

**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

Ref. Docket Nos. 217, 249, 269, and 759

**THIRD SUPPLEMENTAL DECLARATION OF EDWIN J. HARRON
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2014(a)**

I, Edwin J. Harron, Esquire, hereby state as follows:

1. I am a partner in the firm of Young Conaway Stargatt & Taylor, LLP (“Young Conaway” or the “Firm”), Rodney Square, 1000 North King Street, Wilmington, Delaware 19801. I am admitted to practice in, and a member in good standing of, the Bars of the State of Delaware, the State of New Jersey, and the State of New York. I am admitted to practice before the Supreme Court of the United States, the United States Court of Appeals for the Third Circuit, and the United States District Courts for the District of Columbia, the District of Delaware, the Southern District of New York, and the Western District of Pennsylvania. I am authorized to make this supplemental declaration (the “Third Supplemental Declaration”) on behalf of Young Conaway.

2. On October 23, 2018, Young Conaway filed the *Declaration of Edwin J. Harron in Support of Application for Order Authorizing the Future Claimants’ Representative to Retain and Employ Young Conaway Stargatt & Taylor, LLP and Statement as Counsel to Future Claimants’ Representative Pursuant to Federal Rule of Bankruptcy Procedure 2014(a)* [Docket No.

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).

217] (the “Initial Declaration”). On November 5, 2018, Young Conaway filed the *Supplemental Declaration of Edwin J. Harron in Support of Application for Order Authorizing the Future Claimants’ Representative to Retain and Employ Young Conaway Stargatt & Taylor, LLP as His Attorneys* [Docket No. 249]. Young Conaway’s employment was effective as of September 7, 2018 pursuant to an order entered by this Court on November 13, 2018 [Docket No. 269].

3. On June 21, 2019, Young Conaway filed the *Second Supplemental Declaration of Edwin J. Harron Pursuant to Federal Rule of Bankruptcy Procedure 2014(a)* [Docket No. 759].

4. Young Conaway has continued to monitor any potential conflicts that may arise with respect to its representation of Lawrence Fitzpatrick, the legal representative for future asbestos claimants (the “Future Claimants’ Representative”), since the filing of the Initial Declaration and all subsequent supplemental declarations.

5. This Third Supplemental Declaration discloses Young Conaway’s retention as counsel to the legal representative for future claimants in the pending bankruptcy case of In re The Fairbanks Company, Case No. 18-41768 (PWB) (Bankr. N.D. Ga.). This matter is wholly unrelated to Young Conaway’s representation of the Future Claimants’ Representative in this case but is being disclosed out of an abundance of caution.

6. Young Conaway will periodically review its files during the pendency of this case to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, Young Conaway will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration as required by Bankruptcy Rule 2014(a).

7. Except as specifically disclosed in the Initial Declaration and all subsequent supplemental declarations, to the best of my knowledge neither I, the Firm, nor any partner, counsel or associate thereof, insofar as I have been able to ascertain, has any connection with the above-captioned Debtors, their creditors, the Future Claimants' Representative, or any other parties in interest, or their respective attorneys and accountants, or any United States Bankruptcy Judge in this district, or the Office of the United States Trustee for such district or any employee thereof.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of August, 2019.

/s/ Edwin J. Harron
Edwin J. Harron (Del. Bar No. 3396)
Young Conaway Stargatt & Taylor, LLP
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
(302) 571-6600