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

THIRD INTERIM APPLICATION OF YOUNG CONAWAY STARGATT & TAYLOR, LLP FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR PROFESSIONAL SERVICES RENDERED AS COUNSEL TO LAWRENCE FITZPATRICK AS THE LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS FOR THE PERIOD FROM APRIL 1, 2019 THROUGH JULY 31, 2019

SECTION I
FEE SUMMARY

☑ Interim Fee Application (third interim) or ☐ Final Fee Application

	FEES	EXPENSES
TOTAL PREVIOUSLY REQUESTED:	$631,935.00	$24,848.70
TOTAL ALLOWED TO DATE:	$549,648.50	$22,282.68
TOTAL RETAINER[2]:	N/A	N/A
TOTAL HOLDBACK (IF APPLICABLE):	$16,457.30	$0.00
TOTAL PAID OR TO BE PAID TO APPLICANT:	$615,477.70	$24,848.70

FEE TOTALS	$82,286.50
DISBURSEMENTS TOTALS	$2,566.02
TOTAL FEE APPLICATION	$84,852.52

[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. Grear	Partner	10.00	$975.00	$9,750.00
Edwin J. Harron	Partner	27.00	$905.00	$24,435.00
Daniel P. Johnson	Partner	0.00	$510.00	$0.00
James L. Patton, Jr.	Partner	1.40	$1,325.00	$1,855.00
Sharon M. Zieg	Partner	0.00	$785.00	$0.00
Sara Beth A.R. Kohut	Counsel	60.50	$600.00	$36,300.00
Michael S. Neiburg	Counsel	0.00	$600.00	$0.00
Betsy L. Feldman	Associate	0.00	$340.00	$0.00
Brittani Gordon	Associate	0.00	$340.00	$0.00
Jared W. Kochenash	Associate	0.00	$325.00	$0.00
Jordan E. Sazant	Associate	0.00	$340.00	$0.00
Matthew Milana	Law Clerk	0.00	$275.00	$0.00
Casey S. Cathcart	Paralegal	13.00	$285.00	$3,705.00
Lisa M. Eden	Paralegal	21.80	$285.00	$6,213.00
Michelle Smith	Paralegal	0.10	$285.00	$28.50
Total		**133.80**		**$82,286.50**
Attorney Blended Rate: $615.00				
* Reflects 50% rate reduction due to non-working travel time.				

SECTION II
SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
(B001) Case Administration	9.80	$2,855.00
(B002) Court Hearings	8.10	$4,437.50
(B008) Meetings	1.30	$1,108.00
(B009) Stay Relief Matters	0.00	2$0.00
(B011) Other Adversary Proceedings	0.00	$0.00
(B012) Plan and Disclosure Statement	71.80	$54,117.00
(B017) Retention of Professionals/Fee Issues	28.90	$13,735.50
(B018) Fee Application Preparation	11.20	$4,413.50
(B019) Travel (billed at 50% rate reduction)	2.70	$1,620.00

SERVICE TOTALS	**133.80**	**$82,286.50**

SECTION III
SUMMARY OF DISBURSEMENTS

DESCRIPTION	**AMOUNT**
AP Outside Scanning Services	$0.00
Air/Rail Travel	$625.00
Car/Bus/Subway Travel	$41.30
Computerized Legal Research	$604.48
Court Costs	$0.00
Court Reporter	$0.00
Deposition/Transcript	$0.00
Docket Retrieval / Search	$349.80
Facsimile	$0.00
Federal Express	$92.75
Filing Fee	$0.00
Hotel	$0.00
Mileage	$0.00
Outside Litigation Support	$0.00
Oversized Copies	$0.00
Parking	$26.00
Postage	$47.20
Reproduction Charges	$360.60
Staff Overtime	$0.00
Teleconference / Video Conference	$404.33
Travel Meals	$0.00
Working Meals	$14.62
TOTAL DISBURSEMENTS	**$2,566.08**

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

Date: August 15, 2019

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

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:	Chapter 11
Duro Dyne National Corp., *et al.*[1]	Case No. 18-27963 (MBK)
Debtors.	(Jointly Administered)
	Hearing Date: September 26, 2019 at 10:00 a.m. **Objection Deadline: September 19, 2019 at 4:00 p.m.**

THIRD INTERIM APPLICATION OF YOUNG CONAWAY STARGATT & TAYLOR, LLP FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR PROFESSIONAL SERVICES RENDERED AS COUNSEL TO LAWRENCE FITZPATRICK AS THE LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS FOR THE PERIOD FROM APRIL 1, 2019 THROUGH JULY 31, 2019

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 third interim application (the "Application") for allowance of compensation and reimbursement of expenses for the period April 1, 2019 through July 31, 2019 (the "Interim Period"). By this Application, YCST seeks allowance and payment of compensation in the amount of $82,286.50 for services rendered by YCST during the Interim

[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).

Period. YCST also seeks allowance and reimbursement of actual and necessary expenses in the amount of $2,566.08 for the Interim 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.

SUMMARY OF SERVICES

6. During the Interim 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.

7. The Applicant has maintained contemporaneous records of the time expended for the performance of the professional services during the Interim Period. The documentation reflecting the services performed, the time expended, and current hourly rate is set forth in **Exhibits A1-A4** annexed hereto.

8. The professional services that YCST performed as counsel to the FCR during the Interim Period included, but were not limited to[2], the following:

a. **Case Administration (B001)** (9.80 hours; $2,855.00). This category includes tasks which were necessary in the general administration of these Chapter 11 Cases including maintaining case calendars, file maintenance, reviewing documents and correspondence, and other miscellaneous tasks.

b. **Court Hearings (B002)** (8.10 hours; $4,437.50). This category includes time attending and preparing for mediation on May 17, 2019 and for preparing and attending the hearings on May 22, 2019 and June 7, 2019 regarding insurance settlements and confirmation issues. Time was expended preparing for, attending, and participating in the hearings held on December 10, 2018 and January 31, 2019. Additional time was spent reviewing recent hearing transcripts.

c. **Plan and Disclosure Statement (B012)** (71.80 hours; $54,117.00). This category includes time spent reviewing and revising plan documents. Time was also expended drafting proposed findings of fact and conclusions of law for the confirmation hearing. Time was also spent preparing for and attending mediation

[2] This summary is only intended to highlight the general categories of services performed by YCST as counsel to the FCR. It is not intended to set forth each and every item of professional services which YCST performed. In addition, YCST has not included summaries for categories in which 3 hours or less of time has been billed.

with North River. Additional time was spent researching, drafting, and revising the response brief regarding the U.S. Trustee's FCR appointment appeal.

d. **Retention of Professionals/Fee Issues (B017)** (28.90 hours; $13,735.50). This category includes time spent reviewing the U.S. Trustee's reply brief regarding Mr. Fitzpatrick's appointment. Time was also expended drafting a letter regarding supplemental authority for appeal of the FCR appointment order. Additional time was spent preparing Mr. Fitzpatrick's second quarterly fee statement and monthly fee statements for the months of March-June 2019.

e. **Fee Application Preparation (B018)** (11.20 hours; $4,413.50). This category includes time spent preparing YCST's second quarterly fee statement and monthly fee statements for the months of for the months of March-June 2019.

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

10. This is YCST's third interim application. YCST has made no prior or other application to this or any other Court for the relief requested herein. YCST has and will continue to perform additional necessary services subsequent to July 31, 2019, for which YCST will file subsequent fee applications.

EXPENSES INCURRED

11. YCST incurred out-of-pocket expenses during the Interim Period in the amount of $2,566.08, which expenses are reasonable and necessary in connection with the performance of the legal services described herein. A detailed description of the expenses incurred is set forth in **Exhibits B1-B4** annexed hereto.

RELIEF REQUESTED

12. 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 of April 1, 2019 through July 31, 2019.

13. 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.

14. 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

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

(Continued on Next Page)

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 for the period from April 1, 2019 through July 31, 2019, in the amount of (i) $82,286.50 as compensation for necessary professional services rendered, and (ii) $2,566.08 for actual and necessary expenses incurred, for a total of $84,852.58; (b) that the Debtors are authorized and directed to pay YCST the outstanding amount of such sums; and (c) for such other and further relief as may be just and proper.

Dated: August 15, 2019

Respectfully submitted,

/s/ Edwin J. Harron

Edwin J. Harron, Esq. (New Jersey Bar No. 040701995)
Sara Beth A.R. Kohut, Esq. (Admitted *Pro Hac Vice*)
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
skohut@ycst.com

Counsel to the Future Claimants' Representative