UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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

Debtor: Duro Dyne National Corp., *et al.*[1]
Case No.: 18-27963-MBK
Chapter: 11

Applicant: Gilbert LLP
Clients: Official Committee of Asbestos Claimants
Case Filed: September 7, 2018

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

RETENTION ORDER ATTACHED AS EXHIBIT C

SEVENTH MONTHLY FEE STATEMENT[2] OF GILBERT LLP, INSURANCE COUNSEL FOR THE OFFICIAL COMMITTEE OF ASBESTOS CLAIMANTS, FOR THE PERIOD MAY 1, 2019 THROUGH MAY 31, 2019

SECTION 1
FEE SUMMARY

	FEES	EXPENSES
TOTAL PREVIOUSLY REQUESTED	$298,281.00	$ 9,197.83
TOTAL ALLOWED TO DATE	$283,734.00	$ 9,129.83
TOTAL RETAINER APPLIED (IF APPLICABLE)	$ (3,699.05)[3]	$ 0.00
TOTAL AMOUNT OWING @ 80% + EXPENSES	$ 0.00	$ 0.00
TOTAL AMOUNT OWING @ 20% (HOLDBACK)	$ 2,909.40	$ 0.00
TOTAL RECEIVED BY GILBERT LLP	$291,678.55[4]	$ 9,197.83

FEE TOTAL – PAGE 2	$ 27,450.25
DISBURSEMENT TOTAL – PAGE 2	$ 1,658.79
TOTAL FOURTH MONTHLY FEE STATEMENT	$ 29,109.04
MINUS 20% HOLDBACK	$ (5,490.05)
AMOUNT SOUGHT AT THIS TIME	$ 23,618.99

[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] Gilbert LLP's first monthly fee statement was also filed as an interim fee application under the title *First Interim Fee Application of Gilbert LLP for Allowance of Fees and Reimbursement of Expenses* (the "**First Application**") on December 14, 2018 [Docket No 339].

[3] Gilbert LLP held a retainer from pre-petition services in the amount of $3,699.05 (the "**Retainer**"), which was applied to the First Application and reflected above.

[4] The Total Received by Gilbert LLP is the amount that was owed after the Retainer was applied and was paid by the Debtors. It also represents all amounts paid to date, including fees and expenses requested in monthly fee statements (80%/100%), which have not been included in an interim application.

NAME OF PROFESSIONAL & TITLE	YEAR ADMITED	RATE	HOURS	FEES
Kami E. Quinn - Partner	Virginia – 2000	$700.00	13.8	$9,660.00
	District of Columbia – 2006	$350.00	7.0	$2,450.00
Heather Frazer – Associate	Florida – 2009	$575.00	22.0	$12,650.00
	District of Columbia – 2017	$287.50	3.5	$1,006.25
Kelly Saunders – Paralegal	N/A	$245.00	4.9	$1,200.50
Stephanie Seymour – Paralegal	N/A	$275.00	0.5	$137.50
Gabriela Foster – Project Assistant	N/A	$180.00	1.5	$270.00
Mary Carter Smith – Billing Specialist	N/A	$190.00	0.4	$76.00
	Totals		**53.6**	**$27,450.25**
	Attorney Blended Rate	**$556.51**		

SECTION II
SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEES
Insurance Analysis & Recovery	32.9	$18,464.50
Retention / Fee Application	0.4	$76.00
Non-Working Travel (Billed @ 50%)	10.5	$3,456.25
Disclosure Statement / Plan of Reorganization	9.8	$5,453.50
Totals	**53.6**	**$27,450.25**

SECTION III
SUMMARY OF DISBURSEMENTS

EXPENSE	AMOUNT
Conference Call – Court Call	$100.00
Filing Fees	$252.00
PACER	$85.20
Westlaw	$92.95
Travel – Taxi Fare	$42.64
Travel – Train Fare	$1,086.00
Totals	**$1,658.79**

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: November 20, 2018, effective as of September 26, 2018 [Docket No. 290]. See Order attached as Exhibit C

(4) SUMMARIZE IN BRIEF THE BENEFITS TO THE ESTATE AND ATTACH SUPPLEMENTS AS NEEDED:

a. Gilbert LLP negotiated with insurers re potential settlement and pursued mediation options;

b. Gilbert LLP drafted its sixth monthly fee statement and drafted its second interim fee application;

c. Gilbert LLP reviewed and addressed insurance-related issues related to the plan of reorganization and addressed objections filed by insurers regarding confirmation.

(5) ANTICIPATED DISTRUBTION 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): Unknown at this time

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

Date: June 25, 2019

/s/ Kami E. Quinn
Kami E. Quinn

EXHIBIT A

GILBERT LLP

1100 New York Avenue, NW
Suite 700
Washington, DC 20005
O 202.772.2200
F 202.772.3333
GilbertLegal.com

June 21, 2019

ACC for Duro Dyne Corporation
c/o Jeffrey A. Liesemer
Caplin & Drysdale, Chartered
One Thomas Circle NW, Suite 1100
Washington, DC 20005

Invoice Number: 11316914
Client Number: 1558

FOR PROFESSIONAL SERVICES RENDERED through May 31, 2019

Re: ACC for Duro Dyne Corporation

Matter Description	Fees	Costs	Total
Insurance Analysis & Recovery	18,464.50	427.05	18,891.55
Retention / Fee Application	76.00	3.10	79.10
Non-Working Travel	3,456.25	1,128.64	4,584.89
Disclosure Statement / Plan of	5,453.50	100.00	5,553.50
Total	**27,450.25**	**1,658.79**	**29,109.04**

TOTAL FEES	$ 27,450.25
TOTAL EXPENSES	$ 1,658.79
TOTAL FEES AND EXPENSES	**$ 29,109.04**

GILBERT LLP

FOR PROFESSIONAL SERVICES RENDERED through May 31, 2019

Insurance Analysis & Recovery

Date	Name	Services	Hours	Amount
5/01/19	Quinn, K.	Communicate with counsel re draft brief.	.20	140.00
5/06/19	Quinn, K.	Correspond with C. Malone and client re scheduling of mediation.	.20	140.00
5/07/19	Quinn, K.	Confer with J. Liesemer and H. Frazier re North River objections to motions to approve settlements.	.20	140.00
5/07/19	Frazier, H.	Review North River objections to motions to approve settlements; confer with J. Liesemer and K. Quinn re same.	.60	345.00
5/08/19	Quinn, K.	Review briefing strategy from Caplin and follow up re same.	.30	210.00
5/08/19	Frazier, H.	Research re judgment reduction as protection for non-settling insurer contribution claims.	1.00	575.00
5/09/19	Frazier, H.	Review mediation brief.	.40	230.00
5/10/19	Quinn, K.	Review and comment on draft mediation brief.	1.00	700.00
5/10/19	Frazier, H.	Review North River objections; further research re adequate protection and judgment reduction.	2.20	1,265.00
5/13/19	Quinn, K.	Review and revise draft brief and H. Frazier comments re same.	.70	490.00
5/13/19	Quinn, K.	Correspond with H. Frazier re preparation for mediation.	.20	140.00
5/13/19	Saunders, K.	Review and revise citations in reply brief in support of insurance settlements.	1.30	318.50
5/13/19	Frazier, H.	Research re standard for fairness re contribution rights when settlement agreements provide for judgment reduction; draft summary of research re same; review response to objections to settlements re same; confer with K. Quinn re same.	5.60	3,220.00
5/14/19	Quinn, K.	Communicate with C. Malone re mediation logistics.	.10	70.00
5/15/19	Frazier, H.	Review plan; review mediation statement; confer with K. Saunders re preparation for mediation; review final response to opposition to settlements.	1.50	862.50
5/16/19	Quinn, K.	Prepare for mediation.	1.60	1,120.00
5/16/19	Seymour, S.	Review and prepare supplemental documents for mediation.	.50	137.50
5/16/19	Saunders, K.	Prepare mediation materials for H. Frazier and K. Quinn.	1.60	392.00

Invoice Number: 11316914
June 21, 2019

Date	Name	Services	Hours	Amount
5/16/19	Foster, G.	Prepare materials for mediation.	1.50	270.00
5/17/19	Quinn, K.	Attend mediation.	6.00	4,200.00
5/17/19	Saunders, K.	Review files re coverage charts; send for attorney review.	.20	49.00
5/17/19	Frazier, H.	Attend mediation with North River.	6.00	3,450.00
		TOTAL CHARGEABLE HOURS	**32.90**	
		TOTAL FEES		**$ 18,464.50**

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Quinn, K.	10.50	700.00	7,350.00
Seymour, S.	.50	275.00	137.50
Saunders, K.	3.10	245.00	759.50
Frazier, H.	17.30	575.00	9,947.50
Foster, G.	1.50	180.00	270.00
TOTALS	**32.90**		**$ 18,464.50**

EXPENSE DETAILS

Date	Description	Task	Amount
5/23/19	Filing Fees - New Jersey Lawyers Fund - Annual Fee - K. Quinn	E112	252.00
5/31/19	Westlaw	E106	92.95
5/31/19	PACER	E106	82.10
	TOTAL EXPENSES		**$ 427.05**
	TOTAL FEES AND EXPENSES FOR MATTER		**$ 18,891.55**

Invoice Number: 11316914
June 21, 2019

FOR PROFESSIONAL SERVICES RENDERED through May 31, 2019

Retention / Fee Application

Date	Name	Services	Hours	Amount
5/06/19	Smith, M.C.	Draft sixth monthly fee application and cover sheet.	.40	76.00
		TOTAL CHARGEABLE HOURS	**.40**	
		TOTAL FEES		**$ 76.00**

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Smith, M.C.	.40	190.00	76.00
TOTALS	**.40**		**$ 76.00**

EXPENSE DETAILS

Date	Description	Task	Amount
5/31/19	PACER	E106	3.10
	TOTAL EXPENSES		**$ 3.10**
	TOTAL FEES AND EXPENSES FOR MATTER		**$ 79.10**

Invoice Number: 11316914
June 21, 2019

FOR PROFESSIONAL SERVICES RENDERED through May 31, 2019

Non-Working Travel

Date	Name	Services	Hours	Amount
5/17/19	Quinn, K.	Travel to / from New York, NY for mediation.	7.00	2,450.00
5/17/19	Frazier, H.	Travel to New York, NY for mediation with North River.	3.50	1,006.25
		TOTAL CHARGEABLE HOURS	**10.50**	
		TOTAL FEES		**$ 3,456.25**

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Quinn, K.	7.00	350.00	2,450.00
Frazier, H.	3.50	287.50	1,006.25
TOTALS	**10.50**		**$ 3,456.25**

EXPENSE DETAILS

Date	Description	Task	Amount
5/17/19	Travel - Train Fare - Kami Quinn / New York NY / Attend Mediation / 05/17/2019	E110	543.00
5/17/19	Travel - Train Fare - Heather Frazier / New York NY / Attend North River Mediation / 05.17.2019	E110	543.00
5/17/19	Travel - Taxi Fare - Kami Quinn / New York NY / Attend Mediation / 05/17/2019	E110	42.64
	TOTAL EXPENSES		**$ 1,128.64**
	TOTAL FEES AND EXPENSES FOR MATTER		**$ 4,584.89**

Invoice Number: 11316914
June 21, 2019

FOR PROFESSIONAL SERVICES RENDERED through May 31, 2019

Disclosure Statement / Plan of Reorganization

Date	Name	Services	Hours	Amount
5/01/19	Saunders, K.	Update case calendar re deadlines for reply to North River objections.	.20	49.00
5/03/19	Quinn, K.	Review US Trustee objection.	.60	420.00
5/20/19	Saunders, K.	Prepare materials for hearing.	1.20	294.00
5/20/19	Frazier, H.	Confer with K. Saunders re documents for upcoming hearing.	.50	287.50
5/22/19	Saunders, K.	Review recent court filings.	.40	98.00
5/22/19	Frazier, H.	Attend telephonic hearing re plan confirmation; confer with K. Quinn re same; review summary re same.	1.30	747.50
5/23/19	Quinn, K.	Listen to recording of Court's ruling.	1.00	700.00
5/24/19	Frazier, H.	Review C. Malone letter to T. Gallagher re Viking Pump; correspondence re hearing re plan.	.40	230.00
5/28/19	Quinn, K.	Communicate with J. Weinberg re hearing.	.10	70.00
5/29/19	Quinn, K.	Telephone calls with J. Leisemer and insurer representatives re plan confirmation.	.60	420.00
5/30/19	Quinn, K.	Participate in client call re Court's ruling.	.80	560.00
5/30/19	Quinn, K.	Confer with H. Frazier re hearing.	.10	70.00
5/30/19	Frazier, H.	Confer with Committee re Judge's order on plan; review revisions re same; confer with Plan Proponents re same.	1.60	920.00
5/31/19	Quinn, K.	Confer with H. Frazier re hearing update.	.10	70.00
5/31/19	Frazier, H.	Review correspondence re plan revisions; attend telephonic status conference re same; confer with K. Quinn re same.	.90	517.50
		TOTAL CHARGEABLE HOURS	**9.80**	
		TOTAL FEES		**$ 5,453.50**

Invoice Number: 11316914
June 21, 2019

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Quinn, K.	3.30	700.00	2,310.00
Saunders, K.	1.80	245.00	441.00
Frazier, H.	4.70	575.00	2,702.50
TOTALS	**9.80**		**$ 5,453.50**

EXPENSE DETAILS

Date	Description	Task	Amount
5/22/19	Conference Call Heather Frazier / Court Hearing via Conference Call / 05/22/2019	E105	50.00
5/31/19	Conference Call Heather Frazier / Status Hearing via Conference call / 05/31/2019	E105	50.00
	TOTAL EXPENSES		**$ 100.00**
	TOTAL FEES AND EXPENSES FOR MATTER		**$ 5,553.50**
	TOTAL FEES AND EXPENSES		**$ 29,109.04**

EXHIBIT B

EXPENSES

May 1, 2019 - May 31, 2019

Date	Description	Amount
05/17/2019	Travel - Airfare	$ 543.00
05/17/2019	Travel - Taxi Fare	$ 42.64
05/17/2019	Travel - Train Fare	$ 543.00
05/22/2019	Conference Call	$ 50.00
05/23/2019	Filing Fees	$ 252.00
05/31/2019	PACER	$ 82.10
05/31/2019	Westlaw	$ 92.95
05/31/2019	PACER	$ 3.10
05/31/2019	Conference Call	$ 50.00
		$ 1,658.79

EXHIBIT C

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY **Caption in Compliance with D.N.J. LBR 9004-1**
THE LAW OFFICE OF JOHN A. FIALCOWITZ John A. Fialcowitz, Esq. 89 Headquarters Plaza North, Suite 1216 Morristown, NJ 07960 (973) 532-7208 (Telephone) (973) 993-1857 (Fax) *Proposed Local Counsel for the Official Committee of Asbestos Claimants*
In re: Duro Dyne National Corp., *et al.*[1] Debtors.

Order Filed on November 20, 2018
by Clerk
U.S. Bankruptcy Court
District of New Jersey

Chapter 11

Case No. 18-27963 (MBK)

(Jointly Administered)

ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF GILBERT LLP AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF ASBESTOS CLAIMANTS, *NUNC PRO TUNC* AS OF SEPTEMBER 26, 2018

The relief set forth on the following pages, numbers two (2) through (3), is hereby ORDERED.

DATED: November 20, 2018

Honorable Michael B. Kaplan
United States Bankruptcy Judge

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtors' 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).

Upon consideration of the application (the "Application") of the Official Committee of Asbestos Claimants (the "Committee") for entry of an order authorizing the employment and retention of Gilbert LLP ("Gilbert") as Special Insurance Counsel to the Committee, *nunc pro tunc* as of September 26, 2018, and upon consideration of the Quinn Declaration in support of the Application; and the Court being satisfied, based on representations made in the Application that (i) Gilbert has no connection with the Debtors, their creditors, any party in interest, their current respective attorneys or professionals, the United States Trustee or any person employed in the office of the United States Trustee, and does not represent any entity having an adverse interest to the Debtors in connection with the Debtors' chapter 11 cases, except as set forth in the Quinn Declaration; (ii) Gilbert is a "disinterested person" as that phrase is defined in § 101(14) of the Bankruptcy Code; (iii) neither Gilbert, nor its professionals, have any connection with the Debtors, their creditors or any other party in interest; (iv) Gilbert's employment is necessary and in the best of the Committee; and (v) the Court having jurisdiction over this matters pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title* 11 of the United States District Court for the District of New Jersey dated September 18, 2012 (Simandle, C.J.); and venue being proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and notice of the Application being sufficient under the circumstances; and it appearing that no other or further notice need be provided; and after due deliberations and sufficient cause appearing therefore:

IT IS HEREBY ORDER THAT:

1. The Application is **GRANTED** as set forth herein.

2. The Committee is authorized to employ and to retain Gilbert LLP to serve as insurance counsel to the Committee in these chapter 11 cases, *nunc pro tunc* as of September 26, 2018.

3. Gilbert LLP shall be compensated in accordance with §§ 330 and 331 of the Bankruptcy Code, the applicable provisions of the Bankruptcy Rules, the Local Rules, and any orders entered in this case governing professional compensation and reimbursement for services rendered and charges and disbursement incurred.

4. The requirement set forth in Local Rule 9013-1(a)(3) that any motion or other request for relief be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Application or otherwise waived.

5. The Committee is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

6. This Court shall retain exclusive jurisdiction to hear and decide any and all disputes related to or arising from the implementation, interpretation and enforcement of this Order.