

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

MAREMONT CORPORATION, et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-10118 (KJC)

(Joint Administration Requested)

**Related to Docket Nos. 3, 4, 6 - 9**

**Hearing Date: January 23, 2019 at 11:30 a.m.**

**NOTICE OF HEARING ON FIRST-DAY MOTIONS**

TO: (i) the U.S. Trustee; (ii) the firms listed on the Debtors' consolidated list of twenty-five (25) law firms representing the largest numbers of asbestos plaintiffs asserting claims against the Debtors; (iii) the creditors listed on the Debtors' consolidated list of creditors holding unsecured claims against the Debtors other than asbestos-related claims; (iv) counsel to Meritor, Inc.; (v) counsel to the prepetition Asbestos Claimants Committee; (vi) counsel to the prepetition Future Claimants' Representative; (vii) the United States Attorney's Office for the District of Delaware; (viii) the Internal Revenue Service; (ix) the United States Department of Justice; and (x) any party that has requested notice pursuant to Bankruptcy Rule 2002.

**PLEASE TAKE NOTICE** that on January 22, 2019, the above-captioned debtors and debtors in possession (the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors are continuing to operate their businesses and manage their properties as Debtors and Debtors in Possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that the Debtors will present the Motions and related pleadings set forth below at a hearing on January 23, 2019 at 11:30 a.m. (Prevailing Eastern Time) before the Honorable Kevin J. Carey, at the United States Bankruptcy Court for the District of Delaware, located at 824 Market Street, 5<sup>th</sup> Floor, Courtroom No. 5, Wilmington, Delaware 19801.

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<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal taxpayer identification number, are: Maremont Corporation (6138); Maremont Exhaust Products, Inc. (9284); AVM, Inc. (9285); and Former Ride Control Operating Company, Inc. (f/k/a ArvinMeritor, Inc., a Delaware corporation) (9286). The mailing address for each Debtor for purposes of these chapter 11 cases is 2135 West Maple Road, Troy, MI 48084.

**Declaration in Support**

1. Declaration of Carl D. Anderson, II in Support of First Day Pleadings (Docket No. 3, filed January 22, 2019)

**Administrative Motions**

2. Debtors' Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief (Docket No. 4, filed January 22, 2019)

3. Debtors' Application for Entry of an Order Appointing Donlin, Recano and Company, Inc. as Claims and Noticing Agent, *Nunc Pro Tunc* to the Petition Date (Docket No. 6, filed January 22, 2019)

**First-Day Motions**

4. Debtors' Motion for Entry of an Order (I) Authorizing the Filing of a List of (A) the Twenty-Five Law Firms Representing the Largest Numbers of Asbestos Plaintiffs Asserting Claims Against the Debtors and (B) the Unsecured Creditors of the Debtors, (II) Authorizing the Listing of Addresses of Counsel for Asbestos Claimants in Creditor Matrix in Lieu of Claimants' Addresses, (III) Approving Notice Procedures for Such Claimants, and (IV) Granting Related Relief (Docket No. 7, filed January 22, 2019)

5. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Continue to Use Their Existing Cash Management System, Including Existing Bank Accounts and Business Forms, (II) Authorizing the Continuation of Certain Intercompany Transactions, (III) Waiving the Requirements of Section 345(b) of the Bankruptcy Code on an Interim Basis, and (IV) Granting Related Relief (Docket No. 8, filed January 22, 2019)

6. Debtors' Motion for Entry of an Order (I) Scheduling Combined Hearing to Consider Approval of Disclosure Statement and Confirmation of Prepackaged Plan, (II) Establishing the Plan and Disclosure Statement Objection Deadline and Related Procedures, (III) Approving the Solicitation Procedures and Forms of Ballots, (IV) Approving the Form and Manner of Notice of the Combined Hearing, Objection Deadline, and Notice of Commencement, (V) Conditionally Directing that a Meeting of Creditors Not Be Convened, (VI) Conditionally Extending Deadline to File Schedules and Statements, and (VII) Granting Related Relief (Docket No. 9, filed January 22, 2019)

**PLEASE TAKE FURTHER NOTICE** that copies of all of the First Day Motions will be mailed to you subsequent to the Hearing, and are currently available on the website of the Debtors' proposed claims and noticing agent, Donlin, Recano & Company, Inc., dedicated to these chapter 11 cases, <https://www.donlinrecano.com/Clients/mc/Index>, or on the Court's website, [www.deb.uscourts.gov](http://www.deb.uscourts.gov).

Dated: January 22, 2019

SIDLEY AUSTIN LLP  
James F. Conlan  
Andrew F. O'Neill  
Allison Ross Stromberg  
Blair M. Warner  
One South Dearborn Street  
Chicago, Illinois 60603  
Telephone: (312) 853-7000  
Facsimile: (312) 853-7036

-and-

COLE SCHOTZ P.C.

/s/ J. Kate Stickles

Norman L. Pernick (No. 2290)  
J. Kate Stickles (No. 2917)  
500 Delaware Avenue, Suite 1410  
Wilmington, Delaware 19801  
Telephone: (302) 652-3131  
Facsimile: (302) 652-3117

PROPOSED ATTORNEYS FOR THE DEBTORS  
AND DEBTORS IN POSSESSION