

**SETTLEMENT AGREEMENT REGARDING CLAIMS AGAINST  
INTERIOR-EXTERIOR IN MDL NO. 2047**

**EXHIBIT 1.23 - LIST OF PRIOR  
SETTLEMENTS**

## 1.23. Prior Settlements

**1. Pilot Remediation Program Settlement Payments:** Pursuant to (i) the September 23, 2010 Term Sheet between Knauf and InEx and (ii) the subsequent "Settlement Agreement For the Demonstration Remediation Of Homes With KPT Drywall" between the Plaintiffs' Steering Committee and Knauf, InEx has agreed to pay \$18,750 per house towards the remediation of up to 120 homes, for a total of up to \$2,225,000.

- Prior to the Execution Date of the Settlement Agreement, InEx has funded (i.e. actually paid) its agreed \$18,750 for 39 of the homes for a total paid of \$731,250, which constitute Prior Settlements.
- The 39 homes for which InEx has made its payment are listed on the attached schedule.
- Arch Insurance Company and Liberty Mutual Fire Insurance Company have each paid 50% of each of the 39 payments.

**2. Castle Rock Settlement:** As part of a settlement reached in or about March 2011 between Castle Rock Communities, Knauf, and InEx regarding 21 homes in Texas, InEx agreed to pay \$3.00 per square foot for a total of \$120,183 towards the total settlement payment to Castle Rock. That amount has been paid and constitutes a Prior Settlement.

- Arch Insurance Company and Liberty Mutual Fire Insurance Company have each paid 50% of the \$120,183 payment.

**Total Amount of Prior Settlements:**

| <b>Settlement</b>                         | <b>Total amount paid</b> | <b>Amount paid by Arch</b> | <b>Amount paid by Liberty</b> |
|---|--------------------------|----------------------------|-------------------------------|
| 39 homes in the Pilot Remediation Program | \$731,250                | \$365,625                  | \$365,625                     |
| 21 homes in the Castle Rock Settlement    | \$120,183                | \$60,091.50                | \$60,091.50                   |
| <b>Total</b>                              | <b>\$851,433</b>         | <b>\$425,716.50</b>        | <b>\$425,716.50</b>           |

| Chinese Drywall Remediation - Release Received through 3/24/11 |                                 |                           |               |    |                       |
|--|---------------------------------|---------------------------|---------------|----|-----------------------|
|  | Homeowner                       | Street Address            | City          | ST | Release Received Date |
| 3.   | Amerson, Amy                    | 1205 Magnolia Alley       | Mandeville    | LA | 3/1/11                |
| 4.   | Armstrong, David & Bonnie       | 8929 Glenfield Drive      | Baton Rouge   | LA | 2/16/11               |
| 5.   | Arnaud, Lester & Catherine      | 17504 Rosemont Drive      | Prarieville   | LA | 3/2/11                |
| 6.   | Banner, William & Kmy           | 70486 4th Street          | Covington     | LA | 2/28/11               |
| 8.   | Borne, Carol                    | 835 Montgomery Street     | Mandeville    | LA | 2/15/11               |
| 9.   | Boudreaux, Virginia R.          | 209 Cottage Green Lane    | Covington     | LA | 3/2/11                |
| 10.  | Bourdon, Lucille                | 10574 Pamela Drive        | Covington     | LA | 2/22/11               |
| 11.  | Cassagne, Brande & Jordon       | 209 Place Saint Jean      | Covington     | LA | 2/16/11               |
| 12.  | Cassard, Jesse & Angela         | 1768 Ashland Dr.          | New Orleans   | LA | 2/17/11               |
| 13.  | Cunningham, Dennis & Susan      | 288 Penn Mill Lakes Blvd. | Covington     | LA | 2/25/11               |
| 15.  | DeJan, Charlotte                | 4635 Evangeline Dr.       | New Orleans   | LA | 3/3/11                |
| 16.  | DeJan, Leroy & Ann              | 4624 Chantilly Dr.        | New Orleans   | LA | 3/3/11                |
| 17.  | Desporte, Edward, Jr. and Joann | 28140 Chukkar Lane        | Folsom        | LA | 3/3/11                |
| 18.  | Donaldson, Malcolm & Kelli      | 293 Penn Mill Lakes Blvd. | Covington     | LA | 2/22/11               |
| 19.  | Dorsey, Glenda                  | 39085 Pirogue Ave.        | Gonzales      | LA | 2/25/11               |
| 21.  | Franatovich, Mitchell & Sarah   | 2251 3rd Street           | Mandeville    | LA | 2/23/11               |
| 22.  | Gardette, Michael & Nicole      | 268 Penn Mill Lakes Blvd. | Covington     | LA | 3/3/11                |
| 23.  | Gardette, Michael & Rhonda      | 276 Penn Mill Lakes Blvd. | Covington     | LA | 3/3/11                |
| 24.  | Garrett, Roger                  | 13496 Adison Avenue       | Gulfport      | MS | 3/2/11                |
| 25.  | Greco, Vincent                  | 70461 11th Street         | Covington     | LA | 2/28/11               |
| 27.  | Hebert, Loney & Vickie          | 5190 Courtyard Drive      | Gonzales      | LA | 3/1/11                |
| 28.  | Henderson, Linda                | 70510 4th Street          | Covington     | LA | 2/23/11               |
| 29.  | Hidalgo, Sidney & Tonya         | 273 Penn Mill Lakes Blvd. | Covington     | LA | 2/15/11               |
| 33.  | LeJune, Michael & Melissa       | 680 Silverthorne Lane     | Madisonville  | LA | 2/22/11               |
| 34.  | Matus, Aldo & Ghedy             | 41299 Tulip Hill Ave.     | Prarieville   | LA | 3/2/11                |
| 37.  | Naden, Roberta & Craig          | 5263 Courtyard Drive      | Gonzales      | LA | 2/23/11               |
| 38.  | Nunez, Frederick & Lisa         | 123 Dominion Blvd.        | Madisonville  | LA | 2/23/11               |
| 40.  | Perry, Timothy & Tracy          | 15190 Westin Cove         | Gulfport      | MS | 2/16/11               |
| 41.  | Pierson, Neil & Jan             | 348 Jade Court            | Madisonville  | LA | 3/1/11                |
| 42.  | Porter, Lindsay & Doris         | 23620 Kirtley Drive       | Plaquemine    | LA | 3/2/11                |
| 44.  | Robair, Alexander J.            | 39058 Bayou View Ave.     | Gonzales      | LA | 2/16/11               |
| 45.  | Roberson, Sandra                | 929 Flora Lane            | Baton Rouge   | LA | 3/3/11                |
| 46.  | Rogers, Brad & Cassandra        | 516 Mare Court            | Covington     | LA | 2/17/11               |
| 49.  | Taylor, David & Amanda          | 3216 Joy Lane             | Ocean Springs | MS | 2/18/11               |
| 51.  | Tom, San & Jianran              | 602 Charleston Lane       | Long Beach    | MS | 2/18/11               |
| 52.  | Ward, Truman & Amy              | 5367 Courtyard Drive      | Gonzales      | LA | 2/23/11               |
| 54.  | White, Taenia                   | 828 N. Sabine Dr.         | Baton Rouge   | LA | 3/1/11                |
| 55.  | Woods, Recha                    | 2931 Willow Drive         | Lacombe       | LA | 3/1/11                |
| 56.  | Zeber, Michelle & Neal          | 8949 Glenfield Drive      | Baton Rouge   | LA | 2/18/11               |