

**YOUNG CONAWAY STARGATT & TAYLOR, LLP**

Edwin J. Harron, Esq. (New Jersey Bar No. 040701995)

Sara Beth A.R. Kohut, Esq. (Admitted *Pro Hac Vice*)

Rodney Square

1000 North King Street

Wilmington, Delaware 19801

(302) 571-6600 (Telephone)

(302) 571-1253 (Facsimile)

*Counsel to the Future Claimants' Representative*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

Duro Dyne National Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-27963 (MBK)

(Jointly Administered)

**TWENTY-FOURTH MONTHLY FEE STATEMENT<sup>2</sup> OF LAWRENCE FITZPATRICK  
AS THE LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS  
FOR THE PERIOD OCTOBER 1, 2020 THROUGH OCTOBER 31, 2020**

Lawrence Fitzpatrick, the legal representative for future claimants (the “**Future Claimants’ Representative**”, the “**FCR**”, or the “**Applicant**”), through the undersigned counsel, submits this twenty-fourth monthly fee statement for the period from October 1, 2020 through October 31, 2020 (the “**Twenty-Fourth Fee Statement**”) pursuant to the Court’s *Administrative Fee Order Establishing Certain Procedures for Allowance of Interim Compensation and Reimbursement of Expenses of Professionals Retained By Order of this Court*, dated December 18, 2018 [Docket No. 345] (the “**Administrative Order**”).

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: Duro Dyne National Corp. (4664); Duro Dyne Machinery Corp. (9699); Duro Dyne Corporation (3616); Duro Dyne West Corp. (5943); and Duro Dyne Midwest Corp. (4662).

<sup>2</sup> Lawrence Fitzpatrick filed his *First Interim Application as the Legal Representative for Future Asbestos Personal Injury Claimants for Compensation for Services Rendered and Reimbursement of Expenses for the Period from September 7, 2018 through November 30, 2018* [Docket No. 334] in lieu of a first monthly fee statement.

Pursuant to the Administrative Order, responses to the Twenty-fourth Fee Statement, if any, are due by November 30, 2020.

Dated: November 19, 2020

Respectfully submitted,

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Edwin J. Harron

Edwin J. Harron, Esq. (NJ Bar No. 040701995)  
Sara Beth A.R. Kohut, Esq. (Admitted *Pro Hac Vice*)  
Rodney Square  
1000 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 571-6600  
Facsimile: (302) 571-1253  
Email: eharron@ycst.com  
skohut@ycst.com

*Counsel to the Future Claimants' Representative*

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**D.N.J. LBR 2016-1, FEE APPLICATION COVER SHEET**

IN RE: Duro Dyne National Corp., et al.<sup>1</sup> APPLICANT: Lawrence Fitzpatrick  
CASE NO.: 18-27963 (MBK) AUTHORIZED TO PROVIDE PROFESSIONAL SERVICES AS: Legal Representative for Future Asbestos Personal Injury Claimants  
CHAPTER: 11 CASE FILED: September 7, 2018

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION  
UNDER PENALTY OF PERJURY, PURSUANT TO 28 U.S.C. SECTION 1746

**TWENTY-FOURTH MONTHLY FEE STATEMENT<sup>2</sup> OF LAWRENCE FITZPATRICK  
AS THE LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS  
FOR THE PERIOD OCTOBER 1, 2020 THROUGH OCTOBER 31, 2020**

---

SECTION I  
FEE SUMMARY

---

|  | <u>FEES</u>         | <u>EXPENSES</u> |
|--|---------------------|-----------------|
| TOTAL PREVIOUSLY REQUESTED:                    | <u>\$115,492.00</u> | <u>\$74.00</u>  |
| TOTAL ALLOWED TO DATE:                         | <u>\$112,528.00</u> | <u>\$74.00</u>  |
| TOTAL RETAINER (IF APPLICABLE):                | <u>n/a</u>          | <u>n/a</u>      |
| TOTAL HOLDBACK (IF APPLICABLE):                | <u>\$592.80</u>     | <u>\$0.00</u>   |
| TOTAL RECEIVED OR TO BE RECEIVED BY APPLICANT: | <u>\$114,899.20</u> | <u>\$74.00</u>  |

|                               |                   |
|-------------------------------|-------------------|
| FEE TOTALS – PAGE 2           | <u>\$1,144.00</u> |
| DISBURSEMENTS TOTALS – PAGE 2 | <u>\$0.00</u>     |
| TOTAL FEE APPLICATION         | <u>\$1,144.00</u> |
| MINUS 20% HOLDBACK            | <u>- \$228.80</u> |
| AMOUNT SOUGHT AT THIS TIME    | <u>\$915.20</u>   |

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Duro Dyne National Corp. (4664); Duro Dyne Machinery Corp. (9699); Duro Dyne Corporation (3616); Duro Dyne West Corp. (5943); and Duro Dyne Midwest Corp. (4662).

<sup>2</sup> Lawrence Fitzpatrick filed his *First Interim Application as the Legal Representative for Future Asbestos Personal Injury Claimants for Compensation for Services Rendered and Reimbursement of Expenses for the Period from September 7, 2018 through November 30, 2018* [Docket No. 334] in lieu of a first monthly fee statement.

| <b>Name of Professional</b>   | <b>Title</b>                     | <b>Rate</b> | <b>Hours</b> | <b>Fees</b><br>(*Reflects 50% rate reduction due to non-working travel time) |
|-------------------------------|----------------------------------|-------------|--------------|--|
| Lawrence Fitzpatrick          | Future Claimants' Representative | \$520.00    | 2.20         | \$1,144.00   |
| <b>TOTALS:</b>                |                                  |             | <b>2.20</b>  | <b>\$1,144.00</b>  |
| <b>Blended Rate: \$520.00</b> |                                  |             |              |  |

---

**SECTION II  
SUMMARY OF SERVICES**

| <b>SERVICES RENDERED</b>                            | <b>HOURS</b> | <b>FEES</b>       |
|---|--------------|-------------------|
| Case Administration (B001)                          | 0.70         | \$364.00          |
| Schedules & Statements, U.S. Trustee Reports (B004) | 0.20         | \$104.00          |
| Plan and Disclosure Statement (B012)                | 0.90         | \$468.00          |
| Retention of Professionals / Fee Issues (B017)      | 0.20         | \$104.00          |
| Fee Application Preparation (B018)                  | 0.20         | \$104.00          |
| <b>TOTALS:</b>                                      | <b>2.20</b>  | <b>\$1,144.00</b> |

---

**SECTION III  
SUMMARY OF DISBURSEMENTS**

| <b>DESCRIPTION</b>          | <b>AMOUNT</b> |
|-----------------------------|---------------|
| <b>TOTAL DISBURSEMENTS:</b> | <b>\$0.00</b> |

---

**SECTION IV  
CASE HISTORY**

---

(NOTE: Items 3 -6 are not applicable to applications under 11 U.S. C. § 506)

- (1) DATE CASE FILED: September 7, 2018
- (2) CHAPTER UNDER WHICH CASE WAS COMMENCED: 11
- (3) DATE OF RETENTION: October 17, 2018, effective as of September 7, 2018 [D.I. 191].  
See order attached as Exhibit C.
- (4) SUMMARIZE IN BRIEF THE BENEFITS TO THE ESTATE AND ATTACH SUPPLEMENTS AS NEEDED:

During the period covered by this monthly fee statement, the FCR:

- a) Reviewed the order confirming the plan;
  - b) discussed and reviewed the status of the case with counsel;
  - c) reviewed monthly fee statements; and
  - d) performed other professional services as the legal representative for future claimants as necessary and appropriate in the case.
- (5) ANTICIPATED DISTRIBUTION TO CREDITORS:
    - (A) ADMINISTRATION EXPENSES: (unknown at this time)
    - (B) SECURED CREDITORS: (unknown at this time)
    - (C) PRIORITY CREDITORS: (unknown at this time)
    - (D) GENERAL UNSECURED CREDITORS: (unknown at this time)
  - (6) FINAL DISPOSITION OF CASE AND PERCENTAGE OF DIVIDEND PAID TO CREDITORS (IF APPLICABLE): Final disposition of case and dividend are unknown at this time.

I certify under penalty of perjury that the foregoing is true and correct.

Date: November 19, 2020

/s/ Edwin J. Harron  
Edwin J. Harron, Esq.