

**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

Objection Deadline: August 29, 2019 at 4:00 p.m. (ET)

Hearing Date: September 27, 2019 at 10:00 a.m. (ET)

NOTICE OF FEE 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 Fifth Monthly and Final Application 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 Monthly Period From June 1, 2019 Through July 9, 2019 and the Final Period From January 22, 2019 Through July 9, 2019** (the "Application") has been filed with the United States Bankruptcy Court for the District of Delaware. In the Application, the FCR seeks final allowance of fees in the amount of \$79,235.00 and expenses in the amount of \$225.75 and YCST seeks monthly allowance of fees in the amount of \$8,355.00 and expenses in the amount of \$916.67 and final allowance of fees in the amount of \$351,932.00³ and expenses in the amount of \$5,603.11.

PLEASE TAKE FURTHER NOTICE that objections to the Application, if any, must be filed on or before **August 29, 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.

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.

³ Amount reflects a reduction of \$30,000 agreed to by the FCR and YCST pursuant to discussions with the United States Trustee [see Docket No. 307]. For the sake of simplicity, this amount has been deducted from the amount of final fees sought by YCST rather than divided between the FCR and YCST.

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 Reorganized Debtors: Maremont Corporation, 2135 West Maple Road, Troy, Michigan 48084, Attn: Carl D. Anderson, II; (ii) counsel to the Reorganized Debtors: (a) Sidley Austin LLP, One South Dearborn, Chicago, Illinois 60603, Attn: Andrew F. O'Neill and Blair M. Warner and (b) Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, Delaware 19801, Attn: Norman L. Pernick and J. Kate Stickles; and (iii) counsel to the FCR: 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 **September 27, 2019 at 10:00 a.m. (ET)** before the Honorable Laurie Selber Silverstein at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801.

Dated: August 8, 2019

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Sara Beth A.R. Kohut

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