

**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 THIRD INTERIM APPLICATION OF  
LAWRENCE FITZPATRICK AS THE LEGAL REPRESENTATIVE FOR  
FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS FOR COMPENSATION  
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD FROM APRIL 1, 2019 THROUGH JULY 31, 2019**

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 Third Interim Application of Lawrence Fitzpatrick as the Legal Representative for Future Asbestos Personal Injury Claimants for Services Rendered and Reimbursement of Expenses for the Period From April 1, 2019 Through July 31, 2019

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Upon the *Third Interim Application of Lawrence Fitzpatrick as the Legal Representative for Future Asbestos Personal Injury Claimants for Services Rendered and Reimbursement of Expenses for the Period From April 1, 2019 Through July 31, 2019* (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,

**IT IS HEREBY ORDERED THAT:**

1. The Application is granted as provided herein.
2. The Future Claimants’ Representative is hereby allowed a third interim allowance of compensation for services rendered in the sum of \$23,972.00 and reimbursement of expenses incurred in the sum of \$43.70 for the period from April 1, 2019 Through July 31, 2019.
3. The Debtors are authorized and directed to make payment of the outstanding amount of such sums to the Future Claimants’ Representative within ten (10) days of the entry of this Order.

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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)

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