

FEE APPLICATION COVER SHEET

IN RE: Duro Dyne National Corp., et al.¹ APPLICANT: Young Conaway
Stargatt & Taylor, LLP
CASE NO.: 18-27963 (MBK) CLIENT: Lawrence Fitzpatrick,
Legal Representative for Future
Asbestos Personal Injury Claimants

CHAPTER: 11 CASE FILED: September 7, 2018

**SEVENTH INTERIM AND FINAL APPLICATION OF YOUNG CONAWAY
STARGATT & TAYLOR, LLP FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES AS COUNSEL TO LAWRENCE FITZPATRICK, THE
LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS FOR
(I) THE INTERIM PERIOD FROM AUGUST 1, 2020 THROUGH DECEMBER 31, 2020 AND
(II) THE FINAL PERIOD FROM SEPTEMBER 7, 2018 THROUGH DECEMBER 31, 2020**

**SECTION I
FEE SUMMARY**

☐ Interim Fee Application or ☒ Final Fee Application (seventh interim and final)

	<u>FEES</u>	<u>EXPENSES</u>
TOTAL PREVIOUSLY REQUESTED:	<u>\$748,742.50</u>	<u>\$26,402.48</u>
TOTAL ALLOWED TO DATE:	<u>\$714,624.00</u>	<u>\$26,223.74</u>
TOTAL RETAINER ² :	<u>N/A</u>	<u>N/A</u>
TOTAL HOLDBACK (IF APPLICABLE):	<u>\$6,823.70</u>	<u>\$0.00</u>
TOTAL PAID OR TO BE PAID TO APPLICANT:	<u>\$741,918.80</u>	<u>\$26,402.48</u>

FEE TOTALS	<u>\$34,118.50</u>
DISBURSEMENTS TOTALS	<u>\$178.68</u>
TOTAL FEE APPLICATION	<u>\$34,297.18</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 Mr. Fitzpatrick and YCST were paid for their prepetition services in connection with the Chapter 11 Cases and related matters from a retainer. Mr. Fitzpatrick and YCST have been paid for all amounts owed for legal services rendered prior to the Petition Date and YCST is holding a retainer in the amount of approximately \$40,942.

Name of Professional	Title/ Department	Hours	Rate	Fees
Craig D. Gear	Partner	14.50	\$1,025.00	\$14,862.50
Edwin J. Harron	Partner	3.40	\$970.00	\$3,298.00
Sara Beth A.R. Kohut	Counsel	8.30	\$700.00	\$5,810.00
Casey S. Cathcart	Paralegal	5.40	\$295.00	\$1,593.00
Lisa M. Eden	Paralegal	29.00	\$295.00	\$8,555.00
Total		60.60		\$34,118.50
Attorney Blended Rate: \$563.01				
* Reflects 50% rate reduction due to non-working travel time.				

**SECTION II
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	FEE
(B001) Case Administration	7.00	\$2,173.00
(B002) Court Hearings	0.50	\$147.50
(B012) Plan and Disclosure Statement	25.00	\$22,860.50
(B017) Retention of Professionals/Fee Issues	15.70	\$4,793.50
(B018) Fee Application Preparation	12.40	\$4,144.00
SERVICE TOTALS	60.60	\$34,118.50

**SECTION III
SUMMARY OF DISBURSEMENTS**

DESCRIPTION	AMOUNT
Docket Retrieval / Search	\$21.80
Federal Express	\$81.58
Postage	\$5.40
Reproduction Charges	\$69.90
TOTAL DISBURSEMENTS	\$178.68

I certify under penalty of perjury that the above is true.

Date: January 21, 2021

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

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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

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.*¹

Debtors.

Chapter 11

Case No. 18-27963 (MBK)

(Jointly Administered)

Hearing Date: February 25, 2021 at 10:00 a.m.

Objection Deadline: February 1, 2021 at 4:00 p.m.

**SEVENTH INTERIM AND FINAL APPLICATION OF YOUNG CONAWAY
STARGATT & TAYLOR, LLP FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES AS COUNSEL TO LAWRENCE FITZPATRICK, THE
LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS FOR
(I) THE INTERIM PERIOD FROM AUGUST 1, 2020 THROUGH DECEMBER 31, 2020 AND
(II) THE FINAL PERIOD FROM 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, Young Conaway Stargatt & Taylor, LLP (“YCST” or the “Applicant”) as counsel to Lawrence Fitzpatrick, the legal representative for future claimants (the “Future Claimants' Representative” or the “FCR”), files this (i) seventh interim and final application (the “Application”) for allowance of compensation and reimbursement of expenses for the period August 1, 2020 through December 31, 2020 (the “Interim Period”), and (ii) its final application for allowance of compensation and reimbursement of expenses for the period September 7, 2018

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).

through December 31, 2020 (the “Final Period”). By this Application, pursuant to the Interim Compensation Order (defined below), YCST seeks allowance and payment of (i) compensation in the amount of \$34,118.50 for services rendered by YCST during the Interim Period and reimbursement of its actual and necessary expenses in the amount of \$178.68 for the Interim Period; and (ii) compensation in the amount of \$748,742.50 for services rendered by YCST during the Final Period and reimbursement of its actual and necessary expenses in the amount of \$26,402.48 for the Final Period. In support of this Application, YCST 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 November 13, 2018, the Court entered the *Order Authorizing the Future Claimants’ Representative to Retain and Employ Young Conaway Stargatt & Taylor, LLP as His Attorneys* (the “Retention Order”) [Docket No. 269]. The Retention Order authorizes YCST 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] on December 18, 2018.

6. On October 23, 2020, the United States District Court for the District of New Jersey entered the *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, as Modified* (the “Confirmation Order”) [Docket No. 1322].

7. On December 31, 2020, the Effective Date of the Plan occurred [Docket No. 1373].

**YCST’S APPLICATIONS FOR COMPEMNSATION
AND FOR REIMBURSEMENT OF EXPENSES**

8. YCST’S monthly fee statements (the “Monthly Fee Statements”) for the period September 7, 2018 through December 31, 2020 have been filed and served pursuant to the Interim Compensation Order.

9. On December 18, 2018, YCST filed its First Interim Application of Young Conaway Stargatt & Taylor, LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period September 7, 2018 through November 30, 2018² (the “First Interim Fee Statement”) requesting \$287,669.50 in fees and \$12,093.01 in expenses. The Order Allowing First Interim Application of Young Conaway Stargatt & Taylor, LLP for Allowance of Compensation and

² YCST filed the *First Interim Application of Young Conaway Stargatt & Taylor, LLP for Services Rendered and Reimbursement of Expenses as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period September 7, 2018 through November 30, 2018* [Docket No. 335] in lieu of a first monthly fee statement.

Reimbursement of Expenses as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period September 7, 2018 through November 30, 2018 was entered on January 18, 2019 [Docket No. 379].

10. On January 23, 2019, YCST filed its Second Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period December 1, 2018 through December 31, 2018 (the “Second Monthly Fee Statement”) requesting \$16,076.50 in fees and \$2,207.98 in expenses. The Certificate of No Objection for the Second Monthly Fee Statement was filed on February 6, 2019 [Docket No. 437].

11. On February 21, 2019, YCST filed its Third Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period January 1, 2019 through January 31, 2019 (the “Third Monthly Fee Statement”) requesting \$37,636.50 in fees and \$399.81 in expenses. The Certificate of No Objection for the Third Monthly Fee Statement was filed on March 5, 2019 [Docket No. 513].

12. On March 19, 2019, YCST filed its Fourth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period February 1, 2019 through February 28, 2019 (the “Fourth Monthly Fee Statement”) requesting \$62,429.00 in fees and \$3,648.14 in expenses. The Certificate of No Objection for the Fourth Monthly Fee Statement was filed on April 3, 2019 [Docket No. 597].

13. On April 18, 2019, YCST filed its Fifth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period March 1, 2019 through March 31, 2019 (the “Fifth Monthly Fee”

Statement”) requesting \$145,837.00 in fees and \$3,933.74 in expenses. The Certificate of No Objection for the Fifth Monthly Fee Statement was filed on May 2, 2019 [Docket No. 654].

14. On May 16, 2019, YCST filed its Sixth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period April 1, 2019 through April 30, 2019 (the “Sixth Monthly Fee Statement”) requesting \$30,082.50 in fees and \$398.68 in expenses. The Certificate of No Objection for the Sixth Monthly Fee Statement was filed on May 30, 2019 [Docket No. 722].

15. On June 19, 2019, YCST filed its Seventh Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period May 1, 2019 through May 31, 2019 (the “Seventh Monthly Fee Statement”) requesting \$29,883.00 in fees and \$990.07 in expenses. The Certificate of No Objection for the Seventh Monthly Fee Statement was filed on July 3, 2019 [Docket No. 778].

16. On July 18, 2019, YCST filed its Eighth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period June 1, 2019 through June 30, 2019 (the “Eighth Monthly Fee Statement”) requesting \$10,892.00 in fees and \$810.50 in expenses. The Certificate of No Objection for the Eighth Monthly Fee Statement was filed on August 5, 2019 [Docket No. 808].

17. On August 15, 2019 YCST filed its Ninth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period July 1, 2019 through July 31, 2019 (the “Ninth Monthly Fee Statement”) requesting \$11,429.00 in fees and \$366.83 in expenses. The Certificate of No Objection for the Ninth Monthly Fee Statement was filed on August 28, 2019 [Docket No. 853].

18. On September 19, 2019, YCST filed its Tenth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period August 1, 2019 through August 31, 2019 (the “Tenth Monthly Fee Statement”) requesting \$23,855.50 in fees and \$263.59 in expenses. The Certificate of No Objection for the Tenth Monthly Fee Statement was filed on October 3, 2019 [Docket No. 886].

19. On October 17, 2019, YCST filed its Eleventh Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period September 1, 2019 through September 30, 2019 (the “Eleventh Monthly Fee Statement”) requesting \$5,171.00 in fees and \$16.75 in expenses. The Certificate of No Objection for the Eleventh Monthly Fee Statement was filed on October 31, 2019 [Docket No. 924].

20. On November 19, 2019, YCST filed its Twelfth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period October 1, 2019 through October 31, 2019 (the “Twelfth Monthly Fee Statement”) requesting \$4,149.00 in fees and \$55.87 in expenses. The Certificate of No Objection for the Twelfth Monthly Fee Statement was filed on December 3, 2019 [Docket No. 953].

21. On December 19, 2019, YCST filed its Thirteenth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period November 1, 2019 through November 30, 2019 (the “Thirteenth Monthly Fee Statement”) requesting \$4,059.00 in fees and \$321.34 in expenses. The Certificate of No Objection for the Thirteenth Monthly Fee Statement was filed on January 2, 2020 [Docket No. 1007].

22. On January 16, 2020, YCST filed its Fourteenth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period December 1, 2020 through December 31, 2020 (the “Fourteenth Monthly Fee Statement”) requesting \$3,486.50 in fees and \$221.56 in expenses. The Certificate of No Objection for the Fourteenth Monthly Fee Statement was filed on January 29, 2020 [Docket No. 1036].

23. On February 19, 2020, YCST filed its Fifteenth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period January 1, 2020 through January 31, 2020 (the “Fifteenth Monthly Fee Statement”) requesting \$3,079.00 in fees and \$266.62 in expenses. The Certificate of No Objection for the Fifteenth Monthly Fee Statement was filed on March 4, 2020 [Docket No. 1074].

24. On March 18, 2020, YCST filed its Sixteenth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period February 1, 2020 through February 29, 2020 (the “Sixteenth Monthly Fee Statement”) requesting \$3,006.50 in fees and \$29.79 in expenses. The Certificate of No Objection for the Sixteenth Monthly Fee Statement was filed on April 1, 2020 [Docket No. 1090].

25. On April 15, 2020, YCST filed its Seventeenth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period March 1, 2020 through March 31, 2020 (the “Seventeenth Monthly Fee Statement”) requesting \$9,022.50 in fees and \$35.85 in expenses. The Certificate of

No Objection for the Seventeenth Monthly Fee Statement was filed on April 29, 2020 [Docket No. 1129].

26. On May 19, 2020, YCST filed its Eighteenth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period April 1, 2020 through April 30, 2020 (the “Eighteenth Monthly Fee Statement”) requesting \$6,186.50 in fees and \$43.28 in expenses. The Certificate of No Objection for the Eighteenth Monthly Fee Statement was filed on June 9, 2020 [Docket No. 1200].

27. On June 23, 2020, YCST filed its Nineteenth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period May 1, 2020 through May 31, 2020 (the “Nineteenth Monthly Fee Statement”) requesting \$8,510.50 in fees and \$29.10 in expenses. The Certificate of No Objection for the Nineteenth Monthly Fee Statement was filed on July 7, 2020 [Docket No. 1218].

28. On July 21, 2020, YCST filed its Twentieth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period June 1, 2020 through June 30, 2020 (the “Twentieth Monthly Fee Statement”) requesting \$3,746.50 in fees and \$59.92 in expenses. The Certificate of No Objection for the Twentieth Monthly Fee Statement was filed on August 4, 2020 [Docket No. 1235].

29. On August 20, 2020, YCST filed its Twenty-First Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period July 1, 2020 through July 31, 2020 (the

“Twenty-First Monthly Fee Statement”) requesting \$8,416.50 in fees and \$31.37 in expenses. The Certificate of No Objection for the Twenty-First Monthly Fee Statement was filed on September 3, 2020 [Docket No. 1254].

30. On September 17, 2020, YCST filed its Twenty-Second Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period August 1, 2020 through August 31, 2020 (the “Twenty-Second Monthly Fee Statement”) requesting \$6,670.50 in fees and \$63.66 in expenses. The Certificate of No Objection for the Twenty-Second Monthly Fee Statement was filed on September 30, 2020 [Docket No. 1291].

31. On October 15, 2020, YCST filed its Twenty-Third Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period September 1, 2020 through September 30, 2020 (the “Twenty-Third Monthly Fee Statement”) requesting \$8,628.50 in fees and \$29.00 in expenses. The Certificate of No Objection for the Twenty-Third Monthly Fee Statement was filed on October 29, 2020 [Docket No. 1334].

32. On November 19, 2020, YCST filed its Twenty-Fourth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period October 1, 2020 through October 31, 2020 (the “Twenty-Fourth Monthly Fee Statement”) requesting \$2,047.50 in fees and \$22.74 in expenses. The Certificate of No Objection for the Twenty-Fourth Monthly Fee Statement was filed on December 2, 2020 [Docket No. 1354].

33. On December 15, 2020 YCST filed its Twenty-Fifth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal

Representative for Future Claimants for the Period November 1, 2020 through November 30, 2020 (the “Twenty-Fifth Monthly Fee Statement”) requesting \$2,669.00 in fees and \$10.40 in expenses. The Certificate of No Objection for the Twenty-Fifth Monthly Fee Statement was filed on December 29, 2020 [Docket No. 1369].

34. On January 15, 2021, YCST filed its Twenty-Sixth Monthly Fee Statement of Young Conaway Stargatt & Taylor, LLP as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period December 1, 2020 through December 31, 2020 (the “Twenty-Sixth Monthly Fee Statement”) requesting \$14,103.00 in fees and \$52.88 in expenses. The Certificate of No Objection for the Twenty-Sixth Monthly Fee Statement will be filed assuming no answer, objection, or other responsive pleading is received. Objections to the Twenty-Sixth Monthly Fee Statement are to be filed and served no later than January 25, 2021.

35. In accordance with the Interim Compensation Order, YCST seeks final approval of all fees and expenses sought in the Monthly Fee Statements and payment in an amount equal to the difference between the amount of the fees and expenses allowed and the actual payments received by YCST on account of the Monthly Fee Statements.

SUMMARY OF SERVICES

36. During the Final Period, the Applicant rendered significant professional services to the FCR solely in connection with these Chapter 11 Cases and in accordance with the YCST’s professional responsibilities. The services performed were necessary legal services involving this Chapter 11 proceeding and were beneficial at the time at 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.

37. The Monthly Fee Statements covered by this Application contained detailed daily time logs describing the actual and necessary services provided by YCST during the periods covered by such application. Detailed descriptions of the services rendered during the Interim Period were included in the Monthly Fee Statements and incorporated herein by reference as if fully set forth in their entirety. In addition, YCST incorporates herein by reference the summaries of services performed by YCST contained in the Monthly Fee Statements as if fully set forth in their entirety.

38. YCST has rendered professional services as counsel to the FCR as requested and necessary and appropriate in these Chapter 11 Cases.

39. During the course of these Chapter 11 Cases, YCST incurred and paid its actual and necessary disbursements and expenses.

40. This is YCST's seventh interim and final application pursuant to the Interim Compensation Order. YCST has made no prior or other application to this or any other Court for the relief requested herein.

EXPENSES INCURRED

41. During the course of these Chapter 11 Cases, YCST incurred and paid its actual and necessary disbursements and expenses, which totaled \$26,402.48. The Monthly Fee Statements covered by this Application contain detailed itemizations of expense incurred by YCST during the Final Period. The Monthly Fee Statements are incorporated herein by reference as if fully set forth in their entirety. In Addition, YCST incorporates herein by reference the itemizations of expenses incurred by YCST contained in the Monthly Fee Statements as if fully set forth herein in their entirety.

RELIEF REQUESTED

42. By this Application, YCST requests that the Court approve payment of one-hundred percent (100%) of the fees and expenses incurred by the Applicant during the Interim Period and grant a final award of one-hundred percent (100%) of the fees and expenses incurred by YCST during the Final Period.

43. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount of compensation requested by YCST 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.

44. Moreover, YCST has reviewed the requirements of D.N.J. LBR 2016-3 and the Revised UST Guidelines and believes this Application substantially complies with such local rule and guidelines.

CERTIFICATION OF COUNSEL

45. The Certification of Edwin J. Harron is attached hereto as **Exhibit C** and made part of this Application.

WHEREFORE, YCST respectfully requests the Court enter an order, substantially in the form attached hereto as **Exhibit D**, providing (a) that an interim allowance be made to YCST in the amount of (i) \$34,118.50 as compensation for necessary professional services rendered during the Interim Period, and (ii) \$178.68 for actual and necessary expenses incurred during the Interim Period; (b) a final allowance be made to YCST in the amount of (i) \$748,742.50 as compensation for necessary professional services rendered during the Final Period, and (ii) \$26,402.48 for actual and necessary expenses incurred during the Final Period, for a total of

\$775,144.92; (c) the Debtors are authorized and directed to pay YCST the outstanding amount of such sums in accordance with the Plan; and (d) for such other and further relief as may be just and proper.

Dated: January 21, 2021

Respectfully submitted,

/s/ Edwin J. Harron

Edwin J. Harron, Esq. (New Jersey Bar No. 040701995)
YOUNG CONAWAY STARGATT & TAYLOR, LLP
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: eharron@ycst.com

Counsel to the Future Claimants' Representative