

LOWENSTEIN SANDLER LLP

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Counsel to the Debtors and Debtors-in-Possession

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

In re:

Duro Dyne National Corp., *et al.*¹

Debtors.

Chapter 11

Case No. 18-27963 (MBK)

(Jointly Administered)

Hearing Date: February 25, 2021 at 10:00 a.m.
Objection Deadline: February 18, 2021 at 4:00 p.m.

**NOTICE OF SEVENTH INTERIM AND FINAL FEE APPLICATION OF
LOWENSTEIN SANDLER LLP AS COUNSEL TO THE DEBTORS FOR ALLOWANCE
OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES INCURRED FROM (I) AUGUST 1 2020 THROUGH DECEMBER 31, 2020
AND (II) SEPTEMBER 7, 2018 THROUGH DECEMBER 31, 2020**

PLEASE TAKE NOTICE that on **February 25, 2021 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard², Lowenstein Sandler LLP (“Lowenstein Sandler”), counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), shall move before the Honorable Michael B. Kaplan at the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey, Courtroom #8, for an order granting Lowenstein Sandler LLP’s seventh interim and final fee application for compensation in the sum of \$1,792,891.00 and

¹ 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).

² This hearing will be conducted telephonically. Parties who wish to appear at the hearing must make arrangements through Court Solutions at <http://www.Court-Solutions.com>.

reimbursement of expenses in the sum of \$56,617.50 for the period of September 7, 2018 through December 31, 2020 (the "Application").

PLEASE TAKE FURTHER NOTICE that Lowenstein Sandler shall rely upon the Application. No brief is necessary as no novel issues of fact or law are presented by the Application. A proposed form of Order has been submitted therewith. Oral argument is requested in the event an objection is timely filed.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Application shall conform with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules, and shall be filed with the Bankruptcy Court, and pursuant to Local Bankruptcy Rule 9013-1(d), shall be served upon the undersigned **so as to be received no later than February 18, 2021 at 4:00 p.m. (Eastern Time)**. In the event that no objections are filed, the relief requested in the Application may be granted without a hearing.

Dated: January 21, 2021

Respectfully submitted,

LOWENSTEIN SANDLER LLP

/s/ Jeffrey D. Prol

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*Counsel to the Debtors and
Debtors-in-Possession*

FEE APPLICATION COVER SHEET

IN RE: Duro Dyne National Corp., et al.¹ APPLICANT: Lowenstein Sandler LLP
CASE NO.: 18-27963 (MBK) CLIENT: Chapter 11 Debtors
CHAPTER: 11 CASE FILED: September 7, 2018

SEVENTH INTERIM AND FINAL FEE APPLICATION OF LOWENSTEIN SANDLER LLP AS COUNSEL TO THE DEBTORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FROM (I) AUGUST 1 2020 THROUGH DECEMBER 31, 2020 AND (II) SEPTEMBER 7, 2018 THROUGH DECEMBER 31, 2020

**SECTION I
FEE SUMMARY**

Interim Fee Application or Final Fee Application

	<u>FEES</u>	<u>EXPENSES</u>
TOTAL PREVIOUS FEES REQUESTED:	<u>\$1,782,891.00</u>	<u>\$56,617.50</u>
TOTAL FEES ALLOWED TO DATE:	<u>\$1,443,771.00</u>	<u>\$46,406.31</u>
TOTAL RECEIVED BY APPLICANT ² :	<u>\$1,391,655.70</u>	<u>\$46,337.31</u>
TOTAL HOLDBACK (IF APPLICABLE):	<u>\$1,443,771.00</u>	<u>\$46,406.31</u>
 FEE TOTALS	 \$1,792,891.00³	
DISBURSEMENTS TOTALS	<u>+ \$10,211.19</u>	
TOTAL FEE APPLICATION	<u>\$1,849,508.50</u>	

¹ 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).

² Prior to the Petition Date, Lowenstein Sandler was retained to represent the Debtors in these Chapter 11 Cases. Lowenstein Sandler has been paid for all amounts owed for legal services rendered prior to the Petition Date and Lowenstein Sandler held a retainer in the amount of \$117,300.04 for services and expenses incurred during these Chapter 11 Cases. The total amount received by Lowenstein Sandler reflected above includes the application of the retainer.

³ This amount includes a voluntary fee reduction in the amount pf \$150.00 per agreement with the U.S. Trustee. This amount also includes an additional \$10,000 for fees incurred and expected to be incurred after December 31, 2020 in connection with the preparation and prosecution of this Application.

TIMEKEEPER SUMMARY (Seventh Interim Period):

Timekeeper Name	Year Admitted	Title	Department	Hours Worked	Rate	Bill Amount
Adamo, Lesley P.	2010	Partner	Corporate / Tax	0.20	\$895.00	\$179.00
Berger, John L.	1982	Partner	Corporate / Tax	1.90	\$855.00	\$1,624.50
Citron, Lowell A.	1994	Partner	Corporate / Tax	2.20	\$1,115.00	\$2,453.00
Prol, Jeffrey D.	1989	Partner	Bankruptcy	88.50	\$895.00	\$79,207.50
Wovsaniker, Alan	1977	Partner	Corporate / Tax	11.40	\$905.00	\$10,317.00
Klinka, Elisia M.	2010	Counsel	Corporate / Tax	8.10	\$810.00	\$6,561.00
Kramer, Jeffrey A.	1995	Counsel	Bankruptcy	166.40	\$470.00	\$78,208.00
Suckerman, Daniel A.	2006	Counsel	Corporate / Tax	39.70	\$695.00	\$27,591.50
Tyler, Stacey C.	2013	Counsel	Corporate / Tax	5.20	\$575.00	\$2,990.00
Yusem, Stuart S.	1980	Counsel	Corporate / Tax	98.40	\$755.00	\$74,292.00
Perez, Patricia K.	2010	Associate	Corporate / Tax	38.70	\$585.00	\$22,639.50
Perlmutter, Erica	2018	Associate	Corporate / Tax	3.10	\$420.00	\$1,302.00
Tanico, Stephen	2017	Associate	Corporate / Tax	16.40	\$475.00	\$7,790.00
Claussen, Diane	N/A	Paralegal	Bankruptcy	18.70	\$270.00	\$5,049.00
Lawler, Elizabeth B.	N/A	Paralegal	Bankruptcy	28.80	\$250.00	\$7,200.00
Mendiolaza, Christine	N/A	Paralegal	Corporate / Tax	8.70	\$350.00	\$3,045.00
Mignone, Joseph	N/A	Paralegal	Corporate / Tax	1.90	\$335.00	\$636.50
Power, Megan	N/A	Paralegal	Corporate / Tax	25.30	\$310.00	\$7,843.00
Suhail, Aneela	N/A	Paralegal	Practice Support	0.50	\$255.00	\$127.50
Michaud, Zoraida	N/A	Research Services	Knowledge and Research Services (Formerly Library)	0.20	\$320.00	\$64.00

TOTAL ALL TIMEKEEPERS	564.30	\$339,120.00
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Attorney Blended Rate \$656.30

TIMEKEEPER SUMMARY (final period):

Timekeeper Name	Year Admitted	Title	Department	Hours Worked	Rate	Bill Amount
Adamo, Lesley P.	2010	Partner	Corporate / Tax	0.20	\$895.00	\$179.00
Behlmann, Andrew D.	2009	Partner	Bankruptcy	17.00	\$680.00	\$11,560.00
Berger, John L.	1982	Partner	Corporate / Tax	0.30	\$800.00	\$240.00
***Berger, John L. – rate increase 2019	1982	Partner	Corporate / Tax	1.90	\$855.00	\$1,624.50
Buechler, Bruce	1987	Partner	Bankruptcy	2.40	\$860.00	\$2,064.00
Citron, Lowell A.	1994	Partner	Corporate / Tax	2.70	\$1,115.00	\$3,010.50
Kuntz, Laura R.	1982	Partner	Corporate / Tax	16.30	\$815.00	\$13,284.50
Leit, David	1995	Partner	Corporate / Tax	62.20	\$855.00	\$53,181.00
Lichtenstein, Michael D.	1991	Partner	Litigation	1.80	\$825.00	\$1,485.00
Prol, Jeffrey D.	1989	Partner	Bankruptcy	336.00	\$860.00	\$288,960.00
***Prol, Jeffrey D. - Jane - Rate Increase 2019	1989	Partner	Bankruptcy	604.10	\$895.00	\$540,669.50
*Prol, Jeffrey D. - Travel Time	1989	Partner	Bankruptcy	24.60	\$430.00	\$10,578.00
*Prol, Jeffrey D. - Travel Time	1989	Partner	Bankruptcy	14.00	\$447.50	\$6,265.00
Rosen, Kenneth A.	1979	Partner	Bankruptcy	2.10	\$1,070.00	\$2,247.00
Wovsaniker, Alan	1977	Partner	Corporate / Tax	0.40	\$860.00	\$344.00
Wovsaniker, Alan	1977	Partner	Corporate / Tax	11.60	\$905.00	\$10,498.00
Catalina, Frank T. M.	2009	Counsel	Litigation	0.50	\$635.00	\$317.50
Freedman, Terri Jane	1990	Counsel	Bankruptcy	346.10	\$450.00	\$155,745.00
***Freedman, Terri Jane - Jane - Rate Increase 2019	1990	Counsel	Bankruptcy	410.00	\$470.00	\$192,700.00
*Freedman, Terri Jane - Travel Time	1990	Counsel	Bankruptcy	14.30	\$225.00	\$3,217.50
*Freedman, Terri Jane - Travel Time	1990	Counsel	Bankruptcy	9.70	\$235.00	\$2,279.50
***Freedman, Terri Jane - Rate Increase 2019	1990	Counsel	Bankruptcy	89.80	\$470.00	\$42,206.00
Gross, Philip J.	2008	Counsel	Bankruptcy	3.20	\$690.00	\$2,208.00
Hintz, Matthew	2007	Counsel	Corporate / Tax	9.30	\$630.00	\$5,859.00
Klinka, Elisia M.	2010	Counsel	Corporate / Tax	8.10	\$810.00	\$6,561.00
Kramer, Jeffrey A.	1995	Counsel	Bankruptcy	2.70	\$450.00	\$1,215.00
***Kramer, Jeffrey A. – Rate increase	1995	Counsel	Bankruptcy	243.60	\$470.00	\$114,492.00
***Kramer, Jeffrey A. - Rate Increase 2019	1995	Counsel	Bankruptcy	9.70	\$580.00	\$5,626.00

Timekeeper Name	Year Admitted	Title	Department	Hours Worked	Rate	Bill Amount
Politan, Mark J.	1998	Counsel	Bankruptcy	6.70	\$500.00	\$3,350.00
Suckerman, Daniel A.	2006	Counsel	Corporate / Tax	1.50	\$650.00	\$975.00
***Suckerman, Daniel A. - Rate Increase 2019	2006	Counsel	Corporate / Tax	68.60	\$695.00	\$47,677.00
Tyler, Stacey C.	2013	Counsel	Corporate / Tax	5.20	\$575.00	\$2,990.00
Yusem, Stuart S.	1980	Counsel	Corporate / Tax	0.40	\$705.00	\$282.00
***Yusem, Stuart S. - Rate Increase 2019	1980	Counsel	Corporate / Tax	131.00	\$755.00	\$98,905.00
Perez, Patricia K.	2010	Associate	Corporate / Tax	38.70	\$585.00	\$22,639.50
Perlmutter, Erica	2018	Associate	Corporate / Tax	3.10	\$420.00	\$1,302.00
Tanico, Stephen	2017	Associate	Corporate / Tax	19.70	\$475.00	\$9,357.50
Claussen, Diane	N/A	Paralegal	Bankruptcy	106.40	\$260.00	\$27,664.00
***Claussen, Diane - Rate Increase 2019	N/A	Paralegal	Bankruptcy	97.50	\$270.00	\$26,325.00
Cosentini, Silvana	N/A	Paralegal	Litigation	7.60	\$330.00	\$2,508.00
Jacome, Ruth	N/A	Paralegal	Bankruptcy	3.20	\$230.00	\$736.00
Jara, Gabriel	N/A	Paralegal	Practice Support	8.50	\$260.00	\$2,210.00
Lawler, Elizabeth B.	N/A	Paralegal	Bankruptcy	10.10	\$240.00	\$2,424.00
***Lawler, Elizabeth B. - Rate Increase 2019	N/A	Paralegal	Bankruptcy	153.60	\$250.00	\$38,400.00
Mendiola, Christine	N/A	Paralegal	Corporate / Tax	8.70	\$350.00	\$3,045.00
Mignone, Joseph	N/A	Paralegal	Corporate / Tax	1.90	\$335.00	\$636.50
Pagano, Jamie J.	N/A	Paralegal	Practice Support	2.80	\$295.00	\$826.00
***Pagano, Jamie J. - Rate Increase 2019	N/A	Paralegal	Practice Support	2.20	\$300.00	\$660.00
Power, Megan	N/A	Paralegal	Corporate / Tax	9.50	\$295.00	\$2,802.50
***Power, Megan - Rate Increase 2019	N/A	Paralegal	Corporate / Tax	25.30	\$310.00	\$7,843.00
Suhail, Aneela	N/A	Paralegal	Practice Support	2.60	\$240.00	\$624.00
***Suhail, Aneela - Rate Increase 2019	N/A	Paralegal	Practice Support	0.70	\$255.00	\$178.50
Michaud, Zoraida	N/A	Research Services	Knowledge and Research Services (Formerly Library)	0.20	\$320.00	\$64.00

TOTAL ALL TIMEKEEPERS (minus voluntary reduction and additional fees described in Footnote 3).	2,960.30	\$1,783,041.00
		-\$150.00
		+10,000.00
		\$1,792,891.00

Attorney Blended Rate **\$661.28**

* Reflects 50% rate reduction due to non-working travel time

*** Reflects rate increase effective July 1st of the given year

**SECTION II
SUMMARY OF SERVICES**

Seventh Final Period:

Task	Task Description	Hours	Total
B110	Case Administration	16.10	\$7,078.50
B160	Fee/Employment Applications	15.60	\$4,189.00
B165	Employment and Retention Applications - Others	0.20	\$54.00
B170	Fee/Employment Objections	0.30	\$268.50
B175	Fee Applications and Invoices - Others	16.30	\$5,278.00
B185	Assumption/Rejection of Leases and Contracts	2.50	\$1,175.00
B210	Business Operations	3.40	\$1,443.00
B240	Tax Issues	2.40	\$1,944.50
B250	Real Estate	2.60	\$1,807.00
B310	Claims Administration and Objections	1.40	\$658.00
B320	Plan and Disclosure Statement (including Business Plan)	498.20	\$311,298.00
B420	Restructurings	3.30	\$2,986.50
B430	Adversary Proceedings and Bankruptcy Court Litigation	2.00	\$940.00
	Total Fees Rendered This Statement		\$339,120.00

Final Period:

Task	Task Description	Hours	Total
B110	Case Administration	138.40	\$65,980.00
B120	Asset Analysis and Recovery	0.20	\$94.00
B130	Asset Disposition	2.80	\$1,946.00
B140	Relief from Stay/Adequate Protection Proceedings	48.00	\$24,770.50
B150	Meetings of and Communication with Creditors	3.40	\$2,263.50

Task	Task Description	Hours	Total
B160	Fee/Employment Applications	115.00	\$43,356.00
B165	Employment and Retention Applications - Others	118.80	\$67,229.50
B170	Fee/Employment Objections	134.40	\$88,406.00
B175	Fee Applications and Invoices - Others	140.00	\$50,267.00
B185	Assumption/Rejection of Leases and Contracts	37.30	\$17,559.50
B190	Other Contested Matters (excluding assumption/rejection motions)	6.00	\$3,467.50
B195	Non-Working Travel	66.60	\$24,140.00
B210	Business Operations	35.00	\$22,639.50
B220	Employee Benefits/Pensions	3.80	\$2,601.00
B230	Financing/Cash Collateral	38.60	\$28,434.50
B240	Tax Issues	54.50	\$29,590.00
B250	Real Estate	12.30	\$7,876.50
B310	Claims Administration and Objections	395.20	\$282,124.50
B320	Plan and Disclosure Statement (including Business Plan)	1358.20	\$866,598.50
B410	General Bankruptcy Advice/Opinions	1.70	\$799.00
B420	Restructurings	3.30	\$2,986.50
B430	Adversary Proceedings and Bankruptcy Court Litigation	2.00	\$940.00
B430A	Court Hearings	160.00	\$105,097.50
B440	Schedules and Statements	43.00	\$14,121.00
B450	Valuation	2.50	\$1,125.00
B460	Other - Insurance Matters	39.60	\$28,628.00
Total Fees Rendered This Statement (minus voluntary reduction and additional fees described in Footnote 3).			\$1,783,041.00 -\$150.00 <u>+10,000.00</u> \$1,792,891.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

Seventh Final Period:

Messenger and delivery charges	\$174.24
Filing fees	\$5,780.00
Outside Legal Counsel / Local Counsel	\$2,790.00
State Filing Fees/Annual Report Fees/Registered Agent Fees	\$1,340.00
Bulk rate/special postage	\$8.00
Computerized legal research	\$68.20
Searches	\$50.75
Total Disbursements	\$10,211.19

Final Period:

Messenger and delivery charges	\$258.09
Filing fees	\$14,365.00
Outside Legal Counsel / Local Counsel	\$13,531.75
Miscellaneous	\$231.10
State Filing Fees/Annual Report Fees/Registered Agent Fees	\$1,340.00
Bulk rate/special postage	\$35.10
Computerized legal research	\$20,628.75
Searches	\$50.75
Telecommunications	\$824.98
Transcript charges	\$3,226.15
Travel	\$2,055.81
Meals	\$26.58
Photocopies 362 pages at \$0.12 per page	\$43.44
Total Disbursements	\$56,617.50

I certify under penalty of perjury that the above is true and correct to the best of my information, knowledge and belief.

Date: January 21, 2021

/s/Jeffrey D. Prol
Jeffrey D. Prol, Esq.

LOWENSTEIN SANDLER LLP

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Counsel to the Debtors and Debtors-in-Possession

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

In re:	Chapter 11
Duro Dyne National Corp., <i>et al.</i> ¹	Case No. 18-27963 (MBK)
Debtors.	(Jointly Administered)
	Hearing Date: February 25, 2021 at 10:00 a.m. Objection Deadline: February 18, 2021 at 4:00 p.m.

SEVENTH INTERIM AND FINAL FEE APPLICATION OF LOWENSTEIN SANDLER LLP AS COUNSEL TO THE DEBTORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FROM (I) AUGUST 1 2020 THROUGH DECEMBER 31, 2020 AND (II) SEPTEMBER 7, 2018 THROUGH DECEMBER 31, 2020

Pursuant to 11 U.S.C. §§ 330 and 331 and Rule 2016 of the Federal Rules of Bankruptcy Procedure, Lowenstein Sandler LLP (“Lowenstein Sandler”), as counsel to the above captioned debtors and debtors-in-possession (collectively, the “Debtors”), submits its seventh interim and final application (the “Application”) for allowance of compensation and reimbursement of expenses for the periods of (i) August 1, 2020 through December 31, 2020 (the “Seventh Interim Period”) and (ii) September 7, 2018 through December 31, 2020 (the “Final Period”). By this Application,

¹ 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).

Lowenstein Sandler seeks: (i) allowance and payment of compensation in the amount of \$339,120.00 for services rendered by Lowenstein Sandler during the Seventh Interim Period and (ii) \$1,792,891.00 for services rendered by Lowenstein Sandler during the Final Period. Lowenstein Sandler also seeks allowance and reimbursement of its actual and necessary expenses in the amount of \$10,211.19 for the Seventh Interim Period and \$56,617.50 for the Final Period. In support of this Application, Lowenstein Sandler respectfully states as follows:

BACKGROUND AND INTRODUCTION

1. On September 7, 2018 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, thereby commencing the above-captioned Chapter 11 Cases (the “Chapter 11 Cases”).

2. The Debtors continue to operate their businesses and manage their properties as Debtors-In-Possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.

3. On September 27, 2018, the Office of the United States Trustee appointed the Official Committee of Asbestos Claimants (the “Committee”) [Docket No. 107].

4. On October 19, 2018, the Court entered the *Order Authorizing the Employment and Retention of Lowenstein Sandler LLP as Counsel to the Debtors effective as of the Petition Date* (“Retention Order”) [Docket No. 194]. The Retention Order authorizes Lowenstein Sandler to be compensated in accordance with the procedures set forth in 11 U.S.C. §§ 330 and 331, the applicable Federal Rules of Bankruptcy Procedure, the rules of this Court and any Order entered by this Court with respect to the compensation of professionals.

5. On December 18, 2018, the Court entered the *Administrative Fee Order Establishing Certain Procedures For Allowance Of Interim Compensation And Reimbursement*

Of Expenses Of Professionals Retained By Order Of This Court (the “Interim Compensation Order”) [Docket No. 345].

6. On June 6, 2019, the Plan Proponents (as defined in the Plan) filed the *Third Amended Prenegotiated Plan Of Reorganization For Duro Dyne National Corp. Et Al., Under Chapter 11 Of The Bankruptcy Code, As Modified* (the “Plan”) [Docket No. 729].

7. On October 23, 2020 the Court entered an order (the “Confirmation Order”) (I) *Approving and Adopting the Bankruptcy Court’s Amended Report and Recommendation, And (II) Confirming the Third Amended Prenegotiated Plan of Reorganization for Duro Dyne National Corp. Et Al., Pursuant to Chapter 11 of the Bankruptcy Code*, (the “Plan”) [D.I. 1332].

8. On December 31, 2020, the Effective Date of the Plan occurred. *See* Docket No. 1381. All conditions precedent to the Effective Date set forth in Section 10.02 of the Plan have been satisfied or waived.

9. Pursuant to the *Order Closing Chapter 11 Cases Effective as of December 31, 2020 and Directing Entry of Final Decree* [Docket No. 1367] entered by the Bankruptcy Court on December 29, 2020, the Debtors’ Chapter 11 Cases were deemed closed effective as of December 31, 2020. The Bankruptcy Court retained sole and exclusive jurisdiction to hear and determine all matters arising from or related to any applications for the payment of Professional Claims or requests for the payment of Administrative Claims filed on or after December 31, 2020.

LOWENSTEIN SANDLER’S APPLICATION FOR COMPENSATION AND FOR REIMBURSEMENT OF EXPENSES

10. Lowenstein Sandler’s monthly fee statements (the “Monthly Fee Statements”) and interim fee applications (the “Interim Fee Applications”) for the periods of September 7, 2018

through December 31, 2020 have been filed and served pursuant to the Interim Compensation Order.

11. On December 14, 2018, Lowenstein Sandler filed its *First Interim Application Of Lowenstein Sandler LLP As Counsel To The Debtors For Compensation For Services Rendered And Reimbursement Of Expenses For The Period From September 7, 2018 Through November 30, 2018* [Docket No. 333] (the “First Interim Fee Application”), requesting \$426,263.00 in fees and \$14,045.45 in expenses. The Court entered its order approving the First Interim Fee Application on January 18, 2019 [Docket No. 381].

12. On January 23, 2019, Lowenstein Sandler filed its *Second Monthly Fee Statement of Lowenstein Sandler For The Period From December 1, 2018 Through December 30, 2018* [Docket No. 397] (the “Second Monthly Fee Statement”) requesting \$108,270.00 in fees and \$5,923.25 in expenses. A Certificate of No Objection for the Second Monthly Fee Statement was filed on February 5, 2019 [Docket No. 435].

13. On March 1, 2019, Lowenstein Sandler filed its *Third Monthly Fee Statement of Lowenstein Sandler For The Period From January 1, 2019 Through January 31, 2019* [Docket No. 494] (the “Third Monthly Fee Statement”) requesting \$112,413.25 in fees and \$170.39 in expenses. A Certificate of No Objection for the Third Monthly Fee Statement was filed on March 13, 2019 [Docket No. 561].

14. On April 16, 2019, Lowenstein Sandler filed its *Fourth Monthly Fee Statement of Lowenstein Sandler For The Period From February 1, 2019 Through February 28, 2019* [Docket No. 618] (the “Fourth Monthly Fee Statement”) requesting \$221,556.40 in fees and \$7,334.72 in expenses. A Certificate of No Objection for the Fourth Monthly Fee Statement was filed on April 29, 2019 [Docket No. 649]

15. On May 14, 2019, Lowenstein Sandler filed its *Fifth Monthly Fee Statement of Lowenstein Sandler For The Period From March 1, 2019 Through March 31, 2019* [Docket No. 690] (the “Fifth Monthly Fee Statement”) requesting \$153,478.00 in fees and \$2,036.42 in expenses. A Certificate of No Objection for the Fifth Monthly Fee Statement was filed on May 14, 2019 [Docket No. 690].

16. On May 21, 2019, Lowenstein Sandler filed its *Second Interim Application Of Lowenstein Sandler LLP As Counsel To The Debtors For Compensation For Services Rendered And Reimbursement Of Expenses For The Period From December 1, 2018 Through March 31, 2019* [Docket No. 700] (the “Second Interim Fee Application”), requesting \$595,717.75 in fees and \$15,464.78 in expenses. The Court entered its order approving the Second Interim Fee Application on June 21, 2019 [Docket No. 760].

17. On May 24, 2019, Lowenstein Sandler filed its *Sixth Monthly Fee Statement of Lowenstein Sandler For The Period From April 1, 2019 Through April 30, 2018* [Docket No. 710] (the “Sixth Monthly Fee Statement”) requesting \$87,448.50 in fees and \$640.78 in expenses. A Certificate of No Objection for the Sixth Monthly Fee Statement was filed on June 4, 2019 [Docket No. 725].

18. On July 16, 2019, Lowenstein Sandler filed its *Seventh Monthly Fee Statement of Lowenstein Sandler For The Period From May 1, 2019 Through May 31, 2019* [Docket No. 786] (the “Seventh Monthly Fee Statement”) requesting \$76,172.25 in fees and \$12,484.95 in expenses. A Certificate of No Objection for the Seventh Monthly Fee Statement was filed on July 30, 2019 [Docket No. 804].

19. On August 8, 2019, Lowenstein Sandler filed its *Eighth Monthly Fee Statement of Lowenstein Sandler For The Period From June 1, 2019 Through June 30, 2019* [Docket No.

813] (the “Eighth Monthly Fee Statement”) requesting \$29,542.50 in fees and \$527.54 in expenses. A Certificate of No Objection for the Eighth Monthly Fee Statement was filed on August 20, 2019 [Docket No. 829].

20. On August 15, 2019, Lowenstein Sandler filed its *Ninth Monthly Fee Statement of Lowenstein Sandler For The Period From July 1, 2019 Through July 31, 2019* [Docket No. 820] (the “Ninth Monthly Fee Statement”) requesting \$12,738.50 in fees and \$1.60 in expenses. A Certificate of No Objection for the Ninth Monthly Fee Statement was filed on August 27, 2019 [Docket No. 840].

21. On August 27, 2019, Lowenstein Sandler filed its *Third Interim Application Of Lowenstein Sandler LLP As Counsel To The Debtors For Compensation For Services Rendered And Reimbursement Of Expenses For The Period From April 1, 2019 Through July 31, 2019* [Docket No. 842] (the “Third Interim Fee Application”), requesting \$205,901.75 in fees and \$13,654.87 in expenses. The Court entered its order approving the Third Interim Fee Application on October 3, 2019 [Docket No. 890].

22. On December 20, 2019, Lowenstein Sandler filed its *Tenth Monthly Fee Statement of Lowenstein Sandler For The Period From August 1, 2019 Through August 31, 2019* [Docket No. 982] (the “Tenth Monthly Fee Statement”) requesting \$67,318.00 in fees and \$2,150.97 in expenses. A Certificate of No Objection for the Tenth Monthly Fee Statement was filed on December 31, 2019 [Docket No. 1001].

23. On December 20, 2019, Lowenstein Sandler filed its *Eleventh Monthly Fee Statement of Lowenstein Sandler For The Period From September 1, 2019 Through September, 2019* [Docket No. 983] (the “Eleventh Monthly Fee Statement”) requesting \$14,843.50 in fees

and \$423.20 in expenses. A Certificate of No Objection for the Eleventh Monthly Fee Statement was filed on December 31, 2019 [Docket No. 1002].

24. On December 20, 2019, Lowenstein Sandler filed its *Twelfth Monthly Fee Statement of Lowenstein Sandler For The Period From August 1, 2019 Through August 31, 2019* [Docket No. 984] (the “Twelfth Monthly Fee Statement”) requesting \$14,934.00 in fees and \$461.00 in expenses. A Certificate of No Objection for the Twelfth Monthly Fee Statement was filed on December 31, 2019 [Docket No. 1003].

25. On December 20, 2019, Lowenstein Sandler filed its *Thirteenth Monthly Fee Statement of Lowenstein Sandler For The Period From August 1, 2019 Through August 31, 2019* [Docket No. 985] (the “Thirteenth Monthly Fee Statement”) requesting \$13,686.00 in fees and \$116.54 in expenses. A Certificate of No Objection for the Thirteenth Monthly Fee Statement was filed on December 31, 2019 [Docket No. 1004].

26. On December 20, 2019, Lowenstein Sandler filed its *Fourth Interim Application Of Lowenstein Sandler LLP As Counsel To The Debtors For Compensation For Services Rendered And Reimbursement Of Expenses For The Period From August 1, 2019 Through November 30, 2019* [Docket No. 986] (the “Fourth Interim Fee Application”), requesting \$110,781.50 in fees and \$3,151.71 in expenses. The Court entered its order approving the Fourth Interim Fee Application on January 27, 2020 [Docket No. 1032].

27. On February 5, 2020, Lowenstein Sandler filed its *Fourteenth Monthly Fee Statement of Lowenstein Sandler For The Period From December 1, 2019 Through December 31, 2019* [Docket No. 1056] (the “Fourteenth Monthly Fee Statement”) requesting \$11,900.50 in fees and \$20.60 in expenses. A Certification of No Objection for the Fourteenth Monthly Fee Statement was filed on April 23, 2020.

28. On April 22, 2020, Lowenstein Sandler filed its *Fifteenth Monthly Fee Statement of Lowenstein Sandler For The Period From January 1, 2020 Through January 31, 2020* [Docket No. 1109] (the “Fifteenth Monthly Fee Statement”) requesting \$9,605.00 in fees and \$32.80 in expenses. A Certification of No Objection for the Fifteenth Monthly Fee Statement was filed on May 13, 2020.

29. On April 22, 2020, Lowenstein Sandler filed its *Sixteenth Monthly Fee Statement of Lowenstein Sandler For The Period From February 1, 2020 Through February 29, 2020* [Docket No. 1110] (the “Sixteenth Monthly Fee Statement”) requesting \$2,833.00 in fees and \$7.10 in expenses. A Certification of No Objection for the Sixteenth Monthly Fee Statement was filed on May 13, 2020.

30. On April 22, 2020, Lowenstein Sandler filed its *Seventeenth Monthly Fee Statement of Lowenstein Sandler For The Period From March 1, 2020 Through March 31, 2020* [Docket No. 1110] (the “Seventeenth Monthly Fee Statement”) requesting \$28,731.50 in fees and \$0.00 in expenses. A Certification of No Objection for the Seventeenth Monthly Fee Statement was filed on May 13, 2020.

31. On April 15, 2020, Lowenstein Sandler filed its *Fifth Interim Application Of Lowenstein Sandler LLP As Counsel To The Debtors For Compensation For Services Rendered And Reimbursement Of Expenses For The Period From December 1, 2019 Through March 31, 2020* [Docket No. 1104] (the “Fifth Interim Fee Application”), requesting \$53,070.00 in fees and \$60.50 in expenses. The Court entered its order approving the Fifth Interim Fee Application on June 2, 2020 [Docket No. 1173].

32. On May 1, 2020, Lowenstein Sandler filed its *Eighteenth Monthly Fee Statement of Lowenstein Sandler For The Period From April 1, 2020 Through April 30, 2020* [Docket No.

1159] (the “Eighteenth Monthly Fee Statement”) requesting \$20,086.00 in fees and \$0.00 in expenses. Subsequently, Lowenstein Sandler voluntarily reduced its requested fees by \$150.00 to \$19,936.00 pursuant to an agreement with the United States Trustee. A Certification of No Objection for the Eighteenth Monthly Fee Statement was filed on June 2, 2020.

33. On August 31, 2020, Lowenstein Sandler filed its *Nineteenth Monthly Fee Statement of Lowenstein Sandler For The Period From May 1, 2020 Through May 31, 2020* [Docket No. 1249] (the “Nineteenth Monthly Fee Statement”) requesting \$14,925.00 in fees and \$16.60 in expenses. A Certification of No Objection for the Nineteenth Monthly Fee Statement was filed on September 11, 2020.

34. Also on August 31, 2020, Lowenstein Sandler filed its *Twentieth Monthly Fee Statement of Lowenstein Sandler For The Period From June 1, 2020 Through June 30, 2020* [Docket No. 1250] (the “Twentieth Monthly Fee Statement”) requesting \$10,242.50 in fees and \$12.40 in expenses. A Certification of No Objection for the Twentieth Monthly Fee Statement was filed on September 11, 2020.

35. Also on August 31, 2020, Lowenstein Sandler filed its *Twenty-First Monthly Fee Statement of Lowenstein Sandler For The Period From July 1, 2020 Through July 31, 2020* [Docket No. 1251] (the “Twenty-First Monthly Fee Statement”) requesting \$6,933.50 in fees and \$0.00 in expenses. A Certification of No Objection for the Twenty-First Monthly Fee Statement was filed on September 11, 2020.

36. On September 3, 2020, Lowenstein Sandler filed its *Sixth Interim Application Of Lowenstein Sandler LLP As Counsel To The Debtors For Compensation For Services Rendered And Reimbursement Of Expenses For The Period From April 1, 2020 Through July 31, 2020* [Docket No. 1104] (the “Sixth Interim Fee Application”), requesting \$6,933.50 in fees and

\$29.00 in expenses. The Court entered its order approving the Sixth Interim Fee Application on October 23, 2020 [Docket No. 1313].

37. On November 20, 2020, Lowenstein Sandler filed its *Twenty-Second Monthly Fee Statement of Lowenstein Sandler For The Period From August 1, 2020 Through August 31, 2020* [Docket No. 1345] (the “Twenty-Second Monthly Fee Statement”) requesting \$17,883.00 in fees. A Certification of No Objection for the Twenty-Second Monthly Fee Statement was filed on December 1, 2020.

38. Also on November 20, 2020, Lowenstein Sandler filed its *Twenty-Third Monthly Fee Statement of Lowenstein Sandler For The Period From September 1, 2020 Through September 30, 2020* [Docket No. 1346] (the “Twenty-Third Monthly Fee Statement”) requesting \$59,285.00 in fees and \$346.20 in expenses. A Certification of No Objection for the Twenty-Second Monthly Fee Statement was filed on December 1, 2020.

39. On January 19, 2021, Lowenstein Sandler filed its *Twenty-Fourth Monthly Fee Statement of Lowenstein Sandler For The Period From October 1, 2020 Through October 31, 2020* [Docket No. 1383] (the “Twenty-Fourth Monthly Fee Statement”) requesting \$19,293.00 in fees and \$68.20 in expenses. The Twenty-Fourth Monthly Fee Statement is pending.

40. Also on January 19, 2021, Lowenstein Sandler filed its *Twenty-Fifth Monthly Fee Statement of Lowenstein Sandler For The Period From November 1, 2020 Through November 30, 2020* [Docket No. 1384] (the “Twenty-Fifth Monthly Fee Statement”) requesting \$56,283.00 in fees and \$2,790.00 in expenses. The Twenty-Fifth Monthly Fee Statement is pending.

41. Also on January 19, 2021, Lowenstein Sandler filed its *Twenty-Sixth Monthly Fee Statement of Lowenstein Sandler For The Period From December 1, 2020 Through December 31, 2020* [Docket No. 1385] (the “Twenty-Sixth Monthly Fee Statement”) requesting

\$186,375.50 in fees and \$7,006.79 in expenses. The Twenty-Sixth Monthly Fee Statement is pending.

42. By this Application, Lowenstein Sandler seeks final allowance of the full amount of the fees and expenses requested in the above-referenced Monthly Fee Statements and Interim Fee Applications.

SUMMARY OF SERVICES

43. During the Final Period, Lowenstein Sandler rendered professional services to the Debtors solely in connection with these Chapter 11 Cases and on behalf of the Debtors in accordance with Lowenstein Sandler's professional responsibilities. The services performed were necessary to the administration of these Chapter 11 Cases and were beneficial at the time which the services were rendered. All services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed.

44. The Monthly Fee Statements covered by this Application contain detailed daily time entries describing the actual and necessary services provided by Lowenstein Sandler during the Final Period. The Monthly Fee Statements are incorporated herein by reference as if fully set forth in their entirety. In addition, Lowenstein Sandler incorporates herein by reference the summaries of services performed by Lowenstein Sandler contained in the Monthly Fee Statements as if fully set forth herein in their entirety.

45. Lowenstein Sandler has rendered professional services as counsel to the Debtors as requested and necessary and appropriate in these Chapter 11 Cases.

46. This is Lowenstein Sandler's seventh interim and final application. Lowenstein Sandler has made no prior or other application to this or any other Court for the relief requested herein

EXPENSES INCURRED

47. During the course of these Chapter 11 Cases, Lowenstein Sandler incurred and paid its actual and necessary disbursements and expenses, which totaled \$56,617.50. The Monthly Fee Statements covered by this Application contain detailed itemizations of expenses incurred by Lowenstein Sandler during the Final Period. The Monthly Fee Statements are incorporated herein by reference as if fully set forth in their entirety. In addition, Lowenstein Sandler incorporates herein by reference the itemizations of expenses incurred by Lowenstein Sandler contained in the Monthly Fee Statements as if fully set forth herein in their entirety.

RELIEF REQUESTED

48. By this Application, Lowenstein Sandler requests that the Court approve payment of one-hundred percent (100%) of the fees and expenses incurred by Lowenstein Sandler during the Final Period of September 7, 2018 through December 31, 2020.

49. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount of compensation requested by Lowenstein Sandler in this Application is fair and reasonable given (a) the complexity of the Chapter 11 Cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code.

50. Moreover, Lowenstein Sandler has reviewed the requirements of D.N.J. LBR 2016-4 and the Revised UST Guidelines and believes this Application substantially complies therewith.

CERTIFICATION OF COUNSEL

51. A Certification of Counsel is attached hereto as **Exhibit A** and made part of this Application.

WHEREFORE, Lowenstein Sandler LLP respectfully requests the Court enter an order, substantially in the form attached hereto, providing (a) that an interim allowance be made to Lowenstein Sandler LLP for the period from August 1, 2020 through December 31, 2020, in the amount of (i) \$339,120.00 as compensation for necessary professional services rendered, and (ii) \$10,211.19 for actual and necessary expenses incurred, for a total of \$349,331.19; (b) that a final allowance be made to Lowenstein Sandler LLP for the period from September 7, 2018 through December 31, 2020, in the amount of (i) \$1,792,891.00 as compensation for necessary professional services rendered, and (ii) \$56,617.50 for actual and necessary expenses incurred, for a total of \$1,849,508.50; (c) that the Debtors are authorized and directed to pay Lowenstein Sandler the outstanding amount of such sums; and (c) for such other and further relief as may be just and proper.

Dated: January 21, 2021

Respectfully submitted,

LOWENSTEIN SANDLER LLP

/s/ Jeffrey D. Prol

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Jeffrey D. Prol, Esq.

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Counsel to the Debtors and Debtors-in-Possession

EXHIBIT A

LOWENSTEIN SANDLER LLP

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Counsel to the Debtors and Debtors-in-Possession

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

In re:

Duro Dyne National Corp., *et al.*¹

Debtors.

Chapter 11

Case No. 18-27963 (MBK)

(Jointly Administered)

CERTIFICATION OF JEFFREY D. PROL, ESQ.

Jeffrey D. Prol, pursuant to 28 U.S.C. § 1746, states as follows:

1. I am a partner in the law firm of Lowenstein Sandler LLP, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”). I submit this Certification in connection with the *Seventh Interim And Final Fee Application Of Lowenstein Sandler LLP As Counsel To The Debtors For Allowance Of Compensation For Services Rendered And Reimbursement Of Expenses Incurred From (I) August 1 2020 Through December 31, 2020 And (II) September 7, 2018 Through December 31, 2020* (the “Application”).

2. In accordance with 18 U.S.C. § 155 and the Rules of this Court, neither I nor any attorney of my firm has entered into any agreement, written or oral, express or implied, with the Debtors, any creditor, or any other party in interest, or any attorney of such person, for the

¹ 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).

purpose of fixing the amount of any of the fees or other compensation to be allowed out of or paid from the assets of the Debtors.

3. In accordance with § 504 of the Bankruptcy Code, no agreement or understanding exists between me, my firm or any attorney thereof, on the one hand, and any other person, on the other hand, for the division of such compensation as my firm may receive from the Debtors herein, nor will any division of fees prohibited by § 504 of the Bankruptcy Code be made by me, or any partner or associate of my firm.

4. I have reviewed the requirements of D.N.J. LBR 2016-4 and the Revised UST Guidelines and certify to the best of my knowledge and belief that this Application substantially complies therewith.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated: January 21, 2021

/s/ Jeffrey D. Prol
Jeffrey D. Prol, Esq.