 U.S.A         | .20 YO<br>YOUNG<br>TOWER<br>KOREA |
| TE                                                          | LG CHEM AMERICA                    | LG CHEM LTD.  | 09/18/2007 | 88000  | 40000 | Pusan | Charleston, South Carolina | HANJIN PORTLAND        | South Korea | NO MARKS                                                           | .INC. 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632 U.S.A         | .20 YO<br>YOUNG<br>TOWER<br>KOREA |
| 3 P/O :<br>P/O : 1706<br>100 ACRYLIC<br>PLACARDS<br>OF IS   | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD.  | 09/08/2007 | 36960  | 16800 | Pusan | Charleston, South Carolina | APL TURQUOISE          | South Korea | AS PER LABEL                                                       | INC.920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS,NJ<br>07632                 | 20 YO<br>YOUNG<br>TOWER<br>KOREA  |
| MER P/O :<br>3-11-1000<br>D CLASS 8,<br>CUP:II *DDC<br>4690 | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD.  | 09/01/2007 | 36960  | 16800 | Pusan | Charleston, South Carolina | APL MALAYSIA           | South Korea | AS PER LABEL                                                       | INC.920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS,NJ<br>07632                 | 20 YO<br>YOUNG<br>TOWER<br>KOREA  |
| TE,                                                         | LG CHEM AMERICA<br>INC             | LG CHEM LTD   | 08/25/2007 | 44000  | 20000 | Pusan | Charleston, South Carolina | CHANG JIAN<br>BRIDGE   | South Korea | NO MARKS                                                           | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632                    | .20 YO<br>YOUNG<br>TWIN<br>KOREA  |
| 270<br>LID<br>SELLER-S                                      | TO THE ORDER OF                    | LG CHEM, LTD. | 08/25/2007 | 34540  | 15700 | Pusan | Charleston, South Carolina | EVER RACER             | South Korea | HI MACS   INVOICE NO  <br>SIZE   Q-TY   PATTERN  <br>MADE IN KOREA | LG SOLID SOURCE,<br>LLC8009 W.OLIVE<br>AVE.PEORIA, AZ 85345<br>U.S.A | LG TW<br>DONG<br>GUSE             |
| TE                                                          | LG CHEM AMERICA<br>INC             | LG CHEM LTD.  | 08/18/2007 | 132000 | 60000 | Pusan | Charleston, South Carolina | YM COLOMBO             | South Korea | NO MARKS                                                           | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632 U.S.A              | .20 YO<br>YOUNG<br>TOWER<br>KOREA |
| TE,                                                         | LG CHEM AMERICA                    | LG CHEM LTD.  | 08/18/2007 | 44000  | 20000 | Pusan | Charleston, South Carolina | YM COLOMBO             | South Korea | NO MARKS                                                           | .INC. 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632               | .20 YO<br>YOUNG<br>TOWER<br>KOREA |
| TE, INHIBIT                                                 | TO THE ORDER OF LG<br>CHEM AMERICA | LG CHEM LTD.  | 08/11/2007 | 44000  | 20000 | Pusan | Charleston, South Carolina | HANJIN<br>PHILADELPHIA | South Korea | NO MARKS                                                           | .INC. 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632               | .20 YO<br>YOUNG<br>TOWER<br>KOREA |

|                                                  |                                 |              |            |        |       |       |                            |                        |             |              |                                                              |                                   |
|--------------------------------------------------|---------------------------------|--------------|------------|--------|-------|-------|----------------------------|------------------------|-------------|--------------|--------------------------------------------------------------|-----------------------------------|
| TE                                               | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 08/11/2007 | 88000  | 40000 | Pusan | Charleston, South Carolina | HANJIN PHILADELPHIA    | South Korea | NO MARKS     | .INC. 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632 U.S.A | .20 YO<br>YOUNI<br>TOWE<br>KORE/  |
| TE, INHIBIT                                      | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 08/11/2007 | 44000  | 20000 | Pusan | Charleston, South Carolina | HANJIN PHILADELPHIA    | South Korea | NO MARKS     | .INC. 920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632       | .20 YO<br>YOUNI<br>TOWE<br>KORE/  |
| MER P/O :<br>NHIBITED<br>GING                    | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 07/21/2007 | 36960  | 16800 | Pusan | Charleston, South Carolina | APL JADE               | South Korea | AS PER LABEL | INC.920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS,NJ<br>07632         | 20 YOI<br>YOUNI<br>TOWE<br>KORE/  |
| E                                                | LG CHEM AMERICA<br>INC          | LG CHEM LTD  | 07/21/2007 | 88000  | 40000 | Pusan | Charleston, South Carolina | HANJIN PORTLAND        | South Korea | NO MARKS     | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632            | .20 YO<br>YOUNI<br>TWINT<br>KORE/ |
| MER P/O :<br>11-1000<br>D *NA IMO<br>ALL 4 SIDES | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 07/14/2007 | 36960  | 16800 | Pusan | Charleston, South Carolina | MOL EFFICIENCY         | South Korea | AS PER LABEL | INC.920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS,NJ<br>07632         | 20 YOI<br>YOUNI<br>TOWE<br>KORE/  |
| MER P/O :<br>3-11-1000<br>D CLASS 8,<br>CUP:II   | TO THE ORDER OF LG CHEM AMERICA | LG CHEM LTD. | 07/01/2007 | 36960  | 16800 | Pusan | Charleston, South Carolina | MOL VISION             | South Korea | AS PER LABEL | INC.920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS,NJ<br>07632         | 20 YOI<br>YOUNI<br>TOWE<br>KORE/  |
| E                                                | LG CHEM AMERICA<br>INC          | LG CHEM LTD  | 06/30/2007 | 44000  | 20000 | Pusan | Charleston, South Carolina | CHANG JIANG<br>BRRIDGE | South Korea | NO MARKS     | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632            | .20 YO<br>YOUNI<br>TWINT<br>KORE/ |
| E                                                | LG CHEM AMERICA<br>INC          | LG CHEM LTD  | 06/30/2007 | 44000  | 20000 | Pusan | Charleston, South Carolina | CHANG JIANG<br>BRRIDGE | South Korea | NO MARKS     | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632            | .20 YO<br>YOUNI<br>TWINT<br>KORE/ |
| E                                                | LG CHEM AMERICA<br>INC          | LG CHEM LTD  | 06/30/2007 | 132000 | 60000 | Pusan | Charleston, South Carolina | CHANG JIANG<br>BRRIDGE | South Korea | NO MARKS     | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632            | .20 YO<br>YOUNI<br>TWINT<br>KORE/ |

|     |                            |               |            |        |       |       |                               |                        |             |              |                                                                                                                     |                                   |
|-----|----------------------------|---------------|------------|--------|-------|-------|-------------------------------|------------------------|-------------|--------------|---------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| TE, | LG CHEM AMERICA<br>INC     | LG CHEM LTD   | 06/23/2007 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | HANJIN PHOENIX         | South Korea | NO MARKS     | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632                                                                   | .20 YO<br>YOUNI<br>TWINT<br>KORE/ |
| TE, | LG CHEM AMERICA<br>INC     | LG CHEM LTD   | 06/16/2007 | 44000  | 20000 | Pusan | Charleston, South<br>Carolina | HANJIN<br>PHILADELPHIA | South Korea | NO MARKS     | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632                                                                   | .20 YO<br>YOUNI<br>TWINT<br>KORE/ |
| E   | LG CHEM AMERICA<br>INC     | LG CHEM LTD   | 06/02/2007 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | BAUHINIA BRIDGE        | South Korea | NO MARKS     | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632                                                                   | .20 YO<br>YOUNI<br>TWINT<br>KORE/ |
| E   | LG CHEM AMERICA<br>INC     | LG CHEM LTD   | 05/03/2007 | 88000  | 40000 | Pusan | Charleston, South<br>Carolina | HANJIN PRAHA           | South Korea | NO MARKS     | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS NJ<br>07632                                                                   | .20 YO<br>YOUNI<br>TWINT<br>KORE/ |
| E   | LG CHEM AMERICA<br>INC     | LG CHEM LTD   | 04/19/2007 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | HANJIN<br>PHILADELPHIA | South Korea | NO MARKS     | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS.NJ<br>07632                                                                   | .20 YO<br>YOUNI<br>TWINT<br>KORE/ |
|     | LG CHEM<br>AMERICA,INC.    | LG CHEM LTD.  | 04/11/2007 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | HANJIN IRENE           | South Korea | AS PER LABEL | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS, NJ<br>07632                                                                  | .20 YO<br>YOUNI<br>TOWE<br>KORE/  |
|     | TO THE ORDER OF LG<br>CHEM | LG CHEM, LTD. | 04/11/2007 | 36047  | 16385 | Pusan | Charleston, South<br>Carolina | HANJIN IRENE           | South Korea | NO MARKS     | AMERICA, INC.,920 SYLVAN<br>AVE., ENGLEWOOD<br>CLIFFS,NJ 07632,<br>USAATTN:HANRIET<br>BARGAMIANTEL:201-816-<br>2311 | .LG TV<br>DONG<br>SEQUI           |
|     | LG CHEM AMERICA<br>INC     | LG CHEM LTD   | 02/01/2007 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | HANJIN PORTLAND        | South Korea | NO MARKS     | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS.NJ<br>07632                                                                   | .20 YO<br>YOUNI<br>TWINT<br>KORE/ |
|     | LG CHEM AMERICA<br>INC     | LG CHEM LTD   | 02/01/2007 | 132000 | 60000 | Pusan | Charleston, South<br>Carolina | HANJIN PORTLAND        | South Korea | NO MARKS     | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS.NJ<br>07632                                                                   | .20 YO<br>YOUNI<br>TWINT<br>KORE/ |



|     |                          |               |            |       |       |       |                               |                |             |          |                                                                                                      |                          |
|-----|--------------------------|---------------|------------|-------|-------|-------|-------------------------------|----------------|-------------|----------|------------------------------------------------------------------------------------------------------|--------------------------|
| LIC | ALBEMARLE<br>CORPORATION | LG CHEM, LTD. | 01/24/2007 | 3500  | 1591  | Pusan | Charleston, South<br>Carolina | HANJIN PRAHA   | South Korea | NO MARKS | .ATTN:KYL SHIPPING<br>COORDINATORCANNON<br>BRIDGE ROAD<br>ORAGNEBURG, SC29115<br>USA FAX803-536-0981 | .675<br>SEC<br>CHI       |
| TE  | LG CHEM AMERICA<br>INC   | LG CHEM LTD   | 01/08/2007 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | HANJIN PHOENIX | South Korea | NO MARKS | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS.NJ<br>07632                                                    | .20<br>YOL<br>TWI<br>KOF |
|     | LG CHEM AMERICA<br>INC   | LG CHEM LTD   | 01/08/2007 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | HANJIN PHOENIX | South Korea | NO MARKS | .920 SYLVAN AVENUE<br>ENGLEWOODCLIFFS.NJ<br>07632                                                    | .20<br>YOL<br>TWI<br>KOF |

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF ORANGEBURG ) CIVIL ACTION NO.: 2010-CP-38-1558  
VIKKI G. SHEPPARD as Personal )  
Representative of the Estate of ARTHUR )  
BENJAMIN SHEPPARD, II )

Plaintiff,

v.

MERCEDES-BENZ USA, LLC, DAIMLER )  
AG, F/K/A DAIMLERCHRYSLER AG, )  
TRAVIS KENDELL WILLIAMS, and )  
MALONE'S AUTOMOTIVE, )

Defendants

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF ORANGEBURG ) CIVIL ACTION NO.: 2010-CP-38-1559

VIKKI G. SHEPPARD,

Plaintiff,

v.

MERCEDES-BENZ USA, LLC, DAIMLER AG, )  
F/K/A DAIMLERCHRYSLER AG, TRAVIS )  
KENDELL WILLIAMS, and MALONE'S )  
AUTOMOTIVE, )

Defendants

FILED FOR RECORD  
WINNIE B. CLARK  
CLERK OF COURT  
ORANGEBURG, SC

2012 NOV 15 PM 4:34

ATTEST: TRUE COPY

*Winnie B. Clark*  
CLERK OF COURT  
ORANGEBURG COUNTY, SC

**ORDER**

THIS MATTER CAME BEFORE THE COURT on motion by Defendant Daimler AG to dismiss pursuant to Rule 12(b)(2) South Carolina Rules of Civil Procedure for lack of personal jurisdiction. The motion was heard on December 5, 2011. After considering the arguments of counsel and materials provided in support of the opposing positions, the Court finds that Daimler



AG is subject to jurisdiction for the causes of action set forth in Plaintiffs' complaints and, therefore, denies the motion to dismiss.

### BACKGROUND

This action arises from a November 24, 2007, automobile accident involving a head-on collision between a 2002 Mercedes Benz S430 being operated by the Plaintiffs and a 2004 Chevy Malibu operated by Travis Kendell Williams. The accident occurred in Orangeburg County on U. S. 178 near the Town of Bowman.

The claim against Daimler AG involves allegations that the airbags failed to deploy in the subject vehicle. Arthur Benjamin Sheppard, II died and Vikki Sheppard sustained personal injuries as a result of the collision. For the purposes of this motion, it is undisputed that the airbags did not deploy in the collision. It is also undisputed that Daimler AG, f/k/a Daimler Chrysler AG (Daimler AG), manufactured the subject vehicle in Germany which was later sold to Defendant Mercedes-Benz USA, LLC (MBUSA, LLC). The sale to MBUSA, LLC took place in Germany.

At the time the subject vehicle was manufactured and sold, Daimler AG certified that it met all U. S. Federal Motor Vehicle Safety Standards in effect on the date of manufacture. Daimler AG also certified that the subject vehicle conformed to all year 2002 U.S. EPA Regulations. Daimler AG also provided an Operators Manual with the subject vehicle providing instructions in English on the proper operation of the S-Class Mercedes. It is undisputed that the subject vehicle was designed and manufactured in Germany with the specific intent that it be sold and driven within the United States.

*This is demonstrated by the sale to MBUSA, LLC, a wholly owned subsidiary of Daimler AG.*

### DISCUSSION

In this action the Plaintiffs seek to have the Court exercise jurisdiction over Daimler AG concerning the specific acts and/or omissions alleged in the complaints. "Specific jurisdiction over a cause of action arising from a defendant's contacts with the state is granted pursuant to the



long-arm statute.” State of South Carolina v. NV Sumatra Tobacco Trading Co., 666 S.E.2d 218, 222 (2008). The applicable section of the long-arm statute provides as follows:

**§36-2-803. Personal Jurisdiction based upon conduct.**

- (A) A court may exercise personal jurisdiction over a person who acts directly or by an agent as to a cause of action arising from the person’s: (8) production, manufacture, or distribution of goods with the reasonable expectation that those goods are to be used or consumed in this State and are so used or consumed.

In assessing personal jurisdiction at the pre-trial stage, the burden of proving jurisdiction is met by a prima facie showing in the complaint. Cockrell v. Hillerich & Bradsby Co., 611 S.E.2d 505 (2005). To this end the trial court is not required to consider materials beyond the complaint. However, because the parties have provided additional materials the Court will consider them along with the allegations in the complaint.

As an initial matter, the Plaintiffs’ complaints allege that Daimler AG manufactured and placed the subject vehicle into the stream of commerce. It is further alleged that the Plaintiffs were injured due to defects in the manufacture and design of the subject vehicle and that the injuries occurred while the vehicle was being used in South Carolina.

There can be no question that Daimler AG intended that the subject vehicle be sold and used in the United States by virtue of the certification that the vehicle met all applicable FMVSS and EPA standards.<sup>1</sup> Thus, it is clear to the Court that Daimler AG manufactured and placed the subject vehicle into the stream of commerce with the “reasonable expectation” that it would be used in any of the 50 states including South Carolina. This is especially true given the mobility of vehicles and the fact that all vehicles sold in South Carolina, regardless of manufacturer, must meet the same federal safety and environmental standards.<sup>1</sup>

*its vehicle far enough out the United States.*

Because Daimler AG manufactured and sold the subject vehicle with the reasonable expectation that it would be used in South Carolina and this action arises from its use in South

<sup>1</sup> Of course it is common knowledge that Mercedes Benz vehicles are sold at dealerships in South Carolina.

Carolina, the threshold requirement for jurisdiction under the South Carolina Long Arm Statute is met. However, in order for the Court to exercise jurisdiction it must confirm that doing so is consistent with Due Process.

Due Process requires that there exist minimum contacts between the defendant and the forum state such that maintenance of the suit does not offend traditional notions of fair play and substantial justice. *Id.* Further, Due Process mandates that the defendant possess sufficient minimum contacts with the forum state, so that he could reasonably anticipate being haled into court there. *Id.* citing World-Wide Volkswagen Corp. v. Woodson, 444 U.S. 286, 100 S.Ct. 559, 62 L.Ed.2d 490 (1980). Without minimum contacts, the court does not have the “power” to adjudicate the action. *Id.* The court must also find that the exercise of jurisdiction is “reasonable” or “fair.” *Id.* If either prong fails, the exercise of personal jurisdiction over the defendant fails to comport with the requirements of due process. Southern Plastics Co. v. Southern Commerce Bank, 423 S.E.2d 128 (1992).

The foreseeability that is critical to due process analysis is not the mere likelihood that a product will find its way into the forum state. Rather, it is that the defendant’s conduct and connection with the forum state are such that he should reasonably anticipate being haled into court there. This theory of personal jurisdiction is known as the “stream of commerce” theory. Southern Plastics Co., supra citing World-Wide Volkswagen Corp., 444 U.S. at 297.

In Sumatra, the South Carolina Supreme Court was asked to embrace the “stream of commerce plus” theory of personal jurisdiction. This theory arose in a plurality opinion by Justice Sandra Day O’Connor of the United States Supreme Court in Asahi Metal Ind. Co., Ltd. v. Superior Court of California, 480 U.S. 102, 107 S.Ct. 1026, 94 L.Ed.2d 92 (1987). The “stream of commerce plus” theory states that the placement of a product into the stream of commerce, without more, is not an act of the defendant purposely directed toward the forum state. The theory maintains that additional conduct indicating an intent or purpose to serve the



market in the forum state is also necessary. Asahi, 480 U.S. at 112, 107 S.Ct. 1026. Only three other justices ~~signed onto~~ <sup>adopted</sup> this theory. Justice William Brennan and three other justices maintained that simply placing a product into the stream of commerce is consistent with the Due Process Clause and they would not require a showing of additional conduct to assert jurisdiction. Id. at 117. The South Carolina Supreme Court declined to embrace the “stream of commerce plus” theory.

Trial Courts in South Carolina are required to apply Justice Brennan’s stream of commerce test when assessing whether Due Process is afforded in exercising jurisdiction over a foreign manufacturer. In Asahi, Justice Brennan describes the stream of commerce as follows:

The stream of commerce refers not to unpredictable currents or eddies, but to the regular and anticipated flow of products from manufacture to distribution to retail sale. As long as the participant in this process is aware that the final product is being marketed in the forum State, the possibility of a lawsuit there cannot come as a surprise.

Asahi, 480 U. S. at 117.

Daimler AG argues that after the decision in J. McIntyre Machinery, Ltd. V. Nicastro, 131 S.Ct. 2780 (2011) that the stream of commerce analysis used by the South Carolina Supreme Court is no longer appropriate and that there must be additional conduct directed at the forum state beyond the placement of a product into the stream of commerce with the intent to serve a market. It argues that McIntyre changed the standard for personal jurisdiction such that the precedent of the South Carolina Supreme Court relied on by the Plaintiffs are no longer controlling.

McIntyre, like Asahi, was decided by a plurality of the Court and thus did not involve a majority of the justices required to change existing precedent. The outcome of the case was controlled by Justice Breyer’s concurring vote where he declined to choose between either Justice O’Connor’s “stream of commerce plus” analysis or Justice Brennan’s broader “stream of

commerce” approach. “When a fragmented Court decides a case and no single rationale explaining the result enjoys the assent of five Justices, the holding of the court may be viewed as the position taken by those Members who concurred in the judgment on the narrowest grounds.” Garland v. Roy, 615 F.3d 391,399 (5<sup>th</sup> Cir. 2010)

Justice Breyer simply confirmed that none of the prior precedents upholding personal jurisdiction over a product manufacturer “finds that a single isolated sale, even if accompanied by the kind of sales effort indicated here, is sufficient”. McIntyre, 131 S. Ct. at 2792. He went on to analyze the defendant’s contacts with New Jersey under the existing precedent. Justice Breyer first found that there was not a regular flow or regular sales to New Jersey and there was no “something more, such as special state-related design, advertising, advice, marketing or anything else”. Id. Thus finding jurisdiction did not exist under the “stream of commerce plus” approach taken by Justice O’Connor in Asahi. He then went on to find the plaintiff had not otherwise shown that the manufacturer “delivered its goods in the stream of commerce with the expectation that they will be purchased by New Jersey users” under the “stream of commerce approach set forth in Asahi by Justice Brennan. Id.

McIntyre involved a claim by a citizen of New Jersey for injuries caused by an allegedly defective scrap metal recycling machine manufactured by McIntyre in the U.K. McIntyre did not have any presence in the U.S. or in New Jersey. It had sold only one of its machines in the State of New Jersey through an independent distributor. Although it sold the machine with knowledge that its product could end up via the stream of commerce in any of the fifty states including New Jersey, it did not specifically target New Jersey. The U.S. Supreme Court reversed the New Jersey Supreme Court’s opinion affirming a finding of personal jurisdiction by the trial court. The New Jersey trial Court found personal jurisdiction based on its view that it was foreseeable to McIntyre that its machine could end up in New Jersey via the stream of commerce.



The McIntyre plurality found that the foreseeability that a product could end up in the forum State via the stream of commerce, standing alone, was insufficient to meet the requirements of due process. The Court affirmed prior precedent that a single isolated sale standing alone would not support personal jurisdiction. There was no evidence of a regular flow of sales in New Jersey or that it delivered its machine into the stream of commerce with the expectation that they would be purchased in New Jersey.

Not only is McIntyre distinguishable factually from the present case, the Court disagrees with Daimler AG that McIntyre changes the law with regard to the Due Process analysis required for a court to exercise personal jurisdiction over a foreign product manufacturer. At best McIntyre can be read as leaving Asahi intact and is otherwise of little precedential value except for cases involving similar facts. See Ainsworth v. Cargotec, USA, Inc. 2011 WL 4443626 (S.D. Miss) (Finding McIntyre limited to cases with similar facts holding and that McIntyre did not affect the requirement that district courts in the Fifth Circuit follow Justice Brennan's Due Process analysis from Asahi.) The Court finds that McIntyre does not change the Due Process analysis set forth in Sumutra Tobacco by the South Carolina Supreme Court, which is the test this Court must follow.

This case falls squarely within the purpose of the stream of commerce theory which when applied confirms that the exercise of jurisdiction is consistent with Due Process. This case does not involve the isolated sale of a single product in South Carolina (McIntyre) nor does it involve the sale of a product in a different state by a seller that does not sell any products in South Carolina. (World-Wide Volkswagen) Likewise, it does not involve a product that was swept into South Carolina via the stream of commerce where the defendant took no effort to serve the market in South Carolina. (Asahi) Instead, this case involves a manufacturer who designs and builds automobiles in Germany specifically for sale in the United States including South

Carolina. Automobiles that are sold in the United States and South Carolina through a wholly owned subsidiary that acts as the exclusive distributor of these automobiles.

A review of the cases analyzing personal jurisdiction over foreign product manufacturers reveals an important emphasis expressed by the courts when products enter the forum state via a distributor, especially when the product is designed for the market. For example, in World-Wide Volkswagen, the U.S. Supreme Court distinguished the isolated sale of a product from sales of a manufacturer that seeks to serve a market through a distributor:

Hence if the sale of a product of a manufacturer or distributor such as Audi or Volkswagen is not simply an isolated occurrence, but arises from the efforts of the manufacturer or distributor to serve, directly or indirectly, the market for its product in other States, it is not unreasonable to subject it to suit in one of those States if its allegedly defective merchandise has there been the source of injury to its owner or to others.

World-Wide Volkswagen, 444 U.S. at 297.

Later in Asahi, Justice O'Connor cites as an example the use of a distributor to serve a market as the type of "additional" conduct necessary under her more restrictive view of conduct necessary to sustain personal jurisdiction.

The placement of a product into the stream of commerce, without more, is not an act of the defendant purposefully directed toward the forum State. Additional conduct of the defendant may indicate an intent or purpose to serve the market in the forum State, for example, designing the product for the market in the forum State, advertising in the forum State, establishing channels for providing regular advice to customers in the forum State, or marketing the product through a distributor who has agreed to serve as the sales agent in the forum State.

Asahi, at 112.

The purpose of the stream of commerce theory is to hold a manufacturer "amenable to process in a forum in which its products are sold, even if the products were sold indirectly through importers or distributors with independent sales and marketing schemes." DeJames v. Magnificence Carriers, Inc., 654 F.2d 280, 285 (3d Cir.) cert. denied, 454 U.S. 1085 (1981).



Daimler AG designs and manufactures passenger vehicles, including the subject vehicle, specifically for the U.S. market which includes South Carolina. These vehicles are designed to comply with Federal Motor Vehicle Safety Standards and Environmental Protection Agency standards on emissions. In order to sell a new vehicle in South Carolina it must be designed to meet these standards. Daimler AG provided an owner's manual in English and used English units of measure for mileage on the speedometer. Further, Daimler AG targeted the U.S. market, including South Carolina, through its wholly owned subsidiary MBUSA. This is the very type of conduct that the U.S. Supreme Court has consistently defined as meeting the minimum contacts requirement to sustain personal jurisdiction. "The forum State does not exceed its powers under the Due Process Clause if it asserts personal jurisdiction over a corporation that delivers its products into the stream of commerce with the expectation that they will be purchased by consumers in the forum State." World-Wide Volkswagen, 444 U.S. at 297 – 298.

Other courts presented with almost identical situations post McIntyre have found the exercise of jurisdiction proper where a product reaches the forum state through a distributor where the manufacturer, as here, clearly sought to serve the market. In King v. General Motors Corporation, 2012 WL 1340066 (N.D.Ala.), the district court found that it had jurisdiction over GM's wholly owned subsidiary, General Motors of Canada. There the plaintiff sought to have the court exercise jurisdiction over GM of Canada the manufacturer of the allegedly defective vehicle. GM of Canada moved to dismiss for lack of personal jurisdiction making the exact argument made here by Daimler AG. GM of Canada admitted to designing and manufacturing the vehicle for sale in the U.S. It argued that the Alabama courts did not have jurisdiction because it sold the vehicle to GM, its parent company who then distributed the vehicles for sale in the U.S. The transfer of title to GM took place in Canada. GM of Canada had no agents in

Alabama, was not registered to do business in Alabama, and in fact had never directly done any business in Alabama. In denying the motion to dismiss the Court wrote:

While the court certainly recognizes that GM Canada is a separate and distinct entity from GM Corporation, there is no doubt that GM Canada "seeks to serve" Alabama when it specifically manufactures GM vehicles, in compliance with federal regulations, and designed by its parent corporation who actively sold these vehicles to an Alabama dealership. Indeed, GM Canada cannot plead ignorance of the markets it explicitly targets and serves when its parent corporation directly sells the manufactured products to these markets. GM Canada possesses more than some vague awareness that its products *might* reach U.S. markets – it manufactures vehicles, such as the one at issue, to comply with federal regulations. This equates manufacturing a product "in anticipation of sales in" Alabama. Moreover, GM Canada specifically sold its products to GM Corporation for distribution in the United States. ... Indeed the court finds that this commercial relationship mirrors an example provided by Justice O'Connor in Asahi of a manufacturer "marketing the product through a distributor who has agreed to serve as the sales agent in the forum State."

King, at 7.

In Soria v. Chrysler Canada, Inc., 958 N.E. 2d 285 (Il. App. 1<sup>st</sup> 2011), the Illinois appellate court upheld the trial court's denial of a Chrysler Canada's motion to dismiss for lack of jurisdiction under a factual pattern almost identical to what was presented in King and the present case. There Chrysler Canada, relying on McIntyre, asserted that it had insufficient contacts with Illinois because it only assembled vans that were sold to its parent company, Chrysler Corporation who then sold the vehicles through dealerships to consumers in Illinois. The vehicles were manufactured to meet federal regulations for sale in the U.S. The Court found that Chrysler Canada was specifically aware that its products were manufactured for the U.S. market including Illinois which amounted to the purposeful availment of the benefits and privileges of doing business in Illinois which thereby subjected it to personal jurisdiction. See also Ainsworth v. Cargotec USA, Inc. 2011 WL 4443626 (S.D. Miss) (Post McIntyre denial of forklift manufacturer's motion to dismiss where forklift manufacturer knew that its distributor was marketing its products throughout the U.S. including Mississippi.); Russell v. SNFA, 965

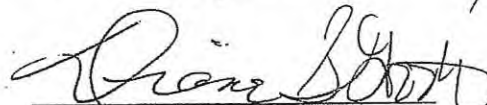


N.E. 2d 1, (Ill. App. 1<sup>st</sup> 2012) (Post McIntyre denial of a motion to dismiss made by French manufacturer of bearings specially designed for helicopters that it knew were being marketed in the U.S. including the forum state.)

Consistent with these decisions, the Court finds that Daimler AG is amenable to process in South Carolina because of its continuous and systematic targeting of its products to the U.S. market which includes South Carolina. Daimler AG cannot claim that it does not serve the market for Mercedes vehicles in South Carolina while admitting that it designs and manufactures these vehicles specifically for sale in the U.S. market. “Stated differently, if not [South Carolina], what market does [Daimler Ag] serve?” King, at 8.

Having found that Daimler AG possesses sufficient contacts with South Carolina to satisfy Due Process, the Court also finds that the exercise of jurisdiction is reasonable and fair. The U.S. Supreme Court has previously stated that the exercise of jurisdiction is not unreasonable where it is based on the efforts of the manufacturer to serve, either directly or indirectly, the market for its product. World-Wide Volkswagen, 444 U.S. at 297-298. “Where the component allegedly fails and causes injury in the very market in which the product was expected to be sold, it is not unreasonable or unfair to require the defendant to be subject to suit in that forum.” Rockwell International Corp. v. Construzioni Aeronautiche Giovanni Agusta, S.P.A., 553 F.Supp. 328 (E.D.Pa. 1982) Here Daimler AG specifically sought to serve the market in South Carolina where its product allegedly caused harm to the Plaintiff. Requiring it to defend its product in South Carolina is both fair and reasonable. This is especially true given that South Carolina has the greatest interest in hearing this matter which arises out of an accident that occurred in South Carolina.

Based on the foregoing, the Court finds that the exercise of personal jurisdiction over the Defendant Daimler AG is proper under the long-arm statute and hereby denies the motion to dismiss.<sup>2</sup> Daimler AG shall file and serve its answer within 15 days of this Order. *service of 201*

  
DIANE S. GOODSTEIN  
PRESIDING JUDGE

*NOV. 13*, 2012  
*Orangeburg, SC*

<sup>2</sup> See Kaplan v. Daimler Chrysler AG, et al., 99 F. supp. 2d 1348 (D.C. Fla. 2000) (Denying motion to dismiss for lack of personal jurisdiction in products case involving a S-Class Mercedes vehicle under near identical circumstances and arguments.)

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF UNION ) IN THE COURT OF COMMON PLEAS  
 ) SIXTEENTH JUDICIAL CIRCUIT  
 )  
Dwayne Thompson, ) Civil Action No. 2019-CP-44-00054  
 )  
Plaintiff, )  
 )  
vs. ) **MOTION TO DISMISS**  
 )  
Rolling Fog Vapor Company, LLC, LG )  
Chem, LTD., and LG Chem America, )  
Inc., )  
 )  
Defendants. )  
 )

**TO: ALEXANDER P. LEWIS, ESQ., W. BLAKE CUMMINGS, ESQ., RONNIE L. CROSBY, ESQ. AND AUSTIN H. CROSBY, ESQ., ATTORNEYS FOR PLAINTIFF DWAYNE THOMPSON**

YOU WILL PLEASE TAKE NOTICE that the undersigned as attorneys for the defendant LG Chem America, Inc. (“LGCAI”) will move before the Court at a time and date to be set by the Court for an Order dismissing this lawsuit against LGCAI for lack of personal jurisdiction, pursuant to SCRCP 12(b)(2). The grounds for this Motion are as follows:

LGCAI is a Delaware corporation with its principal place of business in Atlanta, Georgia and no systematic contacts with the State of South Carolina. Accordingly, it is not subject to the general jurisdiction of South Carolina courts. *BNSF Ry. Co v. Tyrrell*, 137 S. Ct. 1549, 1558 (2017); *Daimler AG v. Bauman*, 571 U.S. 117, 127 (2014). In addition, for specific personal jurisdiction to attach, due process requires that minimum contacts exist between the defendant and the forum state such that maintenance of the suit does not offend traditional notions of fair play and substantial justice. *Cockrell v. Hillerich & Bradsby Co.*, 363 S.C. 485, 491-92, 611 S.E.2d 505, 508 (2005) (citing *Burger King Corp. v. Rudzewicz*, 471 U.S. 462 (1985)). Because minimum contacts do not



exist between LGCAI and South Carolina related to the Plaintiff's claims and sufficient to satisfy due process, this Court lacks personal jurisdiction over LGCAI.

This motion is supported by the pleadings, applicable law, the Affidavit of HyunSoo Kim filed herewith, and LGCAI's supporting memorandum of law to be filed at a later date, along with any exhibits and any additional affidavits or memoranda that LGCAI may hereafter file or submit to this Court.

WHEREFORE, for the foregoing reasons, LGCAI respectfully requests that the Court enter an Order dismissing LGCAI from this action for lack of personal jurisdiction, and such other and further relief the Court deems just and proper.

Respectfully submitted this 24<sup>th</sup> day of April, 2019.

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann  
KATE CAPPELMANN  
South Carolina Bar No.: 100551

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
[kate.cappelmann@lewisbrisbois.com](mailto:kate.cappelmann@lewisbrisbois.com)

Counsel for Defendant  
*LG Chem America, Inc.*

|                                 |   |                                    |
|---------------------------------|---|------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS       |
|                                 | ) |                                    |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO. : 2018-CP-4400054 |
|                                 | ) |                                    |
| DWAYNE THOMPSON,                | ) |                                    |
|                                 | ) |                                    |
| Plaintiff,                      | ) |                                    |
|                                 | ) |                                    |
| vs.                             | ) |                                    |
|                                 | ) |                                    |
| ROLLING FOG VAPOR COMPANY,      | ) |                                    |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                    |
| AMERICA, INC.,                  | ) |                                    |
|                                 | ) |                                    |
| Defendants.                     | ) |                                    |
|                                 | ) |                                    |

**CERTIFICATE OF SERVICE**

I certify that on this date, I filed **LG CHEM AMERICA, INC.’S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION** in this action with the Clerk of Court using the Court’s E-Filing System. A Notice of Electronic Filing will automatically generate to the following counsel of record:

Alexander P. Lewis  
W. Blake Cummings  
**Cumming & Lewis, LLC**  
P.O. Box 5766  
Spartanburg, SC 29304

and

Austin H. Crosby  
Ronnie L. Crosby  
**Peters, Murdaugh, Parker, Eltzroth & Detrick, PA**  
101 MULBERRY STREET EAST  
P.O. Box 457  
HAMPTON, SC 29924  
  
*Counsel for Plaintiff*

This 24<sup>th</sup> day of April, 2019.

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
kate.cappelmann@lewisbrisbois.com

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann  
KATE CAPPELMANN  
South Carolina Bar No.: 100551

Counsel for Defendant  
*LG Chem America, Inc.*

|                                 |   |                                        |
|---------------------------------|---|----------------------------------------|
| STATE OF SOUTH CAROLINA         | ) |                                        |
|                                 | ) | IN THE COURT OF COMMON PLEAS           |
| COUNTY OF UNION                 | ) | SIXTEENTH JUDICIAL CIRCUIT             |
| DWAYNE THOMPSON,                | ) | Civil Action No. 2019-CP-44-00054      |
|                                 | ) |                                        |
| Plaintiff,                      | ) |                                        |
|                                 | ) |                                        |
| vs.                             | ) | <b><u>AFFIDAVIT OF HYUNSOO KIM</u></b> |
|                                 | ) |                                        |
| ROLLING FOG VAPOR COMPANY,      | ) |                                        |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                        |
| AMERICA, INC.,                  | ) |                                        |
|                                 | ) |                                        |
| Defendants.                     | ) |                                        |

Personally appeared before me, HyunSoo Kim, who first being duly sworn, deposes and says:

1. I am over the age of eighteen (18) and am competent to testify to the matters contained in this Affidavit.
2. I am the Compliance Manager and authorized representative for LG Chem America, Inc. ("LGCAI"). I have personal knowledge of the facts described in this Affidavit, and I have been authorized by LGCAI to make this Affidavit. If called upon as a witness, I could and would testify competently under oath as to all such facts based upon my personal knowledge and the business records of LGCAI.
3. This affidavit is submitted in support of LGCAI's Motion to Dismiss for Lack of Personal Jurisdiction.
4. LGCAI sells and distributes various petrochemical materials and products including ABS resin, Engineered Plastic (EP), Rubbers, Acrylate, Super Absorbent Polymer (SAP), and Specialty Polymers. LGCAI does not have any manufacturing plants, and it focuses on sales and/or distribution only.
5. LGCAI is a Delaware incorporated entity with its principal place of business in the State of Georgia. It was incorporated in the State of Delaware on March 1, 2009.



6. LGCAI does not presently, nor has it ever owned, leased, rented, purchased, or controlled any property in the State of South Carolina.

7. LGCAI does not presently, nor has it ever maintained a bank account in the State of South Carolina.

8. LGCAI does not presently, nor has it ever maintained a mailing address, telephone, or telefax number in the State of South Carolina.

9. LGCAI has no employees that reside or work in South Carolina.

10. LGCAI does not and has never designed, manufactured, distributed, advertised, or sold any lithium-ion power cell for use by individual consumers as replaceable, rechargeable batteries in electronic cigarette devices.

11. Plaintiff Dwayne Thompson alleges he was injured while carrying a battery in his pants pocket. Compl., ¶ 11. Plaintiff identifies the subject battery as an "LG Brown Hg2 INR 18650 3000mAh." *Id.*, ¶ 2. If the subject battery identified in Plaintiff's Complaint was, in fact, an LG brand 18650 lithium-ion cell, the cell could not have been manufactured by LGCAI, as LGCAI does not have any manufacturing plants.

12. The Complaint alleges that Plaintiff Dwayne Thompson "purchased the subject battery . . . from Defendant [Rolling Fog Vapor Company, LLC]'s store located at 958 East Main Street in Spartanburg, South Carolina." Compl., ¶ 9. LGCAI has never conducted any business with Rolling Fog Vapor Company, LLC ("Rolling Fog"), and does not direct or control the actions of Rolling Fog. LGCAI has never authorized Rolling Fog to distribute or sell LG brand lithium ion battery cells for any purpose, and did not authorize Rolling Fog to distribute or sell LG branded lithium ion battery cells for use by individual consumers as replaceable, rechargeable batteries in e-cigarette devices.

13. LGCAI has never authorized any distributor, retailer, or re-seller to distribute or sell any lithium ion battery cells for use by individual consumers as replaceable, rechargeable batteries in e-cigarette devices.

I, HyunSoo Kim, hereby declare under penalty of perjury that the foregoing statements made by me are true and correct. I am aware that if any foregoing statements made by me are willfully false, I am subject to punishment.

Executed this 24<sup>th</sup> day of April, 2019.

HyunSoo Kim

SWORN to and subscribed before me

this 24<sup>th</sup> day of April, 2019.

David Hyun Kwak (L.S.)

Notary Public for \_\_\_\_\_

My Commission Expires: \_\_\_\_\_



|                                 |   |                                      |
|---------------------------------|---|--------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS         |
|                                 | ) |                                      |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO. : 2019-CP-4400054   |
|                                 | ) |                                      |
| DWAYNE THOMPSON,                | ) |                                      |
|                                 | ) |                                      |
| Plaintiff,                      | ) | <b>DEFENDANT LG CHEM AMERICA,</b>    |
|                                 | ) | <b>INC.'S MEMORANDUM IN SUPPORT</b>  |
| vs.                             | ) | <b>OF ITS MOTION TO DISMISS FOR</b>  |
|                                 | ) | <b>LACK OF PERSONAL JURISDICTION</b> |
| ROLLING FOG VAPOR COMPANY,      | ) |                                      |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                      |
| AMERICA, INC.,                  | ) |                                      |
|                                 | ) |                                      |
| Defendants.                     | ) |                                      |
| _____                           | ) |                                      |

Defendant LG Chem America, Inc. ("LGCAI") respectfully submits this memorandum of law in support of its motion to dismiss for lack of personal jurisdiction, pursuant to South Carolina Rule of Procedure 12(b)(2).

## I. INTRODUCTION

Plaintiff cannot carry his burden of demonstrating that this Court has either general or specific personal jurisdiction over LGCAI, a Delaware corporation with its principal place of business in Atlanta, Georgia. This is not an "exceptional case" that would allow a court to exercise general jurisdiction in a forum that is not "the corporation's place of incorporation [or] its principal place of business." *BNSF Ry. Co. v. Tyrell*, 137 S. Ct. 1549, 1558 (2017). Nor is there any connection between this "forum and the specific claims at issue," as is required before a court may exercise specific jurisdiction. *Bristol-Myers Squibb Co. v. Superior Court*, 137 S. Ct. 1773, 1781 (2017). Plaintiff alleges that he was injured by an "Hg2" lithium-ion "18650 3000mAh ... battery" that Defendant Rolling Fog Vapor Company, LLC sold him to use with his vaping device. LGCAI has no manufacturing facilities and could not have manufactured the



subject battery. In addition, LGCAI has never designed, manufactured, distributed, advertised, or sold any lithium-ion cell for use by individual consumers as replaceable, rechargeable batteries in e-cigarettes or vaping devices. Nor has LGCAI ever conducted any business with Rolling Fog Vapor Company, LLC, the alleged retailer of the product at issue. Accordingly, the Court should dismiss LGCAI for lack of personal jurisdiction.

## **II. FACTS**

Plaintiff alleges that he purchased an LG Brown Hg2 INR 18650 3000mAh battery from Defendant Rolling Fog Vapor Company, LLC (“Rolling Fog”) to use in his vaping device. (*See* Exhibit A, Plaintiff’s Complaint, at ¶¶2, 8-9.) Plaintiff alleges that Rolling Fog Vapor did not provide him with a case for the HG2 cell. (*Id.* at ¶10). Plaintiff alleges that he was injured when the battery combusted while in his pants pocket. (*Id.* at ¶12.) Plaintiff alleges that LGCAI designed, manufactured, supplied, sold, imported, and distributed the battery. (*Id.* at ¶5.)

LGCAI is incorporated in Delaware with its principal place of business in Atlanta, Georgia; it is not incorporated in South Carolina, it is not headquartered in South Carolina, it has never owned or rented any property in South Carolina, and it has never had any employees in South Carolina. (Affidavit of HyunSoo Kim, dated April 24, 2019, at ¶¶5-9.)

Plaintiff incorrectly alleges, without evidentiary support, that LGCAI is “in the business of manufacturing, fabricating, designing, assembling, distributing, selling, inspecting, warranting, retailing, wholesaling, and advertising the e-cigarette products that the Plaintiff purchased and used.” (Compl. at ¶6.) To the contrary, LGCAI could not have manufactured the battery cell at issue in this case because it does not have any manufacturing plants. (*Id.* at ¶11.) LGCAI sells and distributes various petrochemical materials and products including ABS resin, engineered plastic, rubbers, acrylate, superabsorbent polymer, and specialty polymers. (*Id.* at ¶4.) LGCAI

has never conducted any business with Rolling Fog Vapor and does not direct or control its actions. (*Id.* at ¶12.) LGCAI has never designed, distributed, advertised, or sold any lithium-ion cell for use by individual consumers as replaceable, rechargeable batteries in e-cigarette or vaping devices. (*Id.* at ¶10.)

### **III. ARGUMENT AND CITATION TO AUTHORITY**

“Personal jurisdiction is exercised as ‘general jurisdiction’ or ‘specific jurisdiction.’” *Coggeshall v. Reprod. Endocrine Associates of Charlotte*, 376 S.C. 12, 16, 655 S.E.2d 476, 478 (2007). “General jurisdiction is the State’s right to exercise personal jurisdiction over a defendant even though the suit does not arise out of or relate to the defendant’s contacts with the forum[.]” *Id.* “Specific jurisdiction is the State’s right to exercise personal jurisdiction because the cause of action arises specifically from a defendant’s contacts with the forum[.]” *Id.*

“The party seeking to invoke personal jurisdiction over a non-resident defendant ... bears the burden of establishing jurisdiction.” *Power Prods. & Servs. Co., Inc. v. Kozma*, 379 S.C. 423, 430, 665 S.E.2d 660, 664 (Ct. App. 2008). “When a motion to dismiss attacks the allegations of the complaint on the issue of jurisdiction, the court is not confined to the allegations of the complaint but may resort to affidavits or other evidence to determine jurisdiction.” *Coggeshall*, 376 S.C. at 16, 655 S.E.2d at 478. Conclusory allegations will not suffice. *Power Prods.*, 379 S.C. at 430, 665 S.E.2d at 664.

#### **A. There Is No Basis for Exercising General Jurisdiction Over LGCAI.**

“A court may assert general jurisdiction over foreign (sister-state or foreign-country) corporations to hear any and all claims against them when their affiliations with the State are so ‘continuous and systematic’ as to render them essentially at home in the forum State.” *Daimler AG v. Bauman*, 571 U.S. 117, 127 (2014) (quoting *Goodyear*, 564 U.S. at 925). Only in an

“exceptional case” can a court exercise general jurisdiction in a forum that is not “the corporation’s place of incorporation [or] its principal place of business.” *BNSF*, 137 S. Ct. at 1558. An example of an exceptional case is when war forces a “corporation’s owner to temporarily relocate the enterprise from the Philippines to Ohio,” which becomes “the center of the corporation’s wartime activities.” *Id.* (quoting *Perkins v. Benguet Consol. Mining Co.*, 342 U.S. 437, 448 (1952)).

In *BNSF*, the Supreme Court held that Montana could not exercise general jurisdiction over BNSF even though BNSF had “over 2,000 miles of railroad track and more than 2,000 employees in Montana.” *Id.* at 1559. And in *Daimler*, the Supreme Court declined plaintiffs’ invitation to “look beyond the exemplar bases *Goodyear* identified [place of incorporation and principal place of business], and approve the exercise of general jurisdiction in every State in which a corporation ‘engages in a substantial, continuous, and systematic course of business.’” 571 U.S. at 137-38. “That formulation ... is unacceptably grasping” and would impermissibly result in “exorbitant exercises of all-purpose jurisdiction” in every “State in which [a company’s] sales are sizable.” *Id.* at 138, 139.

The proper inquiry “is not whether a foreign corporation’s in-forum contacts can be said to be in some sense ‘continuous and systematic,’ it is whether that corporation’s ‘affiliations with the State are so “continuous and systematic” as to render [it] essentially at home in the forum State.’” *Id.* at 138-39 (quoting *Goodyear*, 564 U.S. at 919). “A corporation that operates in many places can scarcely be deemed at home in all of them.” *Id.* at 139 n.20. “Otherwise, ‘at home’ would be synonymous with ‘doing business’ tests framed before specific jurisdiction evolved in the United States.” *Id.*

LGCAI is not “at home” in South Carolina. *Daimler*, 571 U.S. at 127. It is undisputed that South Carolina is not LGCAI’s place of incorporation or its principal place of business, (Complaint ¶4; Kim Aff. ¶5), it has no other continuous or systematic contacts with South Carolina, (Kim Aff. ¶¶6-9), and this is not an “exceptional case.” *BNSF*, 137 S. Ct. at 1558. Accordingly, there is no basis for exercising general jurisdiction over LGCAI.

**B. There Is No Basis for Exercising Specific Jurisdiction Over LGCAI.**

Under South Carolina law, “[t]he determination of whether the requirements of due process are satisfied involves a two-prong analysis: (1) the ‘power’ prong, in which minimum contacts provide courts the ‘power’ to adjudicate the action; and (2) the ‘fairness’ prong, which requires the exercise of jurisdiction to be ‘reasonable’ or ‘fair.’” *Moosally v. W.W. Norton & Co., Inc.*, 358 S.C. 320, 331, 594 S.E.2d 878, 884 (Ct. App. 2004).

Due process requires that there exist minimum contacts between the defendant and the forum state such that maintenance of the suit does not offend traditional notions of fair play and substantial justice. *Cockrell v. Hillerich & Bradsby Co.*, 363 S.C. 485, 491, 611 S.E.2d 505, 508 (2005). Further, to satisfy constitutional due process, the exercise of “specific jurisdiction is confined to adjudication of issues deriving from, or connected with, the very controversy that establishes jurisdiction.” *Goodyear*, 564 U.S. at 919 (internal quotation omitted). Accordingly, in order for a court to exercise specific jurisdiction, the suit must arise out of or relate to the defendant’s contacts with the forum. *Bristol-Myers*, 137 S. Ct. at 1780 (citing *Daimler*, 571 U.S. at 127)); accord *Power Prods.*, 379 S.C. at 432, 665 S.E.2d at 665 (“[A] minimum contacts analysis requires a court to find that the defendant directed its activities to residents of South Carolina and that the cause of action arises out of or relates to those activities. Without minimum contacts, the court does not have the ‘power’ to adjudicate the action.”).

When considering whether the defendant has created sufficient contacts with the forum to support the exercise of specific jurisdiction, “the focus must center on the contacts generated by the defendant, and not on the unilateral actions of some other entity.” *Cockrell*, 363 S.C. at 492, 611 S.E.2d at 508-09 (citing *Helicopteros Nacionales de Colombia, S.A. v. Hall*, 466 U.S. 408, 417, 104 S.Ct. 1868, 80 L.Ed.2d 404 (1984) (holding “unilateral activity of another party or a third person is not an appropriate consideration”)). “The foreseeability that is critical to due process analysis is not the mere likelihood that a product will find its way into the forum state. Rather, it is that the defendant's conduct and connection with the forum state are such that he should reasonably anticipate being haled into court there.” *Cockrell*, 363 S.C. at 492, 611 S.E.2d at 508-09 (citing *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 297 (1980).)

“What is needed—and what is missing here—is a connection between the forum and the specific claims at issue.” *Bristol-Myers*, 137 S. Ct. at 1781. Here, Plaintiff has not alleged or introduced evidence of any contacts between LGCAI and South Carolina related to his claims. Instead, Plaintiff alleges only in conclusory fashion that LGCAI has continuing contacts with South Carolina by “manufacturing, distributing, and/or selling goods with the reasonable expectation that they will be used in this state and which are in fact used in this state.” (Compl. ¶7.) This allegation, even if true, would be insufficient to establish personal jurisdiction in this case, because Plaintiff does not allege any conduct by LGCAI related to his claims, as required by due process. Nor could he, when LGCAI has introduced admissible, uncontroverted evidence showing that it does not design, manufacture, distribute, advertise, or sell lithium-ion cells for use by individual consumers as replaceable, rechargeable batteries in e-cigarettes or vaping devices and has never conducted any business with Rolling Fog Vapor Company, LLC, the alleged retailer of the product at issue. (Ryu Aff. ¶¶13, 15, 16.) As a matter of law, therefore,

the requisite connection between South Carolina and Plaintiff's claims is missing. Accordingly, there is no basis for exercising specific jurisdiction over LGCAI.

#### **IV. CONCLUSION**

Defendant LG Chem America, Inc. respectfully requests that this Court dismiss it for lack of personal jurisdiction.

Respectfully submitted, this 18th day of September, 2019.

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann  
KATE CAPPELMANN  
South Carolina Bar No.: 100551

Counsel for Defendant  
*LG Chem America, Inc.*

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
[kate.cappelmann@lewisbrisbois.com](mailto:kate.cappelmann@lewisbrisbois.com)

|                                 |   |                                    |
|---------------------------------|---|------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS       |
|                                 | ) |                                    |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO. : 2018-CP-4400054 |
|                                 | ) |                                    |
| DWAYNE THOMPSON,                | ) |                                    |
|                                 | ) |                                    |
| Plaintiff,                      | ) |                                    |
|                                 | ) |                                    |
| vs.                             | ) |                                    |
|                                 | ) |                                    |
| ROLLING FOG VAPOR COMPANY,      | ) |                                    |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                    |
| AMERICA, INC.,                  | ) |                                    |
|                                 | ) |                                    |
| Defendants.                     | ) |                                    |
| _____                           | ) |                                    |

**CERTIFICATE OF SERVICE**

I certify that on this date, I filed **LG CHEM AMERICA, INC.'S MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION** in this action with the Clerk of Court using the Court's E-Filing System. A Notice of Electronic Filing will automatically generate to the following counsel of record:

Alexander P. Lewis  
W. Blake Cummings  
***Cumming & Lewis, LLC***  
P.O. Box 5766  
Spartanburg, SC 29304

and

Austin H. Crosby  
Ronnie L. Crosby  
***Peters, Murdaugh, Parker, Eltzroth & Detrick, PA***  
101 MULBERRY STREET EAST  
P.O. Box 457  
HAMPTON, SC 29924

*Counsel for Plaintiff*



This 18th day of September, 2019.

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann

KATE CAPPELMANN

South Carolina Bar No.: 100551

Counsel for Defendant  
*LG Chem America, Inc.*

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
kate.cappelmann@lewisbrisbois.com

EXHIBIT "A"

|                                 |   |                               |
|---------------------------------|---|-------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS  |
|                                 | ) |                               |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2018-CP-44- |
|                                 | ) |                               |
| DWAYNE THOMPSON,                | ) |                               |
|                                 | ) |                               |
| Plaintiff,                      | ) |                               |
|                                 | ) |                               |
| v.                              | ) | <b><u>COMPLAINT</u></b>       |
|                                 | ) | <i>(Jury Trial Requested)</i> |
|                                 | ) |                               |
| ROLLING FOG VAPOR COMPANY,      | ) |                               |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                               |
| AMERICA, INC.,                  | ) |                               |
|                                 | ) |                               |
| Defendants.                     | ) |                               |

The Plaintiff alleges:

1. That he is a resident of Union County, South Carolina.
2. That Defendant, Rolling Fog Vapor Company, LLC ("Rolling Fog"), is a domestic limited liability company with its principal place of business in Spartanburg County, South Carolina, and is engaged in the business of selling vapor accessories, e-liquids, lithium-ion rechargeable batteries including, but not limited to, the LG Brown Hg2 INR 18650 3000mAh ("subject battery") and other e-cigarette/vaporizer products.
3. That Defendant, LG Chem, Ltd. ("LG"), is a foreign corporation organized under the laws of Korea with its principal place of business in Seoul, South Korea, and is engaged in the business of manufacturing, designing, testing, marketing, certifying, supplying, selling, importing and distributing lithium ion rechargeable batteries including, but not limited to, the subject battery that forms the basis of this action.
4. The Defendant, LG Chem America, Inc., ("LGA"), is a foreign corporation organized under the laws of Delaware and is engaged in the business of manufacturing, designing, testing, marketing, certifying, supplying, selling, importing and distributing lithium ion

rechargeable batteries including, but not limited to, the subject battery that forms the basis of this action.

5. The subject battery was manufactured, designed, supplied, sold, imported and distributed by LG and LGA.

6. At all times mentioned herein, Defendants were engaged in the business of manufacturing, fabricating, designing, assembling, distributing, selling, inspecting, warranting, retailing, wholesaling, and advertising the e-cigarette products that the Plaintiff purchased and used.

7. LG and LGA have continuing contacts with South Carolina by transacting substantial business in this state and manufacturing, distributing, and/or selling goods with the reasonable expectation that they will be used in this state and which are in fact used in this state.

8. Each cause of action alleged against the Defendants arises out of a battery explosion in Spartanburg County, South Carolina, on July 27, 2018, that seriously and permanently injured the Plaintiff.

9. Plaintiff purchased the subject battery, which was manufactured, designed and imported by LG and LGA, from Defendant Rolling Fog's store located at 958 East Main Street in Spartanburg, South Carolina.

10. A case was not provided with the purchase of the subject batteries.

11. While at his place of employment located at 2155 S 2006, Spartanburg, South Carolina, the subject battery exploded and burst into flames in Plaintiff's right front pant pocket.

12. As a result of the explosion and the chemicals from the subject battery, Plaintiff sustained third degree burns on numerous portions of his body requiring skin grafts. He also suffered and continues to suffer permanent injury and/or disfigurement to his body, pain and

suffering, mental anguish, emotional distress, loss of wages and related medical, hospital and caretaking expenses.

13. Plaintiff's injuries and damages were due to and proximately caused by the negligent, reckless and careless conduct of the Defendants in the following particulars, for which the Defendants are liable:

**FIRST CAUSE OF ACTION**

**(Negligence as to Defendant Rolling Fog Vapor Company, LLC)**

14. The above allegations are incorporated as if repeated verbatim.

15. Plaintiff is informed and believes the Defendant was negligent, willful, wanton, careless, reckless and grossly negligent in the following particulars:

- a. In selling a lithium-ion battery such as the subject battery that was designed and manufactured without a positive temperature coefficient thermistor or similar device to prevent rapid discharge when short circuited, leading to overheating and catastrophic failure;
- b. In selling a battery that was designed and manufactured without internal temperature controls and/or protective circuitry;
- c. In selling a battery with manufacturing defects present;
- d. In selling a battery that was unreasonably dangerous for its foreseeable and intended use;
- e. In selling a battery that failed to comply with generally accepted engineering safety standards applicable to lithium-ion batteries;
- f. In failing to sell and market the subject battery with a package or container that would prevent short circuiting that could lead to rapid discharge, overheating, and catastrophic failure;
- g. In failing to warn customers that the subject battery should not be stored in a pocket and that short circuiting of the battery could lead to catastrophic failure;
- h. In failing to train personnel with regard to industry standards, proper use, and proper storage of the 18650 lithium-ion Hg2 batteries;

- i. In failing to provide adequate warnings and instructions to warn the users of the dangers associated with the use and failure of the lithium-ion Hg2 INR 18650 3000mAh batteries;
- j. In failing to warn of the defective condition of the subject battery; and
- k. In such other particulars as the evidence may establish.

**SECOND CAUSE OF ACTION**  
(Negligence as to Defendants LG and LGA)

- 16. The above allegations are incorporated as if repeated verbatim.
- 17. Plaintiff is informed and believes the Defendants were negligent, willful, wanton, careless, reckless and grossly negligent in the following particulars:
  - a. In failing to include a positive temperature coefficient thermistor or similar device to prevent rapid discharge which short circuited, leading to overheating and catastrophic failure;
  - b. In failing to incorporate any other protection circuitry, current interrupt devices, or other protections against rapid discharge, overheating, and explosion;
  - c. In failing to sell and market the subject battery with a package or container that would prevent short circuiting that could lead to rapid discharge, overheating, and catastrophic failure;
  - d. In failing to warn consumers that the subject battery should not be stored in a pocket and that short circuiting of the subject battery could lead to catastrophic failure;
  - e. In failing to manufacture, design, assemble, test, instruct, warn, distribute, supply and/or sell the subject battery in such a condition so that it would operate safely as a reasonable consumer would expect;
  - f. In failing to manufacture, design, assemble, test, instruct, warn, distribute, supply and/or sell the subject battery in such a manner that it would not spontaneously explode;
  - g. In failing to manufacture, design, assemble, test, instruct, warn, distribute, supply and/or sell the subject battery in such a manner that it would not spontaneously heat and catch fire;

- h. In failing to provide reasonable and adequate warnings to the suppliers, purchasers and users of the subject battery to alert users about the dangerous conditions described herein; and
- i. In such other particulars as the evidence may establish.

**THIRD CAUSE OF ACTION**  
**(Strict Liability as to All Defendants)**

- 18. The above allegations are incorporated as if repeated verbatim.
- 19. Defendants are engaged in the business of selling vaporizing products to the public, including selling the subject battery to the Plaintiff.
- 20. Defendants placed into the stream of commerce the subject battery, which was defective, unfit, and unreasonably dangerous to the intended users or consumers, including Plaintiff.
- 21. Plaintiff's injuries and damages occurred because the subject battery was designed, manufactured, imported, and sold by the Defendants in a defective condition that was unreasonably dangerous to the Plaintiff.
- 22. The subject battery was in the same or substantially the same condition as when sold by the Defendants and was being used in a reasonably foreseeable manner.
- 23. The Defendants sold the subject battery in an unreasonably dangerous and defective condition, and as a result, the Defendants are strictly liable, pursuant to S.C. Code Ann §15-73-10, to Plaintiff in an amount to be ascertained by the jury at the trial of this action.

**FOURTH CAUSE OF ACTION**  
**(Breach of Warranty as to All Defendants)**

- 24. The above allegations are incorporated as if repeated verbatim.
- 25. That by act, word, and/or deed at the time of sale, the Defendants made certain Express Warranties, certain Implied Warranties of Merchantability, and certain Implied



Warranties of Fitness for a Particular Purpose, regarding the subject battery, which was part of the basis of the bargain and/or which arose by operation of law.

26. Plaintiff rightfully and reasonably relied upon the warranties of the Defendants to his great detriment, injury, and damage.

27. The Defendants expressly and impliedly warranted at the time of sale that the subject battery was fit, safe, in good condition, of merchantable quality, and was fit for a particular purpose, namely a safe vaporizer battery, when in fact, the subject battery was unfit, unsafe, not of merchantable quality, and was not fit or suited for its particular purpose.

28. By reason of and in consequence of Defendants' breach of express and implied warranties, Plaintiff suffered the injuries and damages as set forth herein, for which the Defendants are liable.

29. In order to investigate this claim, Plaintiff will need access to certain information concerning the design and manufacture of the subject battery including, but not limited to, design specifications with change histories, design evaluations, chemistry, materials, and manufacture process. Some or all of this information may fall subject to a claim of trade secret. Without access to this information, Plaintiff will be substantially prejudiced in her investigation and proof of defect herein. Plaintiff believes that access to this information will likely lead to admissible evidence at the trial of this case.

WHEREFORE, Plaintiff prays for judgement against the Defendants for actual damages, together with punitive damages in an appropriate amount, for the costs of this action, and for such other and further relief as the Court may deem just and proper.

*-signature page to follow-*

Alexander P. Lewis  
SC Bar No. 78991  
W. Blake Cummings  
SC Bar No. 80067  
Cummings & Lewis, LLC  
Post Office Box 5766  
Spartanburg, South Carolina 29304  
Phone: (864) 573-9688  
[alex.lewis@cummingslewis.com](mailto:alex.lewis@cummingslewis.com)  
[blake.cummings@cummingslewis.com](mailto:blake.cummings@cummingslewis.com)

-and-

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

BY: s/Austin H. Crosby  
Ronnie L. Crosby  
SC Bar No. 66481  
Austin H. Crosby  
SC Bar No. 80161  
101 Mulberry Street East  
P.O. Box 457  
Hampton, SC 29924  
(803) 943-2111  
[rcrosby@pmped.com](mailto:rcrosby@pmped.com)  
[acrosby@pmped.com](mailto:acrosby@pmped.com)  
ATTORNEYS FOR PLAINTIFF

March 4, 2019  
Hampton, South Carolina

|                                 |   |                                          |
|---------------------------------|---|------------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS             |
|                                 | ) |                                          |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2018-CP-44-00054       |
|                                 | ) |                                          |
| DWAYNE THOMPSON,                | ) |                                          |
|                                 | ) |                                          |
| Plaintiff,                      | ) |                                          |
|                                 | ) | <b>PLAINTIFF'S MEMORANDUM OF LAW</b>     |
| v.                              | ) | <b>IN OPPOSITION TO LG CHEM</b>          |
|                                 | ) | <b>AMERICA, INC.'S MOTION TO DISMISS</b> |
| LG CHEM, LTD., LG CHEM AMERICA, | ) |                                          |
| INC., and ROLLING FOG VAPOR     | ) |                                          |
| COMPANY, LLC,                   | ) |                                          |
|                                 | ) |                                          |
| Defendants.                     | ) |                                          |
|                                 | ) |                                          |

PLEASE TAKE NOTICE that the Plaintiff, Dwayne Thompson, submits this memorandum of law in opposition to Defendant, LG Chem America, Inc.'s ("LGCAI"), Motion to Dismiss for Lack of Personal Jurisdiction. As LGCAI has a registered agent and conducts business in South Carolina, personal jurisdiction exists, and the motion should be denied.

### **FACTS**

This case arises out of serious burn injuries that Thompson sustained from an e-cigarette ("e-cig") lithium ion rechargeable battery ("Subject Battery") manufactured by LG that ignited in Thompson's pocket. The Complaint alleges that Thompson visited a Rolling Fog Vapor Company, LLC store on East Main Street in Spartanburg, South Carolina, and purchased the Subject Battery. (Compl. ¶ 9). While at his place of employment on July 27, 2018, the Subject Battery suddenly exploded and burst into flames that resulted in third degree burns to numerous portions of his body requiring skin grafts. (Compl. ¶ 12). The Complaint alleges negligence, strict liability, and breach of warranty allegations against the Defendants. Specifically as to LGCAI, the Complaint alleges that "LG and LGA have continuing contacts with South Carolina by transacting substantial business in this state and manufacturing, distributing, and/or selling goods with the reasonable

expectation that they will be used in this state and which are in fact used in this state.” (Compl. ¶ 7).

### ARGUMENT

#### **I. LGCAI CONSENTS TO JURISDICTION IN SOUTH CAROLINA COURTS THROUGH A CERTIFICATE OF AUTHORITY AND MAINTAINING A REGISTERED AGENT**

While conceding it generates revenue from South Carolina, LGCAI attempts to argue that personal jurisdiction does not exist because it does not own any property in South Carolina, it does not have employees who reside or work in South Carolina, it is not incorporated in South Carolina, and it is not headquartered in South Carolina such that it cannot foresee being subject to suit in South Carolina. (Memo. in Supp. p. 2). These arguments are meritless as LGCAI has maintained a registered agent and has had a certificate of authority to conduct business in South Carolina since September 15, 2010. (Ex. 1 – SC Sec. of State Documents). Section 33-15-105 governs the effect of a certificate of authority with subsection (d) specifically providing that LGCAI consents to jurisdiction in South Carolina’s courts: “By obtaining a certificate of authority, the foreign corporation *agrees to be subject to the jurisdiction of the Department of Revenue and the courts of this State* to determine its South Carolina tax liability, including withholding and estimated taxes, together with related interest and penalties, if any.” LGCAI cannot limit the impact of § 33-15-105 as relating to tax liability as South Carolina courts either have jurisdiction or they don’t. LGCAI cannot agree to subject to jurisdiction for the purposes of tax liability while stating it does not have sufficient contacts to foresee being subject to suit in South Carolina. One reason LGCAI agreed to submit to jurisdiction of SCDOR and the courts regarding tax liability is because of its operations within South Carolina. LGCAI cannot credibly argue it does not have sufficient contacts with South Carolina for a South Carolina court to exercise personal jurisdiction. LGCAI’s



motion should be denied on this basis alone.

## **II. LGCAI IS SUBJECT TO THIS COURT'S JURISDICTION**

### **a. THIS COURT HAS JURISDICTION OVER LGCAI PURSUANT TO SOUTH CAROLINA'S LONG ARM STATUTE**

Even if the Court determines that possessing a certificate of authority and maintaining a registered agent in South Carolina alone are not sufficient to deny LGCAI's motion, it should still be denied as LGCAI possesses minimum contacts so as to not offend traditional notions of fair play and substantial justice. In ruling on a motion to dismiss for lack of personal jurisdiction, all factual disputes are resolved in the plaintiff's favor, and the party asserting jurisdiction under the long-arm statute meets his burden of proof by making a *prima facie* showing of jurisdiction. Taking all facts and inferences in Plaintiff's favor, he makes a *prima facie* case showing specific personal jurisdiction as to LGCAI.

Despite conceding that LGCAI generates revenue and conducts business in South Carolina, it tries to limit the Court's jurisdiction to specifically this product. This narrow interpretation is contrary to South Carolina and federal law. LG Chem LTD and LGCAI import its products into the United States through the Port of Charleston and other ports with South Carolina as the final destination. (Ex. 2 – Import Data). The US Customs data starts from November 1, 2006. (Ex. 2 – Import Data). The data for all imports from LG Chem LTD to South Carolina ports show 984 shipments from LG Chem LTD through the Port of Charleston. (Ex. 2 – Import Data). Of these shipments 818 were cosigned by LGCAI. (Ex. 2 – Import Data). The import data indicates shipments to Carolina Covertech in North Augusta, Continental Tire in Sumter, Covidien in Greenwood, Fitesa Simpsonville in Simpsonville, Flex in West Columbia, Milliken Company in Spartanburg, and Volvo Car US Operations, Inc. in Ridgeville. (Ex. 2 – Import Data).

LGCAI has established minimum contacts with South Carolina by satisfying its long-arm

statute by directing its activities at South Carolina through the intentional placement of its products into the stream of commerce using nationwide distributors. “Specific jurisdiction over a cause of action arising from a defendant’s contacts with the state is granted pursuant to the long-arm statute.” State of South Carolina v. NV Sumatra Tobacco Trading Co., 666 S.E.2d 218, 222 (2008). The applicable section of the long-arm statute provides as follows:

**§36-2-803. Personal Jurisdiction based upon conduct.**

- (A) A court may exercise personal jurisdiction over a person who acts directly or by an agent as to a cause of action arising from the person’s: (8) **production, manufacture, or distribution of goods with the reasonable expectation that those goods are to be used or consumed in this State and are so used or consumed.**

LGCAI’s conduct satisfies subsection (8) of the long-arm statute because it distributed a good with the reasonable expectation that it would be used or purchased in South Carolina, and the Subject Battery was purchased, used, and caused damage in South Carolina. Therefore, LGCAI had a reasonable expectation that its products would be used or purchased in South Carolina.

**b. LGCAI’S CONTACTS WITH SOUTH CAROLINA ARE SUFFICIENT TO SATISFY DUE PROCESS**

LGCAI knowingly placed its products into the stream of commerce with the expectation that they would be used in South Carolina. The foreseeability that is critical to due process analysis is not the mere likelihood that a product will find its way into the forum state. Rather, it is that the defendant’s conduct and connection with the forum state are such that he should reasonably anticipate being haled into court there. This theory of personal jurisdiction is known as the “stream of commerce” theory. Southern Plastics Co., supra citing World-Wide Volkswagen Corp., 444 U.S. at 297. The stream of commerce theory is the law in this state as to personal jurisdiction. State v. NV Sumatra Tobacco Trading, Co., 379 S.C. 81 n.5, 89, 666 S.E.2d 218, 222 (2008). Trial



courts in South Carolina are required to apply the stream of commerce test when assessing whether due process is afforded in exercising jurisdiction over a foreign manufacturer. In Asahi Metal Ind. Co., Ltd. v. Superior Court of California, 480 U.S. 102, 107 S.Ct. 1026, 94 L.Ed.2d 92 (1987), Justice Brennan describes the stream of commerce as follows:

The stream of commerce refers not to unpredictable currents or eddies, but to the regular and anticipated flow of products from manufacture to distribution to retail sale. As long as the participant in this process is aware that the final product is being marketed in the Forum State, the possibility of a lawsuit there cannot come as a surprise. Asahi, 480 U. S. at 117.

The purpose of the stream of commerce theory is to hold a manufacturer “amenable to process in a forum in which its products are sold, even if the products were sold indirectly through importers or distributors with independent sales and marketing schemes.” DeJames v. Magnificence Carriers, Inc., 654 F.2d 280, 285 (3d Cir.) cert. denied, 454 U.S. 1085 (1981). In NV Sumatra, Sumatra, an Indonesian corporation, sold United brand cigarettes to UNICO Trading Pte., Ltd., a Singapore corporation, who in turn sold them to Silmar Trading, Ltd., a British Virgin Islands corporation, who then contracted with F.T.S. Distributors, a United States importer, to distribute the United brand cigarettes throughout the United States. NV Sumatra, 379 S.C. at 85-6. Despite the various layers between NV Sumatra and South Carolina, the South Carolina Supreme Court found the exercise of jurisdiction proper. In NV Sumatra, several facts led the court to determine that Sumatra had sufficient contacts with South Carolina: (1) Sumatra admitted that it manufactured the United brand cigarettes, (2) Sumatra admitted that it owned the United States trademark for that brand, (3) per the Department of Revenue, 6,868,000 United brand cigarettes were sold in South Carolina in 2001, (4) Sumatra, either on its own or by someone else on its behalf, filed an ingredient report for the cigarettes with the Center for Disease Control, (5) Sumatra admitted that it packaged its cigarettes in a way that displayed the United States-required



health warnings, and (6) the United brand cigarette packaging identified the cigarettes as an “American blend,” had a Surgeon General’s warning, and showed an eagle and striped packaging. Id. at 90.

Like Sumatra, LCGAI has sufficient contacts with South Carolina. The South Carolina Supreme Court held that Sumatra was subject to personal jurisdiction on the basis that given the volume of cigarettes sold within South Carolina, it was reasonable for the tobacco company to have been haled into a South Carolina court. NV Sumatra, 379 S.C. at 91. The web of corporations in NV Sumatra is far more complex than in the present case.

In Asahi, 480 U. S. at 117, Justice Brennan explained “that a defendant who places goods, in the stream of commerce purposefully avails itself of a forum state because it benefits economically from the retail sale of the final product...and indirectly benefits from the [s]tate’s laws that regulate and facilitate commercial activity.” In Align Corp. v. Boustred, 2017 CO 103, ¶ 33, 405 P.3d 1148, the Colorado Supreme Court found jurisdiction over Align given that Align placed its products into the stream of commerce by using distributors, Align’s products were distributed throughout the United States, including Colorado, and Align placed no geographic limitation on distribution. The Court held on these facts that Align should have reasonably anticipated being haled into court in Colorado. Align had no physical presence in the United States, instead it used U.S.-based distributors to sell its products to retailers. Id. at ¶ 2. Here, LCGAI uses U.S.-based importers/distributors to sell its products. The Boustred Court explained the consequences of allowing a foreign manufacturer to escape jurisdiction as follows:

We reject Align’s argument that selling its products through a distributor somehow turns the distribution and sale of its products into the unilateral activity of a third party that cannot properly be considered in the minimum contacts analysis. Adopting such a position would render foreign manufacturers immune from suit in the United States so long as they sell their products in the United States through separately incorporated U.S.-based distributors. Such a result would be inequitable,

as it would allow foreign manufacturers to receive the substantial economic benefit from sales to the U.S. market without incurring resulting liabilities and costs. Align Corp. at ¶ 34.

Because LGCAI manufactured and sold the Subject Battery with the reasonable expectation that it would be purchased and used in the United States, including South Carolina, and this action arises from its sale and/or use in South Carolina, it has sufficient contacts such that the exercise of jurisdiction complies with Due Process. LGCAI's motion should be dismissed on this ground alone.

**c. THE COURT EXERCISING JURISDICTION OVER LGCAI IS BOTH REASONABLE AND FAIR**

In addition to LGCAI having sufficient contacts with South Carolina to satisfy due process, the exercise of jurisdiction by this Court is reasonable and fair. The U.S. Supreme Court has previously stated that the exercise of jurisdiction is not unreasonable where it is based on the efforts of the manufacturer to serve, either directly or indirectly, the market for its product. World-Wide Volkswagen, 444 U.S. at 297-98. "Where the component allegedly fails and causes injury in the very market in which the product was expected to be sold, it is not unreasonable or unfair to require the defendant to be subject to suit in that forum." Rockwell International Corp. v. Construzioni Aeronautiche Giovanni Agusta, S.P.A., 553 F.Supp. 328 (E.D.Pa. 1982). Here, LGCAI specifically sought to serve the market in South Carolina where the Subject Battery was purchased as it obtained a certificate of authority from the South Carolina Secretary of State. Requiring LGCAI to defend its product in South Carolina is both fair and reasonable.

The precise issue that is presented in this case was addressed by our Circuit Court earlier this year. LGCAI, while being represented by the same law firm, filed a nearly identical motion to dismiss that was denied by this court. (See Ex. 3, Order from the Honorable Michael G. Nettles).



These same arguments were presented on behalf of the same defendant, by the same law firm, and were rejected by this court.

Nearly the same issue as presented in this case was addressed by our Circuit Court in 2012 in a case filed in Orangeburg County. In the Estate of Arthur Benjamin Sheppard, II v. Mercedes-Benz USA, LLC, Daimler AG, et. al. (2010-CP-38-1558), Daimler AG filed a motion to dismiss pursuant to SCRCP 12(b)(2). Daimler contended that by virtue of being a foreign manufacturer they did not serve the market for Mercedes vehicles in South Carolina and therefore did not possess the requisite minimum contacts with South Carolina. The court rejected this argument and found that the exercise of personal jurisdiction over Daimler AG was proper under the long-arm statute and consistent with due process. (Ex. 4, Order from the Honorable Diane S. Goodstein) (In Sheppard, the sale of the vehicle took place in Germany to Daimler's subsidiary Mercedes Benz USA). Here, LGCAI makes a similar argument made by Daimler i.e. that it does not sell products in South Carolina related to e-cig batteries.

In Roberts v. Owens-Corning Fiberglass Corp., 101 F.Supp.2nd 1076 (S.D.Ind. 1999), the court noted that the point of sale is not controlling when the defendant, like LGCAI in the present case, affirmatively seeks to have its products reach the forum:

Personal jurisdiction does not depend on a mechanical or formalistic test, such as where title passes, but on a practical and realistic approach to determining the purpose of a defendant's conduct. *See North Am. Philips v. American Vending Sales, Inc.*, 35 F.3d 1576, 1579-80 (C.A.Fed. (III.) 1994) (no policy would be furthered by according "controlling significance" to the passage of legal title). The appearance of Bell's asbestos in this state was not random or fortuitous, but was the result of a conscious effort by Bell to exploit a chain of distribution so entrenched that it embraced all of the major trading areas of the United States...Id. at 1083.

To argue that point of "sale" insulates LGCAI flies in the face of both logic and law. Benitez-Allende, et. al., v. Alcan Aluminio Do Brazil, 857 F.2d 26 (1st Cir. 1998) (fact that title to pressure cookers manufactured in Brazil passed in Brazil was irrelevant to question of

manufacturer's susceptibility to jurisdiction); Hanson v. John Blue, 389 N.W.2d 523, 526 (Minn. Ct. App. 1986), overruled on other grounds (the "fairness requirement of due process does not extend so far as to permit a manufacturer to insulate itself from the reach of the forum state's long-arm rule by using an intermediary or by professing ignorance of the ultimate destination for its products.").

In addressing this issue in the context of product distribution, the Seventh Circuit held that a critical fact in determining jurisdiction is: "Whether those defendants were aware of [the] distribution system. *If they were aware*, they were indirectly serving and deriving economic benefits from the national retail market . . . and *they should reasonably anticipate being subject to suit in any forum within that market* where the product caused injury." Nelson by Carson v. Park Industries, 717 F.2d 1120, 1126 (7th Cir. 1983), *cert denied*, 465 U.S. 1024 (1984) (emphasis added). The exercise of jurisdiction under these circumstances is reasonable, as the Supreme Court noted in World-Wide Volkswagen:

[I]f the sale of a product of a manufacturer or distributor such as Audi or Volkswagen is not simply an isolated occurrence, but arises from the efforts of the manufacturer or distributor to serve, *directly or indirectly*, the market for its product in other States, it is not unreasonable to subject it to suit in one of those States if its allegedly defective merchandise has been the source of the injury . . . The forum State does not exceed its powers under the Due Process Clause if it asserts personal jurisdiction over a corporation that delivers its products into the stream of commerce *with the expectation that they will be purchased by consumers* in the Forum State. 444 U.S. 286, 297 (emphasis added).

The burden of LGCAI litigating in South Carolina is minimal. LGCAI will suffer no greater burden in defending this suit in South Carolina than it would in any other state. As such, it is capable of litigating in South Carolina. For these reasons, exercising jurisdiction over LGCAI is fair and does not offend traditional notions of fair play and substantial justice and, therefore, comports with due process.



**CONCLUSION**

Based on the foregoing, this Court should deny LGCAI's motion to dismiss.

Alexander P. Lewis  
SC Bar No. 78991  
W. Blake Cummings  
SC Bar No. 80067  
Cummings & Lewis, LLC  
Post Office Box 5766  
Spartanburg, South Carolina 29304  
Phone: (864) 573-9688  
[alex.lewis@cummingslewis.com](mailto:alex.lewis@cummingslewis.com)  
[blake.cummings@cummingslewis.com](mailto:blake.cummings@cummingslewis.com)

-AND-

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

BY: s/Austin H. Crosby  
Ronnie L. Crosby, SC Bar No. 66481  
Austin H. Crosby, SC Bar No. 80161  
101 Mulberry Street East  
P.O. Box 457  
Hampton, SC 29924  
(803) 943-2111  
[rcrosby@pmped.com](mailto:rcrosby@pmped.com)  
[acrosby@pmped.com](mailto:acrosby@pmped.com)  
ATTORNEYS FOR PLAINTIFF

September 20, 2019  
Hampton, SC

South Carolina Secretary of State

# Business Entities Online

File, Search, and Retrieve Documents Electronically

## LG CHEM AMERICA, INC.

### Corporate Information

**Entity Type:** Corporation

**Status:** Good Standing

**Domestic/Foreign:** Foreign

**Incorporated State:** Delaware

### Important Dates

**Effective Date:** 09/15/2010

**Expiration Date:** N/A

**Term End Date:** N/A

**Dissolved Date:** N/A

### Registered Agent

**Agent:** CORPORATION SERVICE COMPANY

**Address:** 1703 LAUREL STREET  
COLUMBIA, South Carolina 29201

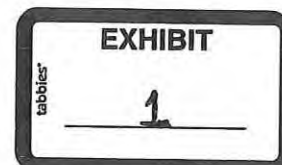
### Official Documents On File

| Filing Type | Filing Date |
|-------------|-------------|
| Authority   | 09/15/2010  |

ELECTRONICALLY FILED - 2019 Sep 20 4:29 PM - UNION - COMMON PLEAS - CASE#2019CP440054

For filing questions please contact us at 803-734-2158

Copyright © 2019 State of South Carolina



|                     | CONSIGNEE                       | SHIPPER       | ARRIVAL<br>DATE | GROSS<br>WEIGHT<br>(LB) | GROSS<br>WEIGHT<br>(KG) | FOREIGN PORT | US PORT                       | VESSEL NAME        | COUNTRY OF<br>ORIGIN | MARKS & AMP;<br>NUMBERS | CONSIGNEE ADDRESS                                                                                       | SHIPPER                         |
|---------------------|---------------------------------|---------------|-----------------|-------------------------|-------------------------|--------------|-------------------------------|--------------------|----------------------|-------------------------|---------------------------------------------------------------------------------------------------------|---------------------------------|
| 2/O :<br>: R<br>REN |                                 |               |                 |                         |                         |              |                               |                    |                      |                         | INC. 2400 LAKEVIEW<br>PKWY STE 580<br>ALPHARETTA GA 30009<br>USA 1-5742394090                           | LG TW<br>DAER<br>SEOUL<br>55320 |
| 36.6                | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 02/08/2019      | 43254                   | 19661                   | Pusan        | Charleston, South<br>Carolina | ZIM CHICAGO        | South Korea          | AS PER LABEL            |                                                                                                         |                                 |
| 45                  | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 02/05/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | YM UTOPIA          | South Korea          | NO MARKS . . .          | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA ATTN BONA<br>CHANG /<br>BCHANGLGCHEMXXX    | LG TW<br>DAER<br>SEOUL<br>07336 |
|                     | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD.  | 02/05/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | YM UTOPIA          | South Korea          | NO MARKS . .            | 15 FOREST STREET<br>CLOSTER, NJ 07624 TEL 1-<br>201-364-4923                                            | LG TW<br>DAER<br>SEOUL<br>07336 |
| 45                  | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 02/05/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | YM UTOPIA          | South Korea          | NO MARKS . . .          | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA ATTN BONA<br>CHANG /<br>BCHANGLGCHEMXXX    | LG TW<br>DAER<br>SEOUL<br>07336 |
| 36.11               | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 02/05/2019      | 46200                   | 21000                   | Pusan        | Charleston, South<br>Carolina | YM UTOPIA          | South Korea          | NO MARKS . . .          | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL 1-404-400-<br>6125<br>BCHANGLGCHEM.COM | LG TW<br>DAER<br>SEOUL<br>07336 |
| 45                  | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD.  | 02/05/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | YM UTOPIA          | South Korea          | NO MARKS . .            | 15 FOREST STREET<br>CLOSTER, NJ 07624 TEL 1-<br>201-364-4923                                            | LG TW<br>DAER<br>SEOUL<br>07336 |
| 45                  | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 01/29/2019      | 44000                   | 20000                   | Pusan        | Charleston, South<br>Carolina | HANOVER<br>EXPRESS | South Korea          | NO MARKS . . .          | 3475 PIEDMONT ROAD,<br>NESTE 1200, ATLANTA, GA<br>30305, USA TEL 1-404-400-<br>6125<br>BCHANGLGCHEM.COM | LG TW<br>DAER<br>SEOUL<br>KORE  |



|                            |                              |               |            |        |        |        |                            |                  |             |                                                     |                                                                                                                      |                        |
|----------------------------|------------------------------|---------------|------------|--------|--------|--------|----------------------------|------------------|-------------|-----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|------------------------|
|                            | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 01/29/2019 | 44000  | 20000  | Pusan  | Charleston, South Carolina | MOL MODERN       | South Korea | NO MARKS . .                                        | SUITE 1200, ATLANTA, GA 30305 USA TEL 1-404-400-6125 BCHANLGCHEM.COM                                                 | DAER SEOU COSE         |
| IYL<br>-IS                 | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 01/29/2019 | 44000  | 20000  | Pusan  | Charleston, South Carolina | MOL MODERN       | South Korea | N/M . . . .                                         | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL 1-404-400-6125 BCHANLGCHEM.COM                            | LG TM DAER SEOU 07336  |
| IYL<br>-IS                 | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 01/29/2019 | 88000  | 40000  | Pusan  | Charleston, South Carolina | MOL MODERN       | South Korea | NO MARKS . . . . NO MARKS . . . .                   | 3475 PIEDMONT RD. NE, SUITE 1200 ATLANTA, GA, 30305 USA TEL 1-404-400-6125 BCHANLGCHEM.COM                           | LG TM DAER SEOU 07336  |
| I36-<br>AL                 | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 01/25/2019 | 222666 | 101212 | Ningpo | Charleston, South Carolina | NORTHERN JASPER  | China       | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL | 243 WOODBINE ST.HIGH POINT, .NORTH CAROLINA- 1-3368784207 TEL EX 53                                                  | LG TM DONG SEOU TEL E  |
| IYL<br>-IS                 | VOLVO CAR US OPERATIONS INC  | LG CHEM       | 01/24/2019 | 26752  | 12160  | Pusan  | Charleston, South Carolina | NORTHERN JASPER  | South Korea | VOLVO CARS CHARLESTON                               | 1801 VOLVO CAR DR RIDGEVILLE SC 29472 US                                                                             | 20 YO YOUN TOWE        |
| -IS                        | LG CHEM AMERICA INC.         | LG CHEM, LTD. | 01/21/2019 | 88000  | 40000  | Pusan  | Charleston, South Carolina | MOL MAGNIFICENCE | South Korea | NO MARKS . . . . NO MARKS . . . .                   | 3475 PIEDMONT RD. NE, SUITE 1200 ATLANTA, GA, 30305 USA ATTN JEENY CHO/JENNYCHO1LGCHEM.COM TEL 404-400-6114 EXT 6125 | LG TM DAER SEOU 07336  |
| 2ID)<br>16.11<br>36-<br>AL | LG CHEM AMERICA INC.         | LG CHEM, LTD. | 01/21/2019 | 46200  | 21000  | Pusan  | Charleston, South Carolina | MOL MAGNIFICENCE | South Korea | NO MARKS . . . .                                    | 3475 PIEDMONT RD. NE, SUITE 1200 ATLANTA, GA, 30305 USA ATTN JEENY CHO/JENNYCHO1LGCHEM.COM TEL 404-400-6114 EXT 6125 | LG TM DAER SEOU 07336  |
| -0464<br>L:336-            | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 01/20/2019 | 222666 | 101212 | Ningpo | Charleston, South Carolina | ZIM ROTTERDAM    | China       | N/M N/M N/M N/M N/M                                 | 243 WOODBINE ST.HIGH POINT, NORTH CAROLINA- 1-3368784207 TEL EX 53                                                   | LG TM DONG SEOU EX 82- |

SEAL NO.: 09476 IN ISO 3475 PIEDMONT RD NE, LG TM

|                               |                       |            |        |        |        |                            |                    |             |                                                                                                               |                                                                                       |                             |
|-------------------------------|-----------------------|------------|--------|--------|--------|----------------------------|--------------------|-------------|---------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-----------------------------|
| LG CHEM AMERICA, INC.         | LG CHEM LTD.          | 01/13/2019 | 88000  | 40000  | Pusan  | Charleston, South Carolina | ZIM NINGBO         | South Korea | TANK SEAL NO.: 109496 IN ISO TANK                                                                             | SUITE 1200, ATLANTA ATLANTA US US                                                     | DAER YOUN                   |
| IHI AG 2-TYL JT,              | LG CHEM AMERICA, INC. | 01/08/2019 | 220462 | 100210 | Pusan  | Charleston, South Carolina | MSC CHICAGO        | South Korea | 1566/011600 RF CU8210591/010719/010754/010758 ITTU 1055141/010221/010223/010242 SEGU80 36009/008106/008115/00 | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA ATTN:BONA CHANG / 1-4044006125 | LG TW DAER SEOU 07336 32555 |
| KAO SPECIALTIES AMERICAS LLC  | LG CHEM, LTD.         | 01/06/2019 | 222666 | 101212 | Ningpo | Charleston, South Carolina | ZIM ANTWERP        | China       | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                                           | 243 WOODBINE ST.HIGH POINT, .NORTH CAROLINA- 1-3368784207 TEL EX 53                   | LG TW DONG SEOU TEL E       |
| LG CHEM AMERICA,              | LG CHEM, LTD.         | 01/03/2019 | 43254  | 19661  | Ningpo | Charleston, South Carolina | TIANJIN            | China       | AS PER LABEL                                                                                                  | INC. 2400 LAKEVIEW PKWY STE 580 ALPHARETTA GA 30009 USA 1-5742394090                  | LG TW DAER SEOU 55320       |
| LG CHEM AMERICA,              | LG CHEM, LTD.         | 01/03/2019 | 43254  | 19661  | Ningpo | Charleston, South Carolina | TIANJIN            | China       | AS PER LABEL                                                                                                  | INC. 2400 LAKEVIEW PKWY STE 580 ALPHARETTA GA 30009 USA 1-5742394090                  | LG TW DAER SEOU 55320       |
| LG CHEM AMERICA, INC.         | LG CHEM LTD.          | 01/03/2019 | 88000  | 40000  | Pusan  | Charleston, South Carolina | TIANJIN            | South Korea | SEAL NO.: 132586 IN ISO TANK SEAL NO.: 132568 IN ISO TANK                                                     | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                | LG TW DAER YOUN             |
| ECOMIRAE SAP TECHNOLOGIES LLC | LG CHEM,LTD.          | 12/22/2018 | 117638 | 53472  | Pusan  | Charleston, South Carolina | ZIM ALABAMA        | South Korea | N/M N/M N/M                                                                                                   | 2445 NW 38TH STREET, GAINESVILLE, FL 32605, USA ATTN: SEUNGKOO KANG— 1-6786913927     | 128 YI YEON SEOU 37731      |
| EATON POWER                   | LG CHEM LTD           | 12/21/2018 | 92633  | 42106  | Pusan  | Charleston, South Carolina | LOS ANGELES TRADER | South Korea | ..... NM                                                                                                      | 8380 CAPITAL BLVD RALEIGH NC 27616 US                                                 | 128 YI YEON 07336           |
| EATON POWER                   | LG CHEM LTD           | 12/21/2018 | 92633  | 42106  | Pusan  | Charleston, South Carolina | LOS ANGELES TRADER | South Korea | ..... NM                                                                                                      | 8380 CAPITAL BLVD RALEIGH NC 27616 US                                                 | 128 YI YEON 07336           |

|                                          |                                |            |        |              |                            |                  |             |                                                           |                                                                                               |                        |
|------------------------------------------|--------------------------------|------------|--------|--------------|----------------------------|------------------|-------------|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------|------------------------|
| EATON POWER                              | LG CHEM LTD                    | 12/21/2018 | 88055  | 40025 Pusan  | Carolina                   | TRADER           | South Korea | NM NM NO MARK                                             | RALEIGH NC 27616 US                                                                           | 07336                  |
| LG CHEM AMERICA, INC.                    | LG CHEM LTD.                   | 12/16/2018 | 88000  | 40000 Pusan  | Charleston, South Carolina | MAERSK SHEERNESS | South Korea | SEAL NO.: 005860 IN ISO TANK SEAL NO.: 005821 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                        | LG TW DAER YOUN        |
| 36-AL                                    |                                |            |        |              |                            |                  |             |                                                           |                                                                                               |                        |
| M                                        |                                |            |        |              |                            |                  |             |                                                           |                                                                                               |                        |
| 464 - KAO SPECIALTIES L:336-AMERICAS LLC | LG CHEM, LTD.                  | 12/16/2018 | 222666 | 101212 Pusan | Charleston, South Carolina | MAERSK SHEERNESS | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL       | 243 WOODBINE ST.HIGH POINT, . NORTH CAROLINA- -- 1-3368784207 TEL EX 53                       | LG TW DONG SEOU TEL E  |
| N                                        |                                |            |        |              |                            |                  |             |                                                           |                                                                                               |                        |
| TANK                                     |                                |            |        |              |                            |                  |             |                                                           |                                                                                               |                        |
| LG CHEM AMERICA, INC                     | LG CHEM LTD.                   | 12/16/2018 | 267859 | 121754 Pusan | Charleston, South Carolina | MAERSK SHEERNESS | South Korea | N/M N/M N/M N/M N/M                                       | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA ATTN:BONA CHANG / BCHANG@LGCHEM.COM ## | LG TW DAER SEOU 07336  |
|                                          |                                |            |        |              |                            |                  |             |                                                           |                                                                                               |                        |
| LG CHEM AMERICA, INC.                    | LG CHEM LTD.                   | 12/15/2018 | 88000  | 40000 Pusan  | Charleston, South Carolina | AMERICA          | South Korea | SEAL NO.: 131599 IN ISO TANK SEAL NO.: 131594 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                        | LG TW DAER YOUN        |
| KG AP 1 < G A P                          |                                |            |        |              |                            |                  |             |                                                           |                                                                                               |                        |
| ECOMIRAE TECHNOLOGIES LLC                | LG CHEM, LTD.                  | 12/10/2018 | 217814 | 99006 Pusan  | Charleston, South Carolina | NORTHERN JULIE   | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL       | 2445 NW 38TH STREET, GAINESVILLE, FL 32605, USA ATTN: SEUNGKOO KANG— 1-6786913927             | 128 YI YEON SEOU 55320 |
|                                          |                                |            |        |              |                            |                  |             |                                                           |                                                                                               |                        |
| LG CHEM AMERICA, INC.                    | LG CHEM LTD.                   | 12/10/2018 | 88000  | 40000 Pusan  | Charleston, South Carolina | NORTHERN JULIE   | South Korea | SEAL NO.: 002644 IN ISO TANK SEAL NO.: 002640 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                        | LG TW DAER YOUN        |
|                                          |                                |            |        |              |                            |                  |             |                                                           |                                                                                               |                        |
| P/O :<br>R<br>DE :                       | LG CHEM AMERICA, INC.          | 12/10/2018 | 50992  | 23178 Pusan  | Charleston, South Carolina | NORTHERN JULIE   | South Korea | AS PER LABEL                                              | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA                                        | 128, Y YEON KORE       |
| P/O :<br>R<br>REN                        |                                |            |        |              |                            |                  |             |                                                           |                                                                                               |                        |
| A                                        |                                |            |        |              |                            |                  |             |                                                           |                                                                                               |                        |
| 36 6                                     | LG CHEM AMERICA, LG CHEM, LTD. | 12/04/2018 | 43254  | 19661 Pusan  | Charleston, South Carolina | MAERSK SEMARANG  | South Korea | AS PER LABEL                                              | INC. 2400 LAKEVIEW PKWY STE 580 ALPHARETTA GA 30009 USA 1-5742394090                          | LG TW DAER SEOU 55320  |

|                       |              |            |        |       |       |                            |                |             |                                                              |                                                                                                       |                             |
|-----------------------|--------------|------------|--------|-------|-------|----------------------------|----------------|-------------|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|-----------------------------|
| LG CHEM AMERICA, INC. | LG CHEM LTD. | 12/01/2018 | 88000  | 40000 | Pusan | Charleston, South Carolina | EVER LEADING   | South Korea | SEAL NO.: 941399 IN ISO TANK<br>SEAL NO.: 941357 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                                | LG TW DAER YOUN             |
| LG CHEM AMERICA       | LG CHEM LTD. | 12/01/2018 | 44000  | 20000 | Pusan | Charleston, South Carolina | EVER LEADING   | South Korea | SEAL NO.: 174599 IN ISO TANK                                 | 3475 PIEDMONT RD NE, SUITE 1200 ATLANTA ATLANTA US US                                                 | LG TW DAER YOUN             |
| LG CHEM AMERICA, INC. | LG CHEM LTD. | 11/26/2018 | 88184  | 40084 | Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | N/M N/M                                                      | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:404-400-6101 EXT. 6114 1-4044006125        | LG TW DAER SEOU EX 82-      |
| LG CHEM AMERICA, INC. | LG CHEM LTD. | 11/26/2018 | 138891 | 63132 | Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | N/M N/M N/M                                                  | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA<br>BCHANG@LGCHEM.COM 1-4044006125              | LG TW DAER SEOU EX 82-      |
| LG CHEM AMERICA, INC. | LG CHEM LTD. | 11/26/2018 | 88184  | 40084 | Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | N/M N/M                                                      | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:404-400-6101 EXT. 1-4044006125             | LG TW DAER SEOU 07336 32555 |
| LG CHEM AMERICA, INC. | LG CHEM LTD. | 11/26/2018 | 88184  | 40084 | Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | N/M N/M                                                      | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:404-400-6101 EXT. 6114 1-4044006125        | LG TW DAER SEOU 07336 32555 |
| LG CHEM AMERICA, INC. | LG CHEM LTD. | 11/26/2018 | 88184  | 40084 | Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | N/M N/M                                                      | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:404-400-6101 EXT. 6114 1-4044006125        | LG TW DAER SEOU 07336 32555 |
| LG CHEM AMERICA, INC. | LG CHEM LTD. | 11/26/2018 | 88184  | 40084 | Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | N/M N/M                                                      | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA ATTN:BONA CHANG/BCHANG@LGCHEM.COM 1-4044006125 | LG TW DAER SEOU 07336 32555 |

|                     |                              |               |            |        |              |                            |                |             |                                                                                                                     |                                                                                                                       |                             |
|---------------------|------------------------------|---------------|------------|--------|--------------|----------------------------|----------------|-------------|---------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------|
|                     | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 11/26/2018 | 267859 | 121754 Pusan | Charleston, South Carolina | MAERSK TAIKUNG | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                                                 | 243 WOODBINE ST. HIGH POINT, NORTH CAROLINA 27261 ATTN: BETH KLINE TEL:336-878-4269/336-878-4223                      | LG TM DONG SEO              |
|                     |                              |               |            |        |              |                            |                |             |                                                                                                                     | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA, GA 30305 BCHANGE@LGCHEM.COM 1-4044006125                                     | LG TM DAER SEOU 07336 32555 |
| HIGH                | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 11/16/2018 | 37037  | 16835 Pusan  | Charleston, South Carolina | ZIM SAN DIEGO  | South Korea | AS PER LABEL                                                                                                        |                                                                                                                       |                             |
| 10 KG               |                              |               |            |        |              |                            |                |             |                                                                                                                     |                                                                                                                       |                             |
|                     | LG CHEM AMERICA, INC.        | LG CHEM, LTD  | 11/16/2018 | 46032  | 20924 Pusan  | Charleston, South Carolina | ZIM SAN DIEGO  | South Korea | AS PER LABEL                                                                                                        | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA 1-4044006125                                                   | 128, Y DAER SEOU TEL E      |
|                     | CHEMBANK INTERNATIONAL, INC. | LG CHEM, LTD  | 11/14/2018 | 44000  | 20000 Pusan  | Charleston, South Carolina | MOL MODERN     | South Korea | NO MARKS . .                                                                                                        | 15 FOREST STREET CLOSTER, NJ 07624 TEL 1-201-364-4923                                                                 | LG TM DAER SEOU 07336       |
| 15                  | LG CHEM AMERICA INC.         | LG CHEM, LTD  | 11/14/2018 | 44000  | 20000 Pusan  | Charleston, South Carolina | MOL MODERN     | South Korea | NO MARKS . . . .                                                                                                    | 3475 PIEDMONT RD. NE, SUITE 1200 ATLANTA, GA, 30305 USA ATTN JEENY CHO/JENNYCHO1@LGCHEM.COM TEL 404-400-6114 EXT 6125 | LG TM DAER SEOU 07336       |
| 15880               |                              |               |            |        |              |                            |                |             |                                                                                                                     |                                                                                                                       |                             |
| 35KG                | LG CHEM AMERICA, INC.        | LG CHEM, LTD  | 11/12/2018 | 45936  | 20880 Pusan  | Charleston, South Carolina | MSC RANIA      | South Korea | AS PER LABEL                                                                                                        | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA                                                                | 128, Y DAER SEOU            |
| 10 N- 1- 1- 9884 15 | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 11/12/2018 | 176000 | 80000 Pusan  | Charleston, South Carolina | MSC RANIA      | South Korea | SEAL NO.: 032428 IN ISO TANK SEAL NO.: 032409 IN ISO TANK SEAL NO.: 032436 IN ISO TANK SEAL NO.: 032479 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200 ATLANTA ATLANTA US US                                                                 | LG TM DAER YOUN             |
|                     | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 11/12/2018 | 35361  | 16073 Pusan  | Charleston, South Carolina | MSC RANIA      | South Korea | AS PER LABEL                                                                                                        | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA                                                                | LG TM DONG SEO              |

243 WOODBINE ST, HIGH  
AS PER LABEL AS PER POINT, NORTH CAROLINA

|                                           |                              |               |            |        |        |       |                            |                  |             |                                                           |                                                                                      |                   |
|-------------------------------------------|------------------------------|---------------|------------|--------|--------|-------|----------------------------|------------------|-------------|-----------------------------------------------------------|--------------------------------------------------------------------------------------|-------------------|
|                                           | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 11/12/2018 | 267859 | 121754 | Pusan | Charleston, South Carolina | MSC RANIA        | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL       | POINT, NORTH CAROLINA 27261 ATTN: BETH KLINE TEL:336-878-4269/336-878-4223           | LG TW DONG SEOU   |
|                                           | EATON POWER                  | LG CHEM LTD   | 11/11/2018 | 10318  | 4690   | Pusan | Charleston, South Carolina | MOL MAGNIFICENCE | South Korea | AS PER LABEL                                              | 8380 CAPITAL BLVD RALEIGH NC 27616 US                                                | 128 YI YEON 07336 |
|                                           | LG CHEM AMERICA, INC         | LG CHEM LTD.  | 11/11/2018 | 46200  | 21000  | Pusan | Charleston, South Carolina | EVER LENIENT     | South Korea | SEAL NO.: 928516 IN ISO TANK                              | 3475 PIEDMONT RD NE, SUITE 1200 ATLANTA, ATLANTA, US US                              | LG TW DAER YOUN   |
|                                           | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 11/11/2018 | 46200  | 21000  | Pusan | Charleston, South Carolina | EVER LENIENT     | South Korea | SEAL NO.: 928526 IN ISO TANK                              | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, ATLANTA, US US                             | LG TW DAER YOUN   |
| 9875<br>4S                                | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 11/09/2018 | 35361  | 16073  | Pusan | Charleston, South Carolina | MSC LISBON       | South Korea | AS PER LABEL                                              | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA                               | LG TW DONG SEOU   |
|                                           | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 10/30/2018 | 88000  | 40000  | Pusan | Charleston, South Carolina | MAERSK STRALSUND | South Korea | SEAL NO.: 032378 IN ISO TANK SEAL NO.: 032346 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                               | LG TW DAER YOUN   |
|                                           | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 10/30/2018 | 88000  | 40000  | Pusan | Charleston, South Carolina | MAERSK STRALSUND | South Korea | SEAL NO.: 109294 IN ISO TANK SEAL NO.: 109275 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                               | LG TW DAER YOUN   |
| NO<br>L-A<br>HS<br>L-A<br>HS<br>L-A<br>HS | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 10/23/2018 | 267859 | 121754 | Pusan | Charleston, South Carolina | COLUMBINE MAERSK | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL       | 243 WOODBINE ST. HIGH POINT, NORTH CAROLINA 27261 ATTN: BETH KLINE TEL: 336-878-4269 | LG TW DONG SEOU   |
|                                           |                              |               |            |        |        |       |                            |                  |             |                                                           | 5550 TRIANGLE PARKWAY                                                                | LG TW DAER SEOU   |



|              |                              |               |            |        |              |                            |                  |             |                                        |                                                                                             |                             |
|--------------|------------------------------|---------------|------------|--------|--------------|----------------------------|------------------|-------------|----------------------------------------|---------------------------------------------------------------------------------------------|-----------------------------|
| 3H           | FNS INC ATL                  | LG CHEM LTD.  | 10/23/2018 | 37037  | 16835 Pusan  | Charleston, South Carolina | COLUMBINE MAERSK | South Korea | AS PER LABEL                           | 3300 TRANSEL PARKWAY, STE 390 NORCROSS, GA 30092 1-6786913927                               | 07336-32555                 |
| 0 KG         |                              |               |            |        |              |                            |                  |             |                                        | 2445 NW 38TH STREET, GAINESVILLE, FL 32605, USA ATTN: SEUNGKOO KANG— 1-4047666441 TEL EX 64 | 128 YI YEON SEOU 55320      |
| EL: ECOMIRAE | TECHNOLOGIES LLC             | LG CHEM, LTD. | 10/23/2018 | 175438 | 79745 Pusan  | Charleston, South Carolina | COLUMBINE MAERSK | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL |                                                                                             |                             |
| 3H           | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 10/23/2018 | 37037  | 16835 Pusan  | Charleston, South Carolina | COLUMBINE MAERSK | South Korea | AS PER LABEL                           | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA RPASHAK@LGCHEM.COM— 1-4044006125     | LG TW DAER SEOU 07336-32555 |
| 9875 IS      | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 10/21/2018 | 44000  | 20000 Pusan  | Charleston, South Carolina | MSC ROMA         | South Korea | SEAL NO.: 032392 IN ISO TANK           | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                      | LG TW DAER YOUN             |
|              | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 10/21/2018 | 35361  | 16073 Pusan  | Charleston, South Carolina | MSC ROMA         | South Korea | AS PER LABEL                           | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA                                      | LG TW DONG SEOU             |
| D L-A        | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 10/21/2018 | 44000  | 20000 Pusan  | Charleston, South Carolina | EVER LAUREL      | South Korea | SEAL NO.: 032793 IN ISO TANK           | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                      | LG TW DAER YOUN             |
|              | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 10/19/2018 | 264552 | 120251 Pusan | Charleston, South Carolina | TIANJIN          | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL | 243 WOODBINE ST. HIGH POINT, NORTH CAROLINA 27261 ATTN: BETH KLINE TEL: 336-878-4269        | LG TW DONG SEOU             |
|              | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 10/18/2018 | 44000  | 20000 Pusan  | Charleston, South Carolina | CMA CGM NORMA    | South Korea | SEAL NO.: 005593 IN ISO TANK           | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                      | LG TW DAER YOUN             |
|              | LG CHEM AMERICA,             |               |            |        |              | Charleston, South          |                  |             | SEAL NO.: 630191 IN                    | 3475 PIEDMONT RD NE, SUITE 1200 ATLANTA                                                     | LG TW DAER                  |

|              |                       |               |            |        |       |        |                            |             |             |                                                           |                                                                                                     |                            |
|--------------|-----------------------|---------------|------------|--------|-------|--------|----------------------------|-------------|-------------|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------|----------------------------|
|              | INC.                  | LG CHEM LTD.  | 10/12/2018 | 46200  | 21000 | Pusan  | Carolina                   | ZIM ANTWERP | South Korea | ISO TANK                                                  | ATLANTA US US                                                                                       | YOUN                       |
|              | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 10/12/2018 | 88000  | 40000 | Pusan  | Charleston, South Carolina | ZIM ANTWERP | South Korea | SEAL NO.: 928967 IN ISO TANK SEAL NO.: 008097 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                              | LG TW DAER YOUN            |
|              | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 10/12/2018 | 88000  | 40000 | Pusan  | Charleston, South Carolina | ZIM ANTWERP | South Korea | SEAL NO.: 005588 IN ISO TANK SEAL NO.: 005541 IN ISO TANK | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA ATLANTA US US                                              | LG TW DAER YOUN            |
| ABS          | LG CHEM AMERICA, INC. | LG CHEM, LTD. | 10/07/2018 | 177176 | 80535 | Ningpo | Charleston, South Carolina | MAERSK UTAH | China       | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL       | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL: 678-984-5714 1-4044006125               | 20 YO YOUN TOWE KORE TEL E |
| 9<br>).C     | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 10/05/2018 | 88000  | 40000 | Pusan  | Charleston, South Carolina | YM UBIQUITY | South Korea | NO MARKS . . . . NO MARKS . . . .                         | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL 404-400-6101 EXT. 6114 RPASHAKLGCHEM.COM | LG TW DAER SEOU            |
| 9<br>).C     | LG CHEM AMERICA, INC. | LG CHEM LRD.  | 10/03/2018 | 44000  | 20000 | Pusan  | Charleston, South Carolina | MOL MAESTRO | South Korea | NO MARKS . . .                                            | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA RPASHAKLGCHEM.COMXX XX                       | LG TW DAER GU,SE CODE      |
| IS           | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 10/03/2018 | 44000  | 20000 | Pusan  | Charleston, South Carolina | MOL MAESTRO | South Korea | NO MARKS . . . .                                          | 3475 PIEDMONT ROAD, NE STE 1200, ATLANTA, GA 30305, USA ATTN SEA GUN LEEEXX                         | LG TW DAER SEOU 07336      |
| L<br>DE      | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 09/29/2018 | 44000  | 20000 | Pusan  | Charleston, South Carolina | MOL MISSION | South Korea | NO MARKS . . .                                            | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA RPASHAKLGCHEM.COMXX XX                       | LG TW DAER SEOU 07336      |
| ER)<br>16.12 | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 09/29/2018 | 44000  | 20000 | Pusan  | Charleston, South Carolina | MOL MISSION | South Korea | NO MARKS . . . .                                          | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA RPASHAKLGCHEM.COM TEL 248-289-5795           | LG TW DAER SEOU 07336      |

|    |       |                              |               |            |        |                          |                            |                    |             |                                        |                                                                                             |                        |
|----|-------|------------------------------|---------------|------------|--------|--------------------------|----------------------------|--------------------|-------------|----------------------------------------|---------------------------------------------------------------------------------------------|------------------------|
| TH | 492   | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 09/28/2018 | 222200 | 101000 Pusan             | Charleston, South Carolina | MAERSK SURABAYA    | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL | 243 WOODBINE ST.HIGH POINT, . NORTH CAROLINA                                                | LG TM DONG SEOU        |
| TH | 492   | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 09/28/2018 | 222200 | 101000 Pusan             | Charleston, South Carolina | MAERSK SURABAYA    | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL | 243 WOODBINE ST.HIGH POINT, . NORTH CAROLINA                                                | LG TM DONG SEOU        |
| ED |       | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 09/28/2018 | 44000  | 20000 Pusan              | Charleston, South Carolina | EVER LEADING       | South Korea | SEAL NO.: 930514 IN ISO TANK           | 3475 PIEDMONT RD NE, SUITE 1200, 30305 ATLANTA ATLANTA US 30305 US                          | LG TM DAER 07336       |
| ED |       | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 09/28/2018 | 44000  | 20000 Pusan              | Charleston, South Carolina | EVER LEADING       | South Korea | SEAL NO.: 005387 IN ISO TANK           | 3475 PIEDMONT RD NE, SUITE 1200, 30305 ATLANTA ATLANTA US 30305 US                          | LG TM DAER GU YC KR    |
| IS | 10993 | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 09/27/2018 | 42020  | 19100 Pusan              | Charleston, South Carolina | E. R. TIANPING     | South Korea | AS PER LABEL                           | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30350 USA RPASHAK@LGCHEM.COM TEL: 248-289-5795 | LG TM DAER SEOU 07336  |
| IS |       | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 09/25/2018 | 35361  | 16073 Pusan              | Charleston, South Carolina | NORTHERN JULIE     | South Korea | AS PER LABEL                           | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA                                      | LG TM DONG SEOU        |
| IS | 10993 | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 09/25/2018 | 88000  | 40000 Pusan              | Charleston, South Carolina | YM UNIFORMITY      | South Korea | NO MARKS . . . . NO MARKS . . . .      | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL 404-400-6101 EXT. 6114           | LG TM DAER GU, SE CODE |
| IS |       | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 09/24/2018 | 35361  | 16073 South Riding Point | Charleston, South Carolina | SEALAND WASHINGTON | Bahamas     | AS PER LABEL                           | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA                                      | LG TM DONG SEOU        |

|                                       |                                 |                        |            |        |              |                               |                       |             |                                                                                      |                                                                                                            |                                        |
|---------------------------------------|---------------------------------|------------------------|------------|--------|--------------|-------------------------------|-----------------------|-------------|--------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|----------------------------------------|
| L<br>DE                               | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.           | 09/17/2018 | 44000  | 20000 Pusan  | Charleston, South<br>Carolina | HARBOUR BRIDGE        | South Korea | NO MARKS . . .                                                                       | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL 1-404-400-<br>6125<br>JENNYCHO1LGCHEM.COM | LG TW<br>DAER<br>SEOU<br>07336<br>NO   |
|                                       | LG CHEM AMERICA<br>INC          | LG CHEM LTD.           | 09/16/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | ZIM DJIBOUTI          | South Korea | SEAL NO.: 128739 IN<br>ISO TANK SEAL NO.:<br>128558 IN ISO TANK                      | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                               | LG TW<br>DAER<br>YOUN                  |
|                                       | LG CHEM AMERICA,<br>INC.,       | LG CHEM LTD.           | 09/07/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | PARSIFAL              | South Korea | SEAL NO.: 005371 IN<br>ISO TANK SEAL NO.:<br>032270 IN ISO TANK                      | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA<br>ATLANTA US US                                                | LG TW<br>DAER<br>YOUN                  |
| -A<br>ETH<br>3<br>RIVE<br>492<br>843- | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD.          | 09/04/2018 | 222200 | 101000 Pusan | Charleston, South<br>Carolina | MAERSK TAIKUNG        | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL            | 243 WOODBINE ST.HIGH<br>POINT, . NORTH CAROLINA                                                            | LG TW<br>DONG<br>SEOU                  |
|                                       | SEALED AIR<br>CORPORATION       | LG CHEM<br>EUROPE GMBH | 08/30/2018 | 1164   | 529 Antwerp  | Charleston, South<br>Carolina | CHARLESTON<br>EXPRESS | Belgium     | SEALED AIR<br>CORPORATION 100<br>ROGERS BRIDGE ROAD<br>BUILDING A 29334<br>DUNCAN US | 100 ROGERS BRIDGE<br>ROAD BUILDING A<br>DUNCAN, OK 29334 US                                                | LYONI<br>FRANI                         |
| '00<br>000<br>IT<br>)- E<br>352-      | ECOMIRAE<br>TECHNOLOGIES LLC    | LG CHEM LTD.           | 08/28/2018 | 38360  | 17436 Pusan  | Charleston, South<br>Carolina | ANNA MAERSK           | South Korea | AS PER LABEL                                                                         | 2445 NW 38TH STREET,<br>GAINESVILLE, FL 32605,<br>USA ATTN: SEUNGKOO<br>KANG— 1-3106674852 TEL<br>EX 33    | LG TW<br>DAER<br>SEOU<br>37731         |
| 57<br>BS                              | FNS INC ATL                     | LG CHEM, LTD.          | 08/28/2018 | 141741 | 64428 Pusan  | Charleston, South<br>Carolina | ANNA MAERSK           | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL                            | 5550 TRIANGLE PARKWAY<br>STE 390 NORCROSS, GA<br>30092 1-6786913927                                        | 20 YO<br>YOUN<br>TOWE<br>KORE<br>TEL E |
| 57<br>BS                              | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD.          | 08/28/2018 | 141741 | 64428 Pusan  | Charleston, South<br>Carolina | ANNA MAERSK           | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL                            | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL: 678-984-<br>5714 1-4044006125            | 20 YO<br>YOUN<br>TOWE<br>KORE<br>TEL E |

|                                       |                              |               |            |        |             |                            |                |             |                                        |                                                                                                     |                             |
|---------------------------------------|------------------------------|---------------|------------|--------|-------------|----------------------------|----------------|-------------|----------------------------------------|-----------------------------------------------------------------------------------------------------|-----------------------------|
| ABS                                   | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 08/28/2018 | 141741 | 64428 Pusan | Charleston, South Carolina | ANNA MAERSK    | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL: 678-984-5714 1-4044006125               | LG TM DAER SEOU 37731       |
| L DE                                  | CHEMBANK INTERNATIONAL, INC. | LG CHEM LTD.  | 08/25/2018 | 44000  | 20000 Pusan | Charleston, South Carolina | HOUSTON BRIDGE | South Korea | NO MARKS . . .                         | 15 FOREST STREET CLOSTER, NJ 07624 TEL 1-201-364-4923                                               | LG TM DAER SEOU 07336       |
| L DE                                  | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 08/25/2018 | 44000  | 20000 Pusan | Charleston, South Carolina | HOUSTON BRIDGE | South Korea | NO MARKS . . .                         | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA RPASHAKLGCHEM.COM TEL 248-289-5795           | LG TM DAER SEOU 07336 NO    |
| .C                                    | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 08/25/2018 | 88000  | 40000 Pusan | Charleston, South Carolina | HOUSTON BRIDGE | South Korea | NO MARKS . . . NO MARKS . . .          | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL 404-400-6101 EXT. 6114 RPASHAKLGCHEM.COM | LG TM DAER SEOU 07336 NO    |
| -9 .C                                 | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 08/25/2018 | 88000  | 40000 Pusan | Charleston, South Carolina | HOUSTON BRIDGE | South Korea | NO MARKS . . . . NO MARKS . . . .      | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL 404-400-6101 EXT. 6114 RPASHAKLGCHEM.COM | LG TM DAER SEOU 07336       |
| 10404<br>'LIC,<br>218,<br>-0099       | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 08/23/2018 | 36960  | 16800 Pusan | Charleston, South Carolina | MSC RANIA      | South Korea | AS PER LABEL                           | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA RPASHAK LGCHEM.COM                           | LG TM DAER SEOU 07336       |
| -NP<br>12,80<br>'A,<br>'C<br>'Q<br>'G | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 08/23/2018 | 30567  | 13894 Pusan | Charleston, South Carolina | MSC RANIA      | South Korea | AS PER LABEL                           | 3475 PIEDMONT ROAD, NE STE 1200, ATLANTA, GA 30305, USA TEL: 678-984-5714 1-4044006125              | 20 YO YOUN TOWE KORE EX 82- |
| 0<br>0<br>'G                          | LG CHEM AMERICA, INC.        | LG CHEM, LTD. | 08/23/2018 | 70870  | 32214 Pusan | Charleston, South Carolina | MSC RANIA      | South Korea | AS PER LABEL AS PER LABEL              | 3475 PIEDMONT ROAD, NE STE 1200, ATLANTA, GA 30305, USA TEL: 678-984-5714 1-4044006125              | 20 YO YOUN TOWE KORE EX 82- |
|                                       |                              |               |            |        |             |                            |                |             |                                        | 3475 PIEDMONT ROAD, NE                                                                              | 20 YO YOUN                  |

|                                                                         |                                 |               |            |        |               |                               |                      |             |                                                                                                                                    |                                                                                                                  |                                         |
|-------------------------------------------------------------------------|---------------------------------|---------------|------------|--------|---------------|-------------------------------|----------------------|-------------|------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| 0<br>17-<br>ABS                                                         | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 08/23/2018 | 70870  | 32214 Pusan   | Charleston, South<br>Carolina | MSC RANIA            | South Korea | AS PER LABEL AS PER<br>LABEL                                                                                                       | STE 1200, ATLANTA, GA<br>30305, USA TEL: 678-984-<br>5714 1-4044006125                                           | TOWE<br>KORE<br>EX 82-                  |
| ABS                                                                     | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 08/23/2018 | 177176 | 80535 Pusan   | Charleston, South<br>Carolina | MSC RANIA            | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL                                                          | 3475 PIEDMONT ROAD, NE<br>STE 1200, ATLANTA, GA<br>30305, USA TEL: 678-984-<br>5714 1-4044006125                 | 20 YO<br>YOUN<br>TOWE<br>KORE<br>EX 82- |
| ABS                                                                     | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 08/23/2018 | 70870  | 32214 Pusan   | Charleston, South<br>Carolina | MSC RANIA            | South Korea | AS PER LABEL AS PER<br>LABEL                                                                                                       | 3475 PIEDMONT ROAD, NE<br>STE 1200, ATLANTA, GA<br>30305, USA TEL: 678-984-<br>5714 1-4044006125                 | 20 YO<br>YOUN<br>TOWE<br>KORE<br>EX 82- |
| 0.000<br>3<br>0.000<br>3<br>0.000<br>17-<br>) KG<br>IL:<br>P/O :<br>17- | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 08/22/2018 | 222666 | 101212 Ningpo | Charleston, South<br>Carolina | SAFMARINE<br>MAFADI  | China       | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL                                                          | 243 WOODBINE ST.HIGH<br>POINT, NORTH CAROLINA<br>27261 ATTN:BETH KLINE<br>336-878-4269 1-3368784207<br>TEL EX 53 | LG TM<br>DONG<br>SEOU<br>EX 82-         |
|                                                                         | TO ORDER                        | LG CHEM, LTD. | 08/15/2018 | 421964 | 191802 Ningpo | Charleston, South<br>Carolina | SAFMARINE<br>MULANJE | China       | N/M N/M N/M N/M N/M<br>N/M N/M N/M N/M N/M<br>N/M                                                                                  | OF LG CHEM AMERICA,<br>INC 3475 PIEDMONT RD<br>NE, SUITE 1200, ATLANTA,<br>GA 30305 USA 1-<br>4044006125         | 128 YI<br>YEON<br>SEOU<br>37731         |
|                                                                         | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD.  | 08/14/2018 | 44000  | 20000 Pusan   | Charleston, South<br>Carolina | MSC LISBON           | South Korea | SEAL NO.: 005226 IN<br>ISO TANK                                                                                                    | 15 FOREST STREET<br>CLOSTER CLOSTER US US                                                                        | LG TW<br>DAER<br>YOUN                   |
|                                                                         | LG CHEM AMERICA,<br>INC.,       | LG CHEM LTD.  | 08/06/2018 | 176000 | 80000 Pusan   | Charleston, South<br>Carolina | MAERSK<br>STRALSUND  | South Korea | SEAL NO.: 005197 IN<br>ISO TANK SEAL NO.:<br>005162 IN ISO TANK<br>SEAL NO.: 005137 IN<br>ISO TANK SEAL NO.:<br>005179 IN ISO TANK | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA<br>ATLANTA US US                                                      | LG TW<br>DAER<br>YOUN                   |
|                                                                         | LG CHEM AMERICA,<br>INC.,       | LG CHEM LTD.  | 08/03/2018 | 88000  | 40000 Pusan   | Charleston, South<br>Carolina | TIANJIN              | South Korea | SEAL NO.: 166347 IN<br>ISO TANK SEAL NO.:<br>166390 IN ISO TANK                                                                    | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA<br>ATLANTA US US                                                      | LG TW<br>DAER<br>YOUN                   |
|                                                                         |                                 |               |            |        |               |                               |                      |             |                                                                                                                                    | 3475 PIEDMONT RD. NE                                                                                             | LG TW                                   |



|                               |                        |              |            |               |                            |                            |             |                                                                                                                     |                                                                                             |                                                                                             |                        |
|-------------------------------|------------------------|--------------|------------|---------------|----------------------------|----------------------------|-------------|---------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|------------------------|
| D                             | LG CHEM AMERICA, INC., | LG CHEM LTD. | 08/03/2018 | 44000         | 20000 Pusan                | Charleston, South Carolina | TIANJIN     | South Korea                                                                                                         | SEAL NO.: 128100 IN ISO TANK                                                                | STE. 1200, ATLANTA ATLANTA US US                                                            | DAER YOUN              |
|                               |                        |              |            |               |                            |                            |             |                                                                                                                     | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                         |                                                                                             |                        |
|                               |                        |              |            |               |                            |                            |             |                                                                                                                     | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                         | 2445 NW 38TH STREET, GAINESVILLE, FL 32605, USA ATTN: SEUNGKOO KANG— 1-6786913927           | 128 YI YEON SEOU 55320 |
| SAP ECOMIRAE TECHNOLOGIES LLC | LG CHEM,LTD.           | 08/01/2018   | 523796     | 238089 Ningpo | Charleston, South Carolina | GRASMERE MAERSK            | China       |                                                                                                                     | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                         | OF LG CHEM AMERICA, INC 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA 1-4044006125 | 128 YI YEON SEOU 37731 |
| TO ORDER                      | LG CHEM,LTD.           | 08/01/2018   | 268523     | 122056 Ningpo | Charleston, South Carolina | GRASMERE MAERSK            | China       |                                                                                                                     | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                         | OF LG CHEM AMERICA, INC 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA 1-4044006125 | 128 YI YEON SEOU 37731 |
|                               |                        |              |            |               |                            |                            |             |                                                                                                                     | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                         | 5550 TRIANGLE PARKWAY STE 390 NORCROSS, GA 30092 1-6786913927                               | 128 YI YEON SEOU 37731 |
| FNS INC ATL                   | LG CHEM,LTD.           | 08/01/2018   | 230162     | 104619 Ningpo | Charleston, South Carolina | GRASMERE MAERSK            | China       |                                                                                                                     | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                         | OF LG CHEM AMERICA, INC 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA 1-4044006125 | 128 YI YEON SEOU 37731 |
| TO ORDER                      | LG CHEM,LTD.           | 08/01/2018   | 230162     | 104619 Ningpo | Charleston, South Carolina | GRASMERE MAERSK            | China       |                                                                                                                     | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                         | OF LG CHEM AMERICA, INC 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA 1-4044006125 | 128 YI YEON SEOU 37731 |
| LG CHEM AMERICA, INC.,        | LG CHEM LTD.           | 07/30/2018   | 176000     | 80000 Pusan   | Charleston, South Carolina | MSC ROMA                   | South Korea | SEAL NO.: 005199 IN ISO TANK SEAL NO.: 005096 IN ISO TANK SEAL NO.: 005188 IN ISO TANK SEAL NO.: 005166 IN ISO TANK | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA ATLANTA US US                                       | LG TM DAER YOUN                                                                             |                        |
| LG CHEM AMERICA, INC.,        | LG CHEM LTD.           | 07/28/2018   | 44000      | 20000 Pusan   | Charleston, South Carolina | ZIM ANTWERP                | South Korea | SEAL NO.: 128084 IN ISO TANK                                                                                        | 3475 PIEDMONT RD. NE STE. 1200, ATLANTA ATLANTA US US                                       | LG TM DAER YOUN                                                                             |                        |
| KAO SPECIALTIES AMERICAS LLC  | LG CHEM, LTD.          | 07/24/2018   | 222200     | 101000 Pusan  | Charleston, South Carolina | MSC MAXINE                 | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                                                 | 243 WOODBINE ST.HIGH POINT., NORTH CAROLINA 27261 ATTN:BETH KLINE TE 336-878-4269           | LG TM DONG SEOU                                                                             |                        |
| TO ORDER                      | LG CHEM,LTD.           | 07/24/2018   | 460225     | 300220 Pusan  | Charleston, South Carolina | MSC MAXINE                 | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL                                                                 | OF LG CHEM AMERICA, INC 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA 1-4044006125 | 128 YI YEON SEOU 37731                                                                      |                        |

|   |                              |               |            |        |              |                            |                 |             |                                                     |                                                                                                   |                             |
|---|------------------------------|---------------|------------|--------|--------------|----------------------------|-----------------|-------------|-----------------------------------------------------|---------------------------------------------------------------------------------------------------|-----------------------------|
| 1 | TO ORDER                     | LG CHEM, LTD. | 07/24/2018 | 460325 | 209239 Pusan | Carolina                   | MSC MAXINE      | South Korea | AS PER LABEL AS PER                                 | 4044006125                                                                                        | 37/37                       |
|   | CHEMBANK INTERNATIONAL, INC  | LG CHEM LTD.  | 07/13/2018 | 44000  | 20000 Pusan  | Charleston, South Carolina | AMERICA         | South Korea | SEAL NO.: 005051 IN ISO TANK                        | 15 FOREST STREET CLOSTER CLOSTER US US                                                            | LG TM DAER YOUN             |
|   | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 07/10/2018 | 37037  | 16835 Pusan  | Charleston, South Carolina | MAERSK SURABAYA | South Korea | AS PER LABEL                                        | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:1-404-400-6125- 1-2018162000 TEL EX 09 | LG TM DAER SEOU 07336 32555 |
|   | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 07/10/2018 | 37037  | 16835 Pusan  | Charleston, South Carolina | MAERSK SURABAYA | South Korea | AS PER LABEL                                        | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:1-404-400-6125- 1-4044006125           | LG TM DAER SEOU 07336 32555 |
|   | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 07/10/2018 | 37037  | 16835 Pusan  | Charleston, South Carolina | MAERSK SURABAYA | South Korea | AS PER LABEL                                        | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:1-404-400-6125- 1-4044006125           | LG TM DAER SEOU 07336 32555 |
|   | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 07/10/2018 | 37037  | 16835 Pusan  | Charleston, South Carolina | MAERSK SURABAYA | South Korea | AS PER LABEL                                        | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:1-404-400-6125- 1-4044006125           | LG TM DAER SEOU 07336 32555 |
|   | LG CHEM AMERICA, INC.        | LG CHEM LTD.  | 07/10/2018 | 37037  | 16835 Pusan  | Charleston, South Carolina | MAERSK SURABAYA | South Korea | AS PER LABEL                                        | 3475 PIEDMONT RD NE, SUITE 1200, ATLANTA, GA 30305 USA TEL:1-404-400-6125- 1-4044006125           | LG TM DAER SEOU 07336 32555 |
|   | KAO SPECIALTIES AMERICAS LLC | LG CHEM, LTD. | 07/10/2018 | 222200 | 101000 Pusan | Charleston, South Carolina | MAERSK SURABAYA | South Korea | AS PER LABEL AS PER LABEL AS PER LABEL AS PER LABEL | 243 WOODBINE ST.HIGH POINT, . NORTH CAROLINA                                                      | LG TM DONG SEOU             |
|   | LG CHEM AMERICA INC          | LG CHEM LTD.  | 07/07/2018 | 44000  | 20000 Pusan  | Charleston, South Carolina | E.R. TIANPING   | South Korea | SEAL NO.: 027192 IN ISO TANK                        | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                                            | LG TM DAER YOUN             |
|   | LG CHEM AMERICA INC          | LG CHEM LTD.  | 07/06/2018 | 44000  | 20000 Pusan  | Charleston, South Carolina | NORTHERN JULIE  | South Korea | SEAL NO.: 027859 IN ISO TANK                        | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                                            | LG TM DAER YOUN             |



|                            |                                 |               |            |        |              |                               |                     |             |                                                                           |                                                                                                                 |                                         |
|----------------------------|---------------------------------|---------------|------------|--------|--------------|-------------------------------|---------------------|-------------|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| 100<br>RYLIC<br>ACID<br>ER | LG CHEM AMERICA,<br>INC.        | LG CHEM LTD.  | 06/19/2018 | 37037  | 16835 Pusan  | Charleston, South<br>Carolina | MAERSK<br>SKARSTIND | South Korea | AS PER LABEL                                                              | 3475 PIEDMONT RD NE,<br>SUITE 1200, ATLANTA, GA<br>30305 USA TEL:1-404-400-<br>6125- 1-4044006125               | LG TW<br>DAER<br>SEOU<br>07336<br>32555 |
|                            | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 06/17/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | ZIM CHICAGO         | South Korea | SEAL NO.: 171395 IN<br>ISO TANK SEAL NO.:<br>002389 IN ISO TANK           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                    | LG TW<br>DAER<br>YOUN                   |
|                            | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD.  | 06/17/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | ZIM CHICAGO         | South Korea | SEAL NO.: 002987 IN<br>ISO TANK SEAL NO.:<br>002961 IN ISO TANK           | 15 FOREST STREET<br>CLOSTER CLOSTER US US                                                                       | LG TW<br>DAER<br>YOUN                   |
|                            | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 06/07/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | ZIM SAN DIEGO       | South Korea | SEAL NO.: 164767 IN<br>ISO TANK SEAL NO.:<br>126714 IN ISO TANK           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                    | LG TW<br>DAER<br>YOUN                   |
|                            | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 05/22/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | NO MARKS AND<br>NUMBERS NO MARKS<br>AND NUMBERS                           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL:404-400-6101<br>EXT. 6114 TE<br>RPASHAK@LGCHEM.COM | LG TW<br>DAER<br>SEOU<br>07336          |
|                            | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 05/22/2018 | 222200 | 101000 Pusan | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27281 ATTN<br>: BETH KLINE/LINDA<br>GARNER                                 | LG TW<br>DAER<br>DONG<br>SEOU           |
|                            | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 05/18/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | ZIM NINGBO          | South Korea | SEAL NO.: 918278 IN<br>ISO TANK SEAL NO.:<br>918299 IN ISO TANK           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                    | LG TW<br>DAER<br>YOUN                   |
|                            | LG CHEM AMERICA<br>INC          | LG CHEM, LTD. | 05/16/2018 | 33230  | 15105 Pusan  | Charleston, South<br>Carolina | MAERSK SAIGON       | South Korea | N/M                                                                       | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 1-4044006125                                           | 128, Y<br>YEON<br>REPU<br>EX 82-        |
|                            |                                 |               |            |        |              |                               |                     |             | AS PER LABEL AS PER                                                       | 243 WOODBINE STREET                                                                                             |                                         |

|                                     |                                 |                                 |            |        |              |                               |                    |             |                                                                                                                                                                                                                              |                                                                                                                     |                                         |
|-------------------------------------|---------------------------------|---------------------------------|------------|--------|--------------|-------------------------------|--------------------|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| ERS,<br>E                           | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD.                   | 05/15/2018 | 222200 | 101000 Pusan | Charleston, South<br>Carolina | MAERSK SAIGON      | South Korea | AS PER LABEL AS PER LABEL<br>AS PER LABEL AS PER LABEL<br>AS PER LABEL AS PER LABEL                                                                                                                                          | 245 WOODBINE STREET<br>HIGH POINT NC 27261 ATTN LG TW<br>BETH KLINE/LINDA DONG<br>GARNER SEOU                       |                                         |
| 10<br>ATE<br>TE<br>NH<br>ING<br>100 | LG CHEM AMERICA<br>INC          | LG CHEM LTD.                    | 05/10/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | MSC MAXINE         | South Korea | SEAL NO.: 125338 IN<br>ISO TANK SEAL NO.:<br>004216 IN ISO TANK                                                                                                                                                              | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                        | LG TW<br>DAER<br>YOUN                   |
|                                     | LG CHEM AMERICA<br>INC          | LG CHEM LTD.                    | 05/10/2018 | 88184  | 40084 Pusan  | Charleston, South<br>Carolina | MSC MAXINE         | South Korea | N/M N/M                                                                                                                                                                                                                      | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL:1-404-400-612<br>JENNYCHO1@LGCHEM.CO<br>M 1-4044006125 | LG TW<br>DAER<br>SEOU<br>07336<br>32555 |
|                                     | LG CHEM AMERICA<br>INC 3475     | LG CHEM LTD. LG<br>TWIN TOWERS, | 05/10/2018 | 132277 | 60126 Pusan  | Charleston, South<br>Carolina | MSC MAXINE         | South Korea | N/M N/M N/M                                                                                                                                                                                                                  | PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 1-4044006125                                                    | 128, Y<br>YOUN<br>KORE<br>55320         |
|                                     | LG CHEM AMERICA<br>INC          | LG CHEM LTD.                    | 05/04/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | MSC ROMA           | South Korea | SEAL NO.: 925486 IN<br>ISO TANK SEAL NO.:<br>925463 IN ISO TANK                                                                                                                                                              | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                        | LG TW<br>DAER<br>YOUN                   |
|                                     | LG CHEM AMERICA<br>INC          | LG CHEM LTD.                    | 05/04/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | MSC ROMA           | South Korea | SEAL NO.: 918952 IN<br>ISO TANK SEAL NO.:<br>918994 IN ISO TANK<br>SEAL NO.: 004792 IN<br>ISO TANK SEAL NO.:<br>004792 IN ISO TANK<br>SEAL NO.: 004785 IN<br>ISO TANK SEAL NO.:<br>004794 IN ISO TANK<br>SEAL NO.: 004790 IN | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                        | LG TW<br>DAER<br>YOUN                   |
|                                     | LG CHEM AMERICA<br>INC          | LG CHEM LTD.                    | 05/04/2018 | 264000 | 120000 Pusan | Charleston, South<br>Carolina | MSC ROMA           | South Korea | SEAL NO.: 004790 IN                                                                                                                                                                                                          | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                        | LG TW<br>DAER<br>YOUN                   |
| 2/O :<br>07AT<br>0.000              | LG CHEM AMERICA                 | LG CHEM, LTD.                   | 04/28/2018 | 33230  | 15105 Pusan  | Charleston, South<br>Carolina | MAERSK<br>SURABAYA | South Korea | AS PER LABEL                                                                                                                                                                                                                 | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 1-4044006125                                               | 128, Y<br>YEON<br>REPU<br>55320         |

|                                 |               |            |        |        |       |                               |                    |             |                                                                           |                                                                                 |                       |
|---------------------------------|---------------|------------|--------|--------|-------|-------------------------------|--------------------|-------------|---------------------------------------------------------------------------|---------------------------------------------------------------------------------|-----------------------|
| LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 04/28/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | MAERSK<br>SURABAYA | South Korea | ISO TANK SEAL NO.:<br>125775 IN ISO TANK                                  | SUITE 1200 ATLANTA<br>ATLANTA US US                                             | LG TM<br>DAER         |
| KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 04/26/2018 | 222200 | 101000 | Pusan | Charleston, South<br>Carolina | MAERSK<br>SURABAYA | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261 ATTN<br>: BETH KLINE/LINDA<br>GARNER | LG TM<br>DONG<br>SEO  |
| VOLVO CAR US<br>OPERATIONS INC  | LG CHEM       | 04/21/2018 | 26752  | 12160  | Pusan | Charleston, South<br>Carolina | E. R. TIANPING     | South Korea | 41050411607                                                               | 1801 VOLVO CAR DR<br>RIDGEVILLE SC 29472 US                                     | 20 YO<br>YOUN<br>TOWE |
| LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 04/08/2018 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | PARSIFAL           | South Korea | SEAL NO.: 004178 IN<br>ISO TANK                                           | 3475 PIEDMONT ROAD NE<br>SUITE 120 ATLANTA<br>ATLANTA US US                     | 128, Y<br>DAER<br>SEO |
| LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 04/08/2018 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | PARSIFAL           | South Korea | SEAL NO.: 004000 IN<br>ISO TANK                                           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                    | 128, Y<br>DAER<br>SEO |
| LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 04/08/2018 | 88000  | 40000  | Pusan | Charleston, South<br>Carolina | PARSIFAL           | South Korea | SEAL NO.: 123966 IN<br>ISO TANK SEAL NO.:<br>918087 IN ISO TANK           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                    | 128, Y<br>DAER<br>SEO |
| LG CHEM AMERICA,<br>INC.,       | LG CHEM LTD.  | 04/08/2018 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | PARSIFAL           | South Korea | SEAL NO.: 004576 IN<br>ISO TANK                                           | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA<br>ATLANTA US US                     | 128, Y<br>DAER<br>SEO |
| LG CHEM AMERICA,<br>INC         | LG CHEM LTD.  | 04/08/2018 | 44000  | 20000  | Pusan | Charleston, South<br>Carolina | PARSIFAL           | South Korea | SEAL NO.: 004597 IN<br>ISO TANK                                           | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA,<br>ATLANTA, US US                   | 128, Y<br>DAER<br>SEO |
| LG CHEM AMERICA,                |               |            |        |        |       | Charleston, South             |                    |             | SEAL NO.: 004594 IN                                                       | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA                                      | LG TM                 |

|                          |               |            |       |       |       |                               |                     |             |                                                                 |                                                                                    |                               |
|--------------------------|---------------|------------|-------|-------|-------|-------------------------------|---------------------|-------------|-----------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------------------|
| INC.,                    | LG CHEM LTD.  | 04/08/2018 | 44000 | 20000 | Pusan | Carolina                      | PARSIFAL            | South Korea | ISO TANK                                                        | ATLANTA US US                                                                      | DAER                          |
| LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 04/08/2018 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | PARSIFAL            | South Korea | SEAL NO.: 931894 IN<br>ISO TANK SEAL NO.:<br>931855 IN ISO TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                       | LG TW<br>DAER                 |
| LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 04/08/2018 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | PARSIFAL            | South Korea | SEAL NO.: 003990 IN<br>ISO TANK                                 | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                       | LG TW<br>DAER                 |
| LG CHEM AMERICA,<br>INC. | LG CHEM. LTD. | 04/05/2018 | 35361 | 16073 | Pusan | Charleston, South<br>Carolina | MOL<br>MAGNIFICENCE | South Korea | AS PER LABEL . . . . .                                          | 3475 PIEDMONT ROAD,<br>NESTE 1200, ATLANTA, GA<br>30305, USA 1-404-400-<br>6112XXX | 20 YO<br>YOUN<br>TOWE<br>KORE |
| LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 04/01/2018 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | MSC ANTIGUA         | South Korea | SEAL NO.: 931295 IN<br>ISO TANK SEAL NO.:<br>931278 IN ISO TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                       | 128, Y<br>DAER<br>SEOU        |
| LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 04/01/2018 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | MSC ANTIGUA         | South Korea | SEAL NO.: 931879 IN<br>ISO TANK SEAL NO.:<br>931873 IN ISO TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                       | 128, Y<br>DAER<br>SEOU        |
| LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 04/01/2018 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | MSC ANTIGUA         | South Korea | SEAL NO.: 001389 IN<br>ISO TANK                                 | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                       | 128, Y<br>DAER<br>SEOU        |
| LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 04/01/2018 | 88000 | 40000 | Pusan | Charleston, South<br>Carolina | ANNA MAERSK         | South Korea | SEAL NO.: 931371 IN<br>ISO TANK SEAL NO.:<br>931366 IN ISO TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                       | 128, Y<br>DAER<br>SEOU        |
| LG CHEM AMERICA,<br>INC  | LG CHEM, LTD. | 03/26/2018 | 35361 | 16073 | Pusan | Charleston, South<br>Carolina | EVER LIFTING        | South Korea | AS PER LABEL                                                    | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 1-404-400-6112            | 20 YO<br>YOUN<br>TOWE<br>KORE |



[illegible]

|                            |                           |               |            |       |             |                               |                     |             |                                                                 |                                                                               |                               |
|----------------------------|---------------------------|---------------|------------|-------|-------------|-------------------------------|---------------------|-------------|-----------------------------------------------------------------|-------------------------------------------------------------------------------|-------------------------------|
|                            | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 03/08/2018 | 46200 | 21000 Pusan | Charleston, South<br>Carolina | ZIM ROTTERDAM       | South Korea | SEAL NO.: 123196 IN<br>ISO TANK                                 | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                  | 128, Y<br>DAER<br>SEO         |
| 16889<br>IS                | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 03/05/2018 | 88000 | 40000 Pusan | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | SEAL NO.: 121824 IN<br>ISO TANK SEAL NO.:<br>123385 IN ISO TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                  | 128, Y<br>DAER<br>SEO         |
| 4028                       |                           |               |            |       |             |                               |                     |             |                                                                 |                                                                               | 20 YO<br>YOUN                 |
| 112                        | LG CHEM AMERICA           | LG CHEM, LTD. | 03/02/2018 | 35361 | 16073 Pusan | Charleston, South<br>Carolina | MAERSK<br>STRALSUND | South Korea | AS PER LABEL                                                    | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 1-404-400-6112       | TOWE<br>KORE                  |
|                            | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 02/26/2018 | 88000 | 40000 Pusan | Charleston, South<br>Carolina | MAERSK SAIGON       | South Korea | SEAL NO.: 002982 IN<br>ISO TANK SEAL NO.:<br>003692 IN ISO TANK | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                  | 128, Y<br>DAER<br>SEO         |
|                            | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 02/20/2018 | 46200 | 21000 Pusan | Charleston, South<br>Carolina | ZIM ANTWERP         | South Korea | SEAL NO.: 120263 ISO<br>TANK                                    | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                  | 128, Y<br>YOUN<br>SEO         |
|                            | LG CHEM AMERICA<br>INC    | LG CHEM LTD.  | 02/20/2018 | 46200 | 21000 Pusan | Charleston, South<br>Carolina | ZIM ANTWERP         | South Korea | SEAL NO.: 100189 ISO<br>TANK                                    | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                  | 28, YE<br>DUNG                |
| 8303<br>LIC,<br>218,<br>3- | CHANNEL PRIME<br>ALLIANCE | LG CHEM, LTD. | 02/20/2018 | 48347 | 21976 Pusan | Charleston, South<br>Carolina | ZIM ANTWERP         | South Korea | AS PER LABEL                                                    | 1803 HULL AVE DES<br>MOINES, IA 50313                                         | 128, Y<br>YEON<br>KOER        |
| 16B Y<br>16889<br>IS       | LG CHEM<br>AMERICA, INC.  | LG CHEM LTD.  | 02/20/2018 | 36960 | 16800 Pusan | Charleston, South<br>Carolina | MAERSK SAIGON       | South Korea | AS PER LABEL                                                    | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA, GA<br>30305 RPASHAK<br>LGCHEM.COM | LG TM<br>DAER<br>SEO<br>07336 |

|                   |                                            |               |            |       |             |                               |               |             |                                                                   |                                                                                            |                                                                         |                               |
|-------------------|--------------------------------------------|---------------|------------|-------|-------------|-------------------------------|---------------|-------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|-------------------------------|
| 4028              |                                            |               |            |       |             |                               |               |             |                                                                   |                                                                                            | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 1-404-400-6112 | 20 YO<br>YOUN<br>TOWE<br>KORE |
| 112               | LG CHEM AMERICA,<br>INC                    | LG CHEM, LTD. | 02/20/2018 | 35361 | 16073 Pusan | Charleston, South<br>Carolina | MAERSK SAIGON | South Korea | AS PER LABEL                                                      |                                                                                            |                                                                         |                               |
|                   |                                            |               |            |       |             |                               |               |             |                                                                   |                                                                                            |                                                                         |                               |
|                   | LG CHEM AMERICA<br>INC                     | LG CHEM LTD.  | 02/16/2018 | 88000 | 40000 Pusan | Charleston, South<br>Carolina | MSC MAXINE    | South Korea | SEAL NO.: 100277 IN<br>ISO TANK SEAL NO.:<br>001320 IN ISO TANK   | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                               | 128, Y<br>DAER<br>SEO                                                   |                               |
| P/O :<br>ER<br>OX | TO THE ORDER OF<br>LG CHEM AMERICA,<br>INC | LG CHEM, LTD. | 02/16/2018 | 43386 | 19721 Pusan | Charleston, South<br>Carolina | MSC MAXINE    | South Korea | AS PER LABEL                                                      | INC. 2400 LAKEVIEW<br>PKWY STE 580<br>ALPHARETTA GA 30009<br>USA 1-5742394090              | 128, Y<br>YEON<br>KORE<br>32555                                         |                               |
|                   |                                            |               |            |       |             |                               |               |             |                                                                   |                                                                                            |                                                                         |                               |
|                   |                                            |               |            |       |             |                               |               |             |                                                                   |                                                                                            |                                                                         |                               |
|                   | LG CHEM AMERICA,<br>INC                    | LG CHEM, LTD. | 02/06/2018 | 43296 | 19680 Pusan | Charleston, South<br>Carolina | EVER LEADER   | South Korea | AS PER LABEL                                                      | INC. 2400 LAKEVIEW<br>PKWY STE 580<br>ALPHARETTA GA 30009<br>USA                           | 128, Y<br>YEON<br>KORE                                                  |                               |
|                   |                                            |               |            |       |             |                               |               |             |                                                                   |                                                                                            |                                                                         |                               |
|                   | LG CHEM AMERICA<br>INC                     | LG CHEM LTD.  | 02/04/2018 | 88000 | 40000 Pusan | Charleston, South<br>Carolina | ASKLIPIOS     | South Korea | SEAL NO.: 122380 IN<br>ISO TANKS SEAL NO.:<br>122379 IN ISO TANKS | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                               | YEOU<br>GU, S                                                           |                               |
|                   |                                            |               |            |       |             |                               |               |             |                                                                   |                                                                                            |                                                                         |                               |
|                   | LG CHEM AMERICA<br>INC                     | LG CHEM LTD.  | 01/30/2018 | 88000 | 40000 Pusan | Charleston, South<br>Carolina | MSC ROMA      | South Korea | SEAL NO.: 929373 IN<br>ISO TANKS SEAL NO.:<br>926293 IN ISO TANKS | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                               | 128, Y<br>YOUN<br>SEO                                                   |                               |
|                   |                                            |               |            |       |             |                               |               |             |                                                                   |                                                                                            |                                                                         |                               |
| P/O :<br>ABS      | LG CHEM AMERICA,<br>INC                    | LG CHEM, LTD. | 01/30/2018 | 35435 | 16107 Pusan | Charleston, South<br>Carolina | MSC ROMA      | South Korea | AS PER LABEL                                                      | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA<br>30305 TEL:678-984-5714 1-<br>4044006125 | 20 YO<br>YOUN<br>TOWE<br>KORE<br>TEL E                                  |                               |
|                   |                                            |               |            |       |             |                               |               |             |                                                                   |                                                                                            |                                                                         |                               |
|                   | LG CHEM AMERICA<br>INC                     | LG CHEM LTD.  | 01/27/2018 | 88000 | 40000 Pusan | Charleston, South<br>Carolina | E R TIANPING  | South Korea | SEAL NO.: 123182 IN<br>ISO TANKS SEAL NO.:<br>123188 IN ISO TANKS | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                               | 128, Y<br>DAER<br>SEO                                                   |                               |
| 17914<br>D<br>ATH |                                            |               |            |       |             |                               |               |             | 4501017114 CUSTOMER<br>P/O _ 508904 PP H7914<br>58,800.000 KG     |                                                                                            |                                                                         |                               |

|                 |                                  |               |            |        |              |                            |                  |             |                                                                                                         |                                                                                            |                             |
|-----------------|----------------------------------|---------------|------------|--------|--------------|----------------------------|------------------|-------------|---------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|-----------------------------|
|                 | LG CHEM AMERICA, INC.            | LG CHEM, LTD. | 01/26/2018 | 129877 | 59035 Pusan  | Charleston, South Carolina | MOL MAGNIFICENCE | South Korea | SURRENDERED POLYPROPYLENE<br>PIC_ HEATH WILLIAMS /                                                      | 3475 PIEDMONT RD. NE, SUITE 1200, ATLANTA, GA, 30305                                       | LG TM DAER SEOU             |
|                 | LG CHEM AMERICA INC              | LG CHEM LTD.  | 01/25/2018 | 88000  | 40000 Pusan  | Charleston, South Carolina | MAERSK SURABAYA  | South Korea | SEAL NO.: 003998 IN ISO TANKS SEAL NO.: 003984 IN ISO TANKS                                             | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                                     | YEOU GU, S                  |
| 500             | TO THE ORDER OF LG CHEM AMERICA, | LG CHEM, LTD. | 01/25/2018 | 43386  | 19721 Pusan  | Charleston, South Carolina | MAERSK SURABAYA  | South Korea | AS PER LABEL                                                                                            | INC. 2400 LAKEVIEW PKWY STE 580 ALPHARETTA GA 30009 USA 1-5742394090                       | 128, Y YEON KORE 32555      |
| P/O :<br>1 KG - | LG CHEM AMERICA, INC             | LG CHEM, LTD. | 01/15/2018 | 35435  | 16107 Pusan  | Charleston, South Carolina | MAERSK SEMARANG  | South Korea | AS PER LABEL                                                                                            | 3475 PIEDMONT RD. NE, SUITE 1200 ATLANTA, GA 30305 TEL:678-984-5714 1-3106674852 TEL EX 33 | 20 YO YOUN TOWE KORE TEL E  |
|                 | LG CHEM AMERICA INC              | LG CHEM LTD.  | 01/15/2018 | 88000  | 40000 Pusan  | Charleston, South Carolina | MAERSK SEMARANG  | South Korea | SEAL NO.: 100268 IN ISO TANKS SEAL NO.: 100266 IN ISO TANKS                                             | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                                     | YEOU GU, S                  |
|                 | LG CHEM AMERICA INC              | LG CHEM LTD.  | 01/15/2018 | 88000  | 40000 Pusan  | Charleston, South Carolina | MAERSK SEMARANG  | South Korea | SEAL NO.: 004175 IN ISO TANKS SEAL NO.: 004184 IN ISO TANKS                                             | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA GE                                        | 128, Y DAER SEOU            |
| ST              |                                  |               |            |        |              |                            |                  |             |                                                                                                         |                                                                                            |                             |
| ' 16,0 0.0      | LG CHEM AMERICA, INC.            | LG CHEM, LTD. | 01/14/2018 | 35435  | 16107 Ningpo | Charleston, South Carolina | KAETHE P         | China       | AS PER LABEL                                                                                            | 3475 PIEDMONT RD. NE STE. 1200 ATLANTA, GA 30305 ATTN: SEA GUN LEE- — 1-4044006125         | 20 YO YOUN TOWE KORE EX 82- |
| i 00 K TEL      | LG CHEM AMERICA, INC             | LG CHEM, LTD. | 01/12/2018 | 43296  | 19680 Pusan  | Charleston, South Carolina | MOL MANEUVER     | South Korea | 4501012737 CUSTOMER P/O_ 4501012737 SYNTHETIC RUBBER NBR 2875 35KG SR GREEN BOX 18,900.000 K G H.S CODE | 2400 LAKEVIEW PKWY STE 580 ALPHARET 30009 USA                                              | 128, Y YEON                 |
|                 | LG CHEM AMERICA                  |               |            |        |              |                            |                  |             | SEAL NO.: 001340 IN ISO TANKS SEAL NO.                                                                  | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA                                                   | 128, Y DAER                 |

|                                             |                          |               |            |        |              |                               |                      |             |                                                                   |                                                                                         |                                        |
|---------------------------------------------|--------------------------|---------------|------------|--------|--------------|-------------------------------|----------------------|-------------|-------------------------------------------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------|
| 13745<br>JP<br>21H-<br>714<br>RILE-<br>ESIN | LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 01/08/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | MSC ANTIGUA          | South Korea | ISO TANKS SEAL NO.:<br>001339 IN ISO TANKS                        | SUITE 1200 ATLANTA<br>ATLANTA US US                                                     | DAER<br>SEOU                           |
|                                             | LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 01/08/2018 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | MSC ANTIGUA          | South Korea | SEAL NO.: 004395 IN<br>ISO TANKS SEAL NO.:<br>004316 IN ISO TANKS | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                            | 128, Y<br>DAER<br>SEOU                 |
|                                             | LG CHEM AMERICA,<br>INC. | LG CHEM, LTD. | 01/05/2018 | 70721  | 32146 Pusan  | Charleston, South<br>Carolina | MSC ANTIGUA          | South Korea | AS PER LABEL AS PER<br>LABEL                                      | 3475 PIEDMONT RD.NE<br>STE.1200 ATLANTA, GA<br>30305 ATTN: SEA GUN LEE                  | 20 YO<br>YOUN<br>TOWE<br>KORE          |
|                                             | LG CHEM AMERICA,<br>INC. | LG CHEM LTD.  | 12/29/2017 | 44000  | 20000 Pusan  | Charleston, South<br>Carolina | NORTHERN<br>JAMBOREE | South Korea | SEAL NO.: 801693 IN<br>ISO TANK                                   | 3475 PIEDMONT RD. NE<br>STE. 1200, ATLANTA<br>ATLANTA US US                             | YOUN<br>KORE                           |
|                                             | LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 12/29/2017 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | NORTHERN<br>JAMBOREE | South Korea | SEAL NO.: 004349 IN<br>ISO TANKS SEAL NO.:<br>004331 IN ISO TANKS | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                            | YOUN<br>KORE                           |
| -NP<br>265<br>JP H<br>H -                   | LG CHEM AMERICA,<br>INC. | LG CHEM, LTD. | 12/22/2017 | 141741 | 64428 Ningpo | Charleston, South<br>Carolina | SAFMARINE<br>MAKUTU  | China       | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL         | 3475 PIEDMONT RD.NE<br>STE.1200 ATLANTA, GA<br>30305 ATTN: SEA GUN LEE-<br>1-4044006125 | 20 YO<br>YOUN<br>TOWE<br>KORE<br>TEL E |
|                                             | LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 12/21/2017 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | MSC LISBON           | South Korea | SEAL NO.: 031949 IN<br>ISO TANKS SEAL NO.:<br>031945 IN ISO TANKS | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                            | LG TW<br>DAER                          |
|                                             | LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 12/12/2017 | 46200  | 21000 Pusan  | Charleston, South<br>Carolina | MAERSK<br>STRALSUND  | South Korea | SEAL NO.: 118845 IN<br>ISO TANK                                   | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                            | LG TW<br>DAER                          |
|                                             | LG CHEM AMERICA<br>INC   | LG CHEM LTD.  | 12/12/2017 | 46200  | 21000 Pusan  | Charleston, South<br>Carolina | MAERSK<br>STRALSUND  | South Korea | SEAL NO.: 120596 IN<br>ISO TANK                                   | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                            | LG TW<br>DAER                          |

|                              |                       |               |            |                   |                            |                            |                  |                                                             |                                                               |                                                                                                                                   |
|------------------------------|-----------------------|---------------|------------|-------------------|----------------------------|----------------------------|------------------|-------------------------------------------------------------|---------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| INC                          | LG CHEM LTD.          | 12/12/2017    | 46200      | 21000 Pusan       | Charleston, South Carolina | MAERSK STRALSUND           | South Korea      | ISO TANK                                                    | ATLANTA US US                                                 | DAER                                                                                                                              |
| LG CHEM AMERICA INC          | LG CHEM LTD.          | 12/12/2017    | 46200      | 21000 Pusan       | Charleston, South Carolina | MAERSK STRALSUND           | South Korea      | SEAL NO.: 120569 IN ISO TANK                                | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US        | LG TW DAER                                                                                                                        |
| LG CHEM AMERICA INC          | LG CHEM LTD.          | 12/12/2017    | 46200      | 21000 Pusan       | Charleston, South Carolina | MAERSK STRALSUND           | South Korea      | SEAL NO.: 118899 IN ISO TANK                                | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US        | LG TW DAER                                                                                                                        |
| LG CHEM AMERICA INC          | LG CHEM LTD.          | 12/12/2017    | 46200      | 21000 Pusan       | Charleston, South Carolina | MAERSK STRALSUND           | South Korea      | SEAL NO.: 118886 IN ISO TANK                                | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US        | LG TW DAER                                                                                                                        |
| LG CHEM AMERICA INC          | LG CHEM LTD.          | 12/12/2017    | 88000      | 40000 Pusan       | Charleston, South Carolina | MAERSK STARLSUND           | South Korea      | SEAL NO.: 921764 IN ISO TANKS SEAL NO.: 119096 IN ISO TANKS | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US        | LG TW DAER                                                                                                                        |
| LG CHEM AMERICA INC          | LG CHEM LTD.          | 12/12/2017    | 44000      | 20000 Pusan       | Charleston, South Carolina | MAERSK STRALSUND           | South Korea      | SEAL NO.: 926561 IN ISO TANK                                | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US        | LG TW DAER                                                                                                                        |
| P/O : ABS                    | LG CHEM AMERICA INC.  | LG CHEM, LTD. | 12/12/2017 | 35435             | 16107 Pusan                | Charleston, South Carolina | MAERSK STRALSUND | South Korea                                                 | AS PER LABEL                                                  | 20 YO<br>2400 LAKEVIEW PKWY, YOUN<br>SUITE 580 ALPHARETTA, GA TOWE<br>30009 U.S.A ATTN: SEA KORE<br>GUN LEE--- 1-5742394090 TEL E |
| NYPRO ASHEVILLE              | LG CHEM POLAND SP ZOO | 12/12/2017    | 45320      | 20600 Bremerhaven | Charleston, South Carolina | HS ROME                    | Germany          | N/M                                                         | 100 VISTA BLVD ARDEN NC 28704 US EM<br>RHONDA.RUTH@NYPRO.C OM | UL LC<br>POD G                                                                                                                    |
| CHEMBANK INTERNATIONAL, INC. | LG CHEM LTD.          | 12/06/2017    | 44000      | 20000 Pusan       | Charleston, South Carolina | MAERSK SAIGON              | South Korea      | SEAL NO.: 121036 IN ISO TANK                                | CHEMBANK INTERNATIONAL, INC.<br>CLOSTER, CLOSTER, US US       | LG TW DAER                                                                                                                        |

|                                                  |                                 |               |            |        |        |        |                               |                |             |                                                           |  |                                                                                           |                                 |
|--------------------------------------------------|---------------------------------|---------------|------------|--------|--------|--------|-------------------------------|----------------|-------------|-----------------------------------------------------------|--|-------------------------------------------------------------------------------------------|---------------------------------|
| P/O :<br>ABS                                     |                                 |               |            |        |        |        |                               |                |             |                                                           |  | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA GA<br>30305 TEL:678-984-5714 1-<br>4044006125 | 20 YO<br>YOUN<br>TOWE<br>32555  |
|                                                  | LG CHEM AMERICA                 | LG CHEM, LTD. | 12/01/2017 | 35435  | 16107  | Pusan  | Charleston, South<br>Carolina | MSC MAXINE     | South Korea | AS PER LABEL                                              |  |                                                                                           |                                 |
| 13263<br>JP<br>21H-<br>E-<br>ESIN<br>-5714<br>-A | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 11/30/2017 | 106084 | 48220  | Pusan  | Charleston, South<br>Carolina | MSC MAXINE     | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL                 |  | 3475 PIEDMONT RD. NE<br>STE. 1200 ATLANTA, GA<br>30305 ATTN: SEA GUN LEE                  | 20 YO<br>YOUN<br>TOWE<br>KORE   |
| IRS,<br>E                                        | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 11/30/2017 | 222200 | 101000 | Pusan  | Charleston, South<br>Carolina | MSC MAXINE     | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL AS PER<br>LABEL |  | 243 WOODBINE STREET<br>HIGH POINT NC 27261 ATTN<br>: BETH KLINE/LINDA<br>GARNER           | LG TW<br>DONG<br>SEOU           |
| 10<br>KG                                         | LG CHEM AMERICA,<br>INC.        | LG CHEM, LTD. | 11/21/2017 | 106306 | 48321  | Ningpo | Charleston, South<br>Carolina | ALS CERES      | China       | AS PER LABEL AS PER<br>LABEL AS PER LABEL                 |  | 3475 PIEDMONT RD. NE<br>STE. 1200 ATLANTA, GA<br>30305 1-3106674852 TEL EX<br>33          | 20 YO<br>YOUN<br>TOWE<br>82-325 |
| IRS,<br>E                                        | KAO SPECIALTIES<br>AMERICAS LLC | LG CHEM, LTD. | 11/16/2017 | 222200 | 101000 | Pusan  | Charleston, South<br>Carolina | CONTI MAKALU   | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL AS PER<br>LABEL |  | 243 WOODBINE STREET<br>HIGH POINT NC 27261 ATTN<br>: BETH KLINE/LINDA<br>GARNER           | LG TW<br>DONG<br>SEOU           |
|                                                  | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 11/14/2017 | 46200  | 21000  | Pusan  | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | SEAL NO.: 120870 IN<br>ISO TANK                           |  | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                              | LG TW<br>DAER                   |
|                                                  | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 11/14/2017 | 46200  | 21000  | Pusan  | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | SEAL NO.: 120887 IN<br>ISO TANK                           |  | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                              | LG TW<br>DAER                   |
|                                                  | LG CHEM AMERICA<br>INC          | LG CHEM LTD.  | 11/14/2017 | 46200  | 21000  | Pusan  | Charleston, South<br>Carolina | MAERSK DHAHRAN | South Korea | SEAL NO.: 120893 IN<br>ISO TANK                           |  | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                              | LG TW<br>DAER                   |
| 19900<br>11/10                                   |                                 |               |            |        |        |        |                               |                |             |                                                           |  | 3475 PIEDMONT RD. NE                                                                      |                                 |



|           |                       |               |            |        |              |                            |                 |             |                                                             |                                                                                    |                            |
|-----------|-----------------------|---------------|------------|--------|--------------|----------------------------|-----------------|-------------|-------------------------------------------------------------|------------------------------------------------------------------------------------|----------------------------|
| 218,      |                       |               |            |        |              |                            |                 |             |                                                             | 3475 PIEDMONT RD. NE                                                               |                            |
| 2627      | LG CHEM AMERICA, INC. | LG CHEM LTD.  | 11/14/2017 | 36960  | 16800 Pusan  | Charleston, South Carolina | MAERSK DHAHRAN  | South Korea | AS PER LABEL                                                | STE. 1200, ATLANTA, GA 30305 DONGWON LEE(DWLEE1 LGCHEM.COM)                        | LG TM DAER SEOU 07336      |
| 3         |                       |               |            |        |              |                            |                 |             |                                                             |                                                                                    |                            |
| 3985      |                       |               |            |        |              |                            |                 |             |                                                             |                                                                                    | 20 YO DONG TWIN KORE TEL E |
| 14        | LG CHEAM AMERICA INC  | LG CHEM.LTD   | 11/14/2017 | 35499  | 16136 Pusan  | Charleston, South Carolina | MAERSK DHAHRAN  | South Korea | AS PER LABEL                                                | 3475 PIEDMONT RD. NE STE.1200 ATLANTA GA30305 ATTN:SEA GUN LEE— 1-4044006125       | 20 YO DONG TWIN KORE TEL E |
| 4         |                       |               |            |        |              |                            |                 |             |                                                             |                                                                                    |                            |
| HS        |                       |               |            |        |              |                            |                 |             |                                                             |                                                                                    |                            |
| 4646      | LG CHEM AMERICA       | LG CHEM, LTD. | 11/07/2017 | 35435  | 16107 Pusan  | Charleston, South Carolina | MSC ROMA        | South Korea | AS PER LABEL                                                | 3475 PIEDMONT RD. NE, SUITE 1200 TEL:678-984-5714 1-4044006125                     | 20 YO YOUN KORE EX 82-     |
| ER,       |                       |               |            |        |              |                            |                 |             |                                                             |                                                                                    |                            |
| 21        | LG CHEM, LTD          | LG CHEM, LTD  | 11/07/2017 | 45804  | 20820 Pusan  | Charleston, South Carolina | MSC ROMA        | South Korea | AS PER LABEL                                                | 128, YEOUI-DAERO, YEONGDEUNGPO-GU, SEOUL KOREA                                     | 128, Y DAER SEOU           |
| 21H-184-  |                       |               |            |        |              |                            |                 |             |                                                             |                                                                                    |                            |
| SAI       | LG CHEM AMERICA, INC. | LG CHEM, LTD. | 11/01/2017 | 141741 | 64428 Ningpo | Charleston, South Carolina | KAETHE P        | China       | N/M N/M N/M N/M                                             | 3475 PIEDMONT RD. NE STE.1200 ATLANTA, GA 30305 ATTN: SEA GUN LEE- -- 1-4044006125 | 20 YO YOUN TOWE TEL E      |
|           |                       |               |            |        |              |                            |                 |             |                                                             |                                                                                    |                            |
|           | LG CHEM AMERICA INC   | LG CHEM LTD.  | 10/27/2017 | 88000  | 40000 Pusan  | Charleston, South Carolina | PARSIFAL        | South Korea | SEAL NO.: 219861 IN ISO TANKS SEAL NO.: 107386 IN ISO TANKS | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                             | LG TM DAER                 |
|           |                       |               |            |        |              |                            |                 |             |                                                             |                                                                                    |                            |
|           | LG CHEM AMERICA INC   | LG CHEM LTD.  | 10/27/2017 | 46200  | 21000 Pusan  | Charleston, South Carolina | PARSIFAL        | South Korea | SEAL NO.: 219883 IN ISO TANK                                | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                             | LG TM DAER                 |
| P/O : ABS |                       |               |            |        |              |                            |                 |             |                                                             |                                                                                    |                            |
|           | LG CHEM AMERICA       | LG CHEM, LTD. | 10/24/2017 | 35499  | 16136 Pusan  | Charleston, South Carolina | MAERSK SEMARANG | South Korea | AS PER LABEL                                                | 3475 PIEDMONT RD. NE, SUITE 1200 ATLANTA GA 30305 TEL:678-984-5714 1-4044006125    | 20 YO YOUN TOWE KORE TEL E |

|       |                         |               |            |        |              |                               |                      |             |                                                                           |                                                                                     |                                 |
|-------|-------------------------|---------------|------------|--------|--------------|-------------------------------|----------------------|-------------|---------------------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------|
|       | LG CHEM AMERICA<br>INC  | LG CHEM LTD   | 10/24/2017 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | ZIM DJIBOUTI         | South Korea | SEAL NO.: 028014 IN<br>ISO TANKS SEAL NO.:<br>028240 IN ISO TANKS         | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                        | LG TM<br>DAER                   |
|       | LG CHEM AMERICA<br>INC  | LG CHEM LTD.  | 10/24/2017 | 46200  | 21000 Pusan  | Charleston, South<br>Carolina | ZIM DJIBOUTI         | South Korea | SEAL NO.: 218650 IN<br>ISO TANK                                           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                        | LG TM<br>DAER                   |
| 2790  |                         |               |            |        |              |                               |                      |             |                                                                           |                                                                                     |                                 |
| 4E    |                         |               |            |        |              |                               |                      |             |                                                                           |                                                                                     |                                 |
| I:    | LG CHEM AMERICA<br>INC. | LG CHEM, LTD. | 10/24/2017 | 43881  | 19946 Pusan  | Charleston, South<br>Carolina | MAERSK<br>SEMARANG   | South Korea | AS PER LABEL                                                              | 3475 PIEDMONT RD. NE,<br>SUITE 1200 ATLANTA, GA,<br>30305 USA CONTACT :<br>SAM PYUN | 20 YO<br>YOUN<br>TOWE<br>150-07 |
|       | LG CHEM AMERICA<br>INC  | LG CHEM LTD.  | 10/17/2017 | 46200  | 21000 Pusan  | Charleston, South<br>Carolina | ZIM CHICAGO          | South Korea | SEAL NO.: 927266,30636<br>IN ISO TANK                                     | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                        | LG TM<br>DAER                   |
|       | LG CHEM AMERICA<br>INC  | LG CHEM LTD.  | 10/17/2017 | 46200  | 21000 Pusan  | Charleston, South<br>Carolina | ZIM CHICAGO          | South Korea | SEAL NO.: 925166 IN<br>ISO TANK                                           | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                        | LG TM<br>DAER                   |
|       | LG CHEM AMERICA<br>INC  | LG CHEM LTD.  | 10/17/2017 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | ZIM CHICAGO          | South Korea | SEAL NO.: 120166 IN<br>ISO TANKS SEAL NO.:<br>120192 IN ISO TANKS         | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                        | LG TM<br>DAER                   |
|       | LG CHEM AMERICA<br>INC  | LG CHEM LTD.  | 10/11/2017 | 44000  | 20000 Pusan  | Charleston, South<br>Carolina | NORTHERN<br>JAMBOREE | South Korea | SEAL NO.:<br>001815,1704211 IN ISO<br>TANK                                | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                        | LG TM<br>DAER                   |
| -A    |                         |               |            |        |              |                               |                      |             |                                                                           |                                                                                     |                                 |
| NA    |                         |               |            |        |              |                               |                      |             |                                                                           |                                                                                     |                                 |
| J, SC | KAO SPECIALTIES         |               |            |        |              |                               |                      |             |                                                                           |                                                                                     |                                 |
| DM    | AMERICAS LLC            | LG CHEM, LTD. | 10/10/2017 | 222200 | 101000 Pusan | Charleston, South<br>Carolina | NORTHERN<br>JAMBOREE | South Korea | AS PER LABEL AS PER<br>LABEL AS PER LABEL<br>AS PER LABEL AS PER<br>LABEL | 243 WOODBINE STREET<br>HIGH POINT NC 27261 ATTN<br>: BETH KLINE/LINDA<br>GARNER     | LG TM<br>DONG<br>SEOU           |
|       |                         |               |            |        |              |                               |                      |             |                                                                           |                                                                                     |                                 |
|       |                         |               |            |        |              |                               |                      |             | SEAL NO.: 134274 IN                                                       | 3475 PIEDMONT ROAD NE                                                               |                                 |

|                               |               |            |        |              |                               |                     |             |                                                                            |                                                                                                    |                                        |
|-------------------------------|---------------|------------|--------|--------------|-------------------------------|---------------------|-------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|----------------------------------------|
| LG CHEM AMERICA<br>INC        | LG CHEM LTD.  | 10/07/2017 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | ZIM SAN DIEGO       | South Korea | ISO TANKS SEAL NO.:<br>132270 IN ISO TANKS                                 | SUITE 1200 ATLANTA<br>ATLANTA US US                                                                | LG TM<br>DAER                          |
| LG CHEM AMERICA<br>INC        | LG CHEM LTD.  | 10/02/2017 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | ZIM ROTTERDAM       | South Korea | SEAL NO.: 024893 IN<br>ISO TANKS SEAL NO.:<br>024898 IN ISO TANKS          | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                       | LG TM<br>DAER                          |
| LG CHEM AMERICA,<br>INC.      | LG CHEM, LTD. | 09/28/2017 | 106306 | 48321 Ningpo | Charleston, South<br>Carolina | MAERSK<br>GATESHEAD | China       | AS PER LABEL AS PER<br>LABEL AS PER LABEL                                  | 3475 PIEDMONT RD.NE<br>STE.1200 ATLANTA, GA<br>30305 ATTN: SEA GUN LEE<br>-- 1-4044006125          | 20 YO<br>YOUN<br>TOWE<br>KORE<br>TEL E |
| LG CHEM AMERICA<br>INC        | LG CHEM, LTD. | 09/23/2017 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | ZIM NINGBO          | South Korea | SEAL NO.: 218693,30531<br>IN ISO TANKS SEAL<br>NO.: 218627 IN ISO<br>TANKS | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                       | 128, Y<br>YEON<br>SEOU                 |
| LG CHEM AMERICA<br>INC        | LG CHEM, LTD. | 09/20/2017 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | ARISTOMENIS         | South Korea | SEAL NO.: 107296 ISO<br>TANKS SEAL NO.:<br>924881 ISO TANKS                | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                       | 128, Y<br>YEON<br>SEOU                 |
| LG CHEM AMERICA,<br>R401-INC. | LG CHEM, LTD. | 09/09/2017 | 35424  | 16102 Pusan  | Charleston, South<br>Carolina | EVER LEGION         | South Korea | AS PER LABEL                                                               | 3475 PIEDMONT RD.NE<br>STE.1200 ATLANTA, GA<br>30305 ATTN: SEA GUN LEE                             | 20 YO<br>YOUN<br>TOWE<br>KORE          |
| LG CHEM AMERICA<br>INC        | LG CHEM LTD.  | 09/03/2017 | 88000  | 40000 Pusan  | Charleston, South<br>Carolina | HYUNDAI MERCURY     | South Korea | SEAL NO.: 924895 IN<br>ISO TANKS SEAL NO.:<br>924882 IN ISO TANKS          | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                       | LG TM<br>DAER                          |
| LG CHEM AMERICA<br>INC.       | LG CHEM LTD   | 08/28/2017 | 70870  | 32214 Pusan  | Charleston, South<br>Carolina | CONTI MAKALU        | South Korea | AS PER LABEL AS PER<br>LABEL                                               | 3475 PIEDMONT RD.NE<br>STE.1200ATLANTA, GA<br>30305 ATTN: SEA GUN LEE<br>1-4044006125              | 20 YO<br>YOUN<br>TOWE<br>TEL E         |
| LG CHEM AMERICA,              |               |            |        |              | Charleston, South             |                     |             |                                                                            | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA, GA<br>30305 (12TH FLOOR),<br>U.S.A. ATTN : ESTHER LE | LG TM<br>DAER<br>SEOU                  |

|                          |                                   |               |            |        |       |                            |                            |             |                                                          |                                                                                                                        |                                                                    |                      |
|--------------------------|-----------------------------------|---------------|------------|--------|-------|----------------------------|----------------------------|-------------|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|----------------------|
| LG CHEM AMERICA, INC.,   | LG CHEM LTD.                      | 08/19/2017    | 53572      | 24351  | Pusan | Carolina                   | E. R. TIANPING             | South Korea | IN ISO TANK                                              | TEL : 404-400-6125                                                                                                     | 07336                                                              |                      |
|                          |                                   |               |            |        |       |                            |                            |             |                                                          | 3475 PIEDMONT RD. NE, SUITE 1200, ATLANTA, GA 30305 (12TH FLOOR), U.S.A. ATTN : ESTHER LE TEL : 404-400-6125           | LG TW DAER SEOU 07336                                              |                      |
| LG CHEM AMERICA, INC.,   | LG CHEM LTD.                      | 08/11/2017    | 107144     | 48702  | Pusan | Charleston, South Carolina | PARSIFAL                   | South Korea | IN ISO TANKS IN ISO TANKS                                |                                                                                                                        |                                                                    |                      |
| P-O 5714,                |                                   |               |            |        |       |                            |                            |             | MARKS AND NUMBERS WITH CONTAINER APZU390761 AS PER LABEL | 3475 PIEDMONT RD. NE STE. 1200 ATLANTA, GA 30305 ATTN SEA GUN LEE                                                      | 20 YOUNG TOWER KOREA                                               |                      |
| LG CHEM AMERICA, INC.    | LG CHEM, LTD.                     | 08/06/2017    | 70721      | 32146  | Pusan | Charleston, South Carolina | EVER LUCID                 | South Korea |                                                          |                                                                                                                        |                                                                    |                      |
|                          |                                   |               |            |        |       |                            |                            |             |                                                          | 3475 PIEDMONT RD. NE, SUITE 1200, ATLANTA, GA 30305 (12TH FLOOR), U.S.A. ATTN : ESTHER LE TEL : 404-400-6125           | LG TW DAER SEOU 07336                                              |                      |
| LG CHEM AMERICA, INC.,   | LG CHEM LTD.                      | 08/03/2017    | 107144     | 48702  | Pusan | Charleston, South Carolina | ZIM DJIBOUTI               | South Korea | IN ISO TANKS IN ISO TANKS                                |                                                                                                                        |                                                                    |                      |
| INC., -3 P/O :           |                                   |               |            |        |       |                            |                            |             |                                                          | 3475 PIEDMONT RD. NE, SUITE 1200, ATLANTA, GA 30305 (12TH FLOOR), U.S ATTN : ESTHER LE, TEL : 404-400-612 1-4044006125 | LG TW DAER SEOU 07336 32555                                        |                      |
| IE 1, -3 P/O :           | LG CHEM AMERICA, INC.,            | LG CHEM LTD.  | 08/01/2017 | 88184  | 40084 | Pusan                      | Charleston, South Carolina | MSC ANTIGUA | South Korea                                              | N/M N/M 4500955392 CUSTOMER P/O _ 507459 PP H7914 58,800.000 KG POLYPROPYLENE H.S CODE 3902100000 FAX _ 213.623.3329   |                                                                    |                      |
| 17914 NE 3329 17914 5087 | LG CHEM AMERICA, INC., 910 SYLVAN | LG CHEM, LTD  | 07/26/2017 | 129877 | 59035 | Pusan                      | Charleston, South Carolina | MOL MISSION | South Korea                                              | 910 SYLVAN AVE., ENGLEWOOD CLIFFS N                                                                                    | LG TW DAER SEOU                                                    |                      |
|                          | LG CHEM AMERICA                   | LG CHEM, LTD. | 07/25/2017 | 35361  | 16073 | Pusan                      | Charleston, South Carolina | ATHOS       | South Korea                                              | AS PER LABEL                                                                                                           | 3475 PIEDMONT RD. NE, SUITE 1200 ATLANTA GA 30305 TEL:678-984-5714 | 20 YOUNG TOWER KOREA |
|                          |                                   |               |            |        |       |                            |                            |             |                                                          | 3475 PIEDMONT RD. NE, SUITE 1200, ATLANTA, GA 30305 (12TH FLOOR), U.S ATTN : ESTHER LE 1-4044006125                    | LG TW DAER SEOU 07336 32555                                        |                      |
| 9 734 ME                 | LG CHEM AMERICA, INC.,            | LG CHEM LTD.  | 07/25/2017 | 88184  | 40084 | Pusan                      | Charleston, South Carolina | ATHOS       | South Korea                                              | N/M N/M                                                                                                                |                                                                    |                      |
|                          |                                   |               |            |        |       |                            |                            |             |                                                          | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                                                                 | YOUNG TOWER KOREA                                                  |                      |
|                          | LG CHEM AMERICA INC               | LG CHEM LTD.  | 07/18/2017 | 44000  | 20000 | Pusan                      | Charleston, South Carolina | MSC LISBON  | South Korea                                              | SEAL NO.: 133586 IN ISO TANK                                                                                           |                                                                    |                      |

|                     |                  |               |            |             |                   |                   |             |                   |                               |                              |       |
|---------------------|------------------|---------------|------------|-------------|-------------------|-------------------|-------------|-------------------|-------------------------------|------------------------------|-------|
| '85 8               |                  |               |            |             |                   |                   |             |                   |                               | 3475 PIEDMONT RD. NE, LG TW  |       |
| )                   |                  |               |            |             |                   |                   |             |                   |                               | SUITE 1200, ATLANTA, GA DAER |       |
| GR LG CHEM AMERICA, | LG CHEM LTD.     | 07/18/2017    | 44092      | 20042 Pusan | Charleston, South | MSC LISBON        | South Korea | MARK & NO. IN ISO | U.S.A. ATTN : ESTHER LE 1-    | 07336                        |       |
| LG INC.,            |                  |               |            |             | Carolina          |                   |             | TANK              | 4044006125                    | 32555                        |       |
| 5087                |                  |               |            |             |                   |                   |             |                   |                               |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   |                               |                              | 20 YO |
|                     | LG CHEM AMERICA  | LG CHEM, LTD. | 07/11/2017 | 35361       | 16073 Pusan       | Charleston, South | MAERSK      |                   | 3475 PIEDMONT RD. NE, YOUN    |                              |       |
|                     |                  |               |            |             |                   | Carolina          | STRALSUND   | South Korea       | SUITE 1200 ATLANTA GA TOWE    |                              |       |
|                     |                  |               |            |             |                   |                   |             | AS PER LABEL      | 30305 TEL:678-984-5714        | KORE                         |       |
| K                   |                  |               |            |             |                   |                   |             |                   |                               |                              |       |
| 6-1 2-              |                  |               |            |             |                   |                   |             |                   |                               |                              |       |
|                     | LG CHEM AMERICA, | LG CHEM LTD.  | 07/11/2017 | 88184       | 40084 Pusan       | Charleston, South | MAERSK      |                   | 3475 PIEDMONT RD. NE, LG TW   |                              |       |
|                     | INC.,            |               |            |             |                   | Carolina          | STRALSUND   | South Korea       | SUITE 1200, ATLANTA, GA DAER  |                              |       |
|                     |                  |               |            |             |                   |                   |             | N/M N/M           | 30305 (12TH FLOOR), U.S SEOU  |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | ATTN : ESTHER LE 1- 07336     |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | 4044006125                    | 32555                        |       |
| 9 738               |                  |               |            |             |                   |                   |             |                   |                               |                              |       |
| ME LG CHEM AMERICA, | LG CHEM LTD.     | 07/06/2017    | 88184      | 40084 Pusan | Charleston, South | MAERSK SAIGON     | South Korea | N/M N/M           | 3475 PIEDMONT RD. NE, LG TW   |                              |       |
| , INC.,             |                  |               |            |             | Carolina          |                   |             |                   | SUITE 1200, ATLANTA, GA DAER  |                              |       |
| 5087                |                  |               |            |             |                   |                   |             |                   | 30305 (12TH FLOOR), U.S SEOU  |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | ATTN : ESTHER LE 1- 07336     |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | 4044006125                    | 32555                        |       |
|                     |                  |               |            |             |                   |                   |             |                   |                               |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   |                               |                              | 20 YO |
|                     | LG CHEM AMERICA  | LG CHEM, LTD. | 06/28/2017 | 35361       | 16073 Pusan       | Charleston, South | MSC MAXINE  | South Korea       | 3475 PIEDMONT RD. NE, YOUN    |                              |       |
|                     |                  |               |            |             |                   | Carolina          |             | AS PER LABEL      | SUITE 1200 ATLANTA GA TOWE    |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | 30305 TEL:678-984-5714        | KORE                         |       |
|                     |                  |               |            |             |                   |                   |             |                   |                               |                              |       |
| 9 739               |                  |               |            |             |                   |                   |             |                   |                               |                              |       |
| ME LG CHEM AMERICA, | LG CHEM LTD.     | 06/28/2017    | 88184      | 40084 Pusan | Charleston, South | MSC MAXINE        | South Korea | N/M N/M           | 3475 PIEDMONT RD. NE, LG TW   |                              |       |
| , INC.,             |                  |               |            |             | Carolina          |                   |             |                   | SUITE 1200, ATLANTA, GA DAER  |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | 30305 (12TH FLOOR), U.S SEOU  |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | ATTN : ESTHER LE 1- 07336     |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | 4044006125                    | 23773                        |       |
| IO                  |                  |               |            |             |                   |                   |             |                   |                               |                              |       |
| LG                  |                  |               |            |             |                   |                   |             |                   |                               |                              | 20 YO |
| 4- LG CHEM AMERICA, | LG CHEM, LTD.    | 06/28/2017    | 35435      | 16107 Pusan | Charleston, South | MSC MAXINE        | South Korea | AS PER LABEL      | 3475 PIEDMONT ROAD, NE YOUN   |                              |       |
| , INC.              |                  |               |            |             | Carolina          |                   |             |                   | STE 1200, ATLANTA, GA TOWE    |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | 30305, USA ATIN: SEA GUN KORE |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | LEE--- 1-4044006125           | TEL E                        |       |
| 9 740               |                  |               |            |             |                   |                   |             |                   |                               |                              |       |
| ME LG CHEM AMERICA, | LG CHEM LTD.     | 06/28/2017    | 88184      | 40084 Pusan | Charleston, South | MSC MAXINE        | South Korea | N/M N/M           | 3475 PIEDMONT RD. NE, LG TW   |                              |       |
| , INC.,             |                  |               |            |             | Carolina          |                   |             |                   | SUITE 1200, ATLANTA, GA DAER  |                              |       |
| ABS                 |                  |               |            |             |                   |                   |             |                   | 30305 (12TH FLOOR), U.S SEOU  |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | ATTN : ESTHER LE 1- 07336     |                              |       |
|                     |                  |               |            |             |                   |                   |             |                   | 4044006125                    | 32555                        |       |

|      |                           |               |            |       |             |                            |                   |             |                              |                                                                                                        |                               |
|------|---------------------------|---------------|------------|-------|-------------|----------------------------|-------------------|-------------|------------------------------|--------------------------------------------------------------------------------------------------------|-------------------------------|
| 310  | ABS LG CHEM AMERICA, INC. | LG CHEM, LTD. | 06/20/2017 | 70999 | 32272 Pusan | Charleston, South Carolina | MAERSK SEOUL      | South Korea | AS PER LABEL AS PER LABEL    | 3475 PIEDMONT ROAD, NE STE 1200, ATLANTA, GA 30305, USA ATTN: SEA GUN LEE— 1-4044006125                | 20 YO YOUN TOWE KORE EX 82-   |
| 1    | LG CHEM AMERICA, INC.,    | LG CHEM LTD.  | 06/15/2017 | 88000 | 40000 Pusan | Charleston, South Carolina | CMA CGM MELISANDE | South Korea | IN ISO TANKS NO MARKS        | 3475 PIEDMONT RD. NE, SUITE 1200,,FULTON,GEORGIA,UNITED STATES, ATLANTA GA, UNITED STATES -- TELEX POS | LG TW DAER GU,SE UL , S POST, |
|      | LG CHEM AMERICA INC       | LG CHEM LTD.  | 06/07/2017 | 44000 | 20000 Pusan | Charleston, South Carolina | MEMPHIS           | South Korea | SEAL NO.: 117735 IN ISO TANK | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                                                 | LG TW DAER                    |
|      | LG CHEM AMERICA INC       | LG CHEM LTD.  | 05/30/2017 | 44000 | 20000 Pusan | Charleston, South Carolina | MAERSK SURABAYA   | South Korea | SEAL NO.: 117879 IN ISO TANK | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                                                 | YOUN KORE                     |
|      | LG CHEM AMERICA INC       | LG CHEM LTD.  | 05/23/2017 | 46200 | 21000 Pusan | Charleston, South Carolina | MAERSK SEMARANG   | South Korea | SEAL NO.: 121092 IN ISO TANK | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                                                 | LG TW DAER                    |
|      | LG CHEM AMERICA INC       | LG CHEM LTD.  | 05/23/2017 | 46200 | 21000 Pusan | Charleston, South Carolina | MAERSK SEMARANG   | South Korea | SEAL NO.: 128100 IN ISO TANK | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                                                 | LG TW DAER                    |
|      | LG CHEM AMERICA INC       | LG CHEM LTD.  | 05/23/2017 | 44000 | 20000 Pusan | Charleston, South Carolina | MAERSK SEMARANG   | South Korea | SEAL NO.: 115734 IN ISO TANK | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA ATLANTA US US                                                 | LG TW DAER                    |
| 1612 | LG CHEM AMERICA INC       | LG CHEM LTD.  | 04/29/2017 | 44000 | 20000 Pusan | Charleston, South Carolina | MOL MODERN        | South Korea | N/M . . .                    | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA GA, 30305 TEL 404-400-6125 EMAIL ESTHERLELGCHEM.COM           | LG TW DAER SEOUL 07336        |
|      |                           |               |            |       |             |                            |                   |             |                              | 3475 PIEDMONT ROAD NE                                                                                  |                               |

|                                   |                         |               |            |        |       |       |                            |                  |             |                                                                                                                        |                                                                                                                        |                            |
|-----------------------------------|-------------------------|---------------|------------|--------|-------|-------|----------------------------|------------------|-------------|------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|----------------------------|
| 2000                              | LG CHEM AMERICA INC     | LG CHEM LTD.  | 04/29/2017 | 44000  | 20000 | Pusan | Charleston, South Carolina | MOL MODERN       | South Korea | N/M                                                                                                                    | SUITE 1200 ATLANTA GA, 30305 TEL 404-400-6125<br>EMAIL ESTHERLELGCHEM.COM                                              | LG T DAEI SEOI 0733        |
| 10, 222948                        | LG CHEM AMERICA, INC.   | LG CHEM, LTD. | 04/27/2017 | 35435  | 16107 | Pusan | Charleston, South Carolina | SAFMARINE MAKUTU | South Korea | AS PER LABEL                                                                                                           | 3475 PIEDMONT ROAD, NE STE 1200, ATLANTA, GA 30305, USA ATTN: SEA GUN LEE--- 1-4044006125                              | 20 YR DON TWIN KOR EX 8    |
| 121H-75412, 20                    | LG CHEM AMERICA, INC.   | LG CHEM, LTD. | 04/12/2017 | 35361  | 16073 | Pusan | Charleston, South Carolina | MOL MAXIM        | South Korea | AS PER LABEL                                                                                                           | 3475 PIEDMONT RD. NE, SUITE 1200 ATLANTA, GA 30305 TEL:678-984-5714                                                    | 20 YR YOUNG TOWN KOR       |
| 11                                | LG CHEM AMERICA, INC.   | LG CHEM, LTD. | 04/05/2017 | 35499  | 16136 | Pusan | Charleston, South Carolina | KAETHE P         | South Korea | AS PER LABEL                                                                                                           | 3475 PIEDMONT RD. NE STE. 1200 ATLANTA, GA 30305 AUN: SEA GUN LEE--- 1-4044006125                                      | 20 YR YOUNG TOWN KOR TEL I |
| 84 PP JMER OF P.O. II, -3 R P/O : | FITESA SIMPSONVILLE INC | LG CHEM, LTD. | 03/28/2017 | 129875 | 59034 | Pusan | Charleston, South Carolina | GRASMERE MAERSK  | South Korea | AS PER LABEL 40 HQX3 CONTAINER ONLY. . . AS PER LABEL 40 HQX3 CONTAINER ONLY. . . AS PER LABEL 40 HQX3 CONTAINER ONLY. | 840 SE MAIN ST SIMPSONVILLE, SC 29681 US                                                                               | 128, YEOI 0733             |
| IDE:2 16, ER ATE,                 | LG CHEM AMERICA, INC.,  | LG CHEM LTD.  | 03/28/2017 | 44092  | 20042 | Pusan | Charleston, South Carolina | GRASMERE MAERSK  | South Korea | N/M                                                                                                                    | 3475 PIEDMONT RD. NE, SUITE 1200, ATLANTA, GA 30305 (12TH FLOOR), U.S ATTN : ESTHER LE, TEL : 404-400-612 1-4044006125 | LG T DAEI SEOI 0733 3255   |
| IDE 90 7 ZED                      | LG CHEM AMERICA, INC.,  | LG CHEM LTD.  | 03/28/2017 | 44092  | 20042 | Pusan | Charleston, South Carolina | GRASMERE MAERSK  | South Korea | N/M                                                                                                                    | 3475 PIEDMONT RD. NE, SUITE 1200, ATLANTA, GA 30305 (12TH FLOOR), U.S ATTN : ESTHER LE 1-4044006125                    | LG T DAEI SEOI 0733 2757   |
| 291612 WT GS                      | LG CHEM AMERICA INC     | LG CHEM LTD.  | 03/17/2017 | 44000  | 20000 | Pusan | Charleston, South Carolina | MOL MATRIX       | South Korea | N/M                                                                                                                    | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA GA, 30305 TE 404-400-6125<br>EMAIL ESTHERLELGCHEM.COM                         | LG T DAEI SEOI 0733        |



|                             |                                 |              |            |       |       |       |                               |                        |             |                                                 |                                                                                                                      |                                           |
|-----------------------------|---------------------------------|--------------|------------|-------|-------|-------|-------------------------------|------------------------|-------------|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| 103<br>INH<br>NO S<br>II HS | LG CHEM AMERICA<br>INC          | LG CHEM LTD. | 03/14/2017 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | SEA LAND METEOR        | South Korea | SEAL NO.: 134957 IN<br>ISO TANK                 | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                         | LG TW<br>DAER                             |
| YU<br>I<br>A<br>1-2-        | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD. | 03/14/2017 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA LAND METEOR        | South Korea | N/M                                             | 15 FOREST STREET<br>CLOSTER, NJ 07624 1-<br>7326750773                                                               | LG TW<br>DAER<br>SEOU<br>07336<br>32555   |
| R)                          | LG CHEM AMERICA<br>INC          | LG CHEM LTD. | 03/14/2017 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA LAND METEOR        | South Korea | IN ISO TANK                                     | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>GA,30305 TEL: 404-400-<br>6125, EMAIL:ESTHERLE@L<br>1-4044006125      | LG TW<br>DAER<br>SEOU<br>07336<br>32555   |
| YU<br>I<br>A<br>1-2-        | LG CHEM AMERICA<br>INC          | LG CHEM LTD. | 03/14/2017 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA LAND METEOR        | South Korea | IN ISO TANK                                     | 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT 30305 TEL:<br>404-400-6125,<br>EMAIL:ESTHERLE@LGCHE<br>M.COM 1-4044006125     | LG TW<br>DAER<br>SEOU<br>07336<br>32555   |
| 103<br>INH<br>NO S<br>II HS | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD. | 03/14/2017 | 44092 | 20042 | Pusan | Charleston, South<br>Carolina | SEA LAND METEOR        | South Korea | N/M                                             | 15 FOREST STREET<br>CLOSTER, NJ 07624 1-<br>7326750773                                                               | LG TW<br>DAER<br>SEOU<br>07336<br>32555   |
|                             | LG CHEM AMERICA<br>INC          | LG CHEM LTD. | 03/12/2017 | 46200 | 21000 | Pusan | Charleston, South<br>Carolina | MOL MISSION            | South Korea | SEAL NO.: 113676 IN<br>ISO TANK                 | 3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>ATLANTA US US                                                         | LG TW<br>DAER                             |
|                             | CHEMBANK<br>INTERNATIONAL, INC. | LG CHEM LTD. | 03/09/2017 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | COSCO NINGBO           | South Korea | SECOND SEAL NO:<br>117052/117070 IN ISO<br>TANK | 15 FOREST<br>STREET,BERGEN,NEW<br>JERSEY, UNITED STATES,<br>CLOSTER NJ, UNITED S<br>TATES -- TELEX: POSTAL:<br>07624 | LG TW<br>DAER<br>GU,SE<br>UL , S<br>POST, |
|                             | LG CHEM AMERICA<br>INC          | LG CHEM LTD. | 02/24/2017 | 44000 | 20000 | Pusan | Charleston, South<br>Carolina | HENRY HUDSON<br>BRIDGE | South Korea | NO MARKS                                        | 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT LANTA GA,<br>UNITED STATES<br>POSTAL:303 05                                   | LG TW<br>DAER<br>SEOU<br>POST,            |
|                             | LG CHEM AMERICA<br>INC          | LG CHEM LTD. |            |       |       | Pusan | Charleston, South<br>Carolina |                        |             |                                                 | 3475 PIEDMONT ROAD NE<br>SUITE 1200 AT LANTA GA,<br>30305 ATLANTA GA,<br>UNITED STATES 404 400                       | LG TW<br>DAER                             |

|                           |              |            |        |             |                               |                    |             |                                                                                                                                           |                                                                                                                                                                 |                                                                   |
|---------------------------|--------------|------------|--------|-------------|-------------------------------|--------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| LG CHEM AMERICA<br>INC    | LG CHEM LTD. | 02/16/2017 | 44000  | 20000 Pusan | Charleston, South<br>Carolina | COSCO<br>GUANGZHOU | South Korea | NO MARKS                                                                                                                                  | UNITED STATES 404-400-<br>6125 POSTAL:30305                                                                                                                     | DAEF<br>KORE                                                      |
| LG CHEM AMERICA,<br>INC., | LG CHEM LTD. | 02/12/2017 | 46200  | 21000 Pusan | Charleston, South<br>Carolina | HANNOVER BRIDGE    | South Korea | IN ISO TANK                                                                                                                               | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA GA,<br>UNITED STATES<br>POSTAL:30 305                                                                              | LG TI<br>DAEF<br>SEOI<br>OSTA                                     |
| LG CHEM AMERICA,<br>INC., | LG CHEM LTD. | 02/12/2017 | 46200  | 21000 Pusan | Charleston, South<br>Carolina | HANNOVER BRIDGE    | South Korea | IN ISO TANK                                                                                                                               | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA GA,<br>UNITED STATES<br>POSTAL:30 305                                                                              | LG TI<br>DAEF<br>SEOI<br>OSTA                                     |
| LG CHEM AMERICA,<br>INC., | LG CHEM LTD. | 02/12/2017 | 46200  | 21000 Pusan | Charleston, South<br>Carolina | HANNOVER BRIDGE    | South Korea | IN ISO TANK                                                                                                                               | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA GA,<br>UNITED STATES<br>POSTAL:30 305                                                                              | LG TI<br>DAEF<br>SEOI<br>POST                                     |
| LG CHEM AMERICA,<br>INC., | LG CHEM LTD. | 02/12/2017 | 46200  | 21000 Pusan | Charleston, South<br>Carolina | HANNOVER BRIDGE    | South Korea | IN ISO TANK                                                                                                                               | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA GA,<br>UNITED STATES<br>POSTAL:30 305                                                                              | LG TI<br>DAEF<br>SEOI<br>POST                                     |
| LG CHEM AMERICA,<br>INC.  | LG CHEM LTD. | 02/12/2017 | 44000  | 20000 Pusan | Charleston, South<br>Carolina | HANNOVER BRIDGE    | South Korea | NO MARKS                                                                                                                                  | 3475 PIEDMONT RD. NE,<br>SUITE 1200, ATLANTA GA,<br>UNITED STATES<br>4044006125 POSTAL:30354                                                                    | LG TI<br>DAEF<br>SEOI<br>POST                                     |
| LG CHEM AMERICA,<br>INC.  | LG CHEM LTD. | 02/11/2017 | 129875 | 59034 Pusan | Charleston, South<br>Carolina | MOL MAJESTY        | South Korea | AS PER LABEL 40<br>HQX3 CONTAINER<br>ONLY. . . AS PER<br>LABEL 40 HQX3 CONT<br>AINER ONLY. . . AS<br>PER LABEL 40 HQX3<br>CONTAINER ONLY. | 840 SE MAIN ST<br>SIMPSONVILLE, SC 29681<br>US                                                                                                                  | 128, '<br>YEOI<br>07336                                           |
| LG CHEM AMERICA,<br>INC.  | LG CHEM LTD. | 02/10/2017 | 45804  | 20820 Pusan | Charleston, South<br>Carolina | MOL MAJESTY        | South Korea | AS PER LABEL<br>PARTY 2 LG CHEM<br>AMERICA INC 3475<br>PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA<br>GA, 30305 TEL:404-400-<br>6125           | INC. 2400 LAKEVIEW<br>PKWY STE 580<br>ALPHARETTA GA 30009<br>USA<br>3475 PIEDMONT ROAD NE<br>SUITE 1200 ATLANTA GA,<br>30305 TEL:404-400-6125, 1-<br>4044006125 | 128, '<br>DAEF<br>SEOI<br>LG TI<br>DAEF<br>SEOI<br>07336<br>32556 |

|                            |                     |              |            |             |                            |                            |                  |             |              |                                                                                   |                             |
|----------------------------|---------------------|--------------|------------|-------------|----------------------------|----------------------------|------------------|-------------|--------------|-----------------------------------------------------------------------------------|-----------------------------|
| INC.                       | LG CHEM LTD.        | 01/19/2017   | 4409Z      | 2004Z Pusan | Charleston, South Carolina | MOLNOR CITAN               | South Korea      | N/A         |              | 404-400-6125                                                                      | 32555                       |
| 14308<br>1018<br>3<br>IL - | LG CHEM AMERICA,    | LG CHEM, LTD | 01/16/2017 | 45804       | 20820 Pusan                | Charleston, South Carolina | MOL MOTIVATOR    | South Korea | AS PER LABEL | INC. 2400 LAKEVIEW PKWY STE 580 ALPHARETTA GA 30009 USA                           | 128, Y DAER SEOU            |
| 14308<br>1018<br>3<br>IL - | LG CHEM AMERICA,    | LG CHEM, LTD | 01/16/2017 | 45804       | 20820 Pusan                | Charleston, South Carolina | MOL MOTIVATOR    | South Korea | AS PER LABEL | INC. 2400 LAKEVIEW PKWY STE 580 ALPHARETTA GA 30009 USA                           | 128, Y DAER SEOU            |
| FED<br>3<br>000<br>JC      | LG CHEM AMERICA INC | LG CHEM LTD. | 12/21/2016 | 46297       | 21044 Pusan                | Charleston, South Carolina | SEA LAND MERCURY | South Korea | IN ISO TANK  | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA GA, 30305 TEL: 404-400-6125 1-0000000000 | LG TM DAER SEOU 07336 32555 |
| 8( 3)<br>N                 | LG CHEM AMERICA INC | LG CHEM LTD. | 12/21/2016 | 46297       | 21044 Pusan                | Charleston, South Carolina | SEA LAND MERCURY | South Korea | N/M          | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA GA, 30305 TEL: 404-400-6125 1-0000000000 | LG TM DAER SEOU 07336 32555 |
| A<br>i.1<br>J.000          | LG CHEM AMERICA INC | LG CHEM LTD. | 12/21/2016 | 4409Z       | 2004Z Pusan                | Charleston, South Carolina | SEA LAND MERCURY | South Korea | IN ISO TANK  | 3475 PIEDMONT ROAD NE SUITE 1200 ATLANTA GA, 30305 TEL: 404-400-6125 1-0000000000 | LG TM DAER SEOU 07336 32555 |

|                                        |   |                                   |
|----------------------------------------|---|-----------------------------------|
| STATE OF SOUTH CAROLINA                | ) | IN THE COURT OF COMMON PLEAS      |
|                                        | ) |                                   |
| COUNTY OF FLORENCE                     | ) | TWELFTH JUDICIAL CIRCUIT          |
|                                        | ) |                                   |
| RANEE MICHELLE MOORE,                  | ) | CIVIL ACTION NO. 2018-CP-21-02884 |
|                                        | ) |                                   |
| Plaintiff,                             | ) |                                   |
|                                        | ) |                                   |
| v.                                     | ) | <b>ORDER DENYING LG CHEM,</b>     |
|                                        | ) | <b>AMERICA, INC.'S, MOTION TO</b> |
|                                        | ) | <b>DISMISS</b>                    |
| PLANET VAPOR, INC., LG CHEM,           | ) |                                   |
| <u>LTD., and LG CHEM AMERICA, INC.</u> | ) |                                   |

This matter came before the Court for a hearing on April 2, 2019, on Defendant LG Chem America, Inc.'s ("LGA") motion to dismiss for lack of personal jurisdiction. After reviewing the parties' submissions and hearing argument of counsel, the Court denies LGA's motion for the reasons stated below.

#### FACTS AND PROCEDURAL HISTORY

This is a product liability action involving an allegedly defective lithium ion battery used for an e-cigarette device. Plaintiff, a South Carolina citizen, alleges that on March 9, 2016, the battery, while in her pants pocket, exploded and burst into flames, causing severe burn injuries. The injuries occurred in Florence, South Carolina. Defendant Planet Vapor, Inc., is a retail store in Columbia, South Carolina, that sold the battery and e-cigarette device to Plaintiff. (Cmplt. ¶ 2). Defendant LGA, a Delaware corporation, and Defendant LG Chem, Ltd., ("LG"), a South Korean corporation, allegedly designed, manufactured, imported, and sold the battery. *Id.* at ¶¶ 3-6.

On October 31, 2018, Plaintiff filed this action in Florence County, South Carolina. The Complaint asserts causes of action for negligence, strict liability, and breach of warranty against all Defendants. As to LGA, Plaintiff alleges LGA has "continuing contacts with South Carolina by transacting substantial business in this state and manufacturing, distributing, and/or selling



goods with the reasonable expectation that they will be used in this state and which are in fact used in this state.” (Cmpl. ¶ 7).

On December 21, 2018, LGA filed a motion to dismiss for lack of personal jurisdiction, along with an affidavit of HyunSoo Kim, an LGA Compliance Manager. Mr. Kim states, *inter alia*, that LGA is incorporated in Delaware with its principal place of business in Georgia. (Aff. ¶3). It does not own or rent property in South Carolina. *Id.* at ¶ 5. In 2017, LGA generated 1.27% of its revenue in South Carolina. *Id.* at ¶ 7. Mr. Kim attests that LGA did not design, manufacture, import or sell a lithium-ion battery in South Carolina. *Id.* at ¶ 8.

On April 2, 2019, Plaintiff filed a memorandum in opposition to the motion to dismiss, along with a South Carolina Certificate of Authority for LGA and hundreds of import records for the Port of Charleston. On September 15, 2010, LGA obtained a Certificate of Authority from the South Carolina Secretary of State that authorizes it to transact business in South Carolina. (Exh. 2). LGA maintains a registered agent in Columbia, South Carolina. *Id.* The import records show that from December 2016 to February 2019, LGA received as consignee approximately 244 product shipments from LG to the Port of Charleston in South Carolina. (Exh. 3). LGA is a wholly-owned subsidiary of LG, and LGA’s business activities for LG are “sales and trading” of its products within the United States.<sup>1</sup>

### STANDARD

“The question of personal jurisdiction over a nonresident defendant is one which must be resolved upon the facts of each particular case. The decision of the trial court should be affirmed unless unsupported by the evidence or influenced by an error of law.” *Moosally v. W.W. Norton &*

---

<sup>1</sup> See LG Chem, Ltd. and Subsidiaries, *Consolidated Interim Financial Statements*, June 30, 2018 and 2017, [http://www.lgchem.com/upload/file/audit-report/2018\\_2Q\\_ConFS\\_ENG.pdf](http://www.lgchem.com/upload/file/audit-report/2018_2Q_ConFS_ENG.pdf) at p. 10.



*Co.*, 358 S.C. 320, 327, 594 S.E.2d 878, 882 (Ct. App. 2004) (internal citation omitted). When addressing a motion to dismiss for lack of personal jurisdiction, “‘Courts will take as true the allegations of the nonmoving party and resolve all factual disputes in its favor.’ This includes any factual disputes brought up by submitted affidavits.” *Brown v. Investment Mgmt. & Research*, 323 S.C. 395, 399, 475 S.E.2d 754, 756 (1996) (quoting 5A Charles A. Wright & Arthur R. Miller, *Federal Practice and Procedure* § 1351 (Supp. 1995)).

### ANALYSIS

Taking as true all allegations of Plaintiff and resolving all factual disputes in her favor, the Court finds there are sufficient minimum contacts between LGA and South Carolina to support exercising specific personal jurisdiction<sup>2</sup> over LGA.

“Specific jurisdiction over a cause of action arising from a defendant’s contacts with the state is granted pursuant to the long arm statute.” *Id.* at 491, 611 S.E.2d at 508 (citing S.C. Code Ann. § 36-2-803 (2003)). “South Carolina’s long-arm statute . . . has been construed to extend to the outer limits of the due process clause.” *Cockrell v. Hillerich & Bradsby Co.*, 363 S.C. 485, 491, 611 S.E.2d 505, 508 (2005). Therefore, “the sole question becomes whether the exercise of personal jurisdiction would violate due process.” *Id.*

“Due process requires that there exist minimum contacts between the defendant and the forum state such that maintenance of the suit does not offend traditional notions of fair play and substantial justice.” *Cockrell*, 363 S.C. at 491, 611 S.E.2d at 508. “[D]ue process mandates that the defendant possess sufficient minimum contacts with the forum state, so that he could reasonably anticipate being haled into court there.” *Id.* at 491-92, 611 S.E.2d at 508. This is the “‘stream of commerce’ theory” used by South Carolina courts. *State v. NV Sumatra Tobacco*

---

<sup>2</sup> Plaintiff did not dispute LGA’s argument as to general jurisdiction.

*Trading, Co.*, 379 S.C. 81, 89, 89 n.5, 666 S.E.2d 218, 222, 222 n.5 (2008) (“declin[ing] to embrace the ‘stream of commerce plus’ theory”).<sup>3</sup> “It is essential in each case that there be some act by which the defendant purposefully avails itself of the privilege of conducting activities within the forum state, thus invoking the benefits and protections of its laws.” *Moosally v. W.W. Norton & Co.*, 358 S.C. 320, 332, 594 S.E.2d 878, 884 (Ct. App. 2004).

“The court must also find that the exercise of jurisdiction is reasonable or fair.” *Cockrell*, 363 S.C. at 492, 611 S.E.2d at 508 (internal quotation marks omitted). “Under the fairness prong, the court must consider: (1) the duration of the activity of the nonresident within the state; (2) the character and circumstances of the commission of the nonresident’s acts; (3) the inconvenience resulting to the parties by conferring or refusing to confer jurisdiction over the nonresident; and (4) the State’s interest in exercising jurisdiction.” *Id.*

Initially, the Court finds Plaintiff proves personal jurisdiction based on the pretrial stage pleadings. “At the pretrial stage, the burden of proving personal jurisdiction over a nonresident is met by a prima facie showing of jurisdiction either in the complaint or in affidavits.” *Cockrell*, 363 S.C. at 491, 611 S.E.2d at 508. “There is no ‘other evidence’ requirement for personal jurisdiction where the complaint itself demonstrates jurisdiction.” *Mid-State Distribs. v. Century Imps.*, 310 S.C. 330, 332, 426 S.E.2d 777, 779 (1993). Plaintiff alleges in the Complaint that LGA has “continuing contacts with South Carolina by transacting substantial business in this state and manufacturing, distributing, and/or selling goods with the reasonable expectation that they will be used in this state and which are in fact used in this state.” (Cmplt. ¶ 7). This demonstrates specific personal jurisdiction under the long-arm statute and due process analysis by asserting sufficient

---

<sup>3</sup> See also *Sheppard v. Mercedes-Benz USA, LLC*, C/A No. 2010-CP-38-1558 (Nov. 15, 2012), p. 7 (affirming South Carolina’s use of the stream of commerce theory pursuant to *Sumatra Tobacco*).



minimum contacts and the fairness and expectation of being haled into court in South Carolina under the stream of commerce theory.

Alternatively, the Court also finds that, based on the additional evidence submitted, Plaintiff demonstrates specific personal jurisdiction. LGA possesses sufficient minimum contacts with South Carolina so that it should reasonably anticipate being haled into court here.

Under South Carolina's long-arm statute,

A court may exercise personal jurisdiction over a person who acts directly or by an agent as to a cause of action arising from the person's: (1) transacting any business in this State; (2) contracting to supply services or things in the State; . . . (4) causing tortious injury or death in this State by an act or omission outside this State if he regularly does or solicits business, or engages in any other persistent course of conduct, or derives substantial revenue from goods used or consumed or services rendered in this State.

S.C. Code Ann. § 36-2-803(A). LGA has a presence in South Carolina in the form of being registered to transact business here, having a registered process agent here, continuously and regularly using a State port to conduct its business activities, and deriving revenue from South Carolina. Plaintiff points to LGA's Certificate of Authority to transact business as evidence that supports the exercise of personal jurisdiction. The Court agrees. Section 33-15-101 of the South Carolina Code lists 13 categories of activities that are **not** considered transacting business in South Carolina. S.C. Code Ann. § 33-15-101. LGA's decision to obtain a Certificate of Authority demonstrates that its activities in South Carolina are more substantial than those listed in § 33-15-101. Further, by obtaining a Certificate of Authority, LGA agreed at a minimum to the jurisdiction of the South Carolina Department of Revenue and our Courts to determine its South Carolina tax liability. S.C. Code Ann. § 33-15-105(d). Along with the evidence of LGA's activities and conduct discussed below, this satisfies the minimum contacts analysis.

Plaintiff submitted an exhibit showing approximately 244 product shipments from LG to LGA as consignee through the Port of Charleston, South Carolina, from December 2016 to

February 2019. This is ample evidence that LGA transacted business in South Carolina; contracted to supply things in South Carolina; and caused injury in South Carolina when it regularly does or solicits business, or engages in a persistent course of conduct, or derives substantial revenue from goods used or consumed in South Carolina. *See* S.C. Code Ann. § 36-5-803(A); *Moosally*, 358 S.C. at 336, 594 S.E.2d at 886 (“W.W. Norton’s continual practice of marketing and distributing books in South Carolina satisfies the power prong of the due process analysis.”); *Catalana v. Carnival Cruise Lines, Inc.*, 618 F. Supp. 18, 22 (D. Md. 1984) (“By using the port of Baltimore as a site for regularly scheduling cruises, Carnival has purposefully availed itself of the privilege of conducting activities within the forum State, thus invoking the benefits and protections of its laws.”). LGA participated in the economic markets of this state and derived revenue from this state. Therefore, the minimum contacts prong is satisfied.

LGA lists in its memorandum and in Mr. Kim’s affidavit various products it sells and distributes, but specifically omits lithium-ion batteries from the list. The Court rejects this assertion because another court already found that “LGCAI is responsible for marketing LGC petrochemicals, information and electronic materials, and *batteries* to customers in the United States.” *Celgard, LLC v. LG Chem, Ltd.*, 2015 U.S. Dist. LEXIS 66600, \*74, 2015 WL 2412467 (W.D.N.C. May 21, 2015) (emphasis added). Therefore, it should come as no surprise to LGA that the subject battery ended up in South Carolina and injured a South Carolina citizen.

The exercise of personal jurisdiction is also reasonable and fair. First, LGA has conducted activities in South Carolina for a sufficient duration. It obtained a Certificate of Authority to transact business in South Carolina over eight years ago and the import records show its use of the Port for over three years. Second, the character and circumstances of the commission of LGA’s acts support exercising personal jurisdiction. It consistently and repeatedly uses the Port of



Charleston and receives products directly to South Carolina. Third, there is no inconvenience to the parties by conferring jurisdiction over LGA. It is a U.S. corporation with a Certificate of Authority and registered agent in South Carolina. Fourth, and finally, South Carolina has an interest in exercising jurisdiction over LGA. “South Carolina has an interest in providing redress for its citizens.” *Cribb v. Spatholt*, 382 S.C. 490, 504, 676 S.E.2d 714, 721 (Ct. App. 2009) (citing *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 473 (1985) (“A State generally has a ‘manifest interest’ in providing its residents with a convenient forum for redressing injuries inflicted by out-of-state actors.”)). The Court has specific personal jurisdiction over LGA.

### CONCLUSION

For the reasons stated above, the Court denies Defendant LG Chem America, Inc.’s motion.

**AND IT IS SO ORDERED.**

Dated: \_\_\_\_\_  
Florence, South Carolina

\_\_\_\_\_  
Michael G. Nettles  
Circuit Court Judge



Florence Common Pleas

**Case Caption:** Ranee Machel Moore , plaintiff, et al VS Planet Vapor Inc ,  
defendant, et al  
**Case Number:** 2018CP2102884  
**Type:** Order/Other

So Ordered

s/ The Honorable Michael G. Nettles #2140

Electronically signed on 2019-04-30 11:09:26 page 8 of 8

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF ORANGEBURG ) CIVIL ACTION NO.: 2010-CP-38-1558  
VIKKI G. SHEPPARD as Personal )  
Representative of the Estate of ARTHUR )  
BENJAMIN SHEPPARD, II )

Plaintiff,  
v.

MERCEDES-BENZ USA, LLC, DAIMLER  
AG, F/K/A DAIMLERCHRYSLER AG,  
TRAVIS KENDELL WILLIAMS, and  
MALONE'S AUTOMOTIVE,

Defendants

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF ORANGEBURG ) CIVIL ACTION NO.: 2010-CP-38-1559

VIKKI G. SHEPPARD,

Plaintiff,

v.

MERCEDES-BENZ USA, LLC, DAIMLER AG,  
F/K/A DAIMLERCHRYSLER AG, TRAVIS  
KENDELL WILLIAMS, and MALONE'S  
AUTOMOTIVE,

Defendants

FILED FOR RECORD  
WINNIE B. CLARK  
CLERK OF COURT  
ORANGEBURG, SC  
2012 NOV 15 PM 4:34



ATTEST: TRUE COPY  
*Winnie B. Clark*  
CLERK OF COURT  
ORANGEBURG COUNTY, SC

ORDER

THIS MATTER CAME BEFORE THE COURT on motion by Defendant Daimler AG to dismiss pursuant to Rule 12(b)(2) South Carolina Rules of Civil Procedure for lack of personal jurisdiction. The motion was heard on December 5, 2011. After considering the arguments of counsel and materials provided in support of the opposing positions, the Court finds that Daimler



AG is subject to jurisdiction for the causes of action set forth in Plaintiffs' complaints and, therefore, denies the motion to dismiss.

### BACKGROUND

This action arises from a November 24, 2007, automobile accident involving a head-on collision between a 2002 Mercedes Benz S430 being operated by the Plaintiffs and a 2004 Chevy Malibu operated by Travis Kendell Williams. The accident occurred in Orangeburg County on U. S. 178 near the Town of Bowman.

The claim against Daimler AG involves allegations that the airbags failed to deploy in the subject vehicle. Arthur Benjamin Sheppard, II died and Vikki Sheppard sustained personal injuries as a result of the collision. For the purposes of this motion, it is undisputed that the airbags did not deploy in the collision. It is also undisputed that Daimler AG, f/k/a Daimler Chrysler AG (Daimler AG), manufactured the subject vehicle in Germany which was later sold to Defendant Mercedes-Benz USA, LLC (MBUSA, LLC). The sale to MBUSA, LLC took place in Germany.

At the time the subject vehicle was manufactured and sold, Daimler AG certified that it met all U. S. Federal Motor Vehicle Safety Standards in effect on the date of manufacture. Daimler AG also certified that the subject vehicle conformed to all year 2002 U.S. EPA Regulations. Daimler AG also provided an Operators Manual with the subject vehicle providing instructions in English on the proper operation of the S-Class Mercedes. It is undisputed that the subject vehicle was designed and manufactured in Germany with the specific intent that it be sold and driven within the United States.

*This is demonstrated by the sale to MBUSA, LLC, a wholly owned subsidiary of Daimler AG.*

### DISCUSSION

In this action the Plaintiffs seek to have the Court exercise jurisdiction over Daimler AG concerning the specific acts and/or omissions alleged in the complaints. "Specific jurisdiction over a cause of action arising from a defendant's contacts with the state is granted pursuant to the

long-arm statute.” State of South Carolina v. NV Sumatra Tobacco Trading Co., 666 S.E.2d 218, 222 (2008). The applicable section of the long-arm statute provides as follows:

**§36-2-803. Personal Jurisdiction based upon conduct.**

- (A) A court may exercise personal jurisdiction over a person who acts directly or by an agent as to a cause of action arising from the person's: (8) production, manufacture, or distribution of goods with the reasonable expectation that those goods are to be used or consumed in this State and are so used or consumed.

In assessing personal jurisdiction at the pre-trial stage, the burden of proving jurisdiction is met by a prima facie showing in the complaint. Cockrell v. Hillerich & Bradsby Co., 611 S.E.2d 505 (2005). To this end the trial court is not required to consider materials beyond the complaint. However, because the parties have provided additional materials the Court will consider them along with the allegations in the complaint.

As an initial matter, the Plaintiffs' complaints allege that Daimler AG manufactured and placed the subject vehicle into the stream of commerce. It is further alleged that the Plaintiffs were injured due to defects in the manufacture and design of the subject vehicle and that the injuries occurred while the vehicle was being used in South Carolina.

There can be no question that Daimler AG intended that the subject vehicle be sold and used in the United States by virtue of the certification that the vehicle met all applicable FMVSS and EPA standards.<sup>1</sup> Thus, it is clear to the Court that Daimler AG manufactured and placed the subject vehicle into the stream of commerce with the "reasonable expectation" that it would be used in any of the 50 states including South Carolina. This is especially true given the mobility of vehicles and the fact that all vehicles sold in South Carolina, regardless of manufacturer, must meet the same federal safety and environmental standards.<sup>1</sup>

Because Daimler AG manufactured and sold the subject vehicle with the reasonable expectation that it would be used in South Carolina and this action arises from its use in South

<sup>1</sup> Of course it is common knowledge that Mercedes Benz vehicles are sold at dealerships in South Carolina.



Carolina, the threshold requirement for jurisdiction under the South Carolina Long Arm Statute is met. However, in order for the Court to exercise jurisdiction it must confirm that doing so is consistent with Due Process.

Due Process requires that there exist minimum contacts between the defendant and the forum state such that maintenance of the suit does not offend traditional notions of fair play and substantial justice. *Id.* Further, Due Process mandates that the defendant possess sufficient minimum contacts with the forum state, so that he could reasonably anticipate being haled into court there. *Id.* citing World-Wide Volkswagen Corp. v. Woodson, 444 U.S. 286, 100 S.Ct. 559, 62 L.Ed.2d 490 (1980). Without minimum contacts, the court does not have the "power" to adjudicate the action. *Id.* The court must also find that the exercise of jurisdiction is "reasonable" or "fair." *Id.* If either prong fails, the exercise of personal jurisdiction over the defendant fails to comport with the requirements of due process. Southern Plastics Co. v. Southern Commerce Bank, 423 S.E.2d 128 (1992).

The foreseeability that is critical to due process analysis is not the mere likelihood that a product will find its way into the forum state. Rather, it is that the defendant's conduct and connection with the forum state are such that he should reasonably anticipate being haled into court there. This theory of personal jurisdiction is known as the "stream of commerce" theory. Southern Plastics Co., *supra* citing World-Wide Volkswagen Corp., 444 U.S. at 297.

In Sumatra, the South Carolina Supreme Court was asked to embrace the "stream of commerce plus" theory of personal jurisdiction. This theory arose in a plurality opinion by Justice Sandra Day O'Connor of the United States Supreme Court in Asahi Metal Ind. Co., Ltd. v. Superior Court of California, 480 U.S. 102, 107 S.Ct. 1026, 94 L.Ed.2d 92 (1987). The "stream of commerce plus" theory states that the placement of a product into the stream of commerce, without more, is not an act of the defendant purposely directed toward the forum state. The theory maintains that additional conduct indicating an intent or purpose to serve the

market in the forum state is also necessary. Asahi, 480 U.S. at 112, 107 S.Ct. 1026. Only three other justices ~~signed onto~~ <sup>adopted</sup> this theory. Justice William Brennan and three other justices maintained that simply placing a product into the stream of commerce is consistent with the Due Process Clause and they would not require a showing of additional conduct to assert jurisdiction. Id. at 117. The South Carolina Supreme Court declined to embrace the “stream of commerce plus” theory.

Trial Courts in South Carolina are required to apply Justice Brennan’s stream of commerce test when assessing whether Due Process is afforded in exercising jurisdiction over a foreign manufacturer. In Asahi, Justice Brennen describes the stream of commerce as follows:

The stream of commerce refers not to unpredictable currents or eddies, but to the regular and anticipated flow of products from manufacture to distribution to retail sale. As long as the participant in this process is aware that the final product is being marketed in the forum State, the possibility of a lawsuit there cannot come as a surprise.

Asahi, 480 U. S. at 117.

Daimler AG argues that after the decision in J. McIntyre Machinery, Ltd. V. Nicastro, 131 S.Ct. 2780 (2011) that the stream of commerce analysis used by the South Carolina Supreme Court is no longer appropriate and that there must be additional conduct directed at the forum state beyond the placement of a product into the stream of commerce with the intent to serve a market. It argues that McIntyre changed the standard for personal jurisdiction such that the precedent of the South Carolina Supreme Court relied on by the Plaintiffs are no longer controlling.

McIntyre, like Asahi, was decided by a plurality of the Court and thus did not involve a majority of the justices required to change existing precedent. The outcome of the case was controlled by Justice Breyer’s concurring vote where he declined to choose between either Justice O’Connor’s “stream of commerce plus” analysis or Justice Brennan’s broader “stream of



commerce” approach. “When a fragmented Court decides a case and no single rationale explaining the result enjoys the assent of five Justices, the holding of the court may be viewed as the position taken by those Members who concurred in the judgment on the narrowest grounds.” Garland v. Roy, 615 F.3d 391,399 (5<sup>th</sup> Cir. 2010)

Justice Breyer simply confirmed that none of the prior precedents upholding personal jurisdiction over a product manufacturer “finds that a single isolated sale, even if accompanied by the kind of sales effort indicated here, is sufficient”. McIntyre, 131 S. Ct. at 2792. He went on to analyze the defendant’s contacts with New Jersey under the existing precedent. Justice Bryer first found that there was not a regular flow or regular sales to New Jersey and there was no “something more, such as special state-related design, advertising, advice, marketing or anything else”. Id. Thus finding jurisdiction did not exist under the “stream of commerce plus” approach taken by Justice O’Connor in Asahi. He then went on to find the plaintiff had not otherwise shown that the manufacturer “delivered its goods in the stream of commerce with the expectation that they will be purchased by New Jersey users” under the “stream of commerce approach set forth in Asahi by Justice Brennan. Id.

McIntyre involved a claim by a citizen of New Jersey for injuries caused by an allegedly defective scrap metal recycling machine manufactured by McIntyre in the U.K. McIntyre did not have any presence in the U.S. or in New Jersey. It had sold only one of its machines in the State of New Jersey through an independent distributor. Although it sold the machine with knowledge that its product could end up via the stream of commerce in any of the fifty states including New Jersey, it did not specifically target New Jersey. The U.S. Supreme Court reversed the New Jersey Supreme Court’s opinion affirming a finding of personal jurisdiction by the trial court. The New Jersey trial Court found personal jurisdiction based on its view that it was foreseeable to McIntyre that its machine could end up in New Jersey via the stream of commerce.

The McIntyre plurality found that the foreseeability that a product could end up in the forum State via the stream of commerce, standing alone, was insufficient to meet the requirements of due process. The Court affirmed prior precedent that a single isolated sale standing alone would not support personal jurisdiction. There was no evidence of a regular flow of sales in New Jersey or that it delivered its machine into the stream of commerce with the expectation that they would be purchased in New Jersey.

Not only is McIntyre distinguishable factually from the present case, the Court disagrees with Daimler AG that McIntyre changes the law with regard to the Due Process analysis required for a court to exercise personal jurisdiction over a foreign product manufacturer. At best McIntyre can be read as leaving Asahi intact and is otherwise of little precedential value except for cases involving similar facts. See Ainsworth v. Cargotec, USA, Inc. 2011 WL 4443626 (S.D. Miss) (Finding McIntyre limited to cases with similar facts holding and that McIntyre did not affect the requirement that district courts in the Fifth Circuit follow Justice Brennan's Due Process analysis from Asahi.) The Court finds that McIntyre does not change the Due Process analysis set forth in Sumutra Tobacco by the South Carolina Supreme Court, which is the test this Court must follow.

This case falls squarely within the purpose of the stream of commerce theory which when applied confirms that the exercise of jurisdiction is consistent with Due Process. This case does not involve the isolated sale of a single product in South Carolina (McIntyre) nor does it involve the sale of a product in a different state by a seller that does not sell any products in South Carolina. (World-Wide Volkswagen) Likewise, it does not involve a product that was swept into South Carolina via the stream of commerce where the defendant took no effort to serve the market in South Carolina. (Asahi) Instead, this case involves a manufacturer who designs and builds automobiles in Germany specifically for sale in the United States including South



Carolina. Automobiles that are sold in the United States and South Carolina through a wholly owned subsidiary that acts as the exclusive distributor of these automobiles.

A review of the cases analyzing personal jurisdiction over foreign product manufacturers reveals an important emphasis expressed by the courts when products enter the forum state via a distributor, especially when the product is designed for the market. For example, in World-Wide Volkswagen, the U.S. Supreme Court distinguished the isolated sale of a product from sales of a manufacturer that seeks to serve a market through a distributor:

Hence if the sale of a product of a manufacturer or distributor such as Audi or Volkswagen is not simply an isolated occurrence, but arises from the efforts of the manufacturer or distributor to serve, directly or indirectly, the market for its product in other States, it is not unreasonable to subject it to suit in one of those States if its allegedly defective merchandise has there been the source of injury to its owner or to others.

World-Wide Volkswagen, 444 U.S. at 297.

Later in Asahi, Justice O'Connor cites as an example the use of a distributor to serve a market as the type of "additional" conduct necessary under her more restrictive view of conduct necessary to sustain personal jurisdiction.

The placement of a product into the stream of commerce, without more, is not an act of the defendant purposefully directed toward the forum State. Additional conduct of the defendant may indicate an intent or purpose to serve the market in the forum State, for example, designing the product for the market in the forum State, advertising in the forum State, establishing channels for providing regular advice to customers in the forum State, or marketing the product through a distributor who has agreed to serve as the sales agent in the forum State.

Asahi, at 112.

The purpose of the stream of commerce theory is to hold a manufacturer "amenable to process in a forum in which its products are sold, even if the products were sold indirectly through importers or distributors with independent sales and marketing schemes." DeJames v. Magnificence Carriers, Inc., 654 F.2d 280, 285 (3d Cir.) cert. denied, 454 U.S. 1085 (1981).

Daimler AG designs and manufactures passenger vehicles, including the subject vehicle, specifically for the U.S. market which includes South Carolina. These vehicles are designed to comply with Federal Motor Vehicle Safety Standards and Environmental Protection Agency standards on emissions. In order to sell a new vehicle in South Carolina it must be designed to meet these standards. Daimler AG provided an owner's manual in English and used English units of measure for mileage on the speedometer. Further, Daimler AG targeted the U.S. market, including South Carolina, through its wholly owned subsidiary MBUSA. This is the very type of conduct that the U.S. Supreme Court has consistently defined as meeting the minimum contacts requirement to sustain personal jurisdiction. "The forum State does not exceed its powers under the Due Process Clause if it asserts personal jurisdiction over a corporation that delivers its products into the stream of commerce with the expectation that they will be purchased by consumers in the forum State." World-Wide Volkswagen, 444 U.S. at 297 – 298.

Other courts presented with almost identical situations post McIntyre have found the exercise of jurisdiction proper where a product reaches the forum state through a distributor where the manufacturer, as here, clearly sought to serve the market. In King v. General Motors Corporation, 2012 WL 1340066 (N.D.Ala.), the district court found that it had jurisdiction over GM's wholly owned subsidiary, General Motors of Canada. There the plaintiff sought to have the court exercise jurisdiction over GM of Canada the manufacturer of the allegedly defective vehicle. GM of Canada moved to dismiss for lack of personal jurisdiction making the exact argument made here by Daimler AG. GM of Canada admitted to designing and manufacturing the vehicle for sale in the U.S. It argued that the Alabama courts did not have jurisdiction because it sold the vehicle to GM, its parent company who then distributed the vehicles for sale in the U.S. The transfer of title to GM took place in Canada. GM of Canada had no agents in



Alabama, was not registered to do business in Alabama, and in fact had never directly done any business in Alabama. In denying the motion to dismiss the Court wrote:

While the court certainly recognizes that GM Canada is a separate and distinct entity from GM Corporation, there is no doubt that GM Canada "seeks to serve" Alabama when it specifically manufactures GM vehicles, in compliance with federal regulations, and designed by its parent corporation who actively sold these vehicles to an Alabama dealership. Indeed, GM Canada cannot plead ignorance of the markets it explicitly targets and serves when its parent corporation directly sells the manufactured products to these markets. GM Canada possesses more than some vague awareness that its products *might* reach U.S. markets – it manufactures vehicles, such as the one at issue, to comply with federal regulations. This equates manufacturing a product "in anticipation of sales in" Alabama. Moreover, GM Canada specifically sold its products to GM Corporation for distribution in the United States. ... Indeed the court finds that this commercial relationship mirrors an example provided by Justice O'Connor in Asahi of a manufacturer "marketing the product through a distributor who has agreed to serve as the sales agent in the forum State."

King, at 7.

In Soria v. Chrysler Canada, Inc., 958 N.E. 2d 285 (Il. App. 1<sup>st</sup> 2011), the Illinois appellate court upheld the trial court's denial of a Chrysler Canada's motion to dismiss for lack of jurisdiction under a factual pattern almost identical to what was presented in King and the present case. There Chrysler Canada, relying on McIntyre, asserted that it had insufficient contacts with Illinois because it only assembled vans that were sold to its parent company, Chrysler Corporation who then sold the vehicles through dealerships to consumers in Illinois. The vehicles were manufactured to meet federal regulations for sale in the U.S. The Court found that Chrysler Canada was specifically aware that its products were manufactured for the U.S. market including Illinois which amounted to the purposeful availment of the benefits and privileges of doing business in Illinois which thereby subjected it to personal jurisdiction. See also Ainsworth v. Cargotec USA, Inc., 2011 WL 4443626 (S.D. Miss) (Post McIntyre denial of forklift manufacturer's motion to dismiss where forklift manufacturer knew that its distributor was marketing its products throughout the U.S. including Mississippi.); Russell v. SNFA, 965

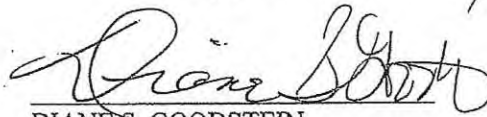
N.E. 2d 1, (Ill. App. 1<sup>st</sup> 2012) (Post McIntyre denial of a motion to dismiss made by French manufacturer of bearings specially designed for helicopters that it knew were being marketed in the U.S. including the forum state.)

Consistent with these decisions, the Court finds that Daimler AG is amenable to process in South Carolina because of its continuous and systematic targeting of its products to the U.S. market which includes South Carolina. Daimler AG cannot claim that it does not serve the market for Mercedes vehicles in South Carolina while admitting that it designs and manufactures these vehicles specifically for sale in the U.S. market. “Stated differently, if not [South Carolina], what market does [Daimler Ag] serve?” King, at 8.

Having found that Daimler AG possesses sufficient contacts with South Carolina to satisfy Due Process, the Court also finds that the exercise of jurisdiction is reasonable and fair. The U.S. Supreme Court has previously stated that the exercise of jurisdiction is not unreasonable where it is based on the efforts of the manufacturer to serve, either directly or indirectly, the market for its product. World-Wide Volkswagen, 444 U.S. at 297-298. “Where the component allegedly fails and causes injury in the very market in which the product was expected to be sold, it is not unreasonable or unfair to require the defendant to be subject to suit in that forum.” Rockwell International Corp. v. Construzioni Aeronautiche Giovanni Agusta, S.P.A., 553 F.Supp. 328 (E.D.Pa. 1982) Here Daimler AG specifically sought to serve the market in South Carolina where its product allegedly caused harm to the Plaintiff. Requiring it to defend its product in South Carolina is both fair and reasonable. This is especially true given that South Carolina has the greatest interest in hearing this matter which arises out of an accident that occurred in South Carolina.



Based on the foregoing, the Court finds that the exercise of personal jurisdiction over the Defendant Daimler AG is proper under the long-arm statute and hereby denies the motion to dismiss.<sup>2</sup> Daimler AG shall file and serve its answer within 15 days of this Order. *service of a/c*

  
DIANE S. GOODSTEIN  
PRESIDING JUDGE

*NOV. 13*, 2012  
*Orangeburg, SC*

<sup>2</sup> See Kaplan v. Daimler Chrysler AG, et al., 99 F. supp. 2d 1348 (D.C. Fla. 2000) (Denying motion to dismiss for lack of personal jurisdiction in products case involving a S-Class Mercedes vehicle under near identical circumstances and arguments.)

|                                 |   |                                     |
|---------------------------------|---|-------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS        |
|                                 | ) |                                     |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2018-CP-4400054   |
|                                 | ) |                                     |
| DWAYNE THOMPSON,                | ) |                                     |
|                                 | ) |                                     |
| Plaintiff,                      | ) | <b>DEFENDANTS LG CHEM, LTD. AND</b> |
|                                 | ) | <b>LG CHEM AMERICA, INC.'S</b>      |
|                                 | ) | <b>MOTION FOR CLARIFICATION</b>     |
| vs.                             | ) | <b>OR, ALTERNATIVELY,</b>           |
|                                 | ) | <b>RECONSIDERATION</b>              |
|                                 | ) |                                     |
| ROLLING FOG VAPOR COMPANY,      | ) |                                     |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                     |
| AMERICA, INC.,                  | ) |                                     |
|                                 | ) |                                     |
| Defendants.                     | ) |                                     |
|                                 | ) |                                     |

**TO: ALEXANDER P. LEWIS, ESQ., W. BLAKE CUMMINGS, ESQ., RONNIE L. CROSBY, ESQ. AND AUSTIN H. CROSBY, ESQ., ATTORNEYS FOR PLAINTIFF DWAYNE THOMPSON**

YOU WILL PLEASE TAKE NOTICE that the undersigned as attorneys for Defendants LG Chem, Ltd. ("LGC") and LG Chem America, Inc. ("LGCAI") will move before the Court at a time and date to be set by the Court for an order clarifying or, alternatively, reconsidering its rulings on LGC's Motion to Quash Service of Process and Dismiss for Lack of Personal Jurisdiction and LGCAI's Motion to Dismiss for Lack of Personal Jurisdiction. The grounds for this motion are as follows:

This matter was brought before the Honorable J. Cordell Maddox, Jr. on September 23, 2019, upon LGC's Motion to Quash Service of Process and Dismiss for Lack of Personal Jurisdiction and LGCAI's Motion to Dismiss for Lack of Personal Jurisdiction. The Court (1) indicated that it viewed LGC and LGCAI's motions to dismiss for lack of personal jurisdiction as premature; and (2) that LGC and LGCAI could refile their motions to dismiss after discovery. Plaintiff's counsel



sent LGC and LGCAI's counsel proposed orders on November 15, 2019, and LGC and LGCAI intend to propose changes and/or object to those proposed orders. For the reasons set forth herein, LGC and LGCAI seek clarification of the Court's rulings or, alternatively, reconsideration of the Court's rulings.

**I. THE COURT DID NOT ADDRESS LGC'S MOTION TO QUASH SERVICE OF PROCESS, WHICH RAISED PURE QUESTIONS OF LAW.**

In addition to moving to dismiss for lack of personal jurisdiction, LGC moved to quash service of process because Plaintiff improperly attempted to serve LGC through the South Carolina Secretary of State instead of the Hague Service Convention. LGC is a South Korean company with its headquarters and principal place of business in Seoul, South Korea. South Korea is a signatory to the Hague Service Convention, "an international treaty that pre-empts inconsistent methods of service prescribed by state law in all cases where service abroad is required." *Bakala v. Bakala*, 352 S.C. 612, 626, 576 S.E.2d 156, 163 (2003) (citing *Volkswagenwerk Aktiengesellschaft v. Schlunk*, 486 U.S. 694, 699 (1988)). Service abroad by mail on a signatory to the Hague Service Convention is only permissible if the signatory has not lodged an objection to Article 10 of the Convention. *Id.* South Korea objected to article 10 of the Hague Service Convention and does not permit the sending of judicial documents by postal channels directly to persons abroad. Declarations and Reservations ¶ 2, HCCH, available at <https://www.hcch.net/en/instruments/conventions/status-table/notifications/?csid=408&disp=resdn>; see, e.g., *Monagas v. Samsung Elecs. Am., Inc.*, No. 3:13CV927 MPS, 2013 WL 5970977, at \*2 (D. Conn. Nov. 8, 2013) (attempted mail service on South Korean company was ineffective because it violated the Hague Service Convention).

It is undisputed that Plaintiff did not serve LGC with process in accordance with the procedures required by the Hague Service Convention, and no discovery is needed to determine

whether the Hague Service Convention preempts the inconsistent method of service that Plaintiff attempted to use—it unquestionably does. *Volkswagenwerk*, 486 U.S. at 699; *Bakala*, 352 S.C. at 626. Accordingly, LGC respectfully requests that the Court clarify whether it intended to deny LGC’s Motion to Quash as premature. To the extent the Court did intend to deny LGC’s Motion to Quash as premature, LGC respectfully requests that the Court reconsider that ruling for the reasons stated above and in LGC’s Motion to Quash. Plaintiff’s failure to comply with the requirements of the Hague Service Convention renders Plaintiff’s service insufficient as a matter of law.

**II. ANY DISCOVERY SHOULD BE LIMITED TO THE THRESHOLD ISSUE OF PERSONAL JURISDICTION.**

To the extent the Court did not rule on LGC’s Motion to Quash for improper service, LGC renews that Motion here and for the reasons stated above. Subject to its pending Motion to Quash, LGC also joins LGCAI in requesting clarification on the Court’s order regarding discovery. The Court stated that LGC and LGCAI would be free to re-file their motions after discovery was conducted, but did not set forth specific limits on the discovery available. LGC and LGCAI renew their Motions to Dismiss for reasons previously stated, and request reconsideration of the Court’s order denying those motions without prejudice as premature.

Subject to and without waiving those objections, LGC and LGCAI in the alternative request an order clarifying the permissible scope of discovery at this preliminary stage of the proceedings. The Court did not specify whether discovery is limited to the threshold issue before the Court—personal jurisdiction—or whether the Court intended to permit Plaintiff to engage in merits-based discovery before the jurisdictional issue is resolved. If the Court intended to permit merits-based discovery, reconsideration is respectfully requested, as personal jurisdiction should be determined prior to litigating the case upon the merits. *Madara v. Hall*, 916 F.2d 1510, 1514



& n. 1 (11th Cir. 1990) (reversing district court that ruled on a merits-based motion to dismiss before ruling on a motion to dismiss for lack of personal jurisdiction; “The court should have addressed the personal jurisdiction question first.”). Indeed, “where a plaintiff’s claim of personal jurisdiction appears to be both attenuated and based on bare allegations in the face of specific denials made by defendants, the court need not permit even limited discovery confined to issues of personal jurisdiction if it would be a fishing expedition.” *Sullivan v. Hawker Beechcraft Corp.*, 397 S.C. 143, 151 (Ct. App. 2012).

### III. CONCLUSION

WHEREFORE, for the foregoing reasons, LGC and LGCAI respectfully request that the Court clarify or, alternatively, reconsider its rulings and enter an order quashing service of process on LGC and dismissing LGC from this action; limiting the scope of discovery to the issue of personal jurisdiction; and granting such other and further relief that the Court deems just and proper.

Respectfully submitted, this 19<sup>th</sup> day of November, 2019.

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann  
KATE CAPPELMANN  
South Carolina Bar No.: 100551

Counsel for Defendants  
*LG Chem, Ltd. and LG Chem America, Inc.*

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
[kate.cappelmann@lewisbrisbois.com](mailto:kate.cappelmann@lewisbrisbois.com)

|                                 |   |                                    |
|---------------------------------|---|------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS       |
|                                 | ) |                                    |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO. : 2018-CP-4400054 |
|                                 | ) |                                    |
| DWAYNE THOMPSON,                | ) |                                    |
|                                 | ) |                                    |
| Plaintiff,                      | ) |                                    |
|                                 | ) |                                    |
| vs.                             | ) |                                    |
|                                 | ) |                                    |
| ROLLING FOG VAPOR COMPANY,      | ) |                                    |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                    |
| AMERICA, INC.,                  | ) |                                    |
|                                 | ) |                                    |
| Defendants.                     | ) |                                    |
| _____                           | ) |                                    |

**CERTIFICATE OF SERVICE**

I certify that on this date, I filed **LG CHEM, LTD. AND LG CHEM AMERICA, INC.’S MOTION FOR CLARIFICATION OR, ALTERNATIVELY, RECONSIDERATION** in this action with the Clerk of Court using the Court’s E-Filing System. A Notice of Electronic Filing will automatically generate to the following counsel of record:

Alexander P. Lewis  
W. Blake Cummings  
**Cumming & Lewis, LLC**  
P.O. Box 5766  
Spartanburg, SC 29304

and

Austin H. Crosby  
Ronnie L. Crosby  
**Peters, Murdaugh, Parker, Eltzroth & Detrick, PA**  
101 MULBERRY STREET EAST  
P.O. BOX 457  
HAMPTON, SC 29924  
  
*Counsel for Plaintiff*

This 19<sup>th</sup> day of November, 2019.

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann

KATE CAPPELMANN

South Carolina Bar No.: 100551

Counsel for Defendants

*LG Chem, Ltd. and LG Chem America, Inc.*

1180 Peachtree Street, NE

Suite 2900

Atlanta, Georgia 30309

404.348.8585 – Telephone

404.467-8845 – Facsimile

kate.cappelmann@lewisbrisbois.com

|                                 |   |                                    |
|---------------------------------|---|------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS       |
|                                 | ) |                                    |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2019-CP-44-00054 |
|                                 | ) |                                    |
| DWAYNE THOMPSON,                | ) |                                    |
|                                 | ) |                                    |
| Plaintiff,                      | ) |                                    |
|                                 | ) |                                    |
| v.                              | ) | <b>PLAINTIFF'S MEMORANDUM IN</b>   |
|                                 | ) | <b>RESPONSE TO MOTION FOR</b>      |
|                                 | ) | <b>CLARIFICATION OR</b>            |
|                                 | ) | <b>ALTERNATIVELY,</b>              |
|                                 | ) | <b>RECONSIDERATION</b>             |
|                                 | ) |                                    |
| LG CHEM, LTD., LG CHEM AMERICA, | ) |                                    |
| INC., and ROLLING FOG VAPOR     | ) |                                    |
| COMPANY, LLC,                   | ) |                                    |
|                                 | ) |                                    |
| Defendants.                     | ) |                                    |

---

Plaintiff, Dwayne Thompson, opposes the Defendant, LG Chem, LTD ("LG Chem") and LG Chem America, Inc.'s ("LGCA") (collectively "LG") Motion for Clarification or, Alternatively, Reconsideration and asks that the motion be denied.

**I. LG CHEM AMERICA'S MOTION IS NOT PROPERLY BEFORE THE COURT**

An understanding of the timeline of events in this case is important to considering LG's motion. On November 19, 2019, LG filed their Motion for Clarification or, Alternatively, Reconsideration (Exh. 1 – Mot. for Clarif. or Recon.). LG's motion, which set forth its arguments, was filed prior to the submission of proposed orders by plaintiff's counsel on November 26, 2019. (Exh. 2 – Email and Cover Letter to Court). After receiving the proposed orders submitted by plaintiff's counsel, and the arguments set forth in LG's prematurely filed motion, the Court entered orders on December 6 and December 23, 2019. (Exh. 3 – 12/6/19 Order; Exh. 4 – 12/23/19 Order). The Court, with knowledge of LG's position on conducting jurisdictional discovery and LG's position



on its Motion to Quash Service of Process, denied the motion (with leave to refile). Subsequent to the entry of the December 6<sup>th</sup> order (which only addressed LG Chem's Motion), LG filed another Motion for Clarification or, Alternatively, Reconsideration on December 16, 2019. (Exh. 5 – Mot. For Clarif.). This motion was filed prior to the entry of the Court's written December 23, 2019 order which denied LGCA's motion to dismiss. No subsequent motion was filed by LG after the entry of the December 23, 2019 written order.

Under Rule 58 of the South Carolina Rules of Civil Procedure, “[e]very judgment shall be set forth in a separate document[,] [and such] judgment is effective *only when* so set forth and entered into the record.” Rule 58 SCRPC. (emphasis added). The South Carolina Supreme Court has held that under Rule 58 “the written order is the trial judge's final order” and until entry of the written order the judge is free to change his mind. *Ford v. State Ethics Comm'n*, 344 S.C. 642, 646, 545 S.E.2d 821, 823 (2001); *First Union Nat'l Bank v. Hitman, Inc.*, 306 S.C. 327, 411 S.E.2d 681 (Ct.App.1991), *aff'd*, 308 S.C. 421, 418 S.E.2d 545 (1992). An oral order of the court is not final and binding until reduced to writing, signed by the judge, and delivered for recordation. *Case v. Case*, 243 S.C. 447, 134 S.E.2d 394 (1964).

A trial court does not have the power to alter or amend a final order if more than ten days passes and no Rule 59(e) motion has been served, *Leviner*, 339 S.C. at 494, 530 S.E.2d at 128, nor does a trial court have any power to grant the moving party an extension of time in which to file a Rule 59(e) motion. The failure to serve a Rule 59(e) motion within ten days of receipt of notice of entry of the order converts the order into a final judgment, and the aggrieved party's only recourse is to file a notice appeal. *Overland, Inc. v. Nance*, 423 S.C. 253, 256–57, 815 S.E.2d 431, 433 (2018).

LGCA's motion should be denied on this basis alone because it is not properly before the Court. This Court's decision was not final and binding until entry of the written order on December 23, 2019. LGCA had ten (10) days from the filing of the order to file its motion but failed to do so. Therefore, there is no properly filed motion for this Court to consider and the Court should deny LGCA's motion on this ground alone.

## **II. LG CHEM'S ARGUMENTS WERE ALREADY PROPERLY CONSIDERED BY THIS COURT**

LG Chem's arguments were already properly considered prior to the written entry of the Court's December 6, 2019 Order. "No order is final until it is written and entered." *Corbin v. Kohler Co.*, 351 S.C. 613, 620, 571 S.E.2d 92, 96 (Ct. App. 2002) (internal citation omitted). "Until written and entered, *the trial judge retains discretion to change his mind* and amend his oral ruling accordingly." *Ford v. State Ethics Comm'n*, 344 S.C. 642, 646, 545 S.E.2d 821, 823 (2001) (emphasis added); *see also Case v. Case*, 243 S.C. 447, 451, 134 S.E.2d 394, 396 (1964) (holding even if the trial judge made oral ruling in favor of one party, such pronouncement is not a final ruling on the merits nor is it binding on the parties until it has been reduced to writing, signed by the judge, and delivered for recordation).

After this Court's oral ruling, but prior to entry of an order, LG Chem raised the very same arguments that it is now attempting to raise in the present motion. Those arguments have already been considered by this Court and ruled upon. LG Chem's motion should be denied on this ground alone. The Fourth Circuit, applying South Carolina law, established three grounds for revisiting a settled matter under Rule 59(e): (1) accommodate an intervening change in the law; (2) to account for new evidence not previously available; and (3) to correct a clear error of law or prevent manifest injustice. *Dockins v. Benchmark Communications*, 189 F.R.D. 294 (D.S.C. 1998) (while the defendants filed their motion pursuant to SCRCP 54(b), the rationale is still the same with



regard to grounds for revisiting a settled matter). None of these three (3) grounds are present in this case and therefore this Court should deny LG Chem Ltd.'s motion.

### **III. LG IS IMPROPERLY ATTEMPTING TO INTRODUCE NEW EVIDENCE AND ARGUMENTS**

A motion for reconsideration, as couched by LG, is not authorized to enable a party to present additional evidence and arguments after the court has ruled. "A party cannot use Rule 59(e) to present to the court an issue the party could have raised prior to judgment but did not." *Hickman v. Hickman*, 301 S.C. 455, 456, 392 S.E.2d 481, 482 (Ct. App. 1990).

LG is admittedly trying to present additional evidence this Court ruled:

**"In addition, LG Chem and LGCAI request the opportunity to supplement the record their motions to quash and dismiss and ask the Court, in the alternative, to reconsider its prior ruling and instead grant the motions to quash and dismiss outright." (LG's Memo in Support of their Joint Mot. for Clar. Or Recon., p. 2).**

LG offers no explanation as to why these arguments could not have been presented in the original briefing and during argument on the initial motion. LG's new arguments appear to be the byproduct of a new law firm taking over the defense of this case and thinking of new arguments that were not previously made. The above cited case law is clear on this issue and these newly raised arguments, and any newly raised evidence, should not be considered by the Court.

### **IV. PLAINTIFF'S POSITION ON THE COURT'S RULING**

LG misstates Plaintiff's position on the Court's ruling. Plaintiff does not "contend the issue of jurisdiction has been decided" but rather contends that merits-based discovery can proceed contemporaneously with jurisdictional discovery. This Court never stated during the hearing, or in the written order that controls, that only jurisdictional discovery was allowed. The final written order contains the binding instructions which are to be followed by the parties. *Ford*, 344 S.C. at 646, 545 S.E.2d at 823 (citing Rule 58 SCRPC) (emphasis added).

LG's interpretation of the Court's ruling makes a leap in logic regarding language that is not found in the Court's order. LG has interpreted the Court's written order as limiting discovery only to jurisdictional issues and have effectively delayed any discovery in this case for the last five (5) months, when the written order contains no limitation. The plaintiff is not presumptuous enough to state what this Court meant with its original ruling, but the controlling orders which were signed and filed make no mention of only conducting jurisdictional discovery.

Plaintiff's position at the hearing, and still today, is that defendants' motion should be denied in its entirety. This would avoid piecemeal litigation and having to argue the jurisdictional issue multiple times.

### **CONCLUSION**

Based on arguments raised in the original briefing, oral argument, and those contained herein, Plaintiff requests the Court deny LG's motion.

*(Signature Page to Follow)*

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

BY: s/Austin H. Crosby

Ronnie L. Crosby, SC Bar No. 66481

Austin H. Crosby, SC Bar No. 80161

William F. Barnes, III, SC Bar 78220

101 Mulberry Street East

P.O. Box 457

Hampton, SC 29924

(803) 943-2111

[rcrosby@pmped.com](mailto:rcrosby@pmped.com)

[acrosby@pmped.com](mailto:acrosby@pmped.com)

ATTORNEYS FOR PLAINTIFF

May 4, 2020  
Hampton, South Carolina

|                                 |   |                                     |
|---------------------------------|---|-------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS        |
|                                 | ) |                                     |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2018-CP-4400054   |
|                                 | ) |                                     |
| DWAYNE THOMPSON,                | ) |                                     |
|                                 | ) |                                     |
| Plaintiff,                      | ) | <b>DEFENDANTS LG CHEM, LTD. AND</b> |
|                                 | ) | <b>LG CHEM AMERICA, INC.'S</b>      |
|                                 | ) | <b>MOTION FOR CLARIFICATION</b>     |
| vs.                             | ) | <b>OR, ALTERNATIVELY,</b>           |
|                                 | ) | <b>RECONSIDERATION</b>              |
|                                 | ) |                                     |
| ROLLING FOG VAPOR COMPANY,      | ) |                                     |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                     |
| AMERICA, INC.,                  | ) |                                     |
|                                 | ) |                                     |
| Defendants.                     | ) |                                     |
|                                 | ) |                                     |

**TO: ALEXANDER P. LEWIS, ESQ., W. BLAKE CUMMINGS, ESQ., RONNIE L. CROSBY, ESQ. AND AUSTIN H. CROSBY, ESQ., ATTORNEYS FOR PLAINTIFF DWAYNE THOMPSON**

YOU WILL PLEASE TAKE NOTICE that the undersigned as attorneys for Defendants LG Chem, Ltd. ("LGC") and LG Chem America, Inc. ("LGCAI") will move before the Court at a time and date to be set by the Court for an order clarifying or, alternatively, reconsidering its rulings on LGC's Motion to Quash Service of Process and Dismiss for Lack of Personal Jurisdiction and LGCAI's Motion to Dismiss for Lack of Personal Jurisdiction. The grounds for this motion are as follows:

This matter was brought before the Honorable J. Cordell Maddox, Jr. on September 23, 2019, upon LGC's Motion to Quash Service of Process and Dismiss for Lack of Personal Jurisdiction and LGCAI's Motion to Dismiss for Lack of Personal Jurisdiction. The Court (1) indicated that it viewed LGC and LGCAI's motions to dismiss for lack of personal jurisdiction as premature; and (2) that LGC and LGCAI could refile their motions to dismiss after discovery. Plaintiff's counsel



sent LGC and LGCAI's counsel proposed orders on November 15, 2019, and LGC and LGCAI intend to propose changes and/or object to those proposed orders. For the reasons set forth herein, LGC and LGCAI seek clarification of the Court's rulings or, alternatively, reconsideration of the Court's rulings.

**I. THE COURT DID NOT ADDRESS LGC'S MOTION TO QUASH SERVICE OF PROCESS, WHICH RAISED PURE QUESTIONS OF LAW.**

In addition to moving to dismiss for lack of personal jurisdiction, LGC moved to quash service of process because Plaintiff improperly attempted to serve LGC through the South Carolina Secretary of State instead of the Hague Service Convention. LGC is a South Korean company with its headquarters and principal place of business in Seoul, South Korea. South Korea is a signatory to the Hague Service Convention, "an international treaty that pre-empts inconsistent methods of service prescribed by state law in all cases where service abroad is required." *Bakala v. Bakala*, 352 S.C. 612, 626, 576 S.E.2d 156, 163 (2003) (citing *Volkswagenwerk Aktiengesellschaft v. Schlunk*, 486 U.S. 694, 699 (1988)). Service abroad by mail on a signatory to the Hague Service Convention is only permissible if the signatory has not lodged an objection to Article 10 of the Convention. *Id.* South Korea objected to article 10 of the Hague Service Convention and does not permit the sending of judicial documents by postal channels directly to persons abroad. Declarations and Reservations ¶ 2, HCCH, available at <https://www.hcch.net/en/instruments/conventions/status-table/notifications/?csid=408&disp=resdn>; see, e.g., *Monagas v. Samsung Elecs. Am., Inc.*, No. 3:13CV927 MPS, 2013 WL 5970977, at \*2 (D. Conn. Nov. 8, 2013) (attempted mail service on South Korean company was ineffective because it violated the Hague Service Convention).

It is undisputed that Plaintiff did not serve LGC with process in accordance with the procedures required by the Hague Service Convention, and no discovery is needed to determine

whether the Hague Service Convention preempts the inconsistent method of service that Plaintiff attempted to use—it unquestionably does. *Volkswagenwerk*, 486 U.S. at 699; *Bakala*, 352 S.C. at 626. Accordingly, LGC respectfully requests that the Court clarify whether it intended to deny LGC’s Motion to Quash as premature. To the extent the Court did intend to deny LGC’s Motion to Quash as premature, LGC respectfully requests that the Court reconsider that ruling for the reasons stated above and in LGC’s Motion to Quash. Plaintiff’s failure to comply with the requirements of the Hague Service Convention renders Plaintiff’s service insufficient as a matter of law.

**II. ANY DISCOVERY SHOULD BE LIMITED TO THE THRESHOLD ISSUE OF PERSONAL JURISDICTION.**

To the extent the Court did not rule on LGC’s Motion to Quash for improper service, LGC renews that Motion here and for the reasons stated above. Subject to its pending Motion to Quash, LGC also joins LGCAI in requesting clarification on the Court’s order regarding discovery. The Court stated that LGC and LGCAI would be free to re-file their motions after discovery was conducted, but did not set forth specific limits on the discovery available. LGC and LGCAI renew their Motions to Dismiss for reasons previously stated, and request reconsideration of the Court’s order denying those motions without prejudice as premature.

Subject to and without waiving those objections, LGC and LGCAI in the alternative request an order clarifying the permissible scope of discovery at this preliminary stage of the proceedings. The Court did not specify whether discovery is limited to the threshold issue before the Court—personal jurisdiction—or whether the Court intended to permit Plaintiff to engage in merits-based discovery before the jurisdictional issue is resolved. If the Court intended to permit merits-based discovery, reconsideration is respectfully requested, as personal jurisdiction should be determined prior to litigating the case upon the merits. *Madara v. Hall*, 916 F.2d 1510, 1514



& n. 1 (11th Cir. 1990) (reversing district court that ruled on a merits-based motion to dismiss before ruling on a motion to dismiss for lack of personal jurisdiction; “The court should have addressed the personal jurisdiction question first.”). Indeed, “where a plaintiff’s claim of personal jurisdiction appears to be both attenuated and based on bare allegations in the face of specific denials made by defendants, the court need not permit even limited discovery confined to issues of personal jurisdiction if it would be a fishing expedition.” *Sullivan v. Hawker Beechcraft Corp.*, 397 S.C. 143, 151 (Ct. App. 2012).

### III. CONCLUSION

WHEREFORE, for the foregoing reasons, LGC and LGCAI respectfully request that the Court clarify or, alternatively, reconsider its rulings and enter an order quashing service of process on LGC and dismissing LGC from this action; limiting the scope of discovery to the issue of personal jurisdiction; and granting such other and further relief that the Court deems just and proper.

Respectfully submitted, this 19<sup>th</sup> day of November, 2019.

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann  
KATE CAPPELMANN  
South Carolina Bar No.: 100551

Counsel for Defendants  
*LG Chem, Ltd. and LG Chem America, Inc.*

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
[kate.cappelmann@lewisbrisbois.com](mailto:kate.cappelmann@lewisbrisbois.com)

**Austin Crosby**

---

**From:** Casey M. Gore  
**Sent:** Tuesday, November 26, 2019 3:42 PM  
**To:** cmaddoxsc@sccourts.org; cmaddoxlc@sccourts.org  
**Cc:** Austin Crosby; Alex Lewis; William Smith; Cappelmann, Kate; Amie Cunningham; Valerie Inabinet; Smith, Lori  
**Subject:** Dwayne Thompson v. LG Chem, Ltd., et al. / 2019-CP-44-00054  
**Attachments:** 20191126154759070.pdf; Proposed Order Denying LG Chem, Ltd.'s Mtn to Quash & Mtn to Dismiss.docx; Proposed Order Denying LG Chem America, Inc.'s Mtn to Dismiss.docx

Dear Judge Maddox:

Please see the attached correspondence from Austin Crosby and the proposed orders referenced within.

Thank you,

**CASEY M. GORE**

Paralegal to Ronnie L. Crosby and Austin H. Crosby

---

**Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A.**

101 Mulberry Street East

P.O. Box 457

Hampton, SC 29924

Direct Dial: (803) 914-6749

Fax: (803) 914-6714

[cgore@pmped.com](mailto:cgore@pmped.com)

[www.pmped.com](http://www.pmped.com)

LAW OFFICES  
**PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK**

PROFESSIONAL ASSOCIATION

OVER 100 YEARS OF LEGAL SERVICE-EST. 1910

JOHN E. PARKER  
DANIEL E. HENDERSON  
MARK D. BALL  
RANDOLPH MURDAUGH, IV  
RONNIE L. CROSBY  
R. ALEXANDER MURDAUGH  
BERT G. UTSEY, III  
RANDOLPH MURDAUGH, III  
GRAHAME E. HOLMES  
LEE D. COPE  
MATTHEW V. CREECH  
LEAGUE B. CREECH  
STEVEN D. MURDAUGH  
WILLIAM F. BARNES, III  
AUSTIN H. CROSBY  
NEIL E. ALGER

RANDOLPH MURDAUGH, SR.  
(1887-1940)  
RANDOLPH MURDAUGH, JR.  
(1915-1998)  
J. ROBERT PETERS, JR.  
(1927-2008)  
J. PAUL DETRICK  
(1948-2016)  
CLYDE A. ELTZROTH, JR. - RET

Austin H. Crosby  
Direct Dial: (803) 914-6705  
Email: [acrosby@pmped.com](mailto:acrosby@pmped.com)

November 26, 2019

The Honorable J. Cordell Maddox, Jr.  
[cmaddoxsc@sccourts.org](mailto:cmaddoxsc@sccourts.org)

**Re: Dwayne Thompson v. Rolling Fog Vapor Company, LLC, LG Chem, Ltd., and  
LG Chem America, Inc.  
Civil Action No.: 2019-CP-44-00054**

Dear Judge Maddox:

Enclosed, please find two proposed orders which were just filed in the above-referenced matter. We submitted the proposed orders to defense counsel, but we were unable to agree on the language in the order. Subsequent to the hearing, counsel for the LG defendants filed a Motion for Clarification or, Alternatively, Reconsideration. Counsel for the plaintiff believes our proposed orders accurately reflect your Honor's ruling.

If you have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am

Sincerely,



Austin H. Crosby

AHC/cmg  
Enclosures

cc: Alexander P. Lewis  
William McBee Smith  
Kate Cappelmann

MAILING: P.O. BOX 457, HAMPTON, SOUTH CAROLINA 29924-0457  
TELEPHONE (803) 943-2111 • TOLL FREE (866) 943-2113 • FACSIMILE (803) 943-3943 WEBSITE [www.pmped.com](http://www.pmped.com)



|                                 |   |                                      |
|---------------------------------|---|--------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS         |
|                                 | ) |                                      |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2019-CP-44-00054   |
|                                 | ) |                                      |
| DWAYNE THOMPSON,                | ) |                                      |
|                                 | ) |                                      |
| Plaintiff,                      | ) |                                      |
|                                 | ) |                                      |
| v.                              | ) | <b>ORDER DENYING LG CHEM, LTD.'S</b> |
|                                 | ) | <b>MOTION TO QUASH SERVICE OF</b>    |
|                                 | ) | <b>PROCESS AND MOTION TO DISMISS</b> |
|                                 | ) | <b>FOR LACK OF PERSONAL</b>          |
|                                 | ) | <b>JURISDICTION</b>                  |
| LG CHEM, LTD., LG CHEM AMERICA, | ) |                                      |
| INC., and ROLLING FOG VAPOR     | ) |                                      |
| COMPANY, LLC,                   | ) |                                      |
|                                 | ) |                                      |
| Defendants.                     | ) |                                      |

This matter came before the court for a hearing on September 23, 2019, on Defendant LG Chem, Ltd.'s ("LG Chem") motion to quash service of process and motion to dismiss for lack of personal jurisdiction. After reviewing the parties' submissions and hearing argument of counsel, the Court denies LG Chem's motion to dismiss for lack of personal jurisdiction, but without prejudice to refile.

This Court finds that LG Chem was properly served through the South Carolina Secretary of State. S.C. Code Ann. §15-9-245 states in pertinent part:

- (a) Every foreign business or nonprofit corporation which is not authorized to do business in this state, by doing in this State, either itself or through an agent, **any business, including any business activity for which authority need not be obtained as provided by Section 33-15-101**, is considered to have designated the Secretary of State as its agent upon whom process against it may be served in any action or proceeding arising in any court in this State out of or in connection with **the doing of any business in this State**.
- (b) Service of process is made by delivering to and leaving with the Secretary of State, or with any person designated by him to receive such service, duplicate copies of the process, notice, or demand. The Secretary of State immediately shall cause one of the copies to be forwarded by certified mail, addressed to the corporation either at its registered office in the jurisdiction of its incorporation, its principal place of business in the jurisdiction, or at the last address of the foreign business or nonprofit corporation known to the plaintiff, in that order.

(Emphasis added.)

Service is effective upon such a foreign corporation by delivering suit papers to the Secretary of State. §15-9-245(a). The Secretary is directed to immediately forward a copy to the corporation by certified mail. § 15-9-245(b). Substituted service is thus effective by delivery upon the Secretary of State as an agent, who then utilizes mail services to directly notify the foreign defendant. S.C. R. Civ. P. 4(d)(7) (providing that service may be made upon a corporation “by delivering a copy of the summons and complaint to an officer, a managing or general agent, or to any other agent authorized by appointment or by law to receive service of process...”); *see also Hammond v. Honda Motor Co., Ltd.*, 128 F.R.D. 638 (D.S.C. 1989)

The statute’s definition of “doing business” includes “**business activity for which authority need not be obtained as provided by § 33-15-101.**” S.C. Code §15-9-245(a) (emphasis added.) South Carolina has an expansive long-arm statute whereby a foreign corporation unauthorized to do business in the United States is considered to be “doing business” if it sells through an independent contractor or owns and controls **a subsidiary corporation that does business in South Carolina**; this is the case even if that foreign corporation does not do so directly. The affidavit from LG Chem does not dispute that it sells its products through an independent contractor, nor does it dispute that it owns and controls a subsidiary corporation that does business in South Carolina. The import records submitted by the plaintiff show 984 shipments from LG Chem through the Port of Charleston from November 1, 2006 thru present date. (Exh. 7 to Plaintiff’s Memorandum in Opposition). Of these shipments 818 were cosigned by LG Chem America, Inc. (*Id.*) This Court finds that LG Chem is “doing business” in South Carolina as defined in §15-9-245 and § 33-15-101 and therefore LG Chem was properly served

through the Secretary of State. Defendant's motion to quash service of process is denied.

AND IT IS SO ORDERED.

Dated: \_\_\_\_\_  
\_\_\_\_\_, South Carolina

\_\_\_\_\_  
J. Cordell Maddox, Jr.  
Circuit Court Judge





Union Common Pleas

**Case Caption:** Dwayne Thompson VS Lg Chem, Ltd. , defendant, et al  
**Case Number:** 2019CP4400054  
**Type:** Order/Other

So Ordered

s/ J. Cordell Maddox Jr.

Electronically signed on 2019-12-06 12:03:35 page 4 of 4

|                                 |   |                                          |
|---------------------------------|---|------------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS             |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2019-CP-44-00054       |
| DWAYNE THOMPSON,                | ) |                                          |
| Plaintiff,                      | ) |                                          |
| v.                              | ) | <b>ORDER DENYING LG CHEM</b>             |
| LG CHEM, LTD., LG CHEM AMERICA, | ) | <b>AMERICA, INC.'S MOTION TO DISMISS</b> |
| INC., and ROLLING FOG VAPOR     | ) |                                          |
| COMPANY, LLC,                   | ) |                                          |
| Defendants.                     | ) |                                          |

This matter came before the court for a hearing on September 23, 2019, on Defendant LG Chem America, Inc.'s ("LGCAI") motion to dismiss for lack of personal jurisdiction. After reviewing the parties' submissions and hearing argument of counsel, the Court denies LGCAI's motion, but without prejudice to refile.

AND IT IS SO ORDERED.

|                       |                                               |
|-----------------------|-----------------------------------------------|
| Dated: _____          | _____                                         |
| _____, South Carolina | J. Cordell Maddox, Jr.<br>Circuit Court Judge |



Union Common Pleas

**Case Caption:** Dwayne Thompson VS Lg Chem, Ltd. , defendant, et al  
**Case Number:** 2019CP4400054  
**Type:** Order/Other

So Ordered

s/ J. Cordell Maddox Jr.

Electronically signed on 2019-12-23 15:20:51 page 2 of 2

|                                 |   |                                     |
|---------------------------------|---|-------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS        |
|                                 | ) |                                     |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO.: 2018-CP-4400054   |
|                                 | ) |                                     |
| DWAYNE THOMPSON,                | ) |                                     |
|                                 | ) |                                     |
| Plaintiff,                      | ) | <b>DEFENDANTS LG CHEM, LTD. AND</b> |
|                                 | ) | <b>LG CHEM AMERICA, INC.'S</b>      |
|                                 | ) | <b>MOTION FOR CLARIFICATION</b>     |
| vs.                             | ) | <b>OR, ALTERNATIVELY,</b>           |
|                                 | ) | <b>RECONSIDERATION</b>              |
|                                 | ) |                                     |
| ROLLING FOG VAPOR COMPANY,      | ) |                                     |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                     |
| AMERICA, INC.,                  | ) |                                     |
|                                 | ) |                                     |
| Defendants.                     | ) |                                     |
|                                 | ) |                                     |

**TO: ALEXANDER P. LEWIS, ESQ., W. BLAKE CUMMINGS, ESQ., RONNIE L. CROSBY, ESQ. AND AUSTIN H. CROSBY, ESQ., ATTORNEYS FOR PLAINTIFF DWAYNE THOMPSON**

YOU WILL PLEASE TAKE NOTICE that the undersigned as attorneys for Defendants LG Chem, Ltd. ("LGC") and LG Chem America, Inc. ("LGCAI") will move before the Court at a time and date to be set by the Court for an order clarifying or, alternatively, reconsidering its rulings on LGC's Motion to Quash Service of Process and Dismiss for Lack of Personal Jurisdiction and LGCAI's Motion to Dismiss for Lack of Personal Jurisdiction. The grounds for this motion are as follows:

This matter was brought before the Honorable J. Cordell Maddox, Jr. on September 23, 2019, upon LGC's Motion to Quash Service of Process and Dismiss for Lack of Personal Jurisdiction and LGCAI's Motion to Dismiss for Lack of Personal Jurisdiction. The Court (1) indicated that it viewed LGC and LGCAI's motions to dismiss for lack of personal jurisdiction as premature; and (2) that LGC and LGCAI could refile their motions to dismiss after discovery. Plaintiff's counsel



sent LGC and LGCAI's counsel proposed orders on November 15, 2019, and LGC and LGCAI intend to propose changes and/or object to those proposed orders. For the reasons set forth herein, LGC and LGCAI seek clarification of the Court's rulings or, alternatively, reconsideration of the Court's rulings.

**I. THE COURT DID NOT ADDRESS LGC'S MOTION TO QUASH SERVICE OF PROCESS, WHICH RAISED PURE QUESTIONS OF LAW.**

In addition to moving to dismiss for lack of personal jurisdiction, LGC moved to quash service of process because Plaintiff improperly attempted to serve LGC through the South Carolina Secretary of State instead of the Hague Service Convention. LGC is a South Korean company with its headquarters and principal place of business in Seoul, South Korea. South Korea is a signatory to the Hague Service Convention, "an international treaty that pre-empts inconsistent methods of service prescribed by state law in all cases where service abroad is required." *Bakala v. Bakala*, 352 S.C. 612, 626, 576 S.E.2d 156, 163 (2003) (citing *Volkswagenwerk Aktiengesellschaft v. Schlunk*, 486 U.S. 694, 699 (1988)). Service abroad by mail on a signatory to the Hague Service Convention is only permissible if the signatory has not lodged an objection to Article 10 of the Convention. *Id.* South Korea objected to article 10 of the Hague Service Convention and does not permit the sending of judicial documents by postal channels directly to persons abroad. Declarations and Reservations ¶ 2, HCCH, available at [https://www.hcch.net/en/instruments/conventions/status-table/notifications/?csid=408&disp=resdn;see,e.g.,Monagasv.SamsungElecs.Am.,Inc.,No.3:13CV927MPS,2013WL5970977,at\\*2\(D.Conn.Nov.8,2013\)\(attemptedmailserviceonSouthKoreancompanywasineffectivebecauseitviolatedtheHagueServiceConvention\).](https://www.hcch.net/en/instruments/conventions/status-table/notifications/?csid=408&disp=resdn;see,e.g.,Monagasv.SamsungElecs.Am.,Inc.,No.3:13CV927MPS,2013WL5970977,at*2(D.Conn.Nov.8,2013)(attemptedmailserviceonSouthKoreancompanywasineffectivebecauseitviolatedtheHagueServiceConvention).)

It is undisputed that Plaintiff did not serve LGC with process in accordance with the procedures required by the Hague Service Convention, and no discovery is needed to determine

whether the Hague Service Convention preempts the inconsistent method of service that Plaintiff attempted to use—it unquestionably does. *Volkswagenwerk*, 486 U.S. at 699; *Bakala*, 352 S.C. at 626. Accordingly, LGC respectfully requests that the Court clarify whether it intended to deny LGC’s Motion to Quash as premature. To the extent the Court did intend to deny LGC’s Motion to Quash as premature, LGC respectfully requests that the Court reconsider that ruling for the reasons stated above and in LGC’s Motion to Quash. Plaintiff’s failure to comply with the requirements of the Hague Service Convention renders Plaintiff’s service insufficient as a matter of law.

**II. ANY DISCOVERY SHOULD BE LIMITED TO THE THRESHOLD ISSUE OF PERSONAL JURISDICTION.**

To the extent the Court did not rule on LGC’s Motion to Quash for improper service, LGC renews that Motion here and for the reasons stated above. Subject to its pending Motion to Quash, LGC also joins LGCAI in requesting clarification on the Court’s order regarding discovery. The Court stated that LGC and LGCAI would be free to re-file their motions after discovery was conducted, but did not set forth specific limits on the discovery available. LGC and LGCAI renew their Motions to Dismiss for reasons previously stated, and request reconsideration of the Court’s order denying those motions without prejudice as premature.

Subject to and without waiving those objections, LGC and LGCAI in the alternative request an order clarifying the permissible scope of discovery at this preliminary stage of the proceedings. The Court did not specify whether discovery is limited to the threshold issue before the Court—personal jurisdiction—or whether the Court intended to permit Plaintiff to engage in merits-based discovery before the jurisdictional issue is resolved. If the Court intended to permit merits-based discovery, reconsideration is respectfully requested, as personal jurisdiction should be determined prior to litigating the case upon the merits. *Madara v. Hall*, 916 F.2d 1510, 1514



& n. 1 (11th Cir. 1990) (reversing district court that ruled on a merits-based motion to dismiss before ruling on a motion to dismiss for lack of personal jurisdiction; “The court should have addressed the personal jurisdiction question first.”). Indeed, “where a plaintiff’s claim of personal jurisdiction appears to be both attenuated and based on bare allegations in the face of specific denials made by defendants, the court need not permit even limited discovery confined to issues of personal jurisdiction if it would be a fishing expedition.” *Sullivan v. Hawker Beechcraft Corp.*, 397 S.C. 143, 151 (Ct. App. 2012).

### III. CONCLUSION

WHEREFORE, for the foregoing reasons, LGC and LGCAI respectfully request that the Court clarify or, alternatively, reconsider its rulings and enter an order quashing service of process on LGC and dismissing LGC from this action; limiting the scope of discovery to the issue of personal jurisdiction; and granting such other and further relief that the Court deems just and proper.

Respectfully submitted, this 19<sup>th</sup> day of November, 2019.

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann  
KATE CAPPELMANN  
South Carolina Bar No.: 100551

Counsel for Defendants  
*LG Chem, Ltd. and LG Chem America, Inc.*

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
[kate.cappelmann@lewisbrisbois.com](mailto:kate.cappelmann@lewisbrisbois.com)

|                                 |   |                                    |
|---------------------------------|---|------------------------------------|
| STATE OF SOUTH CAROLINA         | ) | IN THE COURT OF COMMON PLEAS       |
|                                 | ) |                                    |
| COUNTY OF UNION                 | ) | CIVIL ACTION NO. : 2018-CP-4400054 |
|                                 | ) |                                    |
| DWAYNE THOMPSON,                | ) |                                    |
|                                 | ) |                                    |
| Plaintiff,                      | ) |                                    |
|                                 | ) |                                    |
| vs.                             | ) |                                    |
|                                 | ) |                                    |
| ROLLING FOG VAPOR COMPANY,      | ) |                                    |
| LLC, LG CHEM, LTD., and LG CHEM | ) |                                    |
| AMERICA, INC.,                  | ) |                                    |
|                                 | ) |                                    |
| Defendants.                     | ) |                                    |
| _____                           | ) |                                    |

**CERTIFICATE OF SERVICE**

I certify that on this date, I filed **LG CHEM, LTD. AND LG CHEM AMERICA, INC.'S**  
**MOTION FOR CLARIFICATION OR, ALTERNATIVELY, RECONSIDERATION** in this  
action with the Clerk of Court using the Court's E-Filing System. A Notice of Electronic Filing will  
automatically generate to the following counsel of record:

Alexander P. Lewis  
W. Blake Cummings  
**Cumming & Lewis, LLC**  
P.O. Box 5766  
Spartanburg, SC 29304

and

Austin H. Crosby  
Ronnie L. Crosby  
**Peters, Murdaugh, Parker, Eltzroth & Detrick, PA**  
101 MULBERRY STREET EAST  
P.O. Box 457  
HAMPTON, SC 29924  
  
*Counsel for Plaintiff*

This 19<sup>th</sup> day of November, 2019.

**LEWIS BRISBOIS BISGAARD  
& SMITH LLP**

/s/ Kate Cappelmann  
KATE CAPPELMANN  
South Carolina Bar No.: 100551

Counsel for Defendants  
*LG Chem, Ltd. and LG Chem America, Inc.*

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585 – Telephone  
404.467-8845 – Facsimile  
kate.cappelmann@lewisbrisbois.com



|                                 |   |                                   |
|---------------------------------|---|-----------------------------------|
| STATE OF SOUTH CAROLINA         | ) |                                   |
|                                 | ) | IN THE COURT OF COMMON PLEAS      |
| COUNTY OF UNION                 | ) | JUDICIAL CIRCUIT                  |
| DWAYNE THOMPSON,                | ) | Civil Action No. 2019-CP-4400054  |
|                                 | ) |                                   |
| Plaintiff,                      | ) |                                   |
|                                 | ) |                                   |
| vs.                             | ) | <b>DEFENDANTS LG CHEM, LTD.'S</b> |
|                                 | ) | <b>AND CHEM AMERICA, INC.'S</b>   |
| ROLLING FOG VAPOR COMPANY,      | ) | <b>MEMORANDUM IN SUPPORT</b>      |
| LLC, LG CHEM, LTD., and LG CHEM | ) | <b>OF THEIR JOINT MOTION FOR</b>  |
| AMERICA, INC.,                  | ) | <b>CLARIFICATION OR,</b>          |
|                                 | ) | <b>ALTERNATIVELY,</b>             |
| Defendant.                      | ) | <b>RECONSIDERATION</b>            |

---

Defendants LG Chem, Ltd. ("LG Chem") and LG Chem America, Inc. ("LGCAI"), through their undersigned counsel, submit this memorandum in support of their Joint Motion for Clarification or, Alternatively, Reconsideration.

### INTRODUCTION

On September 23, 2019, this Court heard argument on LG Chem's Motion to Quash for improper service and LG Chem and LGCAI's motions to dismiss for lack of personal jurisdiction. The Court ruled from the bench as to the Motions to Dismiss, stating those motions were premature and therefore denied without prejudice and leave to refile after conducting discovery related to product identification and jurisdictional issues.

[A]t this point nobody knows whether it's one of their batteries. If it is one of their batteries, then you get to the bill of lading issue and whether or not they've subjected themselves to jurisdiction. . . . factually, there's just not enough information to grant or deny at this point. So I am going to deny but without prejudice and you can file at a later date after you've had some discovery.

Exhibit A, Transcript of Hearing, at page 12:8-13.

The Court then directed Plaintiff to submit proposed orders, and the Plaintiff did so two months later, on November 26, 2019. The Court then entered the Orders, reiterating that LG Chem and LGCAI's motions to dismiss were denied "without prejudice." . (*See* Dec. 6, 2019 Order Denying LG Chem's Mot. to Quash and Mot. to Dismiss; Dec 23, 2019 Order Denying LGCAI's Mot. to Dismiss.)

Plaintiff is refusing to abide by the Court's ruling, as set forth in the Transcript of Hearing at pages 11–12, and instead takes the position that the Court's ruling does not in any way limit discovery in this case. Therefore, LG Chem and LGCAI ask the Court to clarify its written order by entering an Order that incorporates by reference its oral ruling, and specifically that the threshold issues of product identification and jurisdiction must be resolved before LG Chem can be required to respond to merits discovery.

In addition, LG Chem and LGCAI request the opportunity to supplement the record regarding their motions to quash and dismiss and ask the Court, in the alternative, to reconsider its prior ruling and instead grant the motions to quash and dismiss outright.

### **BACKGROUND**

In this products liability action, Plaintiff seeks recovery for injuries allegedly sustained when a lithium-ion battery cell exploded in his pocket. (Compl. ¶ 11–12.) Plaintiff alleges he purchased the battery cell, an "LG Brown Hg2 INR 18650 3000mAh" model cell allegedly manufactured by LG Chem, from Rolling Fog Vapor Company, LLC, a South Carolina retailer of e-cigarettes and accessories. (*Id.* ¶ 2.) Plaintiff filed this action on March 4, 2019, asserting claims of negligence, strict liability, and breach of warranty against LG Chem, LGCAI, and Rolling Fog.

LG Chem is a Korean company with its headquarters in Seoul, South Korea. (Apr. 24, 2019 Affidavit of Sung Hun Ryu ("Ryu Aff."), at ¶ 4.) It is not "at home" in South Carolina, has never

conducted any business with the South Carolina retailer, Rolling Fog Vapor, and has never authorized anyone to sell its 18650 lithium ion battery cells to consumers for use as standalone, removable, rechargeable batteries in e-cigarette devices. (Ryu Aff. ¶ 4, 13–15.) LGCAI is a Delaware corporation with its principal place of business in Atlanta, Georgia. (Apr. 24, 2019 Affidavit of HyunSoo Kim (“Kim Aff.”), at ¶ 5.) It is not “at home” in South Carolina, has never conducted any business with the South Carolina retailer, Rolling Fog Vapor, and has never authorized anyone to sell its 18650 lithium ion battery cells to consumers for use as standalone, removable, rechargeable batteries in e-cigarette devices. (Kim Aff. ¶ 5, 12–13.)

On April 24, 2019, LG Chem filed a motion to quash Plaintiff’s improper service of process and to dismiss for lack of personal jurisdiction (“LG Chem’s Motion to Quash and Motion to Dismiss”). That same day, LGCAI also filed a motion to dismiss for lack of personal jurisdiction (“LGCAI’s Motion to Dismiss”). The arguments that formed the basis of those motions are as follows:

- Plaintiff’s attempt at serving LG Chem through the South Carolina Secretary of State was improper because LG Chem must be served through the Hague Service Convention. (LG Chem’s Mem. in Supp. of its Mot. to Quash and Mot. to Dismiss (“LG Chem’s Memo in Support”) at 4–7, filed Sept. 18, 2019.)
- This Court cannot exercise general personal jurisdiction over LG Chem or LGCAI because neither entity has continuous and systematic affiliations with South Carolina so as to render them essentially “at home” in the state. (LG Chem’s Memo in Supp. at 7–8; LGCAI’s Mem. in Supp. of its Mot. to Dismiss (“LGCAI’s Memo in Support”) at 3–5, filed Sept. 18, 2019.)
- This Court cannot exercise specific personal jurisdiction over LG Chem or LGCAI because neither entity has sufficient minimum contacts with South Carolina to satisfy constitutional due process in that Plaintiff’s suit does not arise out of or relate to any contacts that LG Chem or LGCAI may have with South Carolina. (LG Chem’s Memo in Support at 8–11; LGCAI’s Memo in Support at 5–7.)



The motions were heard on September 23, 2019. At the hearing, Plaintiff offered no evidence to support his burden of proving that his claims arose out of activities directed by these defendants to South Carolina. Indeed, the only evidence proffered by Plaintiff was an attorney-prepared document purporting to be a list of products which LG Chem allegedly imported to the United States through the Port of Charleston. (*See* Ex. A, Tr. of Hearing, at page 5:1–19; *see also* Ex. 7 to Pl.’s Opp. to LG Chem’s Mot. to Quash and Mot. to Dismiss for Lack of Personal Jurisdiction, filed Sept. 20, 2019.) However, Plaintiff offered no evidence that his vape-related personal injury claim bore any relation to these purportedly imported products.

With respect to LG Chem’s and LGCAI’s motions to dismiss for lack of personal jurisdiction, the Court stated the following:

So what I am going to do is dismiss these with no prejudice to refile once discovery is -- there’s been more discovery so you can find out factually. I mean, you know, at this point nobody knows whether it’s one of [LG Chem’s or LGCAI’s] batteries. *If it is one of [LG Chem’s or LGCAI’s] batteries then you get to the bill of lading issue and whether or not they’ve subjected themselves to jurisdiction. . . . [F]actually there’s just not enough information to grant or deny at this point.* So I am going to deny but without prejudice and you can file at a later date after you had some more discovery.

(Ex. A, Tr. of Hearing, at page 11:25–12:13 (emphasis added).) The Court did not address LG Chem’s motion to quash service at the hearing.

In its written orders, filed in December 2019, the Court reiterated that both LG Chem’s and LGCAI’s motions to dismiss for lack of personal jurisdiction were denied “without prejudice to refile.” Plaintiffs have since taken the position that the motions to dismiss were denied outright and contend there are no limits to discovery, when the Court clearly stated at the hearing that the threshold issues of product identification and jurisdiction needed to be resolved before further proceedings. Therefore, LG Chem and LGCAI request clarification of the Court’s written order

to incorporate its prior oral ruling reflecting this limitation. (Ex. A, Tr. of Hearing, at page 11:25–12:13.)

LG Chem and LGCAI also request, in the alternative, that the Court reconsider its above ruling, and instead grant their Motions to Quash and Dismiss. As to LG Chem, the requirements of the Hague Service Convention were not satisfied, and purported service on LG Chem should be quashed for that reason. As to both LG Chem and LGCAI, Plaintiff has not met his burden of showing his claims arose out of actions these defendants directed to South Carolina, nor can he. Therefore, specific personal jurisdiction is lacking. Accordingly, LG Chem and LGCAI respectfully move under SCRCP 54(b) for this Court to reconsider its interlocutory orders denying LG Chem’s Motion to Quash and Motion to Dismiss and LGCAI’s Motion to Dismiss and issue a new order granting the aforementioned motions.

### **ARGUMENT**

#### **I. Standard Applicable to a Motion to Amend or Reconsider a Prior Order.**

Under SCRCP 54(b), this Court has the authority to clarify, or reconsider, its written orders denying LG Chem’s Motion to Quash and denying both LG Chem’s and LGCAI’s motions to dismiss for lack of personal jurisdiction. Under Rule 54(b), “any order . . . which adjudicates fewer than all the claims or the rights and liabilities of fewer than all the parties . . . is subject to revision at any time before the entry of judgment adjudicating all the claims and the rights and liabilities of all the parties.” *See Broom, Jr. v. Andrews*, 2017 WL 10701535, at \*2 (S.C. Ct. Com. Pls. Nov. 2, 2007) (“Rule 54(b) . . . instructs that unless the Court expressly directs the entry of judgment, any intermediate order is subject to revision, at any time, until a final judgment is issued.”). Courts may also clarify their prior orders under Rule 54(b). *See, e.g., Carpenter v.*

*Measter*, 2010 WL 4219701 (S.C. Ct. Com. Pls. Feb. 23, 2010) (issuing a revised order under Rule 54(b) clarifying its previous order granting partial summary judgment).

**II. Clarification of the Court’s Written Order to Incorporate Its Oral Ruling Is Necessary to Ensure Plaintiff’s Compliance.**

At the hearing on September 23, 2019, this Court denied LG Chem’s and LGCAI’s motions to dismiss “with no prejudice to refile.” (Ex. A, Tr. of Hearing, at page 11:24–12:3.) The Court stated there were threshold issues to be decided before it could grant or deny the motion, including whether the battery was even manufactured by LG Chem and whether the defendants had subjected themselves to the jurisdiction of the Court. Therefore, the Court specifically ruled that the motions were without prejudice and granted leave to re-file after discovery on these issues.

Plaintiffs have refused to limit discovery requests to product identification and jurisdictional issues, as ordered by the Court. Instead, Plaintiffs contend the issue of jurisdiction has been decided, and take the position that LG Chem and LGCAI are required to engage in merits-based discovery and otherwise proceed as though their jurisdiction defense had been adjudicated, when it has not.

Therefore, LG Chem requests clarification of the written Order to incorporate the Court’s prior oral ruling, which reflected that the issue of jurisdiction should be decided before proceeding with the merits of the case. *See, e.g., Bridges v. Wyandotte Worsted Co.*, 243 S.C. 1, 9, 132 S.E.2d 18, 22 (1963), overruled in part on other grounds, *Sabb v. S.C. State Univ.*, 350 S.C. 416, 567 S.E.2d 231 (2002) (“The decision of the question of whether the court has jurisdiction is a preliminary one to the determination of the merits of the cause . . . .”); *Hidria, USA, Inc. v. Delo*, 415 S.C. 533, 538–39, 783 S.E.2d 839, 842 (Ct. App. 2016) (explaining the trial court’s decision to “permit[] the parties to conduct discovery on the jurisdictional issues raised in [the defendant’s] motion to dismiss” and to hold “its ruling on the motion to dismiss in abeyance pending completion

of the jurisdictional discovery”); *Sullivan v. Hawker Beechcraft Corp.*, 397 S.C. 143, 151, 723 S.E.2d 835, 839 (Ct. App. 2012) (“When [the] plaintiff can show that discovery is necessary in order to meet defendant's challenge to personal jurisdiction, a court should ordinarily permit discovery on that issue unless plaintiff's claim appears to be clearly frivolous.” (emphasis added) (citation omitted)); *see also*, *Taylor v. Bridgestone/Firestone, Inc.*, Nos. 8:07-1597-HMH, 8:07-1598-HMH, 2007 WL 3232183, at \*2 (D.S.C. Oct. 31, 2007) (allowing “discovery on the specific jurisdiction issue” created by the Japanese defendant’s claim that it did not manufacture the allegedly injurious product at issue in the South Carolina plaintiff’s complaint).

Accordingly, LG Chem respectfully requests that this Court clarify its written order to incorporate its oral ruling by reference, thereby confirming that discovery from LG Chem and LG Chem America is limited to product identification and jurisdictional issues until the Court obtains sufficient evidence to resolve LG Chem’s and LGCAI’s jurisdictional objections.

### **III. Reconsideration of the Court’s Prior Order is Appropriate to Remedy Legal Errors.**

#### **A. Service of Process on LG Chem was Improper**

LG Chem is a South Korean company with its headquarters and principal offices in South Korea. South Korea is a signatory to the Hague Service Convention, and South Korean companies must be served in accordance with its requirements. *See* art. 3, 20 U.S.T. 362; *Volkswagenwerk Aktiengesellschaft v. Schlunk*, 486 U.S. 694, 698 (1988). The Hague Service Convention requires, among other things, that South Korean companies be served with process through the South Korean Central Authority.

Plaintiff did not attempt to follow the procedures required by the Hague Service Convention for serving LG Chem. Instead, he attempted to serve LG Chem with the Summons and Complaint via the South Carolina Secretary of State. However, the Hague Service Convention



preempts inconsistent methods of service of process prescribed by state law by virtue of the Supremacy Clause of Article VI of the United States Constitution. *Id.*; *see also Bakala v. Bakala*, 352 S.C. 612, 626, 576 S.E.2d 156, 163 (2003). Moreover, because South Korea has objected to Article 10 of the Hague Service Convention, a South Korean company, like LG Chem, may not be served via mail. *See, e.g., Monagas v. Samsung Elecs. Am., Inc.*, C.A. No. 3:13-CV-927, 2013 WL 5970977, at \*2 (D. Conn. Nov. 8, 2013).

**B. This Court Lacks Personal Jurisdiction Over LG Chem and LGCAI**

Plaintiff has not disputed that LG Chem and LGCAI are not subject to general personal jurisdiction in South Carolina, and argued only that specific jurisdiction existed as to LG Chem and LGCAI. For specific personal jurisdiction to attach, due process requires that minimum contacts exist between the defendant and the forum state such that maintenance of the suit does not offend traditional notions of fair play and substantial justice. *See Cockrell v. Hillerich & Bradsby Co.*, 363 S.C. 485, 491–92, 611 S.E.2d 505, 508 (2005) (citing *Burger King Corp. v. Rudzewicz*, 471 U.S. 462 (1985)).

Relying on *State v. NV Sumatra Tobacco Trading, Co.*, 379 S.C. 81, 91, 666 S.E.2d 218, 223 (2008), Plaintiff argued that LG Chem and LGCAI have “established minimum contacts with South Carolina by satisfying its long-arm statute by directing its activities at South Carolina through the intentional placement of its products into the stream of commerce using nationwide distributors.” (*See* Pl.’s Opp. to LG Chem’s Mot. to Quash and Mot. to Dismiss for Lack of Personal Jurisdiction at 6; Pl.’s Opp. to LGCAI’s Mot. to Dismiss for Lack of Personal Jurisdiction at 4–5, filed Sept. 20, 2019.) However, due process cannot be satisfied by simply placing products in the stream of commerce in Korea, and Plaintiff offered no facts to support his argument that LG Chem or LGCAI directed activities related to his claims to South Carolina.

To satisfy constitutional due process, the exercise of “specific jurisdiction is confined to adjudication of issues deriving from, or connected with, the very controversy that establishes jurisdiction.” *Goodyear*, 564 U.S. at 919 (internal quotation omitted). Accordingly, in order for a court to exercise specific jurisdiction, the suit must arise out of or relate to the defendant’s contacts with the forum. *See Cockrell v. Illerich & Bradsby Co.*, 363 S.C. 485, 491-94, 611 S.E.2d 505, 509–10 (2005); *Power Prods. & Servs. Co., Inc. v. Kozma*, 379 S.C. 423, 433–35, 665 S.E.2d 660, 665–67 (Ct. App. 2008). Indeed, the court must “find that the defendant directed its activities to a resident of this State and that the cause of action arises out of or relates to those activities.” *Southern Plastics Co. v. Southern Commerce Bank*, 310 S.C. 256, 260, 423 S.E.2d 128, 131 (1992) (emphasis added). Specific personal jurisdiction cannot exist if the cause of action is unrelated to the defendant’s contacts with the forum. *Id.* *Power Prods.*, 379 S.C. at 432, 665 S.E.2d at 665 (“[A] minimum contacts analysis requires a court to find that the defendant directed its activities to residents of South Carolina and that the cause of action arises out of or relates to those activities. Without minimum contacts, the court does not have the ‘power’ to adjudicate the action.”); see also, *Bristol-Myers*, 137 S. Ct. at 1780 (citing *Daimler*, 571 U.S. at 127).

In addition, when considering whether the defendant has created sufficient contacts with the forum to support the exercise of specific jurisdiction, “the focus must center on the contacts generated by the defendant, and not on the unilateral actions of some other entity.” *Cockrell*, 363 S.C. at 492, 611 S.E.2d at 508-09 (citing *Helicopteros Nacionales de Colombia, S.A. v. Hall*, 466 U.S. 408, 417, 104 S.Ct. 1868, 80 L.Ed.2d 404 (1984) (holding “unilateral activity of another party or a third person is not an appropriate consideration”)). “The foreseeability that is critical to due process analysis is not the mere likelihood that a product will find its way into the forum state. Rather, it is that the defendant’s conduct and connection with the forum state are such that he



should reasonably anticipate being haled into court there.” *Cockrell*, 363 S.C. at 492, 611 S.E.2d at 508-09 (citing *World-Wide Volkswagen*, 444 U.S. at 297); see *Walden*, 571 U.S. at 284 (“the defendant-focused ‘minimum contacts’ inquiry” cannot be satisfied “by demonstrating contacts between the plaintiff (or third parties) and the forum state”); *J. McIntyre Mach., Ltd. v. Nicastro*, 564 U.S. 873 (2011) (holding that mere knowledge that a product would end up in a particular state after being placed in the stream of commerce is insufficient to establish specific jurisdiction).

In *J. McIntyre*, the New Jersey Supreme Court held that jurisdiction was proper “because the injury occurred in New Jersey; because petitioner knew or reasonably should have known ‘that its products are distributed through a nationwide distribution system that might lead to those products being sold in any of the fifty states’; and because petitioner failed to ‘take some reasonable step to prevent the distribution of its products in [New Jersey].’” *Id.* at 879 (Kennedy, J., plurality opinion) (quoting *Nicastro v. McIntyre Machinery America, Ltd.*, 987 A.2d 575, 592 (N.J. 2010)). “Both the New Jersey Supreme Court’s holding and its account of what it called ‘[t]he stream-of-commerce doctrine of jurisdiction,’ were incorrect, however.” *Id.* Justice Breyer, although concurring in the judgment on narrower grounds, nevertheless agreed with the plurality that the New Jersey Supreme Court’s view that a manufacturer “is subject to jurisdiction for a products-liability action so long as it ‘knows or reasonably should know that its products are distributed through a nationwide distribution system that might lead to those products being sold in any of the fifty states’” does not comport with due process. *Id.* at 891 (Breyer, J., concurring) (emphasis in original). To adopt the New Jersey Supreme Court’s “view would abandon the heretofore accepted inquiry of whether, focusing upon the relationship between ‘the defendant, the forum, and the litigation,’ it is fair, in light of the defendant’s contacts with that forum, to subject the defendant to suit there.” *Id.* (emphasis in original) (quoting *Shaffer v. Heitner*, 433 U.S. 186,

204 (1977)).

In *Sumatra*, decided three years before *J. McIntyre*, the South Carolina Supreme Court held specific jurisdiction could be exercised over the foreign defendant cigarette manufacturer, based on its analysis that the foreign defendant purposefully availed itself of the privilege of doing business in each of the 50 U.S. States, including South Carolina. Regardless of whether *Sumatra* can withstand constitutional scrutiny after *J. McIntyre*,<sup>1</sup> that debate need not be resolved here, because the facts of this case are distinguishable, and more like *Cockrell*, where the subject product arrived in South Carolina as the result of the unilateral actions of third parties, and not as the result of any conduct by the defendant directed to South Carolina.

Here, plaintiff has not alleged any facts that, if true, would establish contacts between LG Chem or LGCAI and South Carolina relating to his personal injury suit. Likewise, Plaintiff has not introduced admissible evidence of such contacts. Instead, Plaintiff referred the Court to LG Chem's and LGCAI's alleged shipment of various products into the United States through the Port of Charleston. (See Ex. 2. to Pl.'s Opp. to LG Chem's Mot. to Quash and Mot. to Dismiss for Lack of Personal Jurisdiction, filed Sept. 20, 2019.) However, Plaintiff has never claimed that his cause of action *arose from* such a shipment or even *relates to* the products shipped. Indeed, the proffered import data (which itself is inadmissible hearsay in the form of a chart prepared by counsel) illustrates that LG Chem shipped raw chemicals to LGCAI, and electric vehicle batteries to car manufacturers such as Volvo. In addition, LG Chem and LGCAI both introduced admissible evidence confirming that they have never sold or authorized anyone else to sell LG 18650 battery

---

<sup>1</sup> See, e.g., *State v. NV Sumatra Tobacco Trading Co.*, 403 S.W.3d 726, 765 (Tenn. 2013) (reaching opposite conclusion from South Carolina and recognizing that “[i]f New Jersey lacked jurisdiction over J. McIntyre Machinery, which vigorously and directly targeted American markets, including New Jersey, then Tennessee surely lacks jurisdiction over NV Sumatra.”)

cells to consumers for use as standalone, removable, rechargeable batteries with e-cigarette devices, and have never done any business with the South Carolina retailer that sold the subject battery to the plaintiff.

The battery cell which Plaintiff claims caused his injury is an “18650” lithium ion cell. (*Id.*) The term “18650” is an industry-standard term designating a specific category of battery cells that measure 18 millimeters in width, 65 millimeters in length, and are cylindrical in shape (as indicated by the “0”). 18650 battery cells are designed for and used in specific applications. For example, these cells are often configured into battery packs for use in power tools. They are not designed or intended for use as removable power sources for e-cigarettes or vaping devices. LG Chem manufactures 18650 lithium ion battery cells, but neither it nor LGCAI have ever sold or distributed the cells to consumers for use as standalone, replaceable, rechargeable batteries or authorized others to do so either. (*See* Ryu Aff. ¶ 13, 16; Kim Aff. ¶ 13.)

Therefore, if LG Chem manufactured the subject battery cell (a fact which has not been established), it arrived in South Carolina as the result of the unilateral actions of third parties, acting without LG Chem’s authorization, and not as the result of any action directed by LG Chem or LGCAI to South Carolina. This is insufficient to satisfy due process. In *Cockrell*, the Supreme Court of South Carolina found personal jurisdiction was lacking over defendants, the University of Massachusetts at Lowell Baseball Research Center and James Sherwood, a mechanical engineer and Director of the Research Center, because the subject product (baseball bats) “did not arrive in South Carolina through the respondents’ efforts.” *Cockrell*, 363 S.C. at 494, 611 S.E.2d at 510. Instead, the bats arrived in South Carolina through the unilateral efforts of the distributor, Hillerich. Here, LG Chem’s and LGCAI’s purported involvement with the subject suit is even more attenuated. Both defendants have introduced admissible evidence that they never authorized any

distributor, wholesaler, retailer, or other re-seller to advertise, distribute, or sell its 18650 lithium-ion cells for use by individual consumers as replaceable, rechargeable batteries in e-cigarette or vaping devices. (*See* Ryu Aff. ¶ 13, 16; Kim Aff. ¶ 13.) Accordingly, if the subject lithium-ion cell was manufactured by LG Chem, it arrived in South Carolina as the result of the unilateral actions of others, not as the result of any purposeful conduct directed by LG Chem or LGCAI to South Carolina. Due process cannot be satisfied. *Helicopteros Nacionales*, 466 U.S. at 417.

### CONCLUSION

For the reasons stated above, LG Chem and LGCAI respectfully request that this Court clarify its written Order to incorporate by reference its prior oral ruling, to confirm that discovery at this juncture is limited to the threshold issues of product identification and jurisdiction. In the alternative, LG Chem and LGCAI respectfully request that the Court consider this supplemental authority and reconsider its order on LG Chem's Motion to Quash and Motion to Dismiss and LGCAI's Motion to Dismiss and enter an order dismissing Plaintiff's claims for lack of personal jurisdiction.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/Rachel A. Hedley  
James F. Rogers (SC Bar No.: 12942)  
Rachel A. Hedley (SC Bar No.: 16941)  
Nelson Mullins Riley & Scarborough LLP  
1320 Main Street, 17<sup>th</sup> Floor  
Columbia, SC 29201  
803.799.2000 – Telephone  
803.256.7500 – Facsimile  
[jim.rogers@nelsonmullins.com](mailto:jim.rogers@nelsonmullins.com)  
[rachel.hedley@nelsonmullins.com](mailto:rachel.hedley@nelsonmullins.com)



Wesley T. Moran (SC Bar No.: 102787)  
Nelson Mullins Riley & Scarborough LLP  
3751 Grissom Parkway  
Myrtle Beach, SC 29577  
843.946.5686 – Telephone  
843.448.3437 – Facsimile  
[wes.moran@nelsonmullins.com](mailto:wes.moran@nelsonmullins.com)

*Attorneys for Defendants LG Chem, Ltd. and LG  
Chem America, Inc.*

Columbia, SC  
April 17, 2020

EXHIBIT A



1 STATE OF SOUTH CAROLINA

2 -----x

3 DWAYNE THOMPSON,

4 Plaintiff,

5 Case No.

6 -against-

2019-CP-44-00054

7 LG CHEM AMERICA, INC., et al

8 Defendants.

9 -----x

10 September 23, 2019

11 Union, S.C.

12

13 B E F O R E:

14 HONORABLE CORDELL MADDOX

15

16 A P P E A R A N C E S:

17 RONNY CROSBY,

18 Attorney for the Plaintiff

19

20 KATE CAMMELMANN,

21 Attorney for the Defendants

22

23

24 Aileen Butler

25 Official Court Reporter

1 THE COURT: Is this a motion to dismiss, is that  
2 right?

3 MS. CAPPELMANN: It is. We have two motions so d  
4 you want me to take them in turn?

5 THE COURT: Sure.

6 MS. CAPPELMANN: Okay. The first one is LG Kim  
7 America's motion to dismiss for lack of personal  
8 jurisdiction.

9 THE COURT: Okay.

10 Ms. CAPPELMANN: This is based on the fact and I  
11 know that the plaintiff's argument is that LG Kim  
12 America has a certificate of authority filed with the  
13 Secretary of State. Our position our is that in and  
14 of itself is not enough. The statute the plaintiff's  
15 cites in opposition to our motion says that any  
16 corporation that has filed a certificate of authority  
17 has agreed to jurisdiction for the purposes of tax  
18 inquires with the court and the Department of Revenue.  
19 However, they didn't say anything about any kind of  
20 order contractual, or any other kind of jurisdiction.  
21 So, I think that's purposeful when you're talking  
22 about the plain reading of the law and the legislative  
23 intent. They don't cite any case law to support their  
24 contention that just by statute making them under the  
25 jurisdiction of the courts for that specific purpose

1 means that they are under the jurisdiction of the  
2 courts for all purposes.

3 Additionally, the -- I think they're going to have  
4 some like bills of lading or shipping data. LG Chem  
5 if you look at the affidavit of HyunSoo Kim, LG Kim  
6 actually does not -- I apologize that's the incorrect  
7 affidavit. I beg the Court's indulgence.

8 THE COURT: Take your time. Is this case a case  
9 about an exploding battery?

10 MS. CAPPELMANN: It is, Your Honor. I have the  
11 affidavit. I can't put my hands on it right now. But  
12 the affidavit in support of LG Chem America's motion  
13 to dismiss says that LG Kim of America it doesn't  
14 actually manufacturer these batteries. It is actually  
15 more -- it does the kind of rubbers and polymers and  
16 those sorts of things. It has nothing to do with the  
17 lithium-ion batteries. So any -- they don't make the  
18 minimum contacts required to have jurisdiction based  
19 on the subject matter of this actually case.

20 So based on those arguments we would say there is  
21 no personal or specific jurisdiction based on the  
22 facts of this case.

23 THE COURT: Okay. All right. Yes, sir.

24 MR. CROSBY: Good morning, Your Honor. Ronny  
25 Crosby representing the plaintiff.

1           Your Honor, this case does involve an exploding  
2 battery. I am sure you probably heard about some of  
3 those over time on the news where these batteries,  
4 these lithium-ion batteries, catch on fire. This was  
5 in an e-cigarette type application. It was sold and  
6 there not -- no one is here this morning. They're not  
7 involved in this case by Planet Vapor, one of these  
8 vape stores over in Spartanburg. The incident  
9 occurred here in Union County and the plaintiff  
10 suffered severe burns as a result of the battery.

11           The battery was manufactured by LG Chem a Korean  
12 company and imported by its wholly owned distributor,  
13 LG Chem America. And we have pled in the complaint  
14 which really the Court does not have to look beyond.  
15 We passed up an order in a similar case pending in  
16 Florence County where Judge Nettles heard this exact  
17 argument with regard to the same parties in another  
18 e-cigarette battery case and he looked more to the  
19 pleadings which the law allows you to do. We have  
20 pled that these companies manufactured and placed this  
21 battery into the stream of commerce with the  
22 expectation that it would be used in South Carolina  
23 and that it was so used in South Carolina and caused  
24 injury here which is all that is needed to meet the  
25 requirements of the long-arm statute which is

1 36-2-803. But if you want to look further and Miss  
2 Cappelmann referenced the import data. We've passed  
3 as exhibit seven extensive imports of products by  
4 these companies into the Port of Charleston and the  
5 way that works is the Korean company that manufacture  
6 them they were consigned to LG Chem America in Korea  
7 and they were shipped right in through the port of  
8 Charleston. I think we had eight hundred and  
9 something shipments into the Port of Charleston in  
10 addition to lithium ion batteries, other products.  
11 But these companies, not only is LG Chem America  
12 registered to do business here, they are in fact doing  
13 millions of dollars worth of business here in South  
14 Carolina by importing goods not just to LG Chem  
15 America but they import to Volvo and Eaton and various  
16 other companies in South Carolina and that's the  
17 Korean company importing there. But -- and they serve  
18 the market in South Carolina through this distribution  
19 system.

20 I can't imagine, Your Honor, if there's not  
21 jurisdiction here then we can probably start looking  
22 around at the computer sitting here in front of the  
23 court reporter or your computer I suspect -- or this  
24 cord over here that's on the floor, most of this is  
25 all manufactured in some other country and imported



1 here. And there's a big push right now around the  
2 country to challenge personal jurisdiction especially  
3 in product cases made with products made over in China  
4 or India or Korea. And, you know, if what the defense  
5 is saying is the law then this Court would have  
6 jurisdiction over almost no products' case and that's  
7 not the intent of our long-arm statute or any of the  
8 cases interpreting either the long-arm statute or the  
9 due process clause which really is what ultimately  
10 controls. Our court has held that the due process  
11 that our long-arm statute is to be interpreted to the  
12 outer limits of the due process clause. And if you  
13 look to the case of N.V. Sumatra Tobacco Company which  
14 we cited in our brief and I think we outlined it in  
15 the memorandums, there our court held they had  
16 jurisdiction over this Indonesia company that sold to  
17 two other companies before it got to an importer in  
18 Miami and then the cigarettes ultimately ended up in  
19 South Carolina and the South Carolina Supreme Court  
20 held even though there was four layers involved there  
21 that our courts had jurisdiction because they knew  
22 that their products were coming in to South Carolina  
23 and they would be used and sold and used here in South  
24 Carolina and this is a lot less tenuous than that case  
25 because here we've got a Korean company that has a



1 wholly owned distributor in the United States  
2 importing not just into some other port in the US but  
3 right through the Port of Charleston right into this  
4 state.

5 Your Honor, the court clearly has jurisdiction over  
6 this matter and has an interest in providing a form  
7 for redress for one of its citizens that was severely  
8 injured while using this product. And as would be  
9 reflected in the order that we passed up from Judge  
10 Nettles there is certainly no unfairness for this  
11 defendant -- these defendants to defend this case  
12 here. They're defending the one in Florence County  
13 now and by the fact that they regularly use our ports  
14 it's obviously not inconvenient for them to defend a  
15 case here in South Carolina and specifically here he  
16 in Union County and we would ask the Court to deny  
17 both motions to dismiss.

18 THE COURT: Okay.

19 MS. CAPPELMANN: If I may briefly reply?

20 THE COURT: Yes.

21 MS. CAPPELMANN: The N.V. Sumatra case Mr. Crosby  
22 refers to in their brief they cite all these different  
23 points of contact that would put them at subject to  
24 jurisdiction in South Carolina such as they admitted  
25 to the fact that they manufactured the United brand

1 cigarettes. They owned the United States trademark  
2 for that brand. Almost seven million United brand  
3 cigarettes were actually sold in South Carolina.  
4 Sumatra either on it's own or by someone else filed an  
5 ingredient report. All these things that Sumatra  
6 apparently did to conform its product to the United  
7 States and the fact that it knew that its products  
8 were being sold in South Carolina. That's not what LG  
9 Chem America is saying here. LG Chem America  
10 maintains that all of these batteries that the  
11 plaintiff is referring to they have different -- they  
12 aren't -- their destination isn't in South Carolina.  
13 From what I recall from looking at it some of them  
14 were in Georgia. I haven't seen exhibit seven because  
15 the last time I checked the public index it wasn't  
16 available for me to view online and I didn't receive a  
17 courtesy copy. So I haven't seen this import data.  
18 But from what I recall from the other motion that Mr.  
19 Crosby referenced, none of those lithium-ion batteries  
20 ended up -- their main destination was not South  
21 Carolina from what I recall, and there were only maybe  
22 two or three entries out of however many pages.  
23 Everything else was rubbers, polymers, all those sort  
24 of things. So, again, they aren't making those  
25 concessions that Sumatra has made.

1 I also haven't addressed the other motion yet but  
2 I can address that now.

3 THE COURT: Go ahead.

4 MS. CAPPELMANN: The other motion is based on  
5 similar circumstances. LG Chem based out of South  
6 Korea does not have a certificate of authority to do  
7 business in South Carolina. The plaintiff has alleged  
8 in its complaint that by doing business here it has  
9 accepted the South Carolina Secretary of State as its  
10 agent for service. However, for one thing under the  
11 the Hague through the supremacy clause that the  
12 international compact has priority over the state's  
13 statute. It -- you can very easily, plausibly, come  
14 up with a situation in which before even the service  
15 documents from the secretary of state gets to the  
16 final destination in say South Korea they would  
17 already be in default because if service is perfected  
18 through -- at the time that the secretary of state  
19 sends it to the foreign company -- I mean it takes --  
20 I've seen months for it to get to a foreign company.  
21 In China or South Korea it just takes that long and  
22 that's of course an absurd result.

23 South Korea they opted out of Article 10 of the  
24 Hague compact or Hague convention which says that they  
25 do not authorize service by mail. It has to be

1 through their central authority and that hasn't  
2 happened.

3 I understand that one of my predecessors years ago  
4 might have accepted service, however LG Chem they're  
5 inclined to accept service and I don't think there is  
6 any law that says we have to even though they might  
7 have done that in the past.

8 THE COURT: So your position is they have not  
9 designated the secretary of state because they opted  
10 out of the Hague compact?

11 MS. CAPPELMANN: That and we're just basing this  
12 on an allegation in the complaint. There hasn't been  
13 any evidentiary support to show that LG Chem has  
14 actually done business selling lithium-ion batteries in  
15 South Carolina. In fact industrywide, we're all sort  
16 of starting to suspect there's this black market that  
17 has been created in the past few years because these  
18 batteries are sold in a pack for purposes of being  
19 used in the lithium-ion battery packs for like power  
20 tools and things like that.

21 THE COURT: Right.

22 MS. CAPPELMANN: Lawn equipment. They aren't  
23 selling the individual batteries for any specific  
24 purpose to consumers as all. I understand that we  
25 have these cases now. Its come up. But I would say

1 that none of these companies are intending for  
2 consumers to use these individual lithium-ion  
3 batteries and certainly not for vaping equipment.

4 THE COURT: So somehow one of these two-pack  
5 batteries got divided up and sold in a vape to a guy  
6 and it allegedly caught on fire. That's where we are  
7 factually.

8 MS. CAPPELMANN: Correct.

9 THE COURT: And you're not even sure it's a LG  
10 Chem battery?

11 MS. CAPPELMANN: I haven't seen it so I don't  
12 know. Usually it will say LG Chem on the wrap, you  
13 know, but there has been -- and I don't have any  
14 evidence with me today, but there have been instances  
15 where wraps are possibly being changed. You know, I  
16 don't know. I'm not sure. I'm not necessarily saying  
17 that's necessary happened in this situation.

18 THE COURT: Sure. You just don't know yet.

19 MS. CAPPELMANN: Correct.

20 THE COURT: Okay. Well, here's what I am going to  
21 do. I think -- you know, I read your Judge Nettles's  
22 order and I sort of agree with him. In these early  
23 stages these motions to dismiss are pretty often  
24 denied because of exactly factually we don't know  
25 where we are. So what I am going to do is dismiss



1 these with no prejudice to refile once discovery is -  
2 there's been more discovery so you can find out  
3 factually. I mean, you know, at this point nobody  
4 knows whether it's one of their batteries. If it is  
5 one of their batteries then you get to the bill of  
6 lading issue and whether or not they've subjected  
7 themselves to jurisdiction.

8 I don't think I really need to go as far as judge  
9 Nettles order because I think factually there's just  
10 not enough information to grant or deny at this point  
11 So I am going deny but without prejudice and you can  
12 file at a later date after you had some more  
13 discovery.

14 MS. CAPPELMANN: Thank you.

15 (END OF TRANSCRIPT)  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25



1  
2 CERTIFICATION

3 I, the undersigned Aileen Butler, Official Court Reporter  
4 for the 16TH Judicial Circuit of the State of South Carolina, do  
5 hereby certify that the foregoing is a true, accurate, and  
6 complete transcript of record of all the proceedings in the  
7 captioned case, in the Circuit Court for Union County, South  
8 Carolina, on the 23rd day of September, 2019.

9 I do further certify that I am neither of kin, counsel, nor  
10 interest to any party hereto.

11 October 17, 2019  
12  
13

14 S/ Aileen Butler  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

|                            |   |                                   |
|----------------------------|---|-----------------------------------|
| STATE OF SOUTH CAROLINA    | ) |                                   |
|                            | ) | IN THE COURT OF COMMON PLEAS      |
| COUNTY OF UNION            | ) | SIXTEENTH JUDICIAL CIRCUIT        |
| DWAYNE THOMPSON,           | ) | Civil Action No. 2019-CP-44-00054 |
|                            | ) |                                   |
| Plaintiff,                 | ) |                                   |
|                            | ) | <b>DEFENDANT LG CHEM, LTD.'S</b>  |
| vs.                        | ) | <b>RENEWED MOTION TO DISMISS</b>  |
|                            | ) | <b>PLAINTIFF'S COMPLAINT FOR</b>  |
| ROLLING FOG VAPOR COMPANY, | ) | <b>LACK OF PERSONAL</b>           |
| LLC, LG CHEM, LTD., AND LG | ) | <b>JURISDICTION</b>               |
| CHEM AMERICA, INC.,        | ) |                                   |
|                            | ) |                                   |
| Defendants.                | ) |                                   |
|                            | ) |                                   |

Pursuant to Rule 12(b)(2) of the South Carolina Rules of Civil Procedure, and subject to and without waiver of its objection that it was never properly served in this case pursuant to the requirements of the Hague Service Convention, Defendant LG Chem, Ltd. ("LG Chem") hereby renews its motion seeking an Order from the Court dismissing this lawsuit against LG Chem for lack of personal jurisdiction, in accordance with the timing requirements set forth in the Court's Order of July 20, 2020. LG Chem respectfully requests that it receives oral argument on this motion. The grounds for this motion are as follows:

#### **PROCEDURAL BACKGROUND**

On April 24, 2019, LG Chem filed a Motion to Dismiss and Quash Service of Process. The Court conducted a hearing on September 23, 2019, on LG Chem's motion and entered an order on December 6, 2019, denying the motion without prejudice. LG Chem then filed a Motion for Reconsideration or Clarification, insofar as the parties disagreed as to whether the Court's Order allowed Plaintiff to proceed with litigating the substantive merits of the case when the Court had ruled from the bench that the predicate issues of product identification and jurisdiction must be

resolved before further proceeding with the case.<sup>1</sup> On July 20, 2020, the Court entered an Order granting LG Chem's motion to the extent it sought clarification of the prior written order and clarified that LG Chem's position regarding the prior order was correct in that: "only limited discovery is permitted at this time, limited to the threshold issues of whether LG Chem or [Defendant LG Chem America, Inc. ("LGCAI")] designed, manufactured, or sold the subject battery and the extent of LG Chem's and LGCAI's jurisdictional contacts with South Carolina." (July 20, 2020 Order, pp. 1, 4.)<sup>2</sup> The Court ordered that the time period to conduct jurisdictional discovery was 90 days. (*Id.* at p. 4.)

The July 20, 2020 Order further states that "LG Chem and LGCAI may refile motions to dismiss," and that "LG Chem and LGCAI shall have no obligation to file a responsive pleading until 15 days after the jurisdictional discovery period ends." (July 20, 2020 Order, p. 4.)

Shortly thereafter, on July 24, 2020, Plaintiff served written discovery requests on LG Chem. LG Chem objected to many of the requests as failing to comply with the Court's explicit limitation regarding the scope of discovery. The parties were unable to reach an agreement on the scope, and LG Chem filed a motion for protective order on August 21, 2020, seeking this Court's protection from responding to Plaintiff's discovery requests to the extent they are outside the scope of limited jurisdictional discovery previously ordered by the Court. It is LG Chem's understanding that the Motion for Protective Order may be set for hearing on the first available date on the Court's calendar, which is December 7, 2020.

---

<sup>1</sup> LG Chem also timely filed an Answer to Plaintiff's Complaint, timely asserting and preserving its defense of lack of personal jurisdiction.

<sup>2</sup> LG Chem's Motion was denied to the extent LG Chem sought Reconsideration of the Court's Order denying its Motion to Quash Service and Dismiss and, alternatively, to Dismiss for lack of personal jurisdiction, without prejudice.

In addition, in its August 21, 2020 Motion for Protective Order, LG Chem also requested that the Court enter a Confidentiality Order and submitted a proposed Confidentiality Order along with its motion. Plaintiff's counsel has informed LG Chem's counsel that Plaintiff would not agree to the terms of LG Chem's proposed Confidentiality Order, and it is anticipated that the issue of a Confidentiality Order will be heard contemporaneously with the other discovery issues to be heard, tentatively on December 7, 2020.

The time period to conduct jurisdictional discovery expired on October 19, 2020, per the Court's July 20, 2020 Order. However, because Plaintiff has not agreed to the terms of LG Chem's proposed Confidentiality Order, LG Chem cannot produce any confidential documents or information that would be called for by Plaintiff's jurisdictional discovery requests. Due to the July 20, 2020 Order setting LG Chem's time to file its renewed motion to dismiss to fifteen days after the jurisdictional discovery period ends, and in light of LG Chem's position that discovery will not produce evidence of jurisdictionally relevant contacts with South Carolina because no such contacts exist, LG Chem hereby files its Renewed Motion to Dismiss.

### **LEGAL ARGUMENT**

In this products liability case, Plaintiff seeks recovery for injuries allegedly sustained when a lithium-ion battery cell exploded in his pocket. (Compl. ¶¶ 11–12.) Plaintiff alleges he purchased an “LG Brown Hg2 INR 18650 3000mAh” model battery cell, allegedly manufactured by LG Chem, from Defendant Rolling Fog Vapor Company, LLC (“Rolling Fog”), a South Carolina retailer of e-cigarettes and accessories. (*Id.* ¶¶ 2, 9.) Plaintiff filed this action on March 4, 2019, asserting claims of negligence, strict liability, and breach of warranty against LG Chem, LGCAI, and Rolling Fog.

LG Chem is not subject to personal jurisdiction in this case. LG Chem is a Korean company with its headquarters and principal offices in Seoul, South Korea. LG Chem does not have continuous and systematic contacts with the State of South Carolina sufficient to render it essentially “at home” in South Carolina. Accordingly, it is not subject to the general jurisdiction of South Carolina courts. *See BNSF Ry. Co v. Tyrrell*, 137 S. Ct. 1549, 1558 (2017); *Daimler AG v. Bauman*, 571 U.S. 117, 127 (2014).

In addition, for specific personal jurisdiction to attach, due process requires that minimum contacts exist between the defendant and the forum state such that maintenance of the suit does not offend traditional notions of fair play and substantial justice. *See Cockrell v. Hillerich & Bradsby Co.*, 363 S.C. 485, 491–92, 611 S.E.2d 505, 508 (2005) (citing *Burger King Corp. v. Rudzewicz*, 471 U.S. 462 (1985)). Further, South Carolina courts may only exercise specific jurisdiction over a foreign defendant when the plaintiff’s cause of action arises from the defendant’s contacts with South Carolina. *See Cockrell*, 363 S.C. at 491–94, 611 S.E.2d at 509–10; *Power Prods. & Servs. Co., Inc. v. Kozma*, 379 S.C. 423, 433–35, 665 S.E.2d 660, 665–67 (Ct. App. 2008). LG Chem does not design, manufacture, distribute, advertise, or sell 18650 lithium-ion cells for use by individual consumers as standalone, removable batteries in electronic cigarette devices. LG Chem has never conducted any business with Rolling Fog, the retailer where Plaintiff alleges he purchased the subject battery at issue in this case, and does not direct or control the actions of Rolling Fog. LG Chem has never authorized Rolling Fog, or anyone else, to advertise, distribute, or sell LG 18650 lithium-ion cells for use by individual consumers as standalone, removable batteries in e-cigarette devices or for any other purpose. Jurisdictional discovery will not produce evidence of facts supporting a finding that Plaintiff’s claims arose out of or relate to any contacts formed between LG Chem and South Carolina because no such facts exists. Because



Plaintiff has not alleged and cannot prove any facts that would support a finding that his claims arose out of contacts formed between LG Chem and South Carolina, due process is not satisfied, and this Court lacks personal jurisdiction over LG Chem.

This Motion is supported by the pleadings, applicable law, the Affidavit of Sung Han Ryu filed herewith as **Exhibit A** (filed contemporaneously with LG Chem's initial Motion to Dismiss), and LG Chem's supporting memorandum of law to be filed at a later date, along with any exhibits and any additional affidavits or memoranda that LG Chem may hereafter file or submit to this Court.

WHEREFORE, for the foregoing reasons, LG Chem respectfully requests that the Court enter an Order dismissing LG Chem from this action for lack of personal jurisdiction and such other and further relief the Court deems just and proper.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/James F. Rogers

James F. Rogers (SC Bar No.: 12942)  
 Rachel A. Hedley (SC Bar No.: 16941)  
 Nelson Mullins Riley & Scarborough LLP  
 1320 Main Street, 17<sup>th</sup> Floor  
 Columbia, SC 29201  
 803.799.2000 – Telephone  
 803.256.7500 – Facsimile  
[jim.rogers@nelsonmullins.com](mailto:jim.rogers@nelsonmullins.com)  
[rachel.hedley@nelsonmullins.com](mailto:rachel.hedley@nelsonmullins.com)

Deirdre Shelton McCool (SC Bar No.: 64004)  
 151 Meeting Street, Suite 600  
 Charleston, SC 29401  
 Telephone: 843.853.5200  
 Facsimile: 843.722.8700  
[deirdre.mccool@nelsonmullins.com](mailto:deirdre.mccool@nelsonmullins.com)



*Attorneys for Defendants LG Chem, Ltd. and LG  
Chem America, Inc.*

Columbia, SC  
November 2, 2020