

EXHIBIT 1

Proposed Order

**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 (LSS)

Jointly Administered

Ref. Docket Nos. 230 and _____

ORDER APPROVING COMBINED 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

Upon consideration of the combined first interim fee application request of James L. Patton, Jr., as the legal representative for future asbestos claimants (the “FCR”), and Young Conaway Stargatt & Taylor, LLP (“YCST” and together with the FCR, the “Applicants”), as counsel to the FCR, for allowance of compensation and reimbursement of expenses for the period from January 22, 2019 through March 31, 2019 [Docket No. 230] (the “First Quarterly Fee Application”); and it appearing to the Court that all of the requirements of sections 327, 328, 330, 331 and 503(b) of title 11 of the United States Code, as well as Rule 2016 of the Federal Rules of Bankruptcy Procedure and Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware, have been satisfied; and it further appearing that the expenses incurred were reasonable and necessary; and that notice of the First Quarterly Fee Application was appropriate; and after due deliberation and sufficient good cause appearing therefore; it is hereby:

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.

ORDERED, that the First Quarterly Fee Application is hereby APPROVED on an interim basis; and it is further

ORDERED, that the Applicants are granted interim allowance of compensation in the amount of \$376,901.50²; and it is further

ORDERED, that the Applicants are granted, on an interim basis, reimbursement of expenses in the amount of \$3,289.43; and it is further

ORDERED, that the Debtors are authorized and directed, as provided herein, to remit payment in the amounts set forth herein, less any and all amounts previously paid on account of such fees and expenses; and it is further

ORDERED, that the Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this order.

² Amount reflects a voluntary reduction of \$30,000 pursuant to discussions with the U.S. Trustee.