

**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

Objection Deadline: June 5, 2019 at 4:00 p.m. (ET)
Hearing Date: To Be Determined

NOTICE OF APPLICATION

TO: Counsel to the Debtors, Counsel to the Asbestos Claimants Committee, the Office of the United States Trustee for the District of Delaware, and All Parties That Have Requested Notice Pursuant to Bankruptcy Rule 2002

PLEASE TAKE NOTICE that the **Combined² First Interim Fee Application Request of James L. Patton, Jr., as the Legal Representative for Future Asbestos Claimants and Young Conaway Stargatt & Taylor, LLP as Counsel to the Legal Representative for Future Asbestos Claimants for Allowance of Compensation and Reimbursement of Expenses for the Period From January 22, 2019 Through March 31, 2019** (the "Application") has been filed with the United States Bankruptcy Court for the District of Delaware. In the Application, the Futures Representative seeks interim allowance of fees in the amount of \$70,490.00 and expenses in the amount of \$93.80 and YCST seeks interim allowance of fees in the amount of \$336,411.50 and expenses in the amount of \$3,195.63.

PLEASE TAKE FURTHER NOTICE that objections to the Application, if any, must be filed on or before **June 5, 2019 at 4:00 p.m. (ET)** (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that you must also serve a copy of the objection so as to be received by the following parties on or before the Objection Deadline: (i) the Debtors, Maremont Corporation, 2135 West Maple Road, Troy, Michigan 48084, Attn: Carl D. Anderson, II; (ii) counsel to the Debtors, Sidley Austin LLP, One South Dearborn, Chicago, Illinois 60603, Attn: Andrew F. O'Neill and Blair M. Warner; (iii) Delaware co-

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 In light of the fact that James L. Patton, Jr., the legal representative for future claimants (the "Future Claimants' Representative" or "FCR"), is a member of the law firm of Young Conaway Stargatt & Taylor, LLP ("YCST"), which serves as counsel to the FCR, the FCR and YCST will be submitting combined fee applications in an effort to conserve costs. The FCR's time and expense entries are distinguished from all other members of YCST.

counsel to the Debtors, Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, Delaware 19801, Attn: Norman L. Pernick and J. Kate Stickles; (iv) the U.S. Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Richard L. Schepacarter; (v) counsel to the Asbestos Claimants Committee, Robinson & Cole LLP, 1000 North West Street, Suite 1200, Wilmington, Delaware 19801, Attn: Natalie D. Ramsey, and Robinson & Cole LLP, Chrysler East Building, 666 Third Avenue, 20th Floor, New York, New York 10017, Attn: Mark A. Fink; and (vi) counsel to the Future Claimants' Representative, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, Attn: Robert S. Brady and Edwin J. Harron.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Application will be held on a date and time to be determined before the Honorable Kevin J. Carey, U.S. Bankruptcy Judge, U.S. Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

Dated: May 15, 2019

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Edwin J. Harron

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