

**EXHIBIT 1**

**Monthly Application**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

MAREMONT CORPORATION, et al.<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-10118 (KJC)

(Jointly Administered)

Objection Deadline: April 18, 2019 at 4:00 p.m. (ET)

**SUMMARY COVER SHEET OF FIRST MONTHLY APPLICATION OF  
KASOWITZ BENSON TORRES LLP FOR ALLOWANCE OF COMPENSATION FOR  
THE PERIOD FROM JANUARY 22, 2019 TO AND INCLUDING FEBRUARY 28, 2019**

Name of Applicant:	<u>Kasowitz Benson Torres LLP</u>
Authorized to Provide Professional Services to:	<u>Debtors and Debtors in Possession</u>
Date of Retention:	<u>January 22, 2019 (order entered February 21, 2019)</u>
Period for Which Compensation and/or Reimbursement is Sought:	<u>January 22, 2019 – February 28, 2019</u>
Amount of Compensation Sought as Actual, Reasonable, and Necessary:	<u>\$1,945.60 (80% of \$2,432.50)</u>
Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary:	<u>\$0.00</u>

This is a: X monthly \_\_\_ final application

**Prior applications:** None.

<sup>1</sup> 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.

**SUMMARY OF TOTAL FEES AND HOURS  
BY ATTORNEYS AND PARAPROFESSIONALS**

<b>Name</b>	<b>Position Area of Expertise</b>	<b>Year of Admission / Years of Experience</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Michael E. Hutchins	Partner Asbestos Litigation	1983	\$475	4.30	\$2,042.50
Jordan Beltz	Associate Asbestos Litigation	2011	\$260	1.50	\$390.00
<b>Total</b>				<b>5.80</b>	<b>\$2,432.50</b>

**STATEMENT OF FEES AND EXPENSES BY PROJECT CATEGORY**

<b>Task Description</b>	<b>Total Hours</b>	<b>Total Fees</b>
L190 - Case Assessment, Development, and Administration	3.50	\$1,447.50
L210 - Pleading	2.30	\$985
<b>TOTAL</b>	<b>5.80</b>	<b>\$2,432.50</b>

**EXPENSE SUMMARY**

<b>Category</b>	<b>Amount</b>
<b>TOTAL:</b>	<b>\$0.00</b>

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FOR THE DISTRICT OF DELAWARE**

In re:

MAREMONT CORPORATION, et al.<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-10118 (KJC)

(Jointly Administered)

Objection Deadline: April 18, 2019 at 4:00 p.m. (ET)

**FIRST MONTHLY APPLICATION OF KASOWITZ BENSON  
TORRES LLP FOR ALLOWANCE OF COMPENSATION FOR  
THE PERIOD FROM JANUARY 22, 2019 TO FEBRUARY 28, 2019**

Pursuant to sections 327(e) and 1107 of title 11 of the United States Code (the “Bankruptcy Code”), rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 2014-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and Official Committee Members* [Docket No. 91] (the “Interim Compensation Procedures Order”), Kasowitz Benson Torres LLP (“Kasowitz”), special asbestos counsel for the debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby files this first monthly application (this “Application”) for interim allowance and payment of compensation for professional services to the Debtors during the period from January 22, 2019 to and including February 28, 2019 (the “Fee Period”) in the amount of \$1,945.60, representing 80% of the \$2,432.50 of fees incurred by Kasowitz for professional services to the Debtors during the Fee Period. In support of this Application, Kasowitz respectfully represents as follows:

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<sup>1</sup> 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.

## BACKGROUND

1. On January 22, 2019 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Court”). The Debtors have continued in possession of their properties and have continued to operate as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On February 4, 2019, the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an official committee of asbestos personal injury claimants (the “Asbestos Claimants Committee”). No party has requested the appointment of a trustee or examiner in these Chapter 11 Cases.

3. The Debtors retained Kasowitz as their special asbestos counsel, *nunc pro tunc* to the Petition Date, pursuant to the *Order Authorizing the Retention and Employment of Kasowitz Benson Torres LLP as Special Asbestos Counsel Pursuant to 11 U.S.C. §§ 327(e) and 1107, Nunc Pro Tunc to the Petition Date* [Docket No. 90] (the “Retention Order”). The Retention Order authorizes the Debtors to compensate and reimburse Kasowitz in accordance with the terms and conditions set forth in the Debtors’ application to retain Kasowitz, subject to Kasowitz’s application to the Court.

4. On February 21, 2019, the Court entered the Interim Compensation Procedures Order. The Interim Compensation Procedures Order provides, among other things, that each professional shall be entitled, no earlier than the 10th day of each month following the month for which compensation and/or expense reimbursement is sought, to file and serve an application for interim allowance of compensation earned and reimbursement of expenses incurred during the preceding month (each a “Monthly Fee Application”). Parties shall have 20 days after service of

a Monthly Fee Application to object thereto (the “Objection Deadline”). Upon the expiration of the Objection Deadline, the applicant may file a certificate of no objection (a “CNO”) with the Court with respect to the unopposed portion of the fees and/or expenses requested in the applicable Monthly Fee Application. After the filing of a CNO, the Debtors are authorized and directed to pay the applicant an amount equal to 80% of the fees and 100% of the expenses requested in the applicable Monthly Fee Application not subject to an objection.

### **SUMMARY OF SERVICES RENDERED**

5. Attached hereto as **Exhibit A** is a detailed statement of Kasowitz’s hours expended during the Fee Period. Kasowitz did not incur any expenses during the Fee Period. Kasowitz attorneys expended a total of 5.80 hours in connection with the Chapter 11 Cases during the Fee Period. All services for which Kasowitz is requesting compensation were performed for or on behalf of the Debtors. The services rendered by Kasowitz during the Fee Period are grouped into the categories set forth in **Exhibit A** and in the summary cover sheets prefixed to this Application. The attorneys who provided services to the Debtors during the Fee Period are also identified in **Exhibit A** and in the summary cover sheets.

### **VALUATION OF SERVICES**

6. As noted above, the amount of time spent by each Kasowitz attorney and paraprofessional providing services to the Debtors during the Fee Period is set forth in the summary attached hereto as **Exhibit A**. The rates reflected on **Exhibit A** are Kasowitz’s customary hourly rates for work of this character. The reasonable value of the services rendered by Kasowitz for the Fee Period as attorneys to the Debtors in these Chapter 11 Cases is \$2,432.50.

7. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the fees requested are fair and reasonable given (a) the complexity of these Chapter 11 Cases,

(b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

8. Although every effort has been made to include all fees and expenses incurred during the Fee Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Fee Period. Kasowitz reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent fee applications will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Interim Compensation Procedures Order.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, Kasowitz requests interim allowance and payment of compensation for professional services to the Debtors during the Fee Period in the amount of \$1,945.60, representing 80% of the \$2,432.50 of fees incurred by Kasowitz for professional services to the Debtors during the Fee Period.

Dated: March 29, 2019  
Atlanta, Georgia

KASOWITZ BENSON TORRES LLP

/s/ Michael E. Hutchins

Michael E. Hutchins  
Two Midtown Plaza, Suite 1500  
1349 West Peachtree Street, N.W.  
Atlanta, Georgia 30309  
Telephone: (404) 260-6080  
Facsimile: (404) 260-6081

SPECIAL ASBESTOS COUNSEL FOR THE  
DEBTORS AND DEBTORS IN POSSESSION



**CERTIFICATION OF MICHAEL E. HUTCHINS**

Michael E. Hutchins, after being duly sworn according to law, deposes and says:

1. I am a partner of the applicant firm, Kasowitz Benson Torres LLP (“Kasowitz”).
2. I have personally performed many of the legal services rendered by Kasowitz as special asbestos counsel for the Debtors and am thoroughly familiar with all other work performed on behalf of the Debtors by attorneys and/or paraprofessionals of Kasowitz.
3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 29th day of March at Atlanta, Georgia.

*/s/ Michael E. Hutchins*

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Michael E. Hutchins

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

In re:

MAREMONT CORPORATION, et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-10118 (KJC)

Jointly Administered

**Objection Date: April 18, 2019 at 4:00 p.m.**

**Hearing Date: *Only if Objections are filed***

**NOTICE OF FEE APPLICATION**

**PLEASE TAKE NOTICE** that, on March 29, 2019, the **First Monthly Application of Kasowitz Benson Torres LLP for Allowance of Compensation for the Period From January 22, 2019 to and Including February 28, 2019** (the “Application”), which seeks approval of monthly fees in the amount of \$2,432.50, was filed with the Bankruptcy Court.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application are required to be filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served on the following, so as to be **received no later than 4:00 p.m. (prevailing Eastern Time) on April 18, 2019** (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-counsel to the Debtors, Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, Delaware 19801, Attn: Norman L. Pernick and J. Kate Stickle; (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.

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A HEARING ON THE APPLICATION WILL BE HELD, ONLY IF AN OBJECTION IS TIMELY FILED, OR THE COURT DIRECTS OTHERWISE, AT A DATE AND TIME TO BE SCHEDULED 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.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 29, 2019  
Wilmington, Delaware

SIDLEY AUSTIN LLP  
James F. Conlan  
Andrew F. O'Neill  
Allison Ross Stromberg  
Blair M. Warner  
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-and-

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-and-

COLE SCHOTZ P.C.

/s/ J. Kate Stickles

Norman L. Pernick (No. 2290)  
J. Kate Stickles (No. 2917)  
500 Delaware Avenue, Suite 1410  
Wilmington, Delaware 19801  
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ATTORNEYS FOR THE DEBTORS AND  
DEBTORS IN POSSESSION

**Exhibit A**

**Fees Statement**

KASOWITZ BENSON TORRES LLP  
 1633 BROADWAY  
 NEW YORK, NY 10019-6799

Federal I.D. # 13-3720397

MARCH 28, 2019

60191229  
 Maremont Corporation  
 Maremont Bankruptcy Proceedings

DATE	ATTORNEY OR ASSISTANT	HOURS
02/05/19	MICHAEL E. HUTCHINS Review and exchange series of messages with Sidley regarding potential new asbestos complaints filed against Maremont after the 1/22/19 automatic bankruptcy stay, and investigation into and handling of the issue (L190) (0.3). Prepare and exchange series of messages with internal team regarding investigatory steps to be taken (L190) (0.3).	.60
02/05/19	JORDAN BELTZ Communicate with CT Corp. regarding recently served complaints.	1.00
02/06/19	MICHAEL E. HUTCHINS Exchange multiple messages with Sidley, the parent and internal team regarding procedures to be followed with respect to new complaints served on Maremont since the 1/22/19 bankruptcy filing and automatic stay date (L210) (0.3). Review multiple new complaints filed since that time (L210) (0.3). Prepare and exchange multiple messages with Sidley, parent and internal team regarding recommendations with respect to same and service of process policy going forward (L210) (0.3).	.90
02/06/19	JORDAN BELTZ Review recently-filed complaints and draft summary of same.	.50
02/07/19	MICHAEL E. HUTCHINS Review draft Maremont Asbestos Records Cooperation Agreement, add series of comments to same, and prepare message to the Sidley team	.70

Maremont Corporation  
FILE NUMBER: 60191229  
INVOICE NO.: \*\*\*\*\*

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forwarding and discussing same (L190) (0.7).

02/08/19	MICHAEL E. HUTCHINS	.90
	As requested, review existing language in the Hutchins declaration, prepare expanded supplemental language to answer inquiries raised by the U.S. Trustee, and forward same to Sidley (L210) (0.7). Forward exemplar notice of bankruptcy at Andy O'Neill's request (L210) (0.2).	
02/11/19	MICHAEL E. HUTCHINS	.50
	Telephone conference with the Sidley team to discuss questions and issues related to the draft Maremont Asbestos Records Cooperation Agreement (L190) (0.5).	
02/12/19	MICHAEL E. HUTCHINS	.30
	As requested, review revised Maremont document cooperation agreement and exchange messages with Sidley regarding same (L190) (0.3).	
02/13/19	MICHAEL E. HUTCHINS	.40
	Telephone conference with the Sidley team and others to discuss Maremont historical document and case data issues (L190) (0.4).	
	TOTAL HOURS	5.80

Maremont Corporation  
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	HOURS	AMOUNT
PARTNER		
MICHAEL E. HUTCHINS	4.30	2,042.50
ASSOCIATE		
JORDAN BELTZ	1.50	390.00
TOTAL FEES		\$2,432.50
TOTAL COSTS		\$.00
TOTAL FEES AND COSTS		\$2,432.50