

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

In re:

MAREMONT CORPORATION, et al.,¹

Debtors.

For solicitation purposes only. The Prospective Debtors have not yet filed chapter 11 cases.

**INSTRUCTION LETTER FOR LAW FIRMS REPRESENTING
HOLDERS OF CLASS 4 ASBESTOS PERSONAL INJURY CLAIMS**

This letter (this “Instruction Letter”) outlines the options for distributing Solicitation Packages² to your law firm’s clients who are Holders of Class 4 Asbestos Personal Injury Claims. This Instruction Letter provides specific instructions on the steps you must take as counsel if: (1) you do not represent a Holder; (2) you are authorized to submit a Master Ballot on behalf of your clients holding Class 4 Asbestos Personal Injury Claims; (3) you are not authorized to submit a Master Ballot and would like to request that the Claims, Notice and Balloting Agent send Solicitation Packages, including Ballots, directly to your clients holding Class 4 Asbestos Personal Injury Claims; (4) you are requesting that the Claims, Notice and Balloting Agent provide you with Solicitation Packages in order for you to provide such Solicitation Packages, including Ballots, to your clients; or (5) you will submit a Master Ballot on behalf of certain clients holding Class 4 Asbestos Personal Injury Claims and will also direct the Claims, Notice and Balloting Agent to send to certain other clients Solicitation Packages with Ballots, directly or indirectly. You may also direct the Claims, Notice and Balloting Agent to provide to your clients a Solicitation Package without a Ballot for informational purposes by making an informational service request, as noted below.

Option 1: No Solicitation Required. If you do not represent a Holder of a Class 4 Asbestos Personal Injury Claim, no further action is required.

Option 2: Master Ballot Solicitation Method. If you have authority under applicable bankruptcy and/or non-bankruptcy law to vote on behalf of a Holder or Holders of an Asbestos Personal Injury Claim and you intend to exercise such authority, you must record the votes on the Plan for each of your clients on the enclosed Master Ballot following the specific instructions provided in the Master Ballot. If you also wish to provide your clients with a Solicitation

¹ The Prospective Debtors together with the last four digits of each Prospective 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 Prospective Debtor is 2135 West Maple Road, Troy, MI 48084.

² All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Plan.

Package for informational purposes (without a Ballot included), you must submit an informational service request to the Claims, Notice and Balloting Agent, as set forth below.

Option 3: Individual Ballot Direct Solicitation Method. If you (a) are unable to certify that you have the authority to vote on the Plan on behalf of a client that is a Holder of a Class 4 Asbestos Personal Injury Claim, or (b) wish to have any Holder of an Asbestos Personal Injury Claim represented by you cast his or her own Ballot to vote on the Plan, you must furnish the Claims, Notice and Balloting Agent with the first name, last name, last four digits of the injured party's Social Security number (U.S. Holders only) and address (the "Client Information") of each such Holder by December 17, 2018; provided that, if you represent more than twenty (20) such Holders, such Client Information must be provided in electronic format, preferably in Microsoft Excel format via DRCVote@DonlinRecano.com with the subject line "Maremont Vote"; provided further, that if you represent more than twenty (20) such Holders and it is not possible to provide such information in an electronic format, such names and addresses must be sent to the Claims, Notice and Balloting Agent so that they are actually received by December 13, 2018. You may also request that the Claims, Notice and Balloting Agent include in the Solicitation Package a letter from your law firm recommending whether to vote to accept or reject the Plan. If you do so, you must furnish any such letter to the Claims, Notice and Balloting Agent by December 17, 2018.

Option 4: Individual Ballot Indirect Solicitation Method. If you do not have the authority to vote any of your clients' Class 4 Asbestos Personal Injury Claims, or you have such authority but do not intend to exercise it, to the extent you would like the Claims, Notice and Balloting Agent to provide you with Solicitation Packages for one or more of your clients that you will provide to such clients directly you must: (a) provide a delivery address for the Solicitation Packages and the number of packages you need to the Claims, Notice and Balloting Agent in electronic format, preferably in Microsoft Excel format via DRCVote@DonlinRecano.com with the subject line "Maremont Vote"; (b) submit a client list to the Claims, Notice and Balloting Agent on or before December 13, 2018, with the Client Information for each client holding Class 4 Asbestos Personal Injury Claims to which you will directly send Ballots; (c) deliver the Solicitation Packages to such clients holding Class 4 Asbestos Personal Injury Claims within three (3) Business Days after receipt; and (d) within three (3) Business Days of delivery of such Solicitation Packages to such clients holding Class 4 Asbestos Personal Injury Claims, provide the Claims, Notice and Balloting Agent with an affidavit evidencing such service. The affidavit of service need not list each client individually; rather, the affidavit need state only the following: (i) that service of the Solicitation Packages was completed; (ii) the date(s) on which such service took place; and (iii) that you have provided, or will provide (on or before December 13, 2018), a client list to the Claims, Notice and Balloting Agent.

Option 5: Hybrid Solicitation Method. If you have the authority under applicable bankruptcy and/or non-bankruptcy law to vote some, but not all, of your clients' Class 4 Asbestos Personal Injury Claims, you may have the following options: (a) for those clients who are Holders of Class 4 Asbestos Personal Injury Claims for which you have the authority to cast a vote on the Plan, you may submit a Master Ballot pursuant to the instructions under Option 2; and (b) for those clients who are Holders of Class 4 Asbestos Personal Injury Claims for which you do not have authority to cast a vote on the Plan, (i) you must follow the instructions in

Option 3 for those clients for which you would like the Claims, Notice and Balloting Agent to send Solicitation Packages to such clients directly, and/or (ii) you must follow the instructions included in Option 4 for those clients to which you would like to send Solicitation Packages yourself. If you wish to provide your clients with Solicitation Packages for informational purposes (without a Ballot included), you must make an informational service request to the Claims, Notice and Balloting Agent, as set forth below.

Informational Service Request:

You may request that the Claims, Notice and Balloting Agent serve copies of the Solicitation Package (without Ballots) on your clients for informational purposes. To the extent you would like to make an information service request of the Claims, Notice and Balloting Agent, you must furnish the Claims, Notice and Balloting Agent with the Client Information of each such Holder, as well as a copy of any letter or other communication to your clients that you would like to include, by December 17, 2018.