



CEO, chairman, or vice-chairman of more than a dozen troubled companies. I have been a financial advisor to the United States Treasury Department and have consulted for the State of Florida Department of Land Development Regulation. I am also a member of the Philadelphia Stock Exchange. I am a founding director and treasurer of the Turnaround Management Association (Philadelphia), a member of the American Bankruptcy Institute, and the Association for Corporate Growth and Private Investors Forum. Berwyn has experience in industrial asset sales and a deep knowledge of the debtor's particular assets in this case. Berwyn works full-time, daily and integrally with the investment banker in the asset sale efforts, bringing historical and in-depth knowledge of the business, assets and operating potential.

In connection with Berwyn's engagement with the Debtor, as more fully set forth in the attached engagement letter, Berwyn is working full-time with all interested parties on due diligence, terms, and understanding the debtor's operations, background, markets and opportunities. I have been designated by the Debtor as Chief Plan and Transaction Officer and Deputy Chief Executive Officer of the Debtor. On a daily basis, Berwyn works with senior, secured/ DIP lender on daily operations updates and discussions on the Debtor's condition, plan developments, negotiations and negotiating forbearance and funding needs and priorities. Berwyn has established relationships with key employees and managers of the Debtor developed through an almost daily on-site presence and Berwyn interacts extensively with middle management and operating supervisors in the Debtor. Berwyn has been integral in the development, distribution and explanation of key notices to employees and works to maintain employee morale and realistic expectations throughout pendency of bankruptcy. The work performed by Berwyn is not duplicative of any other professional engaged by the Debtor and Berwyn will not in the future perform or seek compensation for any services that are duplicative of the work of any other professional engaged by the Debtor.

3. I am the Managing Partner and Chairman of the firm of Berwyn.
4. The proposed arrangement for compensation, including hourly rates, if applicable, is as follows:

Berwyn will be compensated for its services based on a monthly flat fee of \$35,000.00, a retainer of \$35,000.00, and reimbursement for all actual out-of-pocket expenses incurred in connection with this engagement, as approved by the Court upon application.

Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of D.N.J. LBR 2016-1.

5. To the best of my knowledge, after reasonable and diligent investigation, my connection with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States trustee, is as follows:

- None
- Describe connection:

6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the Debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

- None
- Describe connection:

7. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

- do not hold an adverse interest to the estate.
- do not represent an adverse interest to the estate.
- are disinterested under 11 U.S.C. § 101(14).
- do not represent or hold any interest adverse to the Debtor or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(e).
- Other. Explain:

8. If the professional is an auctioneer,  
The following are my qualification and experience with the liquidation or sale of similar property:

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b. The proposed method of calculation of my compensation, including rates and formulas, is:

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Pursuant to D.N.J. 2014-2, I  do or  do not request a waiver of the requirements of D.N.J. LBR 2016-1.

c. The following is an estimate of all costs and expenses, including labor, security advertising, delivery, mailing, and insurance, for which I will seek reimbursement from the sale proceeds:

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d. Have you or a principal of your firm, been convicted of a criminal offense?

No  Yes (explain below)

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e. I certify that a surety bond as described in D.N.J. LBR 2014-2(a)(6) is in effect and will remain so through the turnover of the auction proceeds.

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows:

I certify under penalty of perjury that the above information is true.

Date: October 5, 2021

/s/ Gerard J. Leimkuhler

Gerard J. Leimkuhler  
Managing Partner and Chairman