

**Exhibit D**

**Proposed Form of Order**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1**

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In re:

DURO DYNE NATIONAL CORP., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-27963 (MBK)

Jointly Administered

**ORDER ALLOWING 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**

The relief set forth on the following page, numbered two (2) through three (3), is hereby **ORDERED.**

<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).

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Debtors: Duro Dyne National Corp., *et al.*

Case No. 18-27963 (MBK)

Caption: Order Allowing 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

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Upon the *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* (the "Application");<sup>2</sup> and due and proper notice of the Application having been given; and it appearing that no other or further notice is required; and it appearing that the Court has jurisdiction to consider the Application in accordance with 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11*, dated September 18, 2012 (Simandle, C.J.); and it appearing that venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that the fees and expenses requested in the Application are reasonable and for necessary services provided during the Interim Period and the Final Period,

**IT IS HEREBY ORDERED THAT:**

1. The Application is granted as provided herein.
2. YCST is hereby allowed (i) compensation for services rendered in the sum of \$34,118.50 and reimbursement of expenses incurred in the sum of \$178.68 for the Interim Period, and is hereby allowed (ii) compensation for services rendered in the sum of

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Application.

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Debtors: Duro Dyne National Corp., *et al.*

Case No. 18-27963 (MBK)

Caption: Order Allowing 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

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\$748,742.50 and reimbursement of expenses incurred in the sum of \$26,402.48 for the Final Period.

3. The Debtors are authorized and directed to make payment of the outstanding amount of such sums to YCST within ten (10) days of the entry of this Order.

4. This Court shall retain jurisdiction over any and all matters arising from or related to the interpretation and/or implementation of this Order.