

EXHIBIT A

HARRON DECLARATION

(Attached)

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

In re:

MAREMONT CORPORATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 19-10118 (KJC)

(Jointly Administered)

**DECLARATION OF EDWIN J. HARRON IN SUPPORT OF APPLICATION
FOR ENTRY OF ORDER AUTHORIZING THE PROPOSED FUTURE CLAIMANTS'
REPRESENTATIVE TO RETAIN AND EMPLOY YOUNG CONAWAY
STARGATT & TAYLOR, LLP, AND STATEMENT AS COUNSEL TO
PROPOSED FUTURE CLAIMANTS' REPRESENTATIVE 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”), Rodney Square, 1000 North King Street, Wilmington, Delaware 19801. I am admitted to practice before the United States Court of Appeals for the Third Circuit; the United States District Courts for the District of Columbia, the District of Delaware, the District of New Jersey, the Southern District of New York, and the Western District of Pennsylvania; and the Supreme Courts of the States of Delaware, New Jersey, New York, and the District of Columbia.²

2. I am authorized to make this declaration (this “Declaration”) on behalf of Young Conaway. This Declaration is submitted pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure in support of the application of James L. Patton, Jr., in his capacity as the

¹ 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.

² I assumed inactive status with the Bar of the District of Columbia in 2017.

proposed representative (the “Future Claimants’ Representative”) for future asbestos-related claimants (the “Future Claimants”) in the above-captioned chapter 11 cases (these “Chapter 11 Cases”), for entry of an order authorizing the employment of Young Conaway as counsel to the Future Claimants’ Representative (the “YCST Application”), *nunc pro tunc* to the Petition Date.

DISINTERESTEDNESS OF PROFESSIONALS

3. Young Conaway has conducted searches in its conflicts database to identify relationships with the Debtors, creditors, and other parties-in-interest (or potential parties-in-interest) in these Chapter 11 Cases as identified in Schedule 1. Except as set forth in this declaration, to the best of our knowledge, Young Conaway (a) does not hold or represent any adverse interest in connection with the matters upon which Young Conaway is to be engaged, and (b) is disinterested.

4. Prior to the Petition Date, the Debtors engaged Mr. Patton to act as a pre-petition legal representative for future claimants for the purpose of representing the interests of Future Claimants in attempting to achieve a global resolution of the Debtors’ asbestos liabilities. In connection with his pre-petition representation of Future Claimants, Mr. Patton retained Young Conaway to act as his counsel. During the course of its pre-petition representation of Mr. Patton, Young Conaway developed an understanding of the Debtors, their corporate history, financial posture, asbestos liabilities, and represented and advised Mr. Patton in connection with negotiating the Plan, as well as the terms of the related trust agreement and trust distribution procedures. The retention of a law firm other than Young Conaway as counsel to the Future Claimants’ Representative would be inefficient and require the Debtors’ estates to incur additional costs as the law firm would have to perform duplicative work to learn about and

become familiar with, *inter alia*, the Debtors, their corporate history, financial posture, asbestos liabilities, insurance settlements and the terms of the Plan.

5. Since the Petition Date, the Future Claimants' Representative and Young Conaway as his counsel have, among other things, continued to engage in discussions with the Debtors and other parties in interest in connection with the Plan and the administration of these cases. Accordingly, the FCR Appointment Motion seeks the appointment of the Future Claimants' Representative *nunc pro tunc* to the Petition Date. Young Conaway has assisted the Future Claimants' Representative in his efforts since the Petition Date such that it is appropriate for Young Conaway's retention to be approved *nunc pro tunc* to the Petition Date.

6. Young Conaway is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, in that Young Conaway, its partners, counsel and associates:

- (a) are not creditors, equity security holders or insiders of the Debtors;
- (b) have not been, within two years before the date of the filing of the Debtors' chapter 11 petition, directors, officers or employees of the Debtors; and
- (c) do not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason.

7. I am not related, and to the best of my knowledge, no bankruptcy attorney at Young Conaway is related, to any United States Bankruptcy Judge in this district or to the U.S. Trustee for this district or any employee thereof.

8. Young Conaway is a general practice, litigation-oriented firm that maintains national, regional and local practices in the areas of corporate, bankruptcy, commercial, real estate, personal injury, employment and environmental law.

9. Young Conaway was selected by the Future Claimants' Representative because of Young Conaway's extensive experience and knowledge in the field of debtors' and creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code. Moreover, Young Conaway has substantial experience in bankruptcy cases affecting the rights of mass-tort asbestos claimants:

(a) Young Conaway represented the legal representative for future claimants in the following asbestos bankruptcy cases that reached confirmation:³ In re Yarway Corp., Ch. 11 Case No. 13-11025 (BLS) (Bankr. D. Del. 2013); In re Metex Mfg. Corp., Ch. 11 Case No. 12-14554 (BRL) (Bankr. S.D.N.Y. 2012); In re United Gilsonite Labs., Ch. 11 Case No. 11-2032 (Bankr. M.D. Pa. 2011); In re Specialty Prods. Holding Corp., Ch. 11 Case No. 10-11780 (JKF) (Bankr. D. Del. 2010); In re Leslie Controls, Inc., Ch. 11 Case No. 10-12199 (CSS) (Bankr. D. Del. 2010); In re Durabla Mfg. Co., Ch. 11 Case No. 09-14415 (MFW) (Bankr. D. Del. 2009); In re Porter-Hayden Co., Ch. 11 Case No. 02-54152-SD (Bankr. D. Md. 2006); In re The Flintkote Co., Ch. 11 Case No. 04-11300 (JKF) (Bankr. D. Del. 2004); In re Mid-Valley, Inc., Ch. 11 Case No. 03-35592 (JKF) (Bankr. W.D. Pa. 2003); In re ACandS Inc., Ch. 11 Case No. 02-12687 (RJN) (Bankr. D. Del. 2002); In re Kaiser Aluminum Corp., Ch. 11 Case No. 02-10429 (JKF) (Bankr. D. Del. 2002); In re N. Am. Refractories Co., Ch. 11 Case No. 02-20198 (JKF) (Bankr. W.D. Pa. 2002); In re Glob. Indus. Techs., Inc., Ch. 11 Case No. 02-21626 (JKF)

³ Mr. Patton was the Future Claimants' Representative in the bankruptcy cases of In re Yarway Corp., In re United Gilsonite Labs., and In re Leslie Controls, Inc.

(Bankr. W.D. Pa. 2002); In re Federal-Mogul Glob. Inc., Ch. 11 Case No. 01-10578 (Bankr. D. Del. 2001); In re USG Corp., Ch. 11 Case No. 01-2094 (RJN) (Bankr. D. Del 2001); In re Armstrong World Indus., Inc., Ch. 11 Case No. 00-4471 (Bankr. D. Del. 2000); In re The Babcock & Wilcox Co., Ch. 11 Case No. 00-10092 (Bankr. E.D. La. 2000); In re Owens Corning, Ch. 11 Case No. 00-3837 (Bankr. D. Del. 2000); In re Pittsburgh Corning Corp., Ch. 11 Case No. 00-22876 (JKF) (Bankr. W.D. Pa. 2000); and In re The Celotex Corp., Ch. 11 Case No. 90-100016-8B1 (Bankr. M.D. Fla. 1996). In addition, Young Conaway represented the legal representative for future claimants exposed to tetrochloroethylene in In re Met-Coil Sys. Corp., Ch. 11 Case No. 03-12676 (MFW) (Bankr. D. Del. 2003).

(b) Young Conaway currently represents the legal representative for future claimants in the pending bankruptcy cases of In re Duro Dyne Nat'l Corp., Ch. 11 Case No. 18-27963 (MBK) (Bankr. D. N.J. 2018), In re Bestwall LLC, Ch. 11 Case No. 17-31795 (LTB) (Bankr. W.D.N.C. 2017), In re Kaiser Gypsum Co., Ch. 11 Case No. 16-31602 (JCW) (Bankr. W.D.N.C. 2016), In re Rapid-Am. Corp., Ch. 11 Case No. 13-10687 (SMB) (Bankr. S.D.N.Y. 2013), and In re Sepco Corp., Ch. 11 Case No. 16-50058 (AMK) (Bankr. N.D. Ohio 2016).⁴

⁴ A motion is pending to appoint Mr. Patton as the future claimants' representative in the case of In re The Fairbanks Co., Ch. 11 Case No. 18-41768-PWB (Bankr. N.D. Ga.). If appointed, Mr. Patton will seek to retain Young Conaway as his counsel in that matter.

(c) Young Conaway represents the legal representative for future claimants in connection with asbestos personal injury settlement trusts⁵ established from the ACandS, Babcock & Wilcox, Celotex, Federal-Mogul, Kaiser Aluminum, Porter-Hayden, Pittsburgh Corning, Flintkote, SPHC, UGL, Durabla, Leslie Controls, APG, NARCO, Metex, and Yarway bankruptcy cases. In addition, Young Conaway represents the legal representative for future claimants in connection with the asbestos and silica settlement trusts established from the Mid-Valley (DII Industries, LLC) bankruptcy case, the legal representative for future claimants in connection with the asbestos settlement trust established from the bankruptcy case of In re Quigley Co., Ch. 11 Case No. 04-15739 (SMB) (Bankr. S.D.N.Y. 2004), and the legal representative for future claimants in connection with the Met-Coil TCE Trust. Young Conaway also represents the State Insulation Corporation Asbestos Personal Injury Trust, of which I serve as the trustee.

(d) Young Conaway represented the debtor in the asbestos-related chapter 11 case of In re Fuller-Austin Insulation Co., Ch. 11 Case No. 98-2038 (JJF) (Bankr. D. Del. 1998), for which a plan was confirmed in 1998.

10. In addition, Young Conaway and certain of its partners, counsel and associates may have in the past represented, may currently represent, and likely in the future will represent parties in interest of the Debtors in connection with matters unrelated to the Debtors and these cases.

⁵ Mr. Patton is the Future Claimants' Representative for the Celotex, UGL, Leslie Controls, and Yarway trusts.

11. Young Conaway represented AIU Insurance Company, one of the Debtors' excess insurance carriers, in connection with an environmental insurance coverage dispute with Maremont Corporation that included asbestos issues. The matter was dismissed without prejudice and Young Conaway's representation concluded and its file was closed prior to Mr. Patton's or Young Conaway's involvement in this matter.

12. Within the past two years, Young Conaway represented Mt. McKinley Insurance Company in an insurance coverage dispute that addressed environmental (including asbestos) issues unrelated to these cases. The matter has concluded and Young Conaway's files on it have been closed.

13. Young Conaway represents Wilmington Trust Company and Wilmington Trust, N.A. in various matters involving trusts that are unrelated to these cases and that do not involve asbestos matters. Young Conaway is counsel to certain future claimants' representatives for asbestos trusts for which Wilmington Trust Company serves as the Delaware statutory trustee.

14. Young Conaway represents Alvarez & Marsal Canada Inc. in its capacity as Foreign Representative in a Chapter 15 proceeding. Young Conaway also is counsel to Alvarez & Marsal CRF Management, LLC in certain corporate litigation.

15. Young Conaway represented JP Morgan Chase Bank, N.A., as a creditor in a bankruptcy case that was closed within the past two years.

16. Young Conaway serves as counsel to the future claimants' representative in other pending bankruptcy cases and asbestos settlement trusts where members of the pre-petition ad hoc committee of asbestos claimants serve on a committee and where the proposed trustee serves as the trustee.

17. None of the representations described above are materially adverse to the interests of the estates, any class of creditors or equity security holders, the Future Claimants or the Future Claimants' Representative. Thus, Young Conaway is disinterested and may act as counsel to the Future Claimants' Representative notwithstanding that it represents creditors in unrelated matters.

18. Neither I, Young Conaway, nor any partner, counsel, or associate thereof, insofar as I have been able to ascertain, represent any interest materially adverse either to the Future Claimants' Representative or the Debtors herein or their estates in the matters upon which Young Conaway is to be engaged.

19. Young Conaway will periodically review its files during the pendency of these Chapter 11 Cases 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 Bankruptcy Rule 2014(a) requires.

PROFESSIONAL COMPENSATION

20. As described in the FCR Appointment Motion and the YCST Application, the Debtors provided to Young Conaway a retainer of \$100,000 (subsequently increased to \$200,000) to pay the pre-petition fees and expenses of the Future Claimants' Representative, Young Conaway, and his claims advisor, Ankura Consulting Group, LLC, incurred while conducting due diligence of the Debtors and their asbestos-related personal injury claims and engaging in negotiations towards a potential plan of reorganization. After reconciling, the balance of the retainer remaining is \$107,000 as of the Petition Date. Attached as Exhibit B to the YCST Application is a summary of the pre-petition invoices and payments.

21. Young Conaway intends to apply for compensation for professional services rendered in connection with these Chapter 11 Cases, subject to approval of this Court and in compliance with applicable provisions of the Bankruptcy Code, this Court’s Local Rules and any orders of this Court, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges that Young Conaway incurs. Young Conaway will charge hourly rates for its services in these cases that are consistent with the rates it charges in bankruptcy and non-bankruptcy matters of this type. These hourly rates are subject to periodic adjustments, without further notice to the Court or any other entity, to reflect economic and other conditions. The principal attorneys and paralegals designated to represent the Future Claimants’ Representative and their current standard hourly rates are:

Robert S. Brady (Partner)	\$975 per hour
Edwin J. Harron (Partner)	\$905 per hour
Sara Beth A.R. Kohut (Counsel)	\$600 per hour
Casey S. Cathcart (Paralegal)	\$285 per hour
Lisa M. Eden (Paralegal)	\$285 per hour

The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Other attorneys and paralegals may from time to time serve the Future Claimants’ Representative in connection with the matters herein described.

22. It is Young Conaway’s policy to charge its clients in all areas of practice for all other expenses incurred in connection with the client’s case. The expenses charged to clients include among other things, photocopying, scanning, witness fees, travel expenses, including airline upgrade certificates, certain secretarial and other overtime expenses, filing and recordation fees, long distance telephone calls, postage, express mail and messenger charges, computerized legal research charges and other computer services, expenses for working meals

and facsimile charges. Young Conaway will charge for these expenses in a manner and at rates consistent with charges made generally to its other clients. Young Conaway believes that it is fairer to charge these expenses to the particular client rather than increasing the hourly rates and spreading the expenses among all clients.

23. No promises have been received by Young Conaway nor by any partner, counsel or associate thereof as to compensation in connection with these cases other than in accordance with the provisions of the Bankruptcy Code. Young Conaway has no agreement with any other entity to share with such entity any compensation received by Young Conaway in connection with these cases. Young Conaway further states pursuant to Rule 2016(b) of the Federal Rules of Bankruptcy Procedure that it has not shared, nor agreed to share (a) any compensation it has received or may receive with another party or person, other than with the partners, counsel and associates of Young Conaway, or (b) any compensation another person or party has received or may receive.

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

Executed this 4th day of February, 2019.

/s/ Edwin J. Harron

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

SCHEDULE 1 TO HARRON DECLARATION

Interested Parties List

The Debtors

AVM, Inc.
Former Ride Control Operating Company, Inc. (f/k/a
ArvinMeritor, Inc.)
Maremont Corporation
Maremont Exhaust Products, Inc.

Directors and Officers of the Debtors

Carl D. Anderson, II
Sherman K. Edmiston III

**Twenty-Five Law Firms Representing the Largest
Numbers of Asbestos Plaintiffs**

Belluck & Fox, LLP
Brookman, Rosenberg, Brown & Sandler
Cooney & Conway
Dalton & Associates, P.A.
Early, Lucarelli, Sweeney & Meisenkothen
Flint Law Firm LLC
Goldenberg Heller Antognoli & Rowland, PC
Gori, Julian & Associates, PC
Kelley & Ferraro, LLP
Law Office of Jeffrey A. Varas
Law Offices of Peter G. Angelos, PC
Levy Konigsberg LLP
Lipsitz & Ponterio, LLC
Maune Raichle Hartley French & Mudd, LLC
Michael B. Serling, PC
Motley Rice LLC
Napoli Shkolnik PLLC
O'Brien Law Firm, PC
Porter & Malouf
Richardson, Patrick, Westbrook & Brickman, LLC
Shrader & Associates, LLP
Simmons Hanly Conroy LLC
Swmw Law, LLC
The Ferraro Law Firm
Weitz & Luxenberg, PC

Insurers

Fireman's Fund Insurance Company
Everest Reinsurance Company
Mt. McKinley Insurance Company
Transit Casualty Co.
Zurich American Insurance Company
Zurich Insurance Company, Ltd.

**Professionals Retained by Prepetition Ad Hoc
Committee of Asbestos Claimants**

Montgomery McCracken Walker & Rhoads LLP
Robinson & Cole LLP
Legal Analysis Systems

Professionals Retained or Utilized by the Debtors

Alvarez & Marsal Disputes and Investigations, LLC
Cole Schotz P.C.
Sidley Austin LLP
Donlin, Recano & Company, Inc.
Kasowitz Benson Torres LLP

**Judges on the United States Bankruptcy Court for
the District of Delaware**

Kevin J. Carey
Kevin Gross
Brendan L. Shannon
Laurie Selber Silverstein
Christopher S. Sontchi
Mary F. Walrath

**Judges on the United States District Court for the
District of Delaware**

Richard G. Andrews
Colm F. Connolly
Maryellen Noreika
Leonard P. Stark

**Attorneys Employed by the Office of the United
States Trustee for Region 3, Delaware Office**

David Buchbinder
Linda Casey
Timothy J. Fox, Jr.
Benjamin Hackman
Brya Keilson
Jane Leamy
Hannah M. McCollum
Linda Richenderfer
Juliet Sarkessian
Richard Schepacarter
T. Patrick Tinker
Jaclyn Weissgerber

Current and Former Nondebtor Affiliates

Meritor, Inc.
Arvin Canada Holding Limited
Arvin European Holdings (UK) Limited
Arvin European Holdings (UK) Limited French Branch
Arvin Exhaust de Venezuela
Arvin Exhaust de Venezuela

Arvin Finance, LLC
 Arvin Holdings Netherlands B.V.
 Arvin Industries, Inc.
 Arvin Innovation Australia Pty. Limited
 Arvin International (UK Limited)
 Arvin International (UK) Limited
 Arvin International Holdings, LLC
 Arvin International, Inc.
 Arvin Motion Control Limited
 Arvin Technologies, Inc.
 Arvin-Kayaba LLC
 ArvinMeritor A&ET Limited
 ArvinMeritor Canada
 ArvinMeritor Filters Operating Co., LLC
 ArvinMeritor Finance Ireland Unlimited Company
 ArvinMeritor Former Ride Control Operating Co., Inc.
 ArvinMeritor Holdings France SNC
 ArvinMeritor Investments SA (Proprietary) Limited
 ArvinMeritor Light Vehicle Systems (UK) Limited
 ArvinMeritor Light Vehicle Systems Australia Pty. Ltd.
 ArvinMeritor Limited
 ArvinMeritor Mexicana, S.A. DE C.V.
 ArvinMeritor OE, LLC
 ArvinMeritor Pension Trustees Limited
 ArvinMeritor Receivables Corporation
 Arvinmeritor Sweden AB
 ArvinMeritor Technology, LLC
 Automotive Axles Limited
 Braseixos Administradora de Bens Ltd.
 Business Builders International
 Carvica C.A.
 Carvicay Ltd
 Carvireca C.A.
 EGE Fren Sanayaii ve Ticaret A.S.
 Fonderie Vénissieux SAS
 Gabricay Ltd.
 Gabriel de Colombia
 Gabriel de México, S.A. de C.V.
 Gabriel de Venezuela C.A.
 Gabriel Europe Inc. Rosendall
 Gabriel Europe, Inc.
 Gabriel India Limited
 Gabriel International, Inc.
 Gabriel Ride Control Products, Inc.
 Gabriel South Africa (Proprietary) Limited
 Gabripan de Caribe S.A.
 Gem Muffler Company
 Indi, S.A.
 Leland Packaging & Distributing
 Maremont Automotive Products, Inc.
 Maremont Automotive Whse Inc.
 Marwil Products Company
 Master Sistemas Automotivos Ltda.
 Meritor (China) Holdings, Limited
 Meritor Aftermarket Canada Inc.
 Meritor Aftermarket France SAS
 Meritor Aftermarket Italy, S.r.l.
 Meritor Aftermarket Netherlands B.V.
 Meritor Aftermarket Spain, S.A.
 Meritor Aftermarket Switzerland AG
 Meritor Aftermarket Switzerland AG (UK Branch)
 Meritor Aftermarket UK Limited
 Meritor Aftermarket USA, LLC
 Meritor Axles France SAS
 Meritor Brazil Holdings, LLC
 Meritor Cayman Islands, Ltd.
 Meritor Commercial Vehicle Systems India Private Limited
 Meritor Czech s.r.o.
 Meritor do Brasil Sistemas Automotivos Ltda.
 Meritor Drivetrain Systems (Nanjing) Co. Ltd.
 Meritor Electric Vehicles, LLC
 Meritor Finance (Barbados) Limited
 Meritor France Holdings, LLC
 Meritor France SNC
 Meritor Germany GmbH
 Meritor GmbH
 Meritor Heavy Vehicle Braking Systems (U.S.A.), LLC
 Meritor Heavy Vehicle Braking Systems (UK) Limited
 Meritor Heavy Vehicle Systems (Manufacturing) Limited
 Meritor Heavy Vehicle Systems (Singapore) Pte., Ltd.
 Meritor Heavy Vehicle Systems (Singapore) Pte., Ltd. (Singapore Branch)
 Meritor Heavy Vehicle Systems (Venezuela), Inc.
 Meritor Heavy Vehicle Systems Australia Ltd.
 Meritor Heavy Vehicle Systems Australia Ltd. (Vietnam Branch)
 Meritor Heavy Vehicle Systems Cameri SpA
 Meritor Heavy Vehicle Systems de Venezuela S.A.
 Meritor Heavy Vehicle Systems Limited
 Meritor Heavy Vehicle Systems, LLC
 Meritor Holdings (Barbados) Limited
 Meritor Holdings France SNC
 Meritor Holdings Spain, S.A.
 Meritor Holdings UK Ltd.
 Meritor Holdings, LLC
 Meritor HVS (India) Limited
 Meritor HVS AB
 Meritor HVS Istanbul Irtibat Burosu
 Meritor International Holdings, LLC
 Meritor Japan K.K.
 Meritor Luxembourg S.a.r.l.
 Meritor Management Corp.
 Meritor Manufacturing de México, S.A. de C.V.
 Meritor Mexicana, S.A. DE C.V.
 Meritor México, S. de R.L. de C.V.
 Meritor Netherlands B.V.
 Meritor Netherlands Brazil B.V.
 Meritor Services de Mexico, S.A. de C.V.
 Meritor Specialty Products LLC
 Meritor Technology, LLC

Meritor, Inc. (a Nevada Corporation)
MTC Inc.
Pratt Industries, Inc.
Saco-Lowell Shops, Inc.
Schrader Far East Ltd.
Sistemas Automotrices de Mexico, S.A. de C.V.
Super Diesel, S.A.
Transportation Power, Inc. (“Transpower”)
Trucktechnic S.A.
Wilmot-Breedon (Holdings) Limited
Xuzhou Meritor Axles Co. Ltd.

Other Potential Parties in Interest

Alan B. Rich
Alusuisse of America, Inc.
Armand Volta, Jr.
Armour & Co. Salaried Employees Pension Plan
Arvin Industries, Inc.
Bank of America, N.A.
Beth Gori
Easley Site Trust
Environmental Control
Ferodo America, Inc.
Francis J. Drew
Gabriel Ride Control Products, Inc.
Gabriel South Africa (Proprietary) Limited
Gem Muffler Company
Great American E & S Insurance Company
John Cooney
JPMorgan Chase Bank, N.A.
Mario E. Dihigo
Nuturn Corporation
Ohio Environmental Protection Agency
Oklahoma Department of Environmental Quality
PACE
Perry Browder
Platt Saco Lowell Corporation
South Carolina Department of Health and
Environmental Control
Wilmington Trust, N.A.