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Debtors-in-Possession*

**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)

**NOTICE OF MOTION FOR ENTRY OF A FOURTH ORDER EXTENDING THE
DEBTORS' TIME TO ASSUME OR REJECT UNEXPIRED
LEASES OF NONRESIDENTIAL REAL PROPERTY**

PLEASE TAKE NOTICE that on **September 19, 2019 at 10:00 a.m. (ET)**, or as soon thereafter as counsel may be heard, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), by and through their undersigned counsel, shall move (the “Motion”) before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, in courtroom #8 of the United States Bankruptcy Court for the District of New Jersey, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for entry of a fourth order, substantially in the form submitted herewith, further extending the Debtors’ time to assume or reject unexpired leases of nonresidential real property.

PLEASE TAKE FURTHER NOTICE that the Debtors shall rely upon the Application in support of the Motion filed herewith. No brief is necessary as no novel issues of fact or law are presented by the Motion. A proposed form of order is also submitted herewith.

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).

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed with the Clerk of the Court together with proof of service thereof, and served so as to be **actually received** **no later than September 12, 2019 at 5:00 p.m. (ET)** by counsel to the Debtors, Lowenstein Sandler LLP, One Lowenstein Drive, Roseland, New Jersey 07068, Attn.: Jeffrey D. Prol.

PLEASE TAKE FURTHER NOTICE that objections to the Motion, if any, must: (a) be in writing; (b) comply with the Bankruptcy Rules and the Local Rules of the United States Bankruptcy Court for the District of New Jersey; and (c) state with particularity the legal and factual basis for the objection.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served in accordance with this notice, it may not be considered by the Bankruptcy Court. In the event no objections are filed, the relief requested in the Motion may be granted without a hearing. Oral argument is requested only in the event an objection is filed.

Dated: August 27, 2019

Respectfully submitted,

Lowenstein Sandler LLP

/s/ Jeffrey D. Prol

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