

**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) RE: D.I. 59
--------------------------------------------------------------------------	-------------------------------------------	--------------------------------------------------------------------------------------------

**SUPPLEMENTAL DECLARATION OF NATALIE D. RAMSEY
IN SUPPORT OF THE APPLICATION OF THE OFFICIAL
COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS FOR
AN ORDER PURSUANT TO 11 U.S.C. §§ 328(a) AND 1103(a), AND
BANKRUPTCY RULES 2014(a) AND 2016(b) AUTHORIZING IT TO
RETAIN AND EMPLOY ROBINSON & COLE LLP AS COUNSEL**

Natalie D. Ramsey, hereby makes this Supplemental Declaration pursuant to 28 U.S.C. § 1746 and states:

1. I am an attorney admitted to practice and a member of good standing of the Bars of the States of Delaware and New York, and the Commonwealth of Pennsylvania. I am admitted to practice before the United States Court of Appeals for the Third Circuit, the United States Districts Courts for the District of Delaware, the United States District Court for the Eastern and Southern Districts of New York, and the United States District Courts for the Eastern and Middle Districts of Pennsylvania. I am a partner of the firm of Robinson & Cole LLP (“RC”) and I am authorized to make this Supplemental Declaration on behalf of RC.

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. ((285); and Former Ride Control Operating Company, Inc. (f/k/a ArvinMeritor, Inc., a Delaware corporation) (9286). The mailing address for each Debtor company for purposes of these chapter 11 cases is 2135 West Maple Road, Troy, MI 48084.

2. On February 8, 2019, the *Application of the Official Committee of Asbestos Personal Injury Claimants for an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103(a), and Bankruptcy Rules 2014(a) And 2016(b) Authorizing it to Retain and Employ Robinson & Cole LLP as Counsel* (the “Application”) [D.I. No. 59] was filed with the Court. Attached as Exhibit B to the Application was the *Declaration of Natalie D. Ramsey* in support thereof (the “Initial Declaration”).

3. Since the filing of the Initial Declaration, RC has been provided with a revised list of parties attached hereto as Exhibit A to monitor for any conflicts or potential conflicts that may arise with respect to its representation of the Official Committee of Asbestos Personal Injury Claimants (the “Committee”). These connections were then reviewed to identify any relationship that would need to be disclosed in accordance with Bankruptcy Rule 2014.

4. The following interested parties have been identified as clients of the firm which RC has represented in matters wholly unrelated to the Chapter 11 Cases: Firemen’s Fund Insurance Company (“FFCI”), Everest Reinsurance Company, Zurich Insurance Company, Ltd., Great American E&S Insurance Company, Bank of America, N.A. and JPMorgan Chase Bank, N.A. Based on my knowledge of the case, none of these parties is adverse to the Committee, although a potential conflict exists with respect to FFCI. To the extent that a conflict arises, the Committee will seek special counsel to assist it with respect to such conflict.

5. RC will periodically review its files during the pendency of these Chapter 11 Cases to ensure that no conflicts of other disqualifying circumstances exists or arise. If any relevant facts or relationships are discovered or raised, RC will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration as required by Bankruptcy Rule 2014(a).

6. To the best of my knowledge after diligent inquiry, neither RC, nor any of its partners, senior counsel, of counsel, or associates has had or presently has any “connection” (as such term is used in Bankruptcy Rule 2014(a)) with the Debtors, their creditors, members, or any other party-in-interest, or its respective attorneys, accountants, the Office of the United States Trustee, or any person employed by the United States Bankruptcy Court for the District of Delaware, except to the extent set forth herein.

7. Except as set forth herein and in the Initial Declaration, to the best of my knowledge, any “connection” of RC to the identified entities are limited to matters unrelated to the Debtors.

8. To the best of my knowledge, information and belief, RC is a disinterested person, and does not hold or represent an interest adverse to the Debtors’ estates, with respect to the matters for which it is to be employed as required by Bankruptcy Code Section 328(c).

I certify under penalty of perjury under the laws of the United States that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Dated: February 28, 2019
Wilmington, Delaware

/s/ Natalie D. Ramsey

Natalie D. Ramsey
Robinson & Cole LLP
1000 West Street, 15th Floor
Wilmington, Delaware 19801
Telephone:
nramsey@rc.com

*Proposed Counsel to the Official Committee of
Asbestos Personal Injury Claimants*