

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In Re	Chapter 11
DBMP LLC, ¹	Case No. 20-30080 (JCW)
Debtor	

**SUMMARY OF FIFTH INTERIM APPLICATION OF SCHIFF HARDIN LLP
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND FOR REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO THE
DEBTOR FOR THE PERIOD FROM MAY 1, 2021 THROUGH AUGUST 31, 2021**

Name of Applicant:	Schiff Hardin LLP
Authorized to Provide Professional Services to:	The above-captioned Debtor
Date of Order Approving Retention:	January 23, 2020 (as of the Petition Date)
Petition Date:	January 23, 2020
Period for which compensation and reimbursement are sought:	May 1, 2021 through August 31, 2021
Amount of compensation sought as actual, reasonable, and necessary:	\$606,026.00
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$22,228.76
Total Compensation Approved by Interim Fee Order to Date:	\$2,337,952.50
Total Expenses Approved by Interim Fee Order to Date:	\$6,579.19
Total Allowed Compensation Paid to Date:	\$2,337,952.50

¹ The last four digits of the Debtor's taxpayer identification number are 8817. The Debtor's address is 20 Moores Road, Malvern, Pennsylvania 19355.

Total Allowed Expenses Paid to Date: \$6,579.19

Compensation Already Paid Pursuant to a Monthly Fee Statement but Not Yet Allowed: \$399,983.40

Expenses Already Paid Pursuant to a Monthly Fee Statement but Not Yet Allowed: \$15,296.19

This is a(n): X interim final application

Prior Monthly Fee Statements Submitted:

Date Submitted	Month Covered	Fees	Expenses
June 30, 2021	May 1-31, 2021	\$128,150.50	\$730.40
August 10, 2021	June 1-30, 2021	\$179,615.50	\$14,466.72
August 31, 2021	July 1-31, 2021	\$136,660.00	\$99.07
October 4, 2021	August 1-31, 2021	\$161,600.00	\$6,932.57

No objections have been received to any prior monthly fee statements and the time for such objections has now expired.

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

Name of Professional Individual	Title and Year in Which Each Professional was First Licensed to Practice Law	Hourly Billing Rate (including changes)	Total Hours Billed	Total Compensation
Elizabeth Geise	Partner (1981)	\$595.00	484.50	\$288,277.50
Valerie Ross	Partner (1993)	\$585.00	489.50	\$286,357.50
Jeffrey Skinner	Partner (2005)	\$525.00	8.20	\$4,305.00
Brett Clements	Associate (2013)	\$350.00	46.60	\$16,310.00
Sonul Rao	Associate (2017)	\$350.00	21.90	\$7,665.00
Claudia Banks	Library Researcher	\$190.00	10.70	\$2,033.00
James S. Whiteree	Records Manager	\$110.00	9.80	\$1,078.00
TOTAL			1,071.20	\$606,026.00

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
Document Review and Production	154.20	\$89,320.50
Privilege & Work Product Defense	0.00	\$0.00
Miscellaneous Tasks	69.60	\$40,550.00
Preparation of Historical Information	0.00	\$0.00
Preparation of Expert Witnesses and Related Evidence	69.10	\$35,955.50
Legal and Factual Analysis Relating to Asbestos Claims	669.20	\$382,361.00
Non-Bankruptcy Litigation Matters	88.40	\$45,700.50
Court Hearings	0.00	\$0.00
Fee Application Preparation	20.70	\$12,138.50
Non-Working Travel	0.00	\$0.00
TOTAL	1,071.20	\$606,026.00

EXPENSE SUMMARY

Expense Category	Service Provider (if applicable)	Total Expense
Duplicating (\$0.10 per Black & White Page)	Schiff Hardin LLP – In-house	\$128.60
Duplicating (\$0.65 per Color Page)	Schiff Hardin LLP – In-house	\$34.80
Outside Duplicating Service	Reprints Desk Inc.	\$322.50
Courier/Delivery Service	Federal Express	\$278.56
Outside Messenger Service	Best Messenger Inc.	\$171.62
eDiscovery Support Services	Schiff Hardin LLP – In-house	\$2,833.00
Professional Services	Expert Witness 1 ²	\$13,875.00
Investigative Expenses		\$3,283.00
Court Filing Fees		\$252.40
Outside On-Line Research		\$394.34
On-Line Research	Pacer	\$654.94
TOTAL		\$22,228.76

² Pursuant to the June 18, 2021 Expert Protocol, agreed upon by the Debtor, the Official Committee of Asbestos Personal Injury Claimants, the Future Claimants’ Representative, and the Bankruptcy Administrator (the “Agreed Expert Protocol”), expense reimbursement requests for retained experts need not disclose the identity of the expert for whom reimbursement is sought or the nature of the work being performed by the expert, provided that each expert is given a unique and consistent identifier.

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In Re	Chapter 11
DBMP LLC, ¹	Case No. 20-30080 (JCW)
Debtor	

**FIFTH INTERIM APPLICATION OF SCHIFF HARDIN LLP FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
FOR REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO THE
DEBTOR FOR THE PERIOD FROM MAY 1, 2021 THROUGH AUGUST 31, 2021**

Schiff Hardin LLP, special counsel to the above-captioned Debtor (the “Debtor”), makes its fifth interim application for allowance of compensation of \$606,026.00 and reimbursement of expenses of \$22,228.76 for the period from May 1, 2021 through August 31, 2021 (the “Compensation Period”) in accordance with the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals*, dated August 6, 2020 (Docket No. 402) (the “Amended Interim Compensation Order”). In support of this application, Schiff Hardin LLP respectfully represents as follows:

1. Schiff Hardin LLP attorneys and paraprofessionals expended a total of 1,071.20 hours during the Compensation Period for which compensation is requested.
2. During the Compensation Period, Schiff Hardin LLP did not receive any payments or promises of payment from any source other than the Debtor for services rendered or

¹ The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

to be rendered in any capacity whatsoever in connection with the matters covered by this application. There is no agreement or understanding between Schiff Hardin LLP and any other person, other than partners of the firm, for sharing of compensation to be received for services rendered in this case.

3. The fees charged by Schiff Hardin LLP in this case are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market.

4. Pursuant to the Interim Compensation Order, included with this application are (a) a schedule setting forth all Schiff Hardin LLP professionals and paraprofessionals who have performed services in this chapter 11 case during the Compensation Period, the capacities in which each individual is employed by Schiff Hardin LLP, the hourly billing rate charged by Schiff Hardin LLP for the services performed by such individual, the aggregate number of hours expended in these cases during the Compensation Period and fees billed therefor and the year in which each professional was first licensed to practice law; (b) a summary of services by billing category for services rendered by Schiff Hardin LLP during the Compensation Period; and (c) a schedule setting forth the actual and necessary disbursements that Schiff Hardin LLP incurred during the Compensation Period in connection with the performance of professional services for the Debtor and for which it seeks reimbursement.

5. Schiff Hardin LLP's itemized time records for professionals and paraprofessionals performing services for the Debtor during the Compensation Period and Schiff Hardin LLP's itemized records detailing expenses incurred on behalf of the Debtor during the Compensation period are attached hereto as Exhibit A.

6. This application complies with sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Amended Interim Compensation Order, the *Guidelines for Compensation and Expense Reimbursement of Professionals* issued by this Court (the “Compensation Guidelines”) and the Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the “Local Rules”).

Background

7. On January 23, 2020 (the “Petition Date”), the Debtor commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtor is authorized to continue to manage its property and operate its business as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

8. On January 23, 2020, the Debtor filed an *Ex Parte Application to Employ Schiff Hardin LLP as Debtor’s Special Counsel Pursuant to Section 327(e) of the Bankruptcy Code, Effective as of the Petition Date* (Docket No. 17) (the “Retention Application”), by which the Debtor sought authority to retain and employ Schiff Hardin LLP as special counsel in this chapter 11 case. On January 24, 2020, the Court entered an order (Docket No. 35) authorizing the retention of Schiff Hardin LLP as special counsel to the Debtor as of the Petition Date (the “Retention Order”).

9. On February 14, 2020, the Court entered an order (Docket No. 155) appointing the Official Committee of Asbestos Personal Injury Claimants (the “Asbestos Claimants’ Committee” or “ACC”).

10. On June 1, 2020, the Court entered an order (Docket No. 310) appointing Sander L. Esserman as Legal Representative for Future Asbestos Claimants (the “FCR”).

11. On July 15, 2020, the Court entered an order (Docket No. 378) granting the First Interim Application of Schiff Hardin LLP for compensation as special counsel for the period from January 24 through April 30, 2020.

12. On November 5, 2020, the Court entered an order (Docket No. 555) granting the Second Interim Application of Schiff Hardin LLP for compensation as special counsel for the period from May 1 through August 31, 2020.

13. On March 11, 2021, the Court entered an order (Docket No. 754) granting the Third Interim Application of Schiff Hardin LLP for compensation as special counsel for the period from September 1, 2020 through December 31, 2020.

14. On July 16, 2021, the Court entered an order (Docket No. 934) granting the Fourth Interim Application of Schiff Hardin LLP for compensation as special counsel for the period January 1, 2021 through April 30, 2021.

Jurisdiction

15. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for this matter is proper in this district pursuant to 28 U.S.C. § 1409.

Summary of Services

16. The professional services performed by Schiff Hardin LLP were necessary and appropriate to the administration of the Debtor's chapter 11 case. These services were in the best interests of the Debtor and other parties in interest. The compensation requested is commensurate with the complexity and nature of the issues and tasks involved.

17. All of the services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Debtor, and not on behalf of any other entity.

Progress of the Chapter 11 Case to Date

18. During the Compensation Period, the Debtor, with the assistance of Schiff Hardin LLP, has worked diligently to continue to effect a smooth transition into chapter 11 and to administer and advance this case. At this stage of the case, achievements the Debtor has accomplished with the assistance of Schiff Hardin LLP include, among others:

- Gathering, reviewing, and preparing production of historical documents from the asbestos litigation, as well as non-privileged documents relating to certain historical cases, to facilitate the production of such documents to the ACC and the FCR in response to the ACC/FCR's discovery requests;
- Drafting responses to the ACC/FCR's discovery requests and participating in the meet-and-confer process with counsel for the ACC and FCR concerning those and prior discovery requests;
- Working with co-counsel to draft replies in support of two discovery motions – Reply in Support of Debtor's Motion for Bankruptcy Rule 2004 Examination of Asbestos Trusts (Docket No. 949); and Reply in Support of Debtor's Motion for Order Pursuant to Bankruptcy Rule 2004 Directing Submission of Personal Injury Questionnaires by Pending Mesothelioma Claimants (Docket No. 947) (collectively "Debtor's Discovery Motions");
- Drafting discovery requests to the Delaware Claims Processing Facility ("DCPF"), the ACC and the FCR in connection with the Debtor's Discovery Motions;
- Working with co-counsel to prepare for the depositions of witnesses associated with the Manville Trust and the DCPF in connection with the Debtor's Motion for Bankruptcy Rule 2004 Examination of Asbestos Trusts (Docket No. 416);
- Working with co-counsel to prepare for the deposition of the ACC's asbestos consultant in connection with the ACC's Motion for an Order Directing the Submission of Information by Debtor's Defense Counsel (Docket No. 904) ("ACC's DCQ Motion");
- Reviewing and analyzing historical claims and settlements in connection with possible settlement discussions, plan formulation, and/or estimation proceedings;
- Working with retained experts in connection with possible settlement discussions, plan formulation, and/or estimation proceedings, including helping to prepare a retained expert for deposition concerning Motion of the

Debtor for Estimation of Current and Future Mesothelioma Claims (Docket No. 948) (“Debtor’s Estimation Motion”);

- Responding to various issues arising in pending asbestos litigation, including engaging in various efforts to notify counsel and courts concerning the automatic stay and the preliminary injunction order, and addressing several requests for historical documents.

Prior Monthly Fee Statements

19. Pursuant to the Interim Compensation Order, Schiff Hardin LLP has submitted the following monthly fee statements (the “Prior Monthly Fee Statements”) to the Debtor for the four months within the Compensation Period, each of which is incorporated herein by reference in its entirety.²

Date Submitted	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
June 30, 2021	May 1-31, 2021	\$128,150.50	\$730.40	\$116,065.85	\$12,815.05
August 10, 2021	June 1-30, 2021	\$179,615.50	\$14,466.72	\$176,120.67	\$17,961.55
August 31, 2021	July 1-31, 2021	\$136,660.00	\$99.07	\$123,093.07	\$13,666.00
October 4, 2021	August 1-31, 2021	\$161,600.00	\$6,932.57	\$0.00	\$168,532.57

20. In total, Schiff Hardin LLP has submitted Prior Monthly Fee Statements during the Compensation Period for total fees of \$606,026.00 and expenses of \$22,228.76. No party has objected to any of Schiff Hardin LLP’s Prior Monthly Fee Statements, and the time for such objections has now expired.

² Copies of the Prior Monthly Fee Statements are attached hereto as Exhibit A.

Compensation by Project Category

The following is a summary of the activities performed by Schiff Hardin LLP professionals and paraprofessionals during the Compensation Period, organized by project billing category.³

21. Document Review and Production – 154.20 hours - \$89,320.50

During the Compensation Period, Schiff Hardin LLP professionals devoted substantial time to assisting in the collection, review, and production of information sought in the Chapter 11 Case relating to asbestos claims. These services included the following:

- Reviewing formal discovery requests from the ACC/FCR, drafting responses, and gathering, reviewing and preparing production of historical documents from the asbestos litigation, as well as non-privileged documents relating to certain historical cases, in response to those discovery requests; and
- Participating in meet and confer exchanges with counsel for the ACC and the FCR regarding new discovery requests, prior discovery responses, and document productions.

22. Miscellaneous Tasks – 69.60 hours - \$40,550.00

During the Compensation Period, Schiff Hardin LLP professionals devoted time to various miscellaneous tasks – primarily participating in a weekly status call with co-counsel on outstanding issues.

23. Preparation of Expert Witnesses and Related Evidence – 69.10 hours - \$35,955.50

During the Compensation Period, Schiff Hardin LLP professionals devoted time to working on various matters relating to expert witnesses. These services included the following:

³ The summary set forth below is qualified in its entirety by reference to the time and services detail attached to each Prior Monthly Fee Statement.

- Preparing for and attending meetings with experts and co-counsel regarding experts' ongoing work; and
- Attending deposition preparation sessions and deposition of expert in connection with Debtor's Estimation Motion.

24. Legal and Factual Analysis Relating to Asbestos Claims – 669.20 hours

- \$382,361.00

During the Compensation Period, Schiff Hardin LLP professionals devoted substantial time to activities relating to the advice, counseling, and marshalling of the facts and law in connection with possible settlement discussions, plan formulation, and/or an estimation proceeding for asbestos claims, to the extent such activities were not covered by another billing category. These services included the following:

- Working with co-counsel to draft replies in support of Debtor's Discovery Motions;
- Drafting discovery requests to the DCPF, the ACC and the FCR in connection with the Debtor's Discovery Motions;
- Working with co-counsel to prepare for the depositions of witnesses associated with the Manville Trust and the DCPF in connection with the Debtor's Motion for Bankruptcy Rule 2004 Examination of Asbestos Trusts (Docket No. 416);
- Working with co-counsel to prepare for the deposition of the ACC's asbestos consultant in connection with the ACC's DCQ Motion;
- Reviewing historical settlement cases for data potentially relevant to settlement discussions, plan formulation, and/or an estimation proceeding;
- Working with co-counsel on discovery issues and motions related to settlement discussions, plan formulation, and/or an estimation proceeding; and
- Working with retained experts on issues related to settlement discussions, plan formulation, and/or an estimation proceeding.

25. Non-Bankruptcy Litigation Matters – 88.40 hours - \$45,700.50

During the Compensation Period, Schiff Hardin LLP professionals devoted some time to responding to various issues arising in pending asbestos litigation, including engaging in various efforts to notify counsel and the courts in non-bankruptcy cases concerning the automatic stay and the preliminary injunction order, addressing several requests for historical documents, and other issues related to non-bankruptcy cases.

26. Fee Application Preparation – 20.70 hours - \$12,138.50

During the Compensation Period, Schiff Hardin LLP professionals devoted some time to (a) preparing and finalizing the Fourth Interim Fee Request for Schiff Hardin; (b) reviewing and revising the May through August 2021 invoices for privilege and to ensure compliance with the Local Rules and (c) drafting, revising, and submitting the Sixteenth through Nineteenth Monthly Fee Statements. Schiff Hardin LLP intends to seek compensation in connection with preparing this application at a later date.

Expenses Incurred By Schiff Hardin LLP

27. Section 330 of the Bankruptcy Code authorizes “reimbursement for actual, necessary expenses” incurred by professionals employed in a chapter 11 case. Accordingly, Schiff Hardin LLP seeks reimbursement for expenses (“Expenses”) incurred in rendering services to the Debtor during the Compensation Period in the amount of \$22,228.76. Itemized records detailing the Expenses incurred during the Compensation Period are attached to the Prior Monthly Fee Statements. The charges for these Expenses are in accord with the policies concerning expenses set forth in Schiff Hardin LLP’s retention application, the Debtor’s billing guidelines, and the parties’ Agreed Expert Protocol.

Retainer Disclosure

28. Schiff Hardin has no retainer for payment of the fees and expenses sought in this application.

Conclusion

29. The fees and expenses requested herein by Schiff Hardin LLP are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market and should be approved on an interim basis pursuant to sections 330 and 331 of the Bankruptcy Code, the Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules.

Notice

30. This application has been served in accordance with the Interim Compensation Order on the Notice Parties, as defined therein. In accordance with the Amended Interim Compensation Order, a notice of opportunity for hearing on this Application in accordance with Local Rule 9013-1(e)(7) has been served on the Notice Parties and all parties that have filed a notice of appearance with the Clerk of this Court and requested such notice. The Debtor submits that, in light of the nature of the relief requested, no other or further notice need be provided.

No Prior Request

31. No prior request for relief sought in this application has been made to this or any other court.

WHEREFORE, Schiff Hardin LLP respectfully requests that, pursuant to sections 330 and 331 of the Bankruptcy Code, the Interim Compensation Order and applicable Bankruptcy Rules and Local Rules, the Court (i) enter an order substantially in the form attached hereto as Exhibit B granting the relief requested herein, and (ii) grant such other and further relief to Schiff Hardin LLP as the Court may deem just and proper.

Dated: October 27, 2021

Respectfully submitted,

/s/ Valerie E. Ross

Valerie E. Ross

(admitted *pro hac vice*)

SCHIFF HARDIN LLP

901 K Street, N.W.

Suite 700

Washington, DC 20001

Telephone: (202) 778-6453

Facsimile: (202) 778-6460

Email: vross@schiffhardin.com

SPECIAL COUNSEL FOR THE DEBTOR

EXHIBIT A

Prior Monthly Fee Statements



Schiff Hardin LLP
901 K Street NW
Suite 700
Washington, DC 20001

T 202.778.6400
F 202.778.6460

schiffhardin.com

June 30, 2021

Valerie E. Ross
(202) 778.6453
vross@schiffhardin.com

VIA EMAIL TO DEBTOR & NOTICE PARTIES IDENTIFIED BY COURT ORDER

Re: Monthly Statement Pursuant to Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals
In re DBMP LLC, Case No. 20-30080 (Bankr. W.D.N.C.)

Dear Counsel and Ms. Abel:

Enclosed please find the Monthly Fee Statement of Schiff Hardin LLP, provided pursuant to the Court's August 6, 2020 Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals. This statement covers the time period of May 1, 2021 through May 31, 2021.

Please contact me should you have any questions about the enclosed.

Sincerely,

/s/ Valerie E. Ross

Valerie E. Ross

VER/cdr
Enclosures
Cc: See attached list

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In Re

DBMP LLC,¹

Debtor

Chapter 11

Case No. 20-30080 (JCW)

**SIXTEENTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY SCHIFF HARDIN LLP AS SPECIAL COUNSEL FOR THE DEBTOR
FOR THE PERIOD FROM MAY 1, 2021 THROUGH MAY 31, 2021**

In accordance with the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 402) (the “Interim Compensation Order”), Schiff Hardin LLP, special counsel to DBMP LLC as debtor and debtor in possession (the “Debtor”), submits its *Sixteenth Monthly Statement of Fees and Expenses Incurred by Schiff Hardin LLP as Special Counsel for the Debtor for the Period from May 1, 2021 through May 31, 2021* (the “Monthly Fee Statement”).

Itemization of Services Rendered and Expenses Incurred

1. Attached here as Exhibit A is Schiff Hardin LLP’s invoice for the period May 1, 2021 through May 31, 2021 (the “Statement Period”).

Total Fees and Expenses for the Statement Period

2. The total amount of fees and expenses incurred by Schiff Hardin LLP during the Statement Period are as follows:

¹ The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

Total Fees	\$128,150.50
Total Expenses	\$730.40
TOTAL	\$128,880.90

3. Pursuant to the Interim Compensation Order, Schiff Hardin LLP seeks payment of \$116,065.85 from the Debtor for the Statement Period (the “Interim Amount”), representing (a) 90% of Schiff Hardin’s fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtor, DBMP LLC, 20 Moores Road, Malvern, Pennsylvania 19355 (Attn.: Michael T. Starczewski, michael.t.starczewski@saint-gobain.com and dbmp@saint-gobain.com); (b) the Debtor’s Counsel, Jones Day, 1221 Peachtree Street, N.E., Suite 400, Atlanta, Georgia 30361 (Attn: Jeffrey B. Ellman, Esq., jbellman@jonesday.com); and Robinson, Bradshaw & Hinson, P.A., 1010 North Tyron Street, Suite 1900, Charlotte, North Carolina 28246 (Attn: Garland S. Cassada, Esq., gcassada@robinsonbradshaw.com); (c) United States Bankruptcy Administrator for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel for Debtor’s non-debtor affiliate, CertainTeed LLC (“New CT”), Goodwin Procter LLP, 1900 N Street, N.W., Washington, D.C. 20036 (Attn: Richard M. Wyner, Esq., rwynr@goodwinlaw.com); (e) counsel to the Official Asbestos Claimants’ Committee, Robinson & Cole, LLP, 1201 N. Market Street, Suite 1406, Wilmington, DE 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com, and Davis Lee Wright, Esq., dwright@rc.com); Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, DC 20005-5802 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com,

and Todd E. Phillips, Esq., tphillips@capdale.com); and Hamilton Stephens Steele + Martin, PLLC, 525 North Tyron Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) counsel to the Future Claimants' Representative, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801 (Attn: Ed Harron, Esq., eharron@ycst.com, and Sharon Zieg, Esq., szieg@ycst.com); and Alexander Ricks PLLC, 1420 E. 7th Street, Suite 100, Charlotte, North Carolina 28204 (Attn: Felton E. Parrish, Esq., Felton.Parrish@alexanderricks.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties and Schiff Hardin LLP, 901 K Street, N.W., Suite 700, Washington, D.C. 20001 (Attn: Valerie E. Ross, Esq., vross@schiffhardin.com) no later than July 14, 2021 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtor will be authorized to pay Schiff Hardin LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Schiff Hardin LLP at a later date.

Dated: June 30, 2021

Respectfully submitted,

/s/ Valerie E. Ross
SCHIFF HARDIN LLP
901 K Street, N.W.
Suite 700
Washington, D.C. 20001-6444
Telephone: (202) 778-6400
Facsimile: (202) 778-6460
E-mail: vross@schiffhardin.com

SPECIAL COUNSEL TO DBMP LLC

NOTICE PARTIES

DBMP LLC

Attn: Michael T. Starczewski (michael.t.starczewski@saint-gobain.com and dbmp@saint-gobain.com)

20 Moores Road
Malvern, PA 19355

Jones Day

Attn: Jeffrey B. Ellman (jbellman@jonesday.com)

1221 Peachtree Street, N.E., Suite 400
Atlanta, GA 30361

Robinson, Bradshaw & Hinton, P.A.

Attn: Garland S. Cassada (gcassada@robinsonbradshaw.com)

101 North Tryon Street, Suite 1900
Charlotte, North Carolina 28246

U.S. Bankruptcy Administrator

Attn: Shelley K. Abel (feeapplications@ncwba.uscourts.gov)

402 West Trade Street, Suite 200
Charlotte, NC 28202-1669

CertainTeed LLC

c/o Goodwin Procter LLP

Attn: Richard M. Wyner (rwynr@goodwinlaw.com)

1900 N Street, NW
Washington, DC 20036

Hamilton Stephens Steele + Martin, PLLC

Attn: Glenn C. Thompson (gthompson@lawhssm.com)

525 North Tryon Street, Suite 1400
Charlotte, NC 28202

Robinson & Cole LLP

Attn: Natalie D. Ramsey (qramsey@rc.com) and Davis Lee Wright (dwright@rc.com)

1201 North Market Street, Suite 1406
Wilmington, DE 19801

Caplin & Drysdale, Chartered

Attn: Kevin C. Maclay (kmaclay@capdale.com), James P. Wehner (jwehner@capdale.com), and

Todd E. Phillips (tphillips@capdale.com)

One Thomas Circle NW, Suite 1100
Washington, DC 20005-5802

Young Conaway Stargatt & Taylor, LLP

Attn: Ed Harron (eharron@ycst.com) and Sharon Zieg (szieg@ycst.com)

Rodney Square

1000 North King Street

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Alexander Ricks PLLC

Attn: Felton E. Parrish (Felton.Parrish@alexanderricks.com)

1420 E. 7th Street, Suite 100

Charlotte, North Carolina 28203

Exhibit A



Schiff Hardin LLP
901 K Street N.W.
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schiffhardin.com

Leslie Dallas, Litigation Assistant
Saint-Gobain Corporation
Law Department
20 Moores Road
Malvern, PA 19355

June 30, 2021
Invoice # 2509728
Matter # 45011
Federal Tax ID: 36-3184453

RE: Chapter 11 Case

FOR PROFESSIONAL SERVICES RENDERED THROUGH May 31, 2021

INVOICE SUMMARY INFORMATION

Total Professional Fees	\$128,150.50
Total Disbursements/Charges	<u>\$ 730.40</u>
Total Current Invoice	<u>\$128,880.90</u>
Total Current Charges (90% of professional fees & 100% of expenses)	\$116,065.85
TOTAL AMOUNT DUE AT THIS TIME	\$116,065.85

Saint Gobain Corporation
Page 2June 30, 2021
Invoice # 2509728
Bill Through May 31, 2021**BILLING SUMMARY**

	FEES	DISBURSMENTS	TOTAL
0713 – Document Review and Production	\$58,051.00	\$335.02	\$58,386.02
0715 – Miscellaneous Tasks	\$8,279.00	\$93.38	\$8,372.38
0717 – Preparation of Expert Witnesses and Related Evidence	\$6,082.50	\$302.00	\$6,384.50
0718 – Legal and Factual Analysis Relating to Asbestos Claims	\$51,275.00	\$0.00	\$51,275.00
0719 - Non-Bankruptcy Litigation Matter	\$1,530.00	\$0.00	\$1,530.00
0721 - Fee Application Preparation	\$2,933.00	\$0.00	\$2,933.00
GRAND TOTAL	\$128,150.50	\$730.40	\$128,880.90

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PROFESSIONAL SERVICES RENDERED

TASK CODE 0713 – Document Review and Production

5/2/21	Elizabeth Runyan Geise	Emails concerning protective order issues.	0.30	178.50
5/2/21	Elizabeth Runyan Geise	Go over different documents concerning document review; email regarding same.	1.30	773.50
5/2/21	Elizabeth Runyan Geise	Emails concerning draft discovery responses.	0.20	119.00
5/2/21	Brett Clements	Communicate with E. Geise and V. Ross re: document production; communicate with R. Blake re: document production; review responses to Requests for Production.	0.50	175.00
5/3/21	Brett Clements	Conduct document review for document production; communicate with E. Geise and V. Ross re: document production; communicate with R. Blake re: document production.	3.20	1,120.00
5/3/21	Elizabeth Runyan Geise	Multiple emails concerning discovery responses; review relevant document; edit discovery responses.	5.40	3,213.00
5/3/21	Valerie E. Ross	Review documents in connection with responding to document requests (1.7); Emails and call re responding to second requests for discovery (1.1); Edit responses to second requests for discovery (0.7)	3.50	2,047.50
5/4/21	Brett Clements	Prepare document production.	0.90	315.00
5/4/21	Valerie E. Ross	Review documents to be produced later this week (2.8); Emails and calls re responses to second requests for discovery (1.8); Edit responses to second requests for discovery (1.4).	6.00	3,510.00
5/4/21	Elizabeth Runyan Geise	Edit discovery responses (3.3); send and respond to several emails concerning discovery responses (0.6); conference call regarding draft discovery (1.2); draft follow-up email (0.2).	5.30	3,153.50
5/4/21	Brett Clements	Communicate with E. Geise and V. Ross re: document production.	0.20	70.00
5/5/21	Brett Clements	Communicate with E. Geise, V. Ross, and R. Blake re: document production.	0.10	35.00
5/5/21	Elizabeth Runyan Geise	Review email concerning new decision relevant to discovery motions.	0.10	59.50

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5/5/21	Brett Clements	Prepare document production.	0.70	245.00
5/5/21	Elizabeth Runyan Geise	Finalize discovery responses.	1.30	773.50
5/5/21	Valerie E. Ross	Emails re responses to second requests for discovery and related document production (1.0); Edit responses to second requests for discovery (2.4); Emails with Betsy Geise re confidentiality designation, potential supplemental document production and related matters (0.4).	3.80	2,223.00
5/5/21	Elizabeth Runyan Geise	Review produced documents to identify documents that need to be marked "PEO"; numerous emails concerning re-designation of documents as "PEO".	4.70	2,796.50
5/6/21	Elizabeth Runyan Geise	Draft and edit letter concerning re-labeled documents; go over production set of documents; several emails regarding same.	3.80	2,261.00
5/6/21	Valerie E. Ross	Emails re document production in connection with second requests for discovery (0.3); Emails with jurisdictional counsel re hard copy documents (0.1).	0.40	234.00
5/6/21	Brett Clements	Review final document production set.	1.20	420.00
5/7/21	Brett Clements	Communicate with Jones Day re: document production.	0.10	35.00
5/7/21	Brett Clements	Review final document production.	0.20	70.00
5/7/21	Elizabeth Runyan Geise	Review additional hard copy documents to prepare for production; edit memo regarding same.	2.90	1,725.50
5/7/21	Elizabeth Runyan Geise	Searches concerning discovery requests; several emails regarding same.	0.70	416.50
5/7/21	Valerie E. Ross	Emails and call re supplemental document request from ACC/FCR (0.4); Begin review of deposition transcript from deposition last week (1.3).	1.70	994.50
5/9/21	Elizabeth Runyan Geise	Review documents from vendor with new labeling and emails regarding same.	0.60	357.00
5/9/21	Elizabeth Runyan Geise	Searches concerning discovery requests.	0.30	178.50
5/10/21	Elizabeth Runyan Geise	Email concerning documents sought in discovery.	0.40	238.00
5/10/21	Valerie E. Ross	Review additional documents in connection with document production.	0.40	234.00

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5/11/21	Elizabeth Runyan Geise	Edit letter concerning informal discovery request.	1.20	714.00
5/11/21	Valerie E. Ross	Draft response to informal request for documents (1.1); Continue review of deposition transcript in connection with confidentiality and related issues (1.6).	2.70	1,579.50
5/12/21	Valerie E. Ross	Edit response to informal request for documents (0.7); Emails re response to informal request for documents (0.6); Finish review of deposition transcript in connection with confidentiality and related issues (1.9); Emails re confidentiality issues in connection with deposition transcript (0.1).	3.30	1,930.50
5/12/21	Elizabeth Runyan Geise	Call with former consultant concerning billing arrangements (0.4); edit letter response concerning informal discovery requests in response to call (0.4); several emails concerning responses to informal discovery requests (0.6).	1.40	833.00
5/13/21	Valerie E. Ross	Emails re confidentiality issues in connection with deposition transcript (0.1); Finalize response to informal request for documents (0.2); Emails re documents from jurisdictional counsel (0.2).	0.50	292.50
5/13/21	Elizabeth Runyan Geise	Review deposition designations concerning confidentiality (0.8); emails regarding same (0.2).	1.00	595.00
5/14/21	Elizabeth Runyan Geise	Emails concerning PEO designation of deposition.	0.20	119.00
5/14/21	Valerie E. Ross	Emails re confidentiality issues in connection with deposition transcript (0.2); Review deposition transcript in connection with confidentiality and related issues (0.7).	0.90	526.50
5/19/21	Valerie E. Ross	Review hard copy documents for potential production (7.3); Call and emails re review of hard copy documents for potential production (0.1).	7.40	4,329.00
5/19/21	Elizabeth Runyan Geise	Emails/call regarding document review.	0.10	59.50
5/19/21	Elizabeth Runyan Geise	Review letters regarding discovery issues and emails concerning same.	0.40	238.00
5/20/21	Elizabeth Runyan Geise	Emails with Ms. Ross concerning document review.	0.20	119.00

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5/20/21	Valerie E. Ross	Review hard copy documents for potential production (6.2); Emails re review of hard copy documents for potential production (0.2).	6.40	3,744.00
5/20/21	Elizabeth Runyan Geise	Review materials relevant to discovery letter; assemble documents and emails concerning same.	0.50	297.50
5/21/21	Elizabeth Runyan Geise	Calls and emails concerning discovery letter response (0.2); edit draft letter (1.1).	1.30	773.50
5/21/21	Elizabeth Runyan Geise	Go over hard copy documents for production (3.0); call with Ms. Ross concerning same (0.2).	3.20	1,904.00
5/21/21	Valerie E. Ross	Draft and edit response to meet and confer letter re informal discovery requests (3.9); Emails and calls re review of hard copy documents for production (0.6); Call with retained professional re discovery issues (0.3).	4.80	2,808.00
5/24/21	Valerie E. Ross	Emails with retained professional re document productions.	0.30	175.50
5/25/21	Valerie E. Ross	Call with Mr. Starczewski re deposition errata sheet.	0.30	175.50
5/26/21	Valerie E. Ross	Edit response to meet and confer letter re informal discovery requests (0.3); Emails re response to meet and confer letter re informal discovery requests (0.2).	0.50	292.50
5/26/21	Elizabeth Runyan Geise	Review briefs for issues regarding potential discovery requests (0.8); discuss potential discovery requests with Ms. Ross (0.3); draft and edit draft discovery requests (1.1).	2.20	1,309.00
5/26/21	Valerie E. Ross	Call re potential discovery to ACC/FCR in connection with discovery motions (0.3); Review potential discovery to ACC/FCR (0.3).	0.60	351.00
5/27/21	Elizabeth Runyan Geise	Draft and edit draft discovery; draft email regarding same.	2.50	1,487.50
5/27/21	Valerie E. Ross	Emails re response to meet and confer letter re informal discovery (0.4); Call with Betsy Geise re response to meet and confer letter re informal discovery (0.6); Research re legal issue in connection with informal discovery request (1.2).	2.20	1,287.00
5/27/21	Elizabeth Runyan Geise	Email concerning discovery letter; review materials and call with Ms. Ross.	0.90	535.50
5/27/21	Valerie E. Ross	Edit potential discovery to ACC/FCR.	0.50	292.50

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5/28/21	Elizabeth Runyan Geise	Edit discovery requests.	1.60	952.00
5/28/21	Valerie E. Ross	Continue research re legal issue in connection with informal discovery request (1.0); Call with client and co-counsel re informal discovery request and related matters (0.9); Emails re informal discovery request (0.1); Emails re deposition errata sheet (0.1).	2.10	1,228.50
5/28/21	Elizabeth Runyan Geise	Prepare for call concerning discovery requests and meet and confer issues (0.5); call with co-counsel on meet and confer response and on discovery requests (0.9).	1.40	833.00
5/31/21	Elizabeth Runyan Geise	Finalize discovery requests and circulate to co-counsel.	0.50	297.50
TASK CODE 0713 TOTAL			101.30	\$58,051.00

TASK CODE 0715 - Miscellaneous Tasks

5/3/21	Valerie E. Ross	Review pleadings in chapter 11 case.	0.50	292.50
5/4/21	Elizabeth Runyan Geise	Review work in process memo for call today (0.3); draft email concerning work in process issue (0.2); participate in work in process call with co-counsel (0.6).	1.10	654.50
5/4/21	Elizabeth Runyan Geise	Email with distributor counsel concerning status.	0.10	59.50
5/4/21	Valerie E. Ross	Review memo re work in process (0.2); Call regarding work in process (0.6).	0.80	468.00
5/11/21	Valerie E. Ross	Review memo re work in process (0.2); Call with co-counsel and client re work in process (1.4); Review filing in another chapter 11 case (0.4).	2.00	1,170.00
5/11/21	Elizabeth Runyan Geise	Review decision concerning discovery motion in another Chapter 11 case.	0.20	119.00
5/11/21	Elizabeth Runyan Geise	Review work in process memo in preparation for call today (0.3); participate in work in process call (1.4).	1.70	1,011.50
5/11/21	Elizabeth Runyan Geise	Draft email concerning "first look" procedure.	0.20	119.00
5/12/21	Jeffrey D. Skinner	Review filings in the bankruptcy proceeding.	0.40	210.00
5/13/21	Elizabeth Runyan Geise	Review new state statutes regarding over-naming, trust claims, and pre-suit disclosures.	0.30	178.50
5/18/21	Elizabeth Runyan Geise	Review work in process memo for call later today (0.3); work in process call with co-counsel (0.8).	1.10	654.50

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5/18/21	Valerie E. Ross	Review memo re work in process (0.2); Call with client and co-counsel re work in process (0.8).	1.00	585.00
5/19/21	Elizabeth Runyan Geise	Review new case on causation standard.	0.10	59.50
5/21/21	Jeffrey D. Skinner	Review filings in the bankruptcy proceeding.	0.80	420.00
5/25/21	Elizabeth Runyan Geise	Call with co-counsel concerning work in process.	1.50	892.50
5/25/21	Valerie E. Ross	Call with client and co-counsel re work in process.	1.50	877.50
5/26/21	Elizabeth Runyan Geise	Email concerning new allocation case.	0.10	59.50
5/27/21	Jeffrey D. Skinner	Review filings in the bankruptcy proceeding.	0.40	210.00
5/28/21	Elizabeth Runyan Geise	Emails to counsel concerning status of certain cases.	0.40	238.00

TASK CODE 0715 TOTAL	14.20	\$8,279.00
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TASK CODE 717 – Preparation of Expert Witnesses and Related Evidence

5/20/21	Valerie E. Ross	Call with client, co-counsel and retained professional re strategic issues (1.7); Call with Betsy Geise re historical claims (0.1).	1.80	1,053.00
5/20/21	Elizabeth Runyan Geise	Email concerning possible expert.	0.10	59.50
5/20/21	Elizabeth Runyan Geise	Call with retained experts concerning strategic issues (1.7); call with Ms. Ross regarding same (.1).	1.80	1,071.00
5/20/21	Elizabeth Runyan Geise	Prepare for call with retained experts.	0.30	178.50
5/26/21	Elizabeth Runyan Geise	Prepare for call with client concerning work with retained experts (0.3); participate in call with client re work of retained expert (0.8).	1.10	654.50
5/26/21	Elizabeth Runyan Geise	Emails regarding potential expert.	0.20	119.00
5/26/21	Valerie E. Ross	Call with client and Betsy Geise re work of retained expert.	0.80	468.00
5/27/21	Elizabeth Runyan Geise	Prepare for call with retained experts; review notes (0.2); call with retained experts (1.9); follow-up call with Ms. Ross and others (0.1).	2.20	1,309.00
5/27/21	Valerie E. Ross	Call with client, co-counsel, and retained professional (1.9); follow up call with Betsy Geise (0.1).	2.00	1,170.00

TASK CODE 0717 TOTAL	10.30	\$6,082.50
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TASK CODE 0718 – Legal and Factual Analysis Relating to Asbestos Claims

4/22/21	Valerie E. Ross	Emails with client re historical claims information.	0.20	117.00
5/6/21	Valerie E. Ross	Research historical claims information and related statistics (1.7); Emails re historical claims information and related statistics (0.1).	1.80	1,053.00
5/7/21	Valerie E. Ross	Research historical claims information (0.5); Emails re historical claims information (0.1).	0.60	351.00
5/9/21	Elizabeth Runyan Geise	Go over prior memos concerning historical claims; review spreadsheets and reports concerning same; draft email concerning same.	2.30	1,368.50
5/10/21	Elizabeth Runyan Geise	Emails and draft outline for historical settlement issues.	0.50	297.50
5/10/21	Elizabeth Runyan Geise	Draft email to co-counsel concerning agreement regarding certain categories of damages.	0.30	178.50
5/10/21	Valerie E. Ross	Calls and emails re review and analysis of historical claims information (1.1); Review and analysis of historical claims information (5.1).	6.20	3,627.00
5/10/21	Elizabeth Runyan Geise	Review of historical settlement claims.	4.80	2,856.00
5/10/21	Elizabeth Runyan Geise	Prepare for call concerning historical settlements with client.	0.20	119.00
5/10/21	Elizabeth Runyan Geise	Call regarding historical settlements with client.	0.80	476.00
5/11/21	Valerie E. Ross	Review and analyze historical claims information (0.9); Call with Betsy Geise re same (0.1).	1.00	585.00
5/11/21	Elizabeth Runyan Geise	Review documents related to historical settlement claims; call and email regarding same.	3.60	2,142.00
5/13/21	Elizabeth Runyan Geise	Review materials concerning historical settlement claims to prepare for call with client (0.9); call with client and co-counsel concerning historical settlement claims issues (1.5); call with Ms. Ross concerning historical settlement claims (0.2).	2.60	1,547.00
5/13/21	Valerie E. Ross	Review and analyze historical claims information (2.8); Calls and emails re review and analysis of historical claims information (2.2).	5.00	2,925.00
5/14/21	Elizabeth Runyan Geise	Review historical settlement claims and emails concerning same.	2.80	1,666.00

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5/14/21	Valerie E. Ross	Review and analyze historical claims information (3.9); Emails re historical claims information (0.3).	4.20	2,457.00
5/17/21	Elizabeth Runyan Geise	Review historical settlement claim materials.	5.80	3,451.00
5/17/21	Valerie E. Ross	Review and analyze historical claims information (4.9); Emails re review and analysis of historical claims information (0.2).	5.10	2,983.50
5/18/21	Valerie E. Ross	Calls and emails re review and analysis of historical claims information and related information (0.2); Review and analyze historical claims information (4.2).	4.40	2,574.00
5/18/21	Elizabeth Runyan Geise	Review materials and draft memo concerning historical settlement claims; emails with Ms. Ross re same.	6.10	3,629.50
5/19/21	Elizabeth Runyan Geise	Review historical settlement claims and drafting memo re same.	6.40	3,808.00
5/20/21	Elizabeth Runyan Geise	Review draft order and email regarding same.	0.80	476.00
5/20/21	Elizabeth Runyan Geise	Review historical settlement claims.	1.20	714.00
5/20/21	Elizabeth Runyan Geise	Draft memo concerning historical settlement claims and strategy for experts regarding same.	1.70	1,011.50
5/21/21	Valerie E. Ross	Edit outline re review of historical claims information (1.1); Call re review of historical claims information (0.2).	1.30	760.50
5/21/21	Elizabeth Runyan Geise	Edit memo concerning historical settlement claims.	0.50	297.50
5/24/21	Valerie E. Ross	Review and analyze historical claims information.	3.80	2,223.00
5/24/21	Elizabeth Runyan Geise	Go over historical settlement claims and draft notes regarding same.	4.60	2,737.00
5/25/21	Elizabeth Runyan Geise	Email concerning historical claims procedures (0.3); review materials concerning historical claims and summary regarding same (2.6).	2.90	1,725.50
5/25/21	Valerie E. Ross	Review and analyze historical claims information (3.3); Call re same and related matters (0.2).	3.50	2,047.50
5/25/21	Elizabeth Runyan Geise	Call with Ms. Ross regarding review of historical claims and related matters (.20).	0.20	119.00
5/26/21	Elizabeth Runyan Geise	Review emails concerning trusts discovery order.	0.60	357.00
5/27/21	Elizabeth Runyan Geise	Review historical settlement cases and draft memo regarding same.	1.00	595.00

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TASK CODE 0718 TOTAL	86.80	\$51,275.00
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TASK CODE 0719 - Non-Bankruptcy Litigation Matters

5/4/21	Valerie E. Ross	Emails with jurisdictional counsel re Washington case.	0.20	117.00
5/12/21	Valerie E. Ross	Emails with jurisdictional counsel re NY case status and issues in connection with same.	0.10	58.50
5/13/21	Elizabeth Runyan Geise	Review new complaint; edit letter regarding same.	0.40	238.00
5/14/21	Elizabeth Runyan Geise	Finalize and send out letter concerning late-filed complaint (0.2); email concerning article regarding plaintiff's counsel (0.1).	0.30	178.50
5/18/21	Valerie E. Ross	Emails re informal discovery request to DBMP.	0.10	58.50
5/24/21	Valerie E. Ross	Review documents and prepare estimate in connection with informal discovery request to DBMP (0.7); Emails re informal discovery request to DBMP (0.2).	0.90	526.50
5/24/21	Elizabeth Runyan Geise	Email concerning invoice search estimate.	0.20	119.00
5/25/21	Valerie E. Ross	Call and emails re informal discovery request to DBMP.	0.40	234.00

TASK CODE 0719 TOTAL	2.60	\$1,530.00
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TASK CODE 0721 - Fee Application Preparation

5/3/21	Valerie E. Ross	Emails re March invoice.	0.10	58.50
5/5/21	Valerie E. Ross	Review March fee application (0.2); Emails re March fee application (0.1).	0.30	175.50
5/7/21	Valerie E. Ross	Edit April invoice.	1.10	643.50
5/11/21	Elizabeth Runyan Geise	Review billing statement for April.	0.50	297.50
5/11/21	Valerie E. Ross	Edit April invoice.	0.90	526.50
5/12/21	Elizabeth Runyan Geise	Several emails concerning billing issues.	0.30	178.50
5/12/21	Valerie E. Ross	Edit April invoice (0.8); Emails re April invoice (0.4).	1.20	702.00
5/17/21	Valerie E. Ross	Edit April invoice.	0.40	234.00
5/21/21	Valerie E. Ross	Edit invoice for April time.	0.20	117.00

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TASK CODE 0721 TOTAL	5.00	\$2,933.00
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TIMEKEEPER SUMMARY

TIMEKEEPER	HOURS	RATE	FEE AMOUNT
Elizabeth Runyan Geise	109.80	595.00	\$65,331.00
Valerie E. Ross	101.70	585.00	\$59,494.50
Jeffrey D. Skinner	1.60	525.00	\$840.00
Brett F. Clements	7.10	350.00	2,485.00
TOTAL	220.20		\$128,150.50

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DISBURSEMENTS/CHARGES:

Delivery Services/Messengers – Federal Express	\$26.98
Duplicating and Binding – Black & White Copies	\$34.00
Duplicating and Binding – Color Copies	\$32.40
Outside Courier Services – Best Messenger Inc.	\$71.02
Outside Duplicating Services – Reprints Desk Inc.	\$302.00
eDiscovery Support Services	\$264.00

TOTAL DISBURSMENTS/CHARGES **\$730.40**

TOTAL INVOICE **\$128,880.90**

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REMITTANCE STATEMENT

Client Name: DBMP, LLC

Invoice # 2509728

Total Fees: \$128,150.50

Total Disbursements: \$730.40

Current Total: \$128,880.90

Wire Instructions

Payment may be wired to
(Including International Transactions):

For Payment Via ACH:

JPMorgan Chase Bank N.A.
For Credit to: Schiff Hardin LLP
Account # 04233255
ABA # 021000021
Swift Code CHAS US 33
Please reference Invoice # 2509728

Chase
For Credit to: Schiff Hardin LLP
Account # 04233255
ABA # 071000013
Please reference Invoice # 2509728

Remittance Address:

Schiff Hardin LLP
233 S. Wacker Dr.
Suite 7100
Chicago, IL 60606



Schiff Hardin LLP
901 K Street NW
Suite 700
Washington, DC 20001

T 202.778.6400
F 202.778.6460

schiffhardin.com

August 10, 2021

Valerie E. Ross
(202) 778.6453
vross@schiffhardin.com

VIA EMAIL TO DEBTOR & NOTICE PARTIES IDENTIFIED BY COURT ORDER

Re: Monthly Statement Pursuant to Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals
In re DBMP LLC, Case No. 20-30080 (Bankr. W.D.N.C.)

Dear Counsel and Ms. Abel:

Enclosed please find the Monthly Fee Statement of Schiff Hardin LLP, provided pursuant to the Court's August 6, 2020 Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals. This statement covers the time period of June 1, 2021 through June 30, 2021.

Please contact me should you have any questions about the enclosed.

Sincerely,

/s/ Valerie E. Ross

Valerie E. Ross

VER/cdr
Enclosures
Cc: See attached list

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In Re

DBMP LLC,¹

Debtor

Chapter 11

Case No. 20-30080 (JCW)

**SEVENTEENTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY SCHIFF HARDIN LLP AS SPECIAL COUNSEL FOR THE DEBTOR
FOR THE PERIOD FROM JUNE 1, 2021 THROUGH JUNE 30, 2021**

In accordance with the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 402) (the “Interim Compensation Order”), Schiff Hardin LLP, special counsel to DBMP LLC as debtor and debtor in possession (the “Debtor”), submits its *Sixteenth Monthly Statement of Fees and Expenses Incurred by Schiff Hardin LLP as Special Counsel for the Debtor for the Period from June 1, 2021 through June 30, 2021* (the “Monthly Fee Statement”).

Itemization of Services Rendered and Expenses Incurred

1. Attached here as Exhibit A is Schiff Hardin LLP’s invoice for the period June 1, 2021 through June 30, 2021 (the “Statement Period”).

Total Fees and Expenses for the Statement Period

2. The total amount of fees and expenses incurred by Schiff Hardin LLP during the Statement Period are as follows:

¹ The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

Total Fees	\$179,615.50
Total Expenses	\$14,466.72
TOTAL	\$194,082.22

3. Pursuant to the Interim Compensation Order, Schiff Hardin LLP seeks payment of \$176,120.67 from the Debtor for the Statement Period (the “Interim Amount”), representing (a) 90% of Schiff Hardin’s fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtor, DBMP LLC, 20 Moores Road, Malvern, Pennsylvania 19355 (Attn.: Michael T. Starczewski, michael.t.starczewski@saint-gobain.com and dbmp@saint-gobain.com); (b) the Debtor’s Counsel, Jones Day, 1221 Peachtree Street, N.E., Suite 400, Atlanta, Georgia 30361 (Attn: Jeffrey B. Ellman, Esq., jbellman@jonesday.com); and Robinson, Bradshaw & Hinson, P.A., 1010 North Tyron Street, Suite 1900, Charlotte, North Carolina 28246 (Attn: Garland S. Cassada, Esq., gcassada@robinsonbradshaw.com); (c) United States Bankruptcy Administrator for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel for Debtor’s non-debtor affiliate, CertainTeed LLC (“New CT”), Goodwin Procter LLP, 1900 N Street, N.W., Washington, D.C. 20036 (Attn: Richard M. Wyner, Esq., rwynr@goodwinlaw.com); (e) counsel to the Official Asbestos Claimants’ Committee, Robinson & Cole, LLP, 1201 N. Market Street, Suite 1406, Wilmington, DE 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com, and Davis Lee Wright, Esq., dwright@rc.com); Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, DC 20005-5802 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com,

and Todd E. Phillips, Esq., tphillips@capdale.com); and Hamilton Stephens Steele + Martin, PLLC, 525 North Tyron Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) counsel to the Future Claimants' Representative, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801 (Attn: Ed Harron, Esq., eharron@ycst.com, and Sharon Zieg, Esq., szieg@ycst.com); and Alexander Ricks PLLC, 1420 E. 7th Street, Suite 100, Charlotte, North Carolina 28204 (Attn: Felton E. Parrish, Esq., Felton.Parrish@alexanderricks.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties and Schiff Hardin LLP, 901 K Street, N.W., Suite 700, Washington, D.C. 20001 (Attn: Valerie E. Ross, Esq., vross@schiffhardin.com) no later than August 24, 2021 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtor will be authorized to pay Schiff Hardin LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Schiff Hardin LLP at a later date.

Dated: August 10, 2021

Respectfully submitted,

/s/ Valerie E. Ross

SCHIFF HARDIN LLP

901 K Street, N.W.

Suite 700

Washington, D.C. 20001-6444

Telephone: (202) 778-6400

Facsimile: (202) 778-6460

E-mail: vross@schiffhardin.com

SPECIAL COUNSEL TO DBMP LLC

NOTICE PARTIES

DBMP LLC

Attn: Michael T. Starczewski (michael.t.starczewski@saint-gobain.com and dbmp@saint-gobain.com)

20 Moores Road
Malvern, PA 19355

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Attn: Jeffrey B. Ellman (jbellman@jonesday.com)

1221 Peachtree Street, N.E., Suite 400
Atlanta, GA 30361

Robinson, Bradshaw & Hinton, P.A.

Attn: Garland S. Cassada (gcassada@robinsonbradshaw.com)

101 North Tryon Street, Suite 1900
Charlotte, North Carolina 28246

U.S. Bankruptcy Administrator

Attn: Shelley K. Abel (feeapplications@ncwba.uscourts.gov)

402 West Trade Street, Suite 200
Charlotte, NC 28202-1669

CertainTeed LLC

c/o Goodwin Procter LLP

Attn: Richard M. Wyner (rwynr@goodwinlaw.com)

1900 N Street, NW
Washington, DC 20036

Hamilton Stephens Steele + Martin, PLLC

Attn: Glenn C. Thompson (gthompson@lawhssm.com)

525 North Tryon Street, Suite 1400
Charlotte, NC 28202

Robinson & Cole LLP

Attn: Natalie D. Ramsey (qramsey@rc.com) and Davis Lee Wright (dwright@rc.com)

1201 North Market Street, Suite 1406
Wilmington, DE 19801

Caplin & Drysdale, Chartered

Attn: Kevin C. Maclay (kmaclay@capdale.com), James P. Wehner (jwehner@capdale.com), and

Todd E. Phillips (tphillips@capdale.com)

One Thomas Circle NW, Suite 1100
Washington, DC 20005-5802

Young Conaway Stargatt & Taylor, LLP

Attn: Ed Harron (eharron@ycst.com) and Sharon Zieg (szieg@ycst.com)

Rodney Square

1000 North King Street

Wilmington, Delaware 19801

Alexander Ricks PLLC

Attn: Felton E. Parrish (Felton.Parrish@alexanderricks.com)

1420 E. 7th Street, Suite 100

Charlotte, North Carolina 28203

Exhibit A



Schiff Hardin LLP
901 K Street N.W.
Suite 700
Washington, DC 20001

T 202.778.6400
F 202.778.6460

schiffhardin.com

Leslie Dallas, Litigation Assistant
Saint-Gobain Corporation
Law Department
20 Moores Road
Malvern, PA 19355

August 10, 2021
Invoice # 2521157
Matter # 45011
Federal Tax ID: 36-3184453

RE: Chapter 11 Case

FOR PROFESSIONAL SERVICES RENDERED THROUGH June 30, 2021

INVOICE SUMMARY INFORMATION

Total Professional Fees	\$179,615.50
Total Disbursements/Charges	<u>\$ 14,466.72</u>
Total Current Invoice	<u>\$194,082.22</u>
Total Current Charges (90% of professional fees & 100% of expenses)	\$176,120.67
TOTAL AMOUNT DUE AT THIS TIME	\$176,120.67

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Bill Through June 30, 2021**BILLING SUMMARY**

	FEES	DISBURSMENTS	TOTAL
0713 – Document Review and Production	\$6,283.00	\$0.00	\$6,283.00
0715 – Miscellaneous Tasks	\$9,959.00	\$0.00	\$9,959.00
0717 – Preparation of Expert Witnesses and Related Evidence	\$9,581.50	\$13,875.00	\$23,456.50
0718 – Legal and Factual Analysis Relating to Asbestos Claims	\$131,251.00	\$577.32	\$131,828.32
0719 - Non-Bankruptcy Litigation Matter	\$17,206.50	\$14.40	\$17,220.90
0721 - Fee Application Preparation	\$5,334.50	\$0.00	\$5,334.50
GRAND TOTAL	\$179,615.50	\$14,466.72	\$194,082.22

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TASK CODE 0713 – Document Review and Production

6/1/21	Valerie E. Ross	Edit response to meet and confer letter re informal discovery request.	0.20	117.00
6/1/21	Elizabeth Runyan Geise	Review meet and confer letter; email concerning discovery.	0.30	178.50
6/2/21	Valerie E. Ross	Finalize meet and confer letter re informal discovery request.	0.20	117.00
6/4/21	Elizabeth Runyan Geise	Email concerning discovery requests.	0.20	119.00
6/7/21	Elizabeth Runyan Geise	Emails concerning miscellaneous deposition issue.	0.10	59.50
6/15/21	Elizabeth Runyan Geise	Go over discovery requests from ACC/FCR.	0.30	178.50
6/24/21	Elizabeth Runyan Geise	Draft and edit responses to third set of discovery served on DBMP.	4.30	2,558.50
6/25/21	Elizabeth Runyan Geise	Draft and edit responses to third set of ACC/FCR discovery to DBMP; emails regarding same.	2.10	1,249.50
6/28/21	Elizabeth Runyan Geise	Go over edits to draft discovery responses and emails regarding same.	0.90	535.50
6/28/21	Valerie E. Ross	Review and edit draft responses to latest discovery from ACC/FCR (1.7); emails in connection with same (0.1).	1.80	1,053.00
6/29/21	Valerie E. Ross	Emails re draft responses to latest discovery from ACC/FCR.	0.20	117.00

TASK CODE 0713 TOTAL	10.60	\$6,283.00
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TASK CODE 0715 - Miscellaneous Tasks

6/1/21	Valerie E. Ross	Review memo re work in process (0.2); Call with client and co-counsel re work in process (1.1).	1.30	760.50
6/1/21	Elizabeth Runyan Geise	Review work in process memo for call today.	0.20	119.00
6/1/21	Elizabeth Runyan Geise	Call with co-counsel concerning work in process.	1.10	654.50

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6/8/21	Elizabeth Runyan Geise	Review work in process report for call later today (0.3); call regarding work in process (1.4).	1.70	1,011.50
6/8/21	Valerie E. Ross	Review memo re work in process (0.2); Call with client and co-counsel re work in process (1.4).	1.60	936.00
6/9/21	Jeffrey D. Skinner	Review filings in the bankruptcy proceeding.	0.30	157.50
6/10/21	Valerie E. Ross	Review filings in chapter 11 case (0.3); Review filing in another chapter 11 case (0.4); Emails regarding recent filings in another chapter 11 case (0.1).	0.80	468.00
6/14/21	Jeffrey D. Skinner	Review filings in the bankruptcy proceeding.	0.30	157.50
6/15/21	Valerie E. Ross	Review memo re work in process (0.2); Call with client and co-counsel re work in process (1.0).	1.20	702.00
6/15/21	Elizabeth Runyan Geise	Review work in process memo to prepare for call today (0.3); call with co-counsel concerning work in process (1.0).	1.30	773.50
6/17/21	Valerie E. Ross	Review filing in chapter 11 case.	0.20	117.00
6/17/21	Elizabeth Runyan Geise	Review Bestwall decision from Delaware court.	0.30	178.50
6/18/21	Elizabeth Runyan Geise	Emails concerning question regarding plant closure.	0.20	119.00
6/18/21	Valerie E. Ross	Emails re timing of plant closure and research re same (0.3).	0.30	175.50
6/23/21	Elizabeth Runyan Geise	Work in process call with co-counsel (1.1); follow-up call with Ms. Ross (0.2).	1.30	773.50
6/23/21	Valerie E. Ross	Review memo re work in process (0.2); Call with client and co-counsel re work in process (1.1); Follow up call with Betsy Geise (0.2); Review filing in another chapter 11 case (0.4).	1.90	1,111.50
6/25/21	Jeffrey D. Skinner	Review filings in the bankruptcy proceeding.	0.20	105.00
6/25/21	Jeffrey D. Skinner	Review transcript of hearing held on June 17, 2021.	0.20	105.00
6/29/21	Valerie E. Ross	Review memo re work in process (0.2); Call with client and co-counsel re work in process (1.1).	1.30	760.50
6/29/21	Elizabeth Runyan Geise	Review work in process memo to prepare for call with co-counsel (0.2); participate in call with co-counsel (1.1).	1.30	773.50
TASK CODE 0715 TOTAL			17.00	\$9,959.00

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TASK CODE 717 – Preparation of Expert Witnesses and Related Evidence

6/7/21	Valerie E. Ross	Emails with co-counsel re confidentiality of portion of expert deposition transcript.	0.30	175.50
6/8/21	Valerie E. Ross	Emails with co-counsel re confidentiality of portion of expert deposition transcript.	0.10	58.50
6/10/21	Elizabeth Runyan Geise	Emails concerning expert stipulation and related issues.	0.30	178.50
6/10/21	Valerie E. Ross	Emails with client regarding possible expert retentions and related matters.	0.10	58.50
6/11/21	Elizabeth Runyan Geise	Email concerning expert issues.	0.10	59.50
6/11/21	Valerie E. Ross	Emails with client regarding possible expert retentions and related matters (0.2); Emails with retained professional re upcoming meeting on project and materials to review in connection with same (0.3)	0.50	292.50
6/15/21	Valerie E. Ross	Draft agenda for meeting with expert consultant later this week.	1.10	643.50
6/16/21	Elizabeth Runyan Geise	Review and edit outline for expert meeting.	1.00	595.00
6/16/21	Valerie E. Ross	Continue drafting agenda for meeting with expert consultant later this week (0.9); Emails re same (0.2).	1.10	643.50
6/17/21	Elizabeth Runyan Geise	Conference call with expert concerning background and tasks.	2.00	1,190.00
6/17/21	Valerie E. Ross	Prepare for call with expert consultant today (0.4); Call with expert consultant to discuss project (2.0).	2.40	1,404.00
6/18/21	Valerie E. Ross	Emails re materials to provide to expert witnesses.	0.40	234.00
6/22/21	Elizabeth Runyan Geise	Call with retained experts concerning coordination with other experts and other issues.	1.00	595.00
6/22/21	Valerie E. Ross	Prepare for and call with retained professional, client and co-counsel re strategic issues.	1.10	643.50
6/24/21	Valerie E. Ross	Emails re providing materials to experts.	0.40	234.00
6/25/21	Elizabeth Runyan Geise	Emails regarding expert materials.	0.20	119.00
6/25/21	Valerie E. Ross	Review materials for experts (3.6); Emails re materials for experts (0.3).	3.90	2,281.50
6/28/21	Valerie E. Ross	Emails re materials for experts.	0.30	175.50

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TASK CODE 0717 TOTAL	16.30	\$9,581.50
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TASK CODE 0718 – Legal and Factual Analysis Relating to Asbestos Claims

6/1/21	Elizabeth Runyan Geise	Prepare for and call with counsel concerning certain historical settlements; draft notes regarding same.	0.60	357.00
6/1/21	Valerie E. Ross	Calls re historical claims information (0.5); Review and analyze historical claims information (1.3).	1.80	1,053.00
6/1/21	Elizabeth Runyan Geise	Review materials concerning historical settlement cases and draft memos regarding same.	5.80	3,451.00
6/2/21	Valerie E. Ross	Call re approach to collecting historical claims information for retained professionals (0.9); Review and analyze historical claims information (3.7).	4.60	2,691.00
6/2/21	Elizabeth Runyan Geise	Review materials concerning historical settlement claims.	6.20	3,689.00
6/2/21	Elizabeth Runyan Geise	Call regarding assembling materials concerning historical claims.	0.90	535.50
6/3/21	Elizabeth Runyan Geise	Review materials relating to historical settlements claims and memos regarding same.	3.30	1,963.50
6/3/21	Valerie E. Ross	Review and analyze historical claims information.	5.90	3,451.50
6/4/21	Elizabeth Runyan Geise	Review decisions concerning trust issues in Bestwall (0.6); discuss with Mr. Cassada (1.6); go over various trust issues in DBMP proceeding and emails regarding same (3.4).	5.60	3,332.00
6/4/21	Valerie E. Ross	Review and analyze historical claims information (2.4); Call with co-counsel re possible discovery in connection with Trust discovery motion (0.6); Emails and call re same (0.5); Draft discovery in connection with Trust discovery motion (1.7).	5.20	3,042.00
6/5/21	Valerie E. Ross	Continue drafting discovery in connection with Trust discovery motion.	2.00	1,170.00
6/6/21	Elizabeth Runyan Geise	Emails with Ms. Ross concerning trust issues and discovery regarding same.	0.10	59.50
6/6/21	Valerie E. Ross	Edit draft discovery in connection with Trust discovery motion (0.3); Emails re same and related matters (0.4).	0.70	409.50

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6/7/21	Valerie E. Ross	Review and analyze historical claims information (0.3); Emails with retained professional re historical claims information (0.1); Edit draft discovery in connection with Trust discovery motion (2.7); Emails re same (0.4); Call re same (0.4).	3.90	2,281.50
6/7/21	Elizabeth Runyan Geise	Edit draft discovery requests; several emails and call regarding same; legal research concerning discovery in bankruptcy actions.	4.40	2,618.00
6/7/21	Elizabeth Runyan Geise	Review materials concerning historical claims and draft memos regarding same.	3.90	2,320.50
6/8/21	Valerie E. Ross	Emails re legal issues in connection with discovery motions (0.2); Call re same (0.2); Call and emails with Betsy Geise, Sony Rao and Brett Clements re research in connection with discovery motion (1.0); Review and analyze historical claims information (1.3); Edit draft discovery in connection with Trust discovery motion (0.7); Emails re draft discovery (0.1).	3.50	2,047.50
6/8/21	Elizabeth Runyan Geise	Research on discovery issues; draft emails and assemble materials regarding same (0.7); call with Mr. Clements, Ms. Rao and Ms. Ross regarding research issues (1.0).	1.70	1,011.50
6/8/21	Brett Clements	Communicate with E. Geise, V. Ross, and S. Rao re: discovery research.	1.00	350.00
6/8/21	Sonul C. Rao	Call with E. Geise, B. Clements, and V. Ross to discuss research project (1.0); review of background materials provided by E. Geise (.5).	1.50	525.00
6/8/21	Elizabeth Runyan Geise	Research on historical settlement cases and draft memos regarding same.	3.50	2,082.50
6/8/21	Elizabeth Runyan Geise	Review draft discovery and emails regarding same.	0.60	357.00
6/9/21	Elizabeth Runyan Geise	Review new information from retained experts on historical settlement claims; review materials on historical settlement claims and draft summaries regarding same.	5.10	3,034.50
6/9/21	Valerie E. Ross	Research on legal issues in connection with discovery motions (0.8); Review and analyze historical claims information (3.6).	4.40	2,574.00
6/9/21	Sonul C. Rao	Research re legal issue in connection with discovery motion.	2.40	840.00
6/10/21	Elizabeth Runyan Geise	Review Bestwall pleading concerning trust discovery issues, and emails regarding same.	0.60	357.00
6/10/21	Elizabeth Runyan Geise	Review historical settlement cases and draft summaries regarding same.	2.40	1,428.00

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6/10/21	Brett Clements	Communicate with S. Rao re: discovery motion research.	0.10	35.00
6/10/21	Valerie E. Ross	Emails with expert re obtaining information in connection with analysis of historical claims (0.2); Review and analyze historical claims information (4.6).	4.80	2,808.00
6/10/21	Sonul C. Rao	Research re legal issue in connection with discovery motion.	2.50	875.00
6/10/21	Claudia Banks	Search for information requested by V. Ross.	0.50	95.00
6/11/21	Sonul C. Rao	Research re legal issue in connection with discovery motion.	2.50	875.00
6/11/21	Brett Clements	Research re: discovery issues.	2.80	980.00
6/11/21	Valerie E. Ross	Emails re obtaining information in connection with analysis of historical claims (0.3); Edit draft discovery in connection with Trust discovery motion (0.2); Emails re draft discovery (0.3); Review ACC and other objections to PIQ Motion and research in connection with same (3.7); Emails re objections to Rule 2004 motions (0.3).	4.80	2,808.00
6/11/21	Elizabeth Runyan Geise	Emails concerning discovery briefing (0.2); Emails concerning discovery requests (0.2).	0.40	238.00
6/13/21	Elizabeth Runyan Geise	Begin review of briefing on PIQ and Trust discovery motion oppositions.	1.60	952.00
6/14/21	Valerie E. Ross	Review various objections to Rule 2004 discovery motions.	5.20	3,042.00
6/14/21	Elizabeth Runyan Geise	Study briefs from ACC, FCR, DCPF and Manville Trusts, exhibits and joinders concerning the PIQ Motion and the Trust Discovery motion.	6.50	3,867.50
6/15/21	Valerie E. Ross	Continue review of various objections to Rule 2004 discovery motions (0.7); Review third set of discovery from ACC/FCR in connection with Rule 2004 discovery motions (0.2); Emails with co-counsel re replies in support of Rule 2004 discovery motions (0.3); Call and emails with Betsy Geise re replies in support of Rule 2004 discovery motion, latest discovery requests from ACC/FCR and related matters (0.8); Emails with experts re obtaining information in connection with analysis of historical claims (0.5); Research re obtaining public information regarding historical claims (0.9)	3.40	1,989.00
6/15/21	Brett Clements	Research re: discovery motion.	2.30	805.00
6/15/21	Sonul C. Rao	Research re legal issue in connection with discovery motion.	1.20	420.00

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6/15/21	Elizabeth Runyan Geise	Finish review of ACC, FCR and Trust Objections briefs (1.5); begin to draft response to Exhibit A of ACC objection (4.5); discuss response and other issues with Ms. Ross (0.8).	6.80	4,046.00
6/16/21	Valerie E. Ross	Emails with co-counsel re replies in support of Rule 2004 motion (0.1); Draft portions of reply in support of Rule 2004 motion for Trust discovery (6.7); Emails re same (0.2).	7.00	4,095.00
6/16/21	Elizabeth Runyan Geise	Draft responses to Exhibit A of ACC's Objection to Trust Discovery Motion; email concerning ongoing research.	6.20	3,689.00
6/16/21	Sonul C. Rao	Research re legal issue in connection with discovery motion.	2.60	910.00
6/17/21	Valerie E. Ross	Draft portions of reply in support of Rule 2004 motion for Trust discovery (5.5); Emails and call re same (0.4).	5.90	3,451.50
6/17/21	Elizabeth Runyan Geise	Draft and edit response to Exhibit A in ACC's Objection to Trust Discovery (5.0); communicate with Ms. Ross re same (0.4).	5.40	3,213.00
6/17/21	Sonul C. Rao	Research re legal issue in connection with discovery motion.	1.10	385.00
6/18/21	Sonul C. Rao	Research re legal issue in connection with discovery motion.	2.80	980.00
6/18/21	Elizabeth Runyan Geise	Draft and edit response to Exhibit A of objection to Trust Discovery Motion.	3.80	2,261.00
6/18/21	Valerie E. Ross	Continue drafting portions of reply in support of Rule 2004 motion for Trust discovery.	5.50	3,217.50
6/18/21	Brett Clements	Research re: discovery motion.	2.60	910.00
6/19/21	Valerie E. Ross	Review memo re legal issue in connection with Rule 2004 motions and emails re same.	0.90	526.50
6/19/21	Brett Clements	Communicate with V. Ross re: discovery motion.	0.10	35.00
6/20/21	Elizabeth Runyan Geise	Draft and edit response to Exhibit A of objections to Trust Discovery Motion.	4.70	2,796.50
6/20/21	Sonul C. Rao	Drafting of memorandum re legal issue in connection with discovery motion.	1.30	455.00
6/21/21	Valerie E. Ross	Emails re ACC objection to Rule 2004 motion (0.1); Continue drafting portions of reply in support of Rule 2004 motion for Trust discovery (5.3); Emails re same (0.1).	5.50	3,217.50
6/21/21	Elizabeth Runyan Geise	Draft and edit response concerning exemplar cases for trust discovery reply brief (5.1); emails regarding same (0.1).	5.20	3,094.00

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6/21/21	Sonul C. Rao	Complete research and draft memo re legal issue in connection with discovery motion.	4.00	1,400.00
6/22/21	Valerie E. Ross	Continue editing and drafting portions of reply in support of Rule 2004 motion for Trust discovery (5.5); Emails re same (0.1).	5.60	3,276.00
6/22/21	Elizabeth Runyan Geise	Draft and edit response to ACC's allegations concerning exemplar cases.	4.50	2,677.50
6/23/21	Elizabeth Runyan Geise	Review and edit response regarding Exhibit A and emails regarding same.	1.10	654.50
6/23/21	Valerie E. Ross	Continue editing and drafting portions of reply in support of Rule 2004 motion for Trust discovery (5.9); Calls and emails re same (0.5).	6.40	3,744.00
6/24/21	Valerie E. Ross	Continue editing and drafting portions of reply in support of Rule 2004 motion for Trust discovery.	5.20	3,042.00
6/25/21	Valerie E. Ross	Continue editing and drafting portions of reply in support of Rule 2004 motion for Trust discovery (2.1); Emails re same (0.2).	2.30	1,345.50
6/25/21	Elizabeth Runyan Geise	Edit draft insert for trust discovery reply brief (3.2); emails regarding same (0.2).	3.40	2,023.00
6/25/21	Brett Clements	Research for discovery motion.	1.10	385.00
6/28/21	Valerie E. Ross	Review and edit reply brief in support of PIQ Motion.	1.50	877.50
6/28/21	Brett Clements	Research re: discovery motion.	1.90	665.00
6/29/21	Valerie E. Ross	Review and edit reply brief in support of PIQ Motion (1.9); Review ACC/FCR discovery motion and related documents (1.4); Review and analyze historical claims information (1.7); Emails re historical claims information (0.2).	5.20	3,042.00
6/29/21	Elizabeth Runyan Geise	Review PIQ motion reply and email regarding same.	1.00	595.00
6/29/21	Brett Clements	Research re: discovery motion.	0.50	175.00
6/30/21	Valerie E. Ross	Review and edit reply in support of trust discovery motion (2.5); Emails re same (0.2).	2.70	1,579.50
6/30/21	Elizabeth Runyan Geise	Research state law questions in connection with refutation to Ex. A of trust motion objection (0.9); draft inserts for same (1.9).	2.80	1,666.00
TASK CODE 0718 TOTAL			236.80	\$131,251.00

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TASK CODE 0719 - Non-Bankruptcy Litigation Matters

6/1/21	Valerie E. Ross	Call with jurisdictional counsel re case status (0.6); Emails with jurisdictional counsel re same (0.2); Emails with client and Betsy Geise re same (0.3).	1.10	643.50
6/2/21	Valerie E. Ross	Calls with jurisdictional counsel re case status (1.1); Emails with jurisdictional counsel re same (0.1); Emails with client and Betsy Geise re same (0.2).	1.40	819.00
6/3/21	Elizabeth Runyan Geise	Review email concerning pending claims.	0.20	119.00
6/3/21	Valerie E. Ross	Emails with jurisdictional counsel re case status.	0.20	117.00
6/4/21	Valerie E. Ross	Review information from jurisdictional counsel re case status (0.3); Emails with client re case status (0.2).	0.50	292.50
6/7/21	Valerie E. Ross	Review information from jurisdictional counsel re case status (0.2); Emails with client re case status (0.2); Emails with jurisdictional counsel re non-bankruptcy case (0.1).	0.50	292.50
6/11/21	Valerie E. Ross	Prepare status report for Pennsylvania case (0.1) Emails re status report for Pennsylvania case (0.1).	0.20	117.00
6/14/21	Valerie E. Ross	Calls re valuation of insurance insolvency claim (0.6); Emails re same (0.4); Research re same (1.1).	2.10	1,228.50
6/16/21	Elizabeth Runyan Geise	Review subpoena; draft letter re same; emails concerning same.	0.80	476.00
6/17/21	Elizabeth Runyan Geise	Finalize letter and follow-up emails concerning subpoena to DBMP.	0.40	238.00
6/17/21	Valerie E. Ross	Review subpoena in non-bankruptcy case and emails re same.	0.20	117.00
6/18/21	Valerie E. Ross	Emails re subpoena in non-bankruptcy case (0.1).	0.10	58.50
6/18/21	Elizabeth Runyan Geise	Emails and review of repository index regarding document subpoena.	0.50	297.50
6/20/21	Elizabeth Runyan Geise	Begin work on response to subpoena.	0.50	297.50
6/21/21	Elizabeth Runyan Geise	Go over materials regarding subpoena for documents; research on applicable state law; review discovery materials and draft email concerning next steps.	3.60	2,142.00
6/22/21	Elizabeth Runyan Geise	Review subpoena rule and email regarding same; review deposition and email regarding same.	2.90	1,725.50
6/23/21	Elizabeth Runyan Geise	Draft and edit letter regarding subpoena.	0.90	535.50

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August 10, 2021
Invoice # 2521157
Bill Through June 30, 2021

6/24/21	Elizabeth Runyan Geise	Draft and edit Rule 45 objections to subpoena (3.0); emails regarding same (0.3).	3.30	1,963.50
6/24/21	Valerie E. Ross	Emails re subpoena in non-bankruptcy case (0.2); Review and edit draft letter objecting to subpoena in non-bankruptcy case (0.3).	0.50	292.50
6/25/21	Elizabeth Runyan Geise	Go over rules for service of subpoena objections (0.3); edit letter to plaintiffs' counsel; numerous emails concerning same (0.8).	1.10	654.50
6/25/21	Valerie E. Ross	Emails re subpoena in non-bankruptcy case.	0.10	58.50
6/28/21	Elizabeth Runyan Geise	Review cases relevant to subpoena.	1.30	773.50
6/29/21	Valerie E. Ross	Call with Betsy Geise re subpoena in non-bankruptcy case and related matters (0.4); emails re same (0.2).	0.60	351.00
6/29/21	Elizabeth Runyan Geise	Email concerning subpoena issues (0.1); prepare for meet and confer and participate in meet and confer concerning subpoena (2.0); send follow-up emails and call with Ms. Ross (0.4).	2.50	1,487.50
6/29/21	Brett Clements	Review information re: document request (0.30); communicate with E. Geise and V. Ross re: document request (0.20).	0.50	175.00
6/30/21	Brett Clements	Communicate with E. Geise and V. Ross re: historical documents.	0.80	280.00
6/30/21	Valerie E. Ross	Prepare for and call with Betsy Geise and Brett Clements re review of historical documents and related matters.	1.20	702.00
6/30/21	Elizabeth Runyan Geise	Prepare for and call with client concerning historical documents (0.2); go over various sources of historical documents to prepare for call with Mr. Clements (0.6); discuss historical documents with Mr. Clements and Ms. Ross (0.8).	1.60	952.00
TASK CODE 0719 TOTAL			29.60	\$17,206.50

TASK CODE 0721 - Fee Application Preparation

6/7/21	Valerie E. Ross	Edit fourth interim fee application.	2.50	1,462.50
6/8/21	Valerie E. Ross	Continue editing fourth interim fee application.	1.70	994.50
6/10/21	Elizabeth Runyan Geise	Review Interim Fee Application and email concerning same.	0.50	297.50
6/10/21	Valerie E. Ross	Edit fourth interim fee application (0.2); Emails re fourth interim fee application (0.2).	0.40	234.00

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6/15/21	Valerie E. Ross	Edit invoice for May time.	1.70	994.50
6/21/21	Valerie E. Ross	Edit May invoice.	0.50	292.50
6/24/21	Elizabeth Runyan Geise	Review and edit May bill.	0.60	357.00
6/25/21	Valerie E. Ross	Edit May invoice (0.8); Emails re May invoice (0.2).	1.00	585.00
6/30/21	Valerie E. Ross	Emails re May invoice.	0.20	117.00

TASK CODE 0721 TOTAL **9.10** **\$5,334.50**

TIMEKEEPER SUMMARY

TIMEKEEPER	HOURS	RATE	FEE AMOUNT
Elizabeth Runyan Geise	139.00	595.00	\$82,705.00
Valerie E. Ross	143.30	585.00	\$83,830.50
Jeffrey D. Skinner	1.00	525.00	\$525.00
Brett F. Clements	13.70	350.00	\$4,795.00
Sonul C. Rao	21.90	350.00	\$7,665.00
Claudia Banks	0.50	190.00	\$95.00
TOTAL	319.40		\$179,615.50

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August 10, 2021
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DISBURSEMENTS/CHARGES:

Delivery Services/Messengers – Federal Express	\$82.32
Duplicating and Binding – Black & White Copies	\$12.00
Duplicating and Binding – Color Copies	\$2.40
eDiscovery Support Services	\$495.00
Professional Services – Expert Witness 1	\$13,875.00

TOTAL DISBURSMENTS/CHARGES **\$14,466.72**

TOTAL INVOICE **\$194,082.22**

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August 10, 2021
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Bill Through June 30, 2021

REMITTANCE STATEMENT

Client Name: DBMP, LLC

Invoice # 2521157

Total Fees: \$179,615.50

Total Disbursements: \$14,466.72

Current Total: \$194,082.22

Wire Instructions

Payment may be wired to
(Including International Transactions):

For Payment Via ACH:

JPMorgan Chase Bank N.A.
For Credit to: Schiff Hardin LLP
Account # 04233255
ABA # 021000021
Swift Code CHAS US 33
Please reference Invoice # 2521157

Chase
For Credit to: Schiff Hardin LLP
Account # 04233255
ABA # 071000013
Please reference Invoice # 2521157

Remittance Address:

Schiff Hardin LLP
233 S. Wacker Dr.
Suite 7100
Chicago, IL 60606



Schiff Hardin LLP
901 K Street NW
Suite 700
Washington, DC 20001

T 202.778.6400
F 202.778.6460

schiffhardin.com

August 31, 2021

Valerie E. Ross
(202) 778.6453
vross@schiffhardin.com

VIA EMAIL TO DEBTOR & NOTICE PARTIES IDENTIFIED BY COURT ORDER

Re: Monthly Statement Pursuant to Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals
In re DBMP LLC, Case No. 20-30080 (Bankr. W.D.N.C.)

Dear Counsel and Ms. Abel:

Enclosed please find the Monthly Fee Statement of Schiff Hardin LLP, provided pursuant to the Court's August 6, 2020 Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals. This statement covers the time period of July 1, 2021 through July 31, 2021.

Please contact me should you have any questions about the enclosed.

Sincerely,

/s/ Valerie E. Ross

Valerie E. Ross

VER/cdr
Enclosures
Cc: See attached list

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In Re

DBMP LLC,¹

Debtor

Chapter 11

Case No. 20-30080 (JCW)

**EIGHTEENTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY SCHIFF HARDIN LLP AS SPECIAL COUNSEL FOR THE DEBTOR
FOR THE PERIOD FROM JULY 1, 2021 THROUGH JULY 31, 2021**

In accordance with the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 402) (the “Interim Compensation Order”), Schiff Hardin LLP, special counsel to DBMP LLC as debtor and debtor in possession (the “Debtor”), submits its *Sixteenth Monthly Statement of Fees and Expenses Incurred by Schiff Hardin LLP as Special Counsel for the Debtor for the Period from July 1, 2021 through July 31, 2021* (the “Monthly Fee Statement”).

Itemization of Services Rendered and Expenses Incurred

1. Attached here as Exhibit A is Schiff Hardin LLP’s invoice for the period July 1, 2021 through July 31, 2021 (the “Statement Period”).

Total Fees and Expenses for the Statement Period

2. The total amount of fees and expenses incurred by Schiff Hardin LLP during the Statement Period are as follows:

¹ The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

Total Fees	\$136,660.00
Total Expenses	\$99.07
TOTAL	\$136,759.07

3. Pursuant to the Interim Compensation Order, Schiff Hardin LLP seeks payment of \$123,093.07 from the Debtor for the Statement Period (the “Interim Amount”), representing (a) 90% of Schiff Hardin’s fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtor, DBMP LLC, 20 Moores Road, Malvern, Pennsylvania 19355 (Attn.: Michael T. Starczewski, michael.t.starczewski@saint-gobain.com and dbmp@saint-gobain.com); (b) the Debtor’s Counsel, Jones Day, 1221 Peachtree Street, N.E., Suite 400, Atlanta, Georgia 30361 (Attn: Jeffrey B. Ellman, Esq., jbellman@jonesday.com); and Robinson, Bradshaw & Hinson, P.A., 1010 North Tyron Street, Suite 1900, Charlotte, North Carolina 28246 (Attn: Garland S. Cassada, Esq., gcassada@robinsonbradshaw.com); (c) United States Bankruptcy Administrator for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel for Debtor’s non-debtor affiliate, CertainTeed LLC (“New CT”), Goodwin Procter LLP, 1900 N Street, N.W., Washington, D.C. 20036 (Attn: Richard M. Wyner, Esq., rwynr@goodwinlaw.com); (e) counsel to the Official Asbestos Claimants’ Committee, Robinson & Cole, LLP, 1201 N. Market Street, Suite 1406, Wilmington, DE 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com, and Davis Lee Wright, Esq., dwright@rc.com); Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, DC 20005-5802 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com,

and Todd E. Phillips, Esq., tphillips@capdale.com); and Hamilton Stephens Steele + Martin, PLLC, 525 North Tyron Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) counsel to the Future Claimants' Representative, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801 (Attn: Ed Harron, Esq., eharron@ycst.com, and Sharon Zieg, Esq., szieg@ycst.com); and Alexander Ricks PLLC, 1420 E. 7th Street, Suite 100, Charlotte, North Carolina 28204 (Attn: Felton E. Parrish, Esq., Felton.Parrish@alexanderricks.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties and Schiff Hardin LLP, 901 K Street, N.W., Suite 700, Washington, D.C. 20001 (Attn: Valerie E. Ross, Esq., vross@schiffhardin.com) no later than September 14, 2021 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtor will be authorized to pay Schiff Hardin LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Schiff Hardin LLP at a later date.

Dated: August 31, 2021

Respectfully submitted,

/s/ Valerie E. Ross
SCHIFF HARDIN LLP
901 K Street, N.W.
Suite 700
Washington, D.C. 20001-6444
Telephone: (202) 778-6400
Facsimile: (202) 778-6460
E-mail: vross@schiffhardin.com

SPECIAL COUNSEL TO DBMP LLC

NOTICE PARTIES

DBMP LLC

Attn: Michael T. Starczewski (michael.t.starczewski@saint-gobain.com and dbmp@saint-gobain.com)

20 Moores Road
Malvern, PA 19355

Jones Day

Attn: Jeffrey B. Ellman (jbellman@jonesday.com)

1221 Peachtree Street, N.E., Suite 400
Atlanta, GA 30361

Robinson, Bradshaw & Hinton, P.A.

Attn: Garland S. Cassada (gcassada@robinsonbradshaw.com)

101 North Tryon Street, Suite 1900
Charlotte, North Carolina 28246

U.S. Bankruptcy Administrator

Attn: Shelley K. Abel (feeapplications@ncwba.uscourts.gov)

402 West Trade Street, Suite 200
Charlotte, NC 28202-1669

CertainTeed LLC

c/o Goodwin Procter LLP

Attn: Richard M. Wyner (rwynr@goodwinlaw.com)

1900 N Street, NW
Washington, DC 20036

Hamilton Stephens Steele + Martin, PLLC

Attn: Glenn C. Thompson (gthompson@lawhssm.com)

525 North Tryon Street, Suite 1400
Charlotte, NC 28202

Robinson & Cole LLP

Attn: Natalie D. Ramsey (qramsey@rc.com) and Davis Lee Wright (dwright@rc.com)

1201 North Market Street, Suite 1406
Wilmington, DE 19801

Caplin & Drysdale, Chartered

Attn: Kevin C. Maclay (kmaclay@capdale.com), James P. Wehner (jwehner@capdale.com), and

Todd E. Phillips (tphillips@capdale.com)

One Thomas Circle NW, Suite 1100
Washington, DC 20005-5802

Young Conaway Stargatt & Taylor, LLP

Attn: Ed Harron (eharron@ycst.com) and Sharon Zieg (szieg@ycst.com)

Rodney Square

1000 North King Street

Wilmington, Delaware 19801

Alexander Ricks PLLC

Attn: Felton E. Parrish (Felton.Parrish@alexanderricks.com)

1420 E. 7th Street, Suite 100

Charlotte, North Carolina 28203

Exhibit A



Schiff Hardin LLP
901 K Street N.W.
Suite 700
Washington, DC 20001

T 202.778.6400
F 202.778.6460

schiffhardin.com

Leslie Dallas, Litigation Assistant
Saint-Gobain Corporation
Law Department
20 Moores Road
Malvern, PA 19355

August 31, 2021
Invoice # 2528577
Matter # 45011
Federal Tax ID: 36-3184453

RE: Chapter 11 Case

FOR PROFESSIONAL SERVICES RENDERED THROUGH July 31, 2021

INVOICE SUMMARY INFORMATION

Total Professional Fees	\$136,660.00
Total Disbursements/Charges	\$ <u>99.07</u>
Total Current Invoice	<u>\$136,759.07</u>
Total Current Charges (90% of professional fees & 100% of expenses)	\$123,093.07
TOTAL AMOUNT DUE AT THIS TIME	\$123,093.07

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August 31, 2021
Invoice # 2528577
Bill Through July 31, 2021

BILLING SUMMARY

	FEES	DISBURSMENTS	TOTAL
0713 – Document Review and Production	\$4,273.00	\$0.00	\$4,273.00
0715 – Miscellaneous Tasks	\$8,772.00	\$0.00	\$8,772.00
0717 – Preparation of Expert Witnesses and Related Evidence	\$2,106.00	\$0.00	\$2,106.00
0718 – Legal and Factual Analysis Relating to Asbestos Claims	\$96,742.50	\$99.07	\$96,841.57
0719 - Non-Bankruptcy Litigation Matter	\$22,246.00	\$0.00	\$22,246.00
0721 - Fee Application Preparation	\$2,520.50	\$0.00	\$2,520.50
GRAND TOTAL	\$136,660.00	\$99.07	\$136,759.07

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PROFESSIONAL SERVICES RENDERED

TASK CODE 0713 – Document Review and Production

7/7/21	Elizabeth Runyan Geise	Emails concerning discovery issues.	0.10	59.50
7/13/21	Valerie E. Ross	Emails with co-counsel and client re response to ACC/FCR discovery request.	0.20	117.00
7/23/21	Valerie E. Ross	Emails re responses to ACC/FCR discovery.	0.20	117.00
7/27/21	Elizabeth Runyan Geise	Email concerning discovery responses.	0.10	59.50
7/28/21	Elizabeth Runyan Geise	Draft and edit discovery responses in light of call today and send emails concerning same.	2.30	1,368.50
7/29/21	Elizabeth Runyan Geise	Review co-counsel comments on discovery responses (0.3); edit discovery responses incorporating comments by emails and phone (3.3).	3.60	2,142.00
7/29/21	Valerie E. Ross	Review and edit responses to ACC/FCR Third Requests for Discovery (0.4); Several emails re same (0.3).	0.70	409.50

TASK CODE 0713 TOTAL			7.20	\$4,273.00
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TASK CODE 0715 - Miscellaneous Tasks

7/6/21	Valerie E. Ross	Review memo re work in process (0.2); Call with client and co-counsel re work in process (0.9).	1.10	643.50
7/6/21	Elizabeth Runyan Geise	Go over work in process memo for call today (.2); call with co-counsel concerning work in process (.9).	1.10	654.50
7/7/21	Jeffrey D. Skinner	Review filings in the bankruptcy proceeding.	0.40	210.00
7/12/21	Jeffrey D. Skinner	Review filings in the bankruptcy proceeding.	0.30	157.50
7/13/21	Valerie E. Ross	Review memo re work in process (0.3); Call with client and co-counsel re work in process (1.1).	1.40	819.00
7/13/21	Elizabeth Runyan Geise	Go over work in process agenda (0.2); participate in call regarding work in process with co-counsel (1.1).	1.30	773.50
7/15/21	Elizabeth Runyan Geise	Review pleading in another chapter 11 case.	0.30	178.50

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August 31, 2021
Invoice # 2528577
Bill Through July 31, 2021

7/16/21	Valerie E. Ross	Review pleading in another chapter 11 case (0.5); Emails re pleading in another chapter 11 case (0.2).	0.70	409.50
7/16/21	Elizabeth Runyan Geise	Review filing in another chapter 11 case and email concerning same.	0.50	297.50
7/20/21	Valerie E. Ross	Review memo re work in process (0.2); Call with client and co-counsel re work in process (0.9).	1.10	643.50
7/20/21	Elizabeth Runyan Geise	Review work in process report (0.3) and participate in call concerning work in process (.9).	1.20	714.00
7/22/21	Valerie E. Ross	Review filings in another chapter 11 case.	0.60	351.00
7/23/21	Jeffrey D. Skinner	Review filings in the bankruptcy proceeding.	0.50	262.50
7/26/21	Elizabeth Runyan Geise	Briefly review new pleading and email concerning same.	0.50	297.50
7/29/21	Elizabeth Runyan Geise	Review pleadings in another Chapter 11 case and email regarding same.	0.30	178.50
7/29/21	Elizabeth Runyan Geise	Review work in process report to prepare for call (0.2); call regarding work in process with co-counsel and client (1.0).	1.20	714.00
7/29/21	Valerie E. Ross	Review memo re work in process (0.3); Call with client and co-counsel re work in process (1.0).	1.30	760.50
7/30/21	Elizabeth Runyan Geise	Review pleadings in another Chapter 11 proceeding and emails regarding same.	0.50	297.50
7/30/21	Valerie E. Ross	Review pleadings in another chapter 11 case and emails re same.	0.70	409.50
TASK CODE 0715 TOTAL			15.00	\$8,772.00

TASK CODE 717 – Preparation of Expert Witnesses and Related Evidence

7/26/21	Valerie E. Ross	Review materials to potentially provide to retained professionals.	3.60	2,106.00
TASK CODE 0717 TOTAL			3.60	\$2,106.00

TASK CODE 0718 – Legal and Factual Analysis Relating to Asbestos Claims

7/1/21	Elizabeth Runyan Geise	Review draft reply to Trust Discovery motion; draft comments and suggestions; email regarding same.	4.10	2,439.50
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August 31, 2021
Invoice # 2528577
Bill Through July 31, 2021

7/1/21	Elizabeth Runyan Geise	Review comments on reply to PIQ motion.	0.30	178.50
7/1/21	Valerie E. Ross	Review and edit reply in support of trust discovery motion (6.1); Emails regarding same (0.2).	6.30	3,685.50
7/2/21	Elizabeth Runyan Geise	Emails concerning state law decision and state law issues.	0.30	178.50
7/2/21	Valerie E. Ross	Review and edit reply in support of trust discovery motion (5.1); Emails regarding same (0.2); Review and edit reply in support of PIQ motion (1.2).	6.50	3,802.50
7/5/21	Elizabeth Runyan Geise	Email to co-counsel regarding standard interrogatories.	0.30	178.50
7/5/21	Valerie E. Ross	Emails re reply in support of PIQ Motion (0.3); Review and edit reply in support of Trust Discovery Motion (1.9).	2.20	1,287.00
7/6/21	Elizabeth Runyan Geise	Begin review of revised Trust Discovery reply brief (0.8); discuss issues regarding brief with Mr. Cassada (0.3).	1.10	654.50
7/6/21	Valerie E. Ross	Review and analyze historical claims information (2.9); Review and edit reply in support of Trust Discovery Motion (1.3); Call with co-counsel re discovery motions and issues in connection with same (0.3).	4.50	2,632.50
7/7/21	Valerie E. Ross	Review and edit reply in support of Trust Discovery Motion (2.9); Review and analyze historical claims information (1.5).	4.40	2,574.00
7/8/21	Elizabeth Runyan Geise	Go over trust discovery reply; emails regarding same; review articles in response to email and make suggestions.	2.60	1,547.00
7/8/21	Valerie E. Ross	Review and analyze historical claims information (3.5); Emails re historical claims information (0.2).	3.70	2,164.50
7/9/21	Elizabeth Runyan Geise	Work on materials concerning historical settlement cases.	5.50	3,272.50
7/9/21	Elizabeth Runyan Geise	Calls and email concerning possible counsel.	0.50	297.50
7/9/21	Valerie E. Ross	Review and analyze historical claims information (4.1); Emails with co-counsel re reply in support of trust discovery motion (0.2).	4.30	2,515.50
7/9/21	Claudia Banks	Locate, obtain and deliver cited articles requested by E. Geise.	1.00	190.00
7/12/21	Valerie E. Ross	Review and analyze historical claims information (3.9); Emails re same (0.2).	4.10	2,398.50
7/12/21	Elizabeth Runyan Geise	Review materials concerning historical settlement cases.	7.40	4,403.00

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August 31, 2021
Invoice # 2528577
Bill Through July 31, 2021

7/13/21	Elizabeth Runyan Geise	Review discovery pleading from ACC/FCR.	0.90	535.50
7/13/21	Elizabeth Runyan Geise	Call with counsel concerning trust issues and assemble documents regarding same.	0.50	297.50
7/13/21	Valerie E. Ross	Review and analyze historical claims information (2.7); Emails re same (0.2); Call and emails with co-counsel re deposition of ACC expert in connection with DCQ motion (0.2); Review declarations in connection with possible depositions in connection with Trust discovery motion (0.7); Emails with co-counsel re same (0.2); Calls re strategy in connection with Trust discovery motion (0.6)	4.60	2,691.00
7/13/21	Valerie E. Ross	Call with retained professional re review and analysis of historical claims information.	0.20	117.00
7/14/21	Valerie E. Ross	Edit reply in support of Trust Discovery Motion (0.4); Begin review of materials in connection with upcoming deposition of ACC expert (0.3).	0.70	409.50
7/14/21	Elizabeth Runyan Geise	Go over historical case information from files and email regarding same (0.8); review articles in preparation for call on trust issues (0.5).	1.30	773.50
7/15/21	Elizabeth Runyan Geise	Call concerning trust discovery briefing (1.6); follow up to call (0.6); review legislative testimony on trust issues and email regarding same (1.3); email concerning strategy issues regarding trust discovery motion (0.3).	3.80	2,261.00
7/15/21	Valerie E. Ross	Call with Betsy Geise et al. re strategic issue (1.6); Call with co-counsel re strategic issue (0.7); Draft email to client and co-counsel re strategic issue (0.3).	2.60	1,521.00
7/15/21	Claudia Banks	Research Congressional documents to locate testimony, hearings, reports requested by E. Geise.	0.80	152.00
7/16/21	Elizabeth Runyan Geise	Review legislative materials relevant to discovery motion and draft email summary.	3.80	2,261.00
7/16/21	Elizabeth Runyan Geise	Review expert deposition relevant to upcoming deposition (1.9); email concerning deposition scheduling (0.1).	2.00	1,190.00
7/16/21	Valerie E. Ross	Edit reply in support of Trust Motion (2.7); Emails re possible depositions in connection with Trust Motion (0.2); Review materials and begin to draft memo re suggestions for upcoming deposition of ACC expert (1.1)	4.00	2,340.00
7/19/21	Valerie E. Ross	Continue reviewing materials and drafting memo re suggestions for upcoming deposition of ACC expert (6.1); Emails with client re strategic issue (0.1).	6.20	3,627.00

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Invoice # 2528577
Bill Through July 31, 2021

7/20/21	Elizabeth Runyan Geise	Review possible questions for deposition and draft possible questions.	1.70	1,011.50
7/20/21	Valerie E. Ross	Continue reviewing materials and drafting memo re suggestions for upcoming deposition of ACC expert.	5.50	3,217.50
7/21/21	Elizabeth Runyan Geise	Review draft TDP and comment on same.	2.10	1,249.50
7/21/21	Elizabeth Runyan Geise	Call with co-counsel concerning upcoming expert deposition	1.00	595.00
7/21/21	Valerie E. Ross	Call with co-counsel re upcoming deposition of ACC expert (1.0); Review and edit draft TDP (3.9); Emails with co-counsel re potential depositions in connection with Trust discovery motion (0.1); Continue reviewing materials and drafting memo re suggestions for upcoming deposition of ACC expert (1.5).	6.50	3,802.50
7/22/21	Elizabeth Runyan Geise	Review and comment on draft estimation motion.	1.30	773.50
7/22/21	Valerie E. Ross	Review and edit revised draft order in connection with trust discovery motion (1.9); Emails with co-counsel re same (0.2); Review and edit draft estimation motion (3.1).	5.20	3,042.00
7/23/21	Valerie E. Ross	Call with client and co-counsel re draft order in connection with trust discovery motion and related matters (0.5); Emails re reply in support of trust discovery motion (0.1); Review and edit draft estimation motion (0.3).	0.90	526.50
7/26/21	Valerie E. Ross	Compare Defense Counsel Questionnaire against already produced documents and prepare memorandum regarding same (3.1); Emails re same (0.2).	3.30	1,930.50
7/26/21	Elizabeth Runyan Geise	Review prior testimony for expert prior to deposition (2.2); edit memo concerning discovery pleading objection (2.9); email concerning possible additional brief (0.1).	5.20	3,094.00
7/27/21	Elizabeth Runyan Geise	Emails concerning possible amicus brief.	0.20	119.00
7/27/21	Valerie E. Ross	Edit memorandum regarding comparison between Defense Counsel Questionnaire and already produced documents (1.5); Call with Betsy Geise re same (0.2); Attend deposition of Dr. Peterson and calls with co-counsel regarding same (5.10).	6.80	3,978.00
7/27/21	Elizabeth Runyan Geise	Participate in Peterson deposition including calls with co-counsel.	5.10	3,034.50
7/27/21	Elizabeth Runyan Geise	Draft and edit memo concerning DCQ pleading; email and call re same.	2.00	1,190.00

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7/28/21	Elizabeth Runyan Geise	Call with co-counsel and others concerning hearing presentation.	1.50	892.50
7/28/21	Elizabeth Runyan Geise	Review materials from prior hearings in preparation for call concerning upcoming hearing.	2.90	1,725.50
7/28/21	Valerie E. Ross	Review latest draft of estimation motion (0.8); Call with co-counsel re preparation for hearing on discovery motions (1.5); Emails re same (0.2); Call with client re deposition of Dr. Peterson yesterday (0.4); Prepare for hearing on discovery motions (1.8).	4.70	2,749.50
7/28/21	Elizabeth Runyan Geise	Review draft motion and email regarding same.	0.30	178.50
7/29/21	Valerie E. Ross	Review and edit reply in support of Trust Discovery Motion (2.3); Review and edit reply in support of PIQ motion (0.3); Various emails re replies in support of discovery motions (0.2); Call with co-counsel re strategy for hearing on discovery motions and related matters (0.1); Emails re hearing on discovery motions (0.3); Prepare for hearing on discovery motions (0.5).	3.70	2,164.50
7/29/21	Elizabeth Runyan Geise	Review co-counsel comments on draft brief (0.2); review draft briefs (0.6); email concerning hearing format (0.1).	0.90	535.50
7/29/21	Claudia Banks	Search for Annual Reports of Asbestos Trusts requested by V. Ross.	1.50	285.00
7/30/21	Elizabeth Runyan Geise	Emails and calls concerning discovery responses and strategy for trust discovery.	0.70	416.50
7/30/21	Elizabeth Runyan Geise	Draft materials for hearing concerning trust discovery; call re same.	5.30	3,153.50
7/30/21	Valerie E. Ross	Participate in meet and confer with DCPF/JM Trust counsel re possible depositions and revised order on Trust Discovery Motion (0.8); Call with co-counsel re DCPF depositions and related matters (0.7); Call with Betsy Geise re preparation for hearing on discovery motions and related matters (0.3); Prepare for hearing on discovery motions (1.9); Work on deposition designations for hearing on discovery motions (1.6).	5.30	3,100.50
7/30/21	Claudia Banks	Search for dockets and annual reports of asbestos trusts requested by V. Ross.	0.80	152.00
7/31/21	Elizabeth Runyan Geise	Prepare materials for hearing on trust discovery.	2.10	1,249.50
TASK CODE 0718 TOTAL			167.00	\$96,742.50

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TASK CODE 0719 - Non-Bankruptcy Litigation Matters

7/1/21	Elizabeth Runyan Geise	Emails concerning historical documents.	0.10	59.50
7/1/21	Valerie E. Ross	Emails with jurisdictional counsel re status of Washington case (0.2); Emails with Betsy Geise and Brett Clements re review of historical documents (0.2).	0.40	234.00
7/1/21	Brett Clements	Review historical documents.	1.40	490.00
7/6/21	Brett Clements	Review historical documents (2.60); communicate with E. Geise and V. Ross re: historical documents (0.50).	3.10	1,085.00
7/7/21	Elizabeth Runyan Geise	Review Mr. Clements' emails and memo concerning historical documents.	0.30	178.50
7/8/21	Brett Clements	Conference with E. Geise and V. Ross re: historical documents.	2.00	700.00
7/8/21	Elizabeth Runyan Geise	Go over historical documents with Mr. Clements and Ms. Ross.	1.40	833.00
7/8/21	Valerie E. Ross	Review historical documents and confer with Betsy Geise and Brett Clements re same (2.1).	2.10	1,228.50
7/9/21	Brett Clements	Review historical documents.	1.20	420.00
7/12/21	Valerie E. Ross	Emails re historical documents.	0.10	58.50
7/12/21	Elizabeth Runyan Geise	Emails concerning historical documents.	0.20	119.00
7/12/21	Brett Clements	Review historical documents (3.90); communicate with E. Geise and V. Ross re: historical documents (0.30).	4.20	1,470.00
7/13/21	Elizabeth Runyan Geise	Review historical documents concerning products and emails from Mr. Clements regarding same.	3.10	1,844.50
7/14/21	Valerie E. Ross	Review historical documents and confer with Betsy Geise and Brett Clements re same.	5.50	3,217.50
7/14/21	Elizabeth Runyan Geise	Review and organize historical documents with Ms. Ross and Mr. Clements; call to client re same.	5.20	3,094.00
7/14/21	Brett Clements	Review historical documents.	5.10	1,785.00
7/15/21	Elizabeth Runyan Geise	Review historical documents for possible document production issue (1.8); email concerning same (0.1).	1.90	1,130.50
7/15/21	Valerie E. Ross	Continue review of historical documents (4.9); Emails with Betsy Geise and Brett Clements re same (0.3).	5.20	3,042.00
7/20/21	Valerie E. Ross	Emails re historical documents.	0.10	58.50

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7/22/21	Valerie E. Ross	Review historical documents.	0.50	292.50
7/23/21	Valerie E. Ross	Emails with client re California case and research re same.	0.30	175.50
7/29/21	Valerie E. Ross	Confer with Betsy Geise and Brett Clements re historical documents (0.5).	0.50	292.50
7/29/21	Elizabeth Runyan Geise	Review historical documents with Ms. Ross and Mr. Clements; organize historical documents.	0.50	297.50
7/29/21	Brett Clements	Communicate with E. Geise and V. Ross re: historical documents.	0.40	140.00

TASK CODE 0719 TOTAL	44.80	\$22,246.00
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TASK CODE 0721 - Fee Application Preparation

7/7/21	Valerie E. Ross	Edit June invoice.	1.80	1,053.00
7/12/21	Valerie E. Ross	Edit June invoice.	1.10	643.50
7/15/21	Elizabeth Runyan Geise	Edit June bill.	0.50	297.50
7/16/21	Valerie E. Ross	Edit June invoice.	0.30	175.50
7/23/21	Valerie E. Ross	Review and edit June invoice.	0.20	117.00
7/29/21	Valerie E. Ross	Review and edit invoice for June time.	0.40	234.00

TASK CODE 0721 TOTAL	4.30	\$2,520.50
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Bill Through July 31, 2021

TIMEKEEPER SUMMARY

TIMEKEEPER	HOURS	RATE	FEE AMOUNT
Elizabeth Runyan Geise	92.90	595.00	\$55,275.50
Valerie E. Ross	126.30	585.00	\$73,885.50
Jeffrey D. Skinner	1.20	525.00	\$630.00
Brett F. Clements	17.40	350.00	\$6,090.00
Claudia Banks	4.10	190.00	\$779.00
TOTAL	241.90		\$136,660.00

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DISBURSEMENTS/CHARGES:

On-Line Research Requested by E. Geise and V. Ross \$99.07

TOTAL DISBURSMENTS/CHARGES \$99.07

TOTAL INVOICE \$136,759.07

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August 31, 2021
Invoice # 2528577
Bill Through July 31, 2021

REMITTANCE STATEMENT

Client Name: DBMP, LLC

Invoice # 2528577

Total Fees: \$136,660.00

Total Disbursements: \$99.07

Current Total: \$136,759.07

Wire Instructions

Payment may be wired to
(Including International Transactions):

For Payment Via ACH:

JPMorgan Chase Bank N.A.
For Credit to: Schiff Hardin LLP
Account # 04233255
ABA # 021000021
Swift Code CHAS US 33
Please reference Invoice # 2528577

Chase
For Credit to: Schiff Hardin LLP
Account # 04233255
ABA # 071000013
Please reference Invoice # 2528577

Remittance Address:

Schiff Hardin LLP
233 S. Wacker Dr.
Suite 7100
Chicago, IL 60606



Schiff Hardin LLP
901 K Street NW
Suite 700
Washington, DC 20001

T 202.778.6400
F 202.778.6460

schiffhardin.com

October 4, 2021

Valerie E. Ross
(202) 778.6453
vross@schiffhardin.com

VIA EMAIL TO DEBTOR & NOTICE PARTIES IDENTIFIED BY COURT ORDER

Re: Monthly Statement Pursuant to Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals
In re DBMP LLC, Case No. 20-30080 (Bankr. W.D.N.C.)

Dear Counsel and Ms. Abel:

Enclosed please find the Monthly Fee Statement of Schiff Hardin LLP, provided pursuant to the Court's August 6, 2020 Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals. This statement covers the time period of August 1, 2021 through August 31, 2021.

Please contact me should you have any questions about the enclosed.

Sincerely,

/s/ Valerie E. Ross

Valerie E. Ross

VER/cdr
Enclosures
Cc: See attached list

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In Re

DBMP LLC,¹

Debtor

Chapter 11

Case No. 20-30080 (JCW)

**NINETEENTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY SCHIFF HARDIN LLP AS SPECIAL COUNSEL FOR THE DEBTOR
FOR THE PERIOD FROM AUGUST 1, 2021 THROUGH AUGUST 31, 2021**

In accordance with the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 402) (the “Interim Compensation Order”), Schiff Hardin LLP, special counsel to DBMP LLC as debtor and debtor in possession (the “Debtor”), submits its *Nineteenth Monthly Statement of Fees and Expenses Incurred by Schiff Hardin LLP as Special Counsel for the Debtor for the Period from August 1, 2021 through August 31, 2021* (the “Monthly Fee Statement”).

Itemization of Services Rendered and Expenses Incurred

1. Attached here as Exhibit A is Schiff Hardin LLP’s invoice for the period August 1, 2021 through August 31, 2021 (the “Statement Period”).

Total Fees and Expenses for the Statement Period

2. The total amount of fees and expenses incurred by Schiff Hardin LLP during the Statement Period are as follows:

¹ The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

Total Fees	\$161,600.00
Total Expenses	\$ 6,932.57
TOTAL	\$168,532.57

3. Pursuant to the Interim Compensation Order, Schiff Hardin LLP seeks payment of \$152,372.57 from the Debtor for the Statement Period (the “Interim Amount”), representing (a) 90% of Schiff Hardin’s fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtor, DBMP LLC, 20 Moores Road, Malvern, Pennsylvania 19355 (Attn.: Michael T. Starczewski, michael.t.starczewski@saint-gobain.com and dbmp@saint-gobain.com); (b) the Debtor’s Counsel, Jones Day, 1221 Peachtree Street, N.E., Suite 400, Atlanta, Georgia 30361 (Attn: Jeffrey B. Ellman, Esq., jbellman@jonesday.com); and Robinson, Bradshaw & Hinson, P.A., 1010 North Tyron Street, Suite 1900, Charlotte, North Carolina 28246 (Attn: Garland S. Cassada, Esq., gcassada@robinsonbradshaw.com); (c) United States Bankruptcy Administrator for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel for Debtor’s non-debtor affiliate, CertainTeed LLC (“New CT”), Goodwin Procter LLP, 1900 N Street, N.W., Washington, D.C. 20036 (Attn: Richard M. Wyner, Esq., rwynr@goodwinlaw.com); (e) counsel to the Official Asbestos Claimants’ Committee, Robinson & Cole, LLP, 1201 N. Market Street, Suite 1406, Wilmington, DE 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com, and Davis Lee Wright, Esq., dwright@rc.com); Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, DC 20005-5802 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com,

and Todd E. Phillips, Esq., tphillips@capdale.com); and Hamilton Stephens Steele + Martin, PLLC, 525 North Tyron Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) counsel to the Future Claimants' Representative, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801 (Attn: Ed Harron, Esq., eharron@ycst.com, and Sharon Zieg, Esq., szieg@ycst.com); and Alexander Ricks PLLC, 1420 E. 7th Street, Suite 100, Charlotte, North Carolina 28204 (Attn: Felton E. Parrish, Esq., Felton.Parrish@alexanderricks.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties and Schiff Hardin LLP, 901 K Street, N.W., Suite 700, Washington, D.C. 20001 (Attn: Valerie E. Ross, Esq., vross@schiffhardin.com) no later than October 18, 2021 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtor will be authorized to pay Schiff Hardin LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Schiff Hardin LLP at a later date.

Dated: October 4, 2021

Respectfully submitted,

/s/ Valerie E. Ross

SCHIFF HARDIN LLP

901 K Street, N.W.

Suite 700

Washington, D.C. 20001-6444

Telephone: (202) 778-6400

Facsimile: (202) 778-6460

E-mail: vross@schiffhardin.com

SPECIAL COUNSEL TO DBMP LLC

NOTICE PARTIES

DBMP LLC

Attn: Michael T. Starczewski (michael.t.starczewski@saint-gobain.com and dbmp@saint-gobain.com)
20 Moores Road
Malvern, PA 19355

Jones Day

Attn: Jeffrey B. Ellman (jbellman@jonesday.com)
1221 Peachtree Street, N.E., Suite 400
Atlanta, GA 30361

Robinson, Bradshaw & Hinton, P.A.

Attn: Garland S. Cassada (gcassada@robinsonbradshaw.com)
101 North Tryon Street, Suite 1900
Charlotte, North Carolina 28246

U.S. Bankruptcy Administrator

Attn: Shelley K. Abel (feeapplications@ncwba.uscourts.gov)
402 West Trade Street, Suite 200
Charlotte, NC 28202-1669

CertainTeed LLC

c/o Goodwin Procter LLP
Attn: Richard M. Wyner (rwynr@goodwinlaw.com)
1900 N Street, NW
Washington, DC 20036

Hamilton Stephens Steele + Martin, PLLC

Attn: Glenn C. Thompson (gthompson@lawhssm.com)
525 North Tryon Street, Suite 1400
Charlotte, NC 28202

Robinson & Cole LLP

Attn: Natalie D. Ramsey (nramsey@rc.com) and Davis Lee Wright (dwright@rc.com)
1201 North Market Street, Suite 1406
Wilmington, DE 19801

Caplin & Drysdale, Chartered

Attn: Kevin C. Maclay (kmaclay@capdale.com), James P. Wehner (jwehner@capdale.com), and
Todd E. Phillips (tphillips@capdale.com)
One Thomas Circle NW, Suite 1100
Washington, DC 20005-5802

Young Conaway Stargatt & Taylor, LLP

Attn: Ed Harron (eharron@ycst.com) and Sharon Zieg (szieg@ycst.com)

Rodney Square

1000 North King Street

Wilmington, Delaware 19801

Alexander Ricks PLLC

Attn: Felton E. Parrish (Felton.Parrish@alexanderricks.com)

1420 E. 7th Street, Suite 100

Charlotte, North Carolina 28203

Exhibit A



Schiff Hardin LLP
901 K Street N.W.
Suite 700
Washington, DC 20001

T 202.778.6400
F 202.778.6460

schiffhardin.com

Leslie Dallas, Litigation Assistant
Saint-Gobain Corporation
Law Department
20 Moores Road
Malvern, PA 19355

October 4, 2021
Invoice # 2531009
Matter # 45011
Federal Tax ID: 36-3184453

RE: Chapter 11 Case

FOR PROFESSIONAL SERVICES RENDERED THROUGH AUGUST 31, 2021

INVOICE SUMMARY INFORMATION

Total Professional Fees	\$161,600.00
Total Disbursements/Charges	<u>\$ 6,932.57</u>
Total Current Invoice	<u>\$168,532.57</u>
Total Current Charges (90% of professional fees & 100% of expenses)	\$152,372.57
TOTAL AMOUNT DUE AT THIS TIME	\$152,372.57

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BILLING SUMMARY

	FEES	DISBURSMENTS	TOTAL
0713 – Document Review and Production	\$20,713.50	\$2,074.00	\$22,787.50
0715 – Miscellaneous Tasks	\$13,540.00	\$100.60	\$13,640.60
0717 – Preparation of Expert Witnesses and Related Evidence	\$18,185.50	\$0.00	\$18,185.50
0718 – Legal and Factual Analysis Relating to Asbestos Claims	\$103,092.50	\$4,709.93	\$107,802.43
0719 - Non-Bankruptcy Litigation Matter	\$4,718.00	\$48.04	\$4,766.04
0721 - Fee Application Preparation	\$1,350.50	\$0.00	\$1,350.50
GRAND TOTAL	\$161,600.00	\$6,932.57	\$168,532.57

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PROFESSIONAL SERVICES RENDERED

TASK CODE 0713 – Document Review and Production

8/2/21	Valerie E. Ross	Emails with co-counsel re document production today.	0.10	58.50
8/12/21	Elizabeth Runyan Geise	Begin draft of discovery chronology to use for meet and confer.	1.20	714.00
8/13/21	Valerie E. Ross	Emails with Betsy Geise re discovery issues.	0.20	117.00
8/13/21	Elizabeth Runyan Geise	Outline chronology of discovery, including review of responses, emails, document productions, and meet and confer letters (4.7); emails re same (0.2).	4.90	2,915.50
8/15/21	Elizabeth Runyan Geise	Edit chronology of discovery; assemble back up documents and draft cover memo.	1.60	952.00
8/16/21	Valerie E. Ross	Call re discovery issues and related matters.	0.30	175.50
8/16/21	Elizabeth Runyan Geise	Edit memo concerning discovery issues (0.3); call regarding same (0.3).	0.60	357.00
8/17/21	Valerie E. Ross	Review and edit discovery chronology in connection with anticipated motion to compel (1.5); Emails regarding same (0.2); Several emails and call re discovery issues (0.3); Collect documents relating to discovery issues (0.3).	2.30	1,345.50
8/18/21	Elizabeth Runyan Geise	Assemble materials on cases in preparation for call on Friday (2.9); draft and edit memo concerning alternatives to discuss on Friday's call (0.9); emails regarding same (0.6); outline possible searches related to historical cases (1.0).	5.40	3,213.00
8/18/21	Valerie E. Ross	Continue to collect documents relating to discovery issue (2.3); Edit memo regarding discovery issue (1.4); Several emails regarding discovery issue (0.3).	4.00	2,340.00
8/19/21	Elizabeth Runyan Geise	Review and edit cover memo for call with co-counsel tomorrow (0.4); emails regarding same (0.2); review additional documents to discuss tomorrow (0.8).	1.40	833.00
8/19/21	Valerie E. Ross	Edit memo regarding discovery issue (0.9); emails re same (0.4); Emails with client re discovery issue and review documents in connection with same (1.6); Review indices location of relating to company documents (0.9).	3.80	2,223.00
8/20/21	Elizabeth Runyan Geise	Call with co-counsel concerning records concerning historical claims (1.5); review records concerning historical claims (0.5).	2.00	1,190.00

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8/20/21	Valerie E. Ross	Call with client and co-counsel re records concerning historical claims (1.5); Emails re same (0.2); Review documents in connection with same (0.6).	2.30	1,345.50
8/23/21	Valerie E. Ross	Call with client and co-counsel re discovery issues.	0.60	351.00
8/26/21	Valerie E. Ross	Emails with co-counsel regarding FCR discovery request (0.2); Emails with FCR counsel re same (0.2).	0.40	234.00
8/26/21	Elizabeth Runyan Geise	Emails and calls concerning response to email concerning discovery issue; draft email response.	0.50	297.50
8/27/21	Elizabeth Runyan Geise	Review certain historical documents in connection with discovery requests.	0.40	238.00
8/27/21	Valerie E. Ross	Review ACC motion to compel Bates White calculations and emails with co-counsel re same.	0.50	292.50
8/30/21	Valerie E. Ross	Review historical settlement documents (1.1); Call re historical settlement documents (0.3); Review ACC motion to compel (1.2).	2.60	1,521.00
TASK CODE 0713 TOTAL			35.10	\$20,713.50
<i>TASK CODE 0715 - Miscellaneous Tasks</i>				
8/2/21	Elizabeth Runyan Geise	Review pleadings in another Chapter 11 case and email regarding same.	0.20	119.00
8/3/21	Valerie E. Ross	Review memo re work in process (0.2); Call with client and co-counsel re work in process (0.7).	0.90	526.50
8/3/21	Elizabeth Runyan Geise	Review and draft email concerning news article (0.2); review and draft email concerning pleading in another Chapter 11 case (0.2); review work in process memo to prepare for call today (0.3); call with co-counsel regarding work in process (0.7).	1.40	833.00
8/5/21	Jeffrey D. Skinner	Review filings in the bankruptcy proceeding.	0.40	210.00
8/9/21	Elizabeth Runyan Geise	Review pleadings in another chapter 11 case.	0.30	178.50
8/10/21	Elizabeth Runyan Geise	Review work in process memo to prepare for conference call (0.2); conference call with co-counsel concerning work in process (1.0).	1.20	714.00
8/10/21	Valerie E. Ross	Review decision in bankruptcy case (1.5); Review memo re work in process (0.2); Call with client and co-counsel re work in process (1.0).	2.70	1,579.50

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8/10/21	Elizabeth Runyan Geise	Review preliminary injunction decision; emails regarding same.	0.80	476.00
8/11/21	Elizabeth Runyan Geise	Email concerning article on legislative issues.	0.10	59.50
8/12/21	Elizabeth Runyan Geise	Call regarding scheduling conference and emails regarding same.	0.60	357.00
8/12/21	Valerie E. Ross	Call and emails with co-counsel and client re today's status conference and schedule for upcoming hearings (0.6).	0.60	351.00
8/13/21	Elizabeth Runyan Geise	Email about proceedings in another Chapter 11 case (0.2); review emails concerning scheduling (0.2).	0.40	238.00
8/16/21	Elizabeth Runyan Geise	Email concerning another Chapter 11 case.	0.10	59.50
8/17/21	Elizabeth Runyan Geise	Email concerning another Chapter 11 case (0.1); go over work in process memo to prepare for call today (0.3); call regarding work in process (1.0).	1.40	833.00
8/17/21	Valerie E. Ross	Review filings in other chapter 11 case (0.3); Review memo re work in process (0.2); Call with client and co-counsel re work in process (1.0).	1.50	877.50
8/20/21	Elizabeth Runyan Geise	Review pleadings on privilege from another Chapter 11 proceeding.	0.50	297.50
8/23/21	Elizabeth Runyan Geise	Review new motions by ACC/FCR (0.8); review work in process report for call tomorrow (0.3).	1.10	654.50
8/23/21	Valerie E. Ross	Review filings from another Chapter 11 case.	0.40	234.00
8/23/21	Jeffrey D. Skinner	Review filings and hearing transcripts from the bankruptcy proceeding.	0.70	367.50
8/24/21	Elizabeth Runyan Geise	Call with co-counsel regarding work in process.	1.00	595.00
8/26/21	Elizabeth Runyan Geise	Participate in call with co-counsel concerning upcoming briefing and scheduling.	1.10	654.50
8/26/21	Valerie E. Ross	Call with client and co-counsel re case strategy, upcoming briefing and scheduling.	1.10	643.50
8/27/21	Elizabeth Runyan Geise	Email concerning another Chapter 11 case (0.1); review pleadings in another Chapter 11 case (0.5).	0.60	357.00
8/27/21	Jeffrey D. Skinner	Review filings and orders in the bankruptcy proceeding.	3.30	1,732.50
8/30/21	Elizabeth Runyan Geise	Email concerning another Chapter 11 case (0.1); review briefing schedule (0.1); review and email concerning motion to continue (0.5).	0.70	416.50
8/31/21	Valerie E. Ross	Review filings in other chapter 11 case.	0.30	175.50

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Bill Through August 31, 2021

TASK CODE 0715 TOTAL	23.40	\$13,540.00
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TASK CODE 717 – Preparation of Expert Witnesses and Related Evidence

8/3/21	Elizabeth Runyan Geise	Call with retained experts and others concerning analysis.	1.00	595.00
8/3/21	Valerie E. Ross	Call with retained professional, client, and co-counsel re case approach and strategy (1.0); Call re materials for retained professional and related matters (0.2).	1.20	702.00
8/12/21	Valerie E. Ross	Prepare for and call with retained professionals and client re status of ongoing project (1.3); Continue review of materials to potentially provide to retained professionals (1.8); Call re same (0.1).	3.20	1,872.00
8/12/21	Elizabeth Runyan Geise	Prepare for follow up to call with retained expert (0.3); call with expert concerning upcoming project (1.1).	1.40	833.00
8/13/21	Valerie E. Ross	Continue review of materials to potentially provide to retained professionals (2.6); Emails re same (0.2).	2.80	1,638.00
8/17/21	Valerie E. Ross	Emails with retained professional re materials to review (0.1); Continue review of materials to potentially provide to retained professional (0.6).	0.70	409.50
8/18/21	Valerie E. Ross	Call with retained professional re materials in connection with ongoing project (0.7); Emails with retained professional re same (0.1); Call re materials in connection with ongoing project (0.2).	1.00	585.00
8/19/21	Valerie E. Ross	Review chart from retained professional re materials relevant to ongoing project (0.6); Emails re same and related matters (0.7); Continue review of materials to potentially provide to retained professional (1.5).	2.80	1,638.00
8/19/21	James S. Whiteree	Search for and collect historical documents requested by V. Ross.	2.50	275.00
8/20/21	Valerie E. Ross	Continue review of materials to potentially provide to retained professional (3.9); Emails re upcoming deposition of Dr. Bates (0.1).	4.00	2,340.00
8/20/21	James S. Whiteree	Search for and collect historical documents requested by V. Ross.	2.50	275.00
8/24/21	Elizabeth Runyan Geise	Go over issues to prepare for expert deposition prep session.	2.30	1,368.50

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8/25/21	Elizabeth Runyan Geise	Prepare for deposition preparation session with retained expert (0.8); attend deposition preparation session (2.1); draft email summary of deposition preparation session for co-counsel (0.5).	3.40	2,023.00
8/27/21	Valerie E. Ross	Attend deposition of Charley Bates and calls with co-counsel re same (4.7); Call with Betsy Geise re Bates deposition and related matters (0.3).	5.00	2,925.00
8/27/21	Elizabeth Runyan Geise	Calls and emails concerning deposition of retained expert.	0.30	178.50
8/30/21	James S. Whiteree	Search for and collect historical documents requested by V. Ross.	1.30	143.00
8/31/21	James S. Whiteree	Search for and collect historical documents requested by V. Ross.	3.50	385.00
TASK CODE 0717 TOTAL			38.90	\$18,185.50

TASK CODE 0718 – Legal and Factual Analysis Relating to Asbestos Claims

8/1/21	Elizabeth Runyan Geise	Email concerning question for briefing (0.3); emails concerning possible research issues (0.2).	0.50	297.50
8/1/21	Valerie E. Ross	Research in connection with deposition of DCPF witness next week (0.9); Work on deposition designations for hearing on discovery motions (1.3).	2.20	1,287.00
8/2/21	Valerie E. Ross	Calls with co-counsel and Betsy Geise re preparation for discovery motion hearing (.9); Several emails re same (0.4); Continue work on deposition designations for hearing on discovery motions (1.8); Work on presentation for discovery motion hearing next week (4.5).	7.60	4,446.00
8/2/21	Elizabeth Runyan Geise	Emails regarding prior depositions/statements of next week's deponents.	0.50	297.50
8/2/21	Elizabeth Runyan Geise	Draft and edit slides for oral argument on trust discovery; emails regarding same.	4.70	2,796.50
8/2/21	Elizabeth Runyan Geise	Call with co-counsel concerning next week's argument and depositions.	0.90	535.50
8/2/21	Claudia Banks	Search for documents requested by E. Geise.	0.80	152.00
8/3/21	Elizabeth Runyan Geise	Go over draft brief and make suggestions.	4.80	2,856.00
8/3/21	Valerie E. Ross	Work on presentation for discovery motion hearing (5.2); Emails re same (0.2); Emails re deposition of DCPF and JM Trust (0.1).	5.50	3,217.50

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8/3/21	Elizabeth Runyan Geise	Go over PowerPoint presentation and email regarding same.	1.00	595.00
8/4/21	Elizabeth Runyan Geise	Review prior Manville Trust officer depositions.	4.50	2,677.50
8/4/21	Elizabeth Runyan Geise	Review draft brief and email concerning same.	0.40	238.00
8/4/21	Valerie E. Ross	Call with co-counsel re preparation for hearing on discovery motion (1.5); Research and review materials in connection with upcoming deposition of DCPF witness (3.1); Multiple emails with co-counsel re same (0.3); Review and edit draft objection to motion for defense counsel questionnaire (2.2); Edit presentation for discovery motion hearing (0.8).	7.90	4,621.50
8/4/21	Elizabeth Runyan Geise	Emails concerning PowerPoint slides (0.5); call with co-counsel concerning hearing presentation (1.5).	2.00	1,190.00
8/5/21	Valerie E. Ross	Research and review materials in connection with upcoming deposition of DCPF witness (0.8); Emails with co-counsel re same (0.2); Continue reviewing and editing draft objection to motion for defense counsel questionnaire (4.5); Call with Betsy Geise re same (0.2).	5.70	3,334.50
8/5/21	Elizabeth Runyan Geise	Go over comments on draft brief; call with Ms. Ross regarding same; review deposition and draft email with further thoughts.	1.30	773.50
8/5/21	Elizabeth Runyan Geise	Email to jurisdictional counsel regarding deposition exhibits (0.1); email concerning trust personnel and new case concerning trust discovery (0.5); review prior testimonies and deposition exhibits for information concerning trust discovery issues (3.9); assemble complaints and discovery responses to illustrate point concerning trust discovery (2.1).	6.60	3,927.00
8/6/21	Elizabeth Runyan Geise	Review materials concerning hearing presentation and emails regarding same.	0.40	238.00
8/6/21	Elizabeth Runyan Geise	Review brief and emails regarding same.	0.60	357.00
8/6/21	Valerie E. Ross	Continue reviewing and editing draft objection to motion for defense counsel questionnaire (1.1); Research and review materials in connection with upcoming deposition of DCPF witness (1.2); Emails in connection with same (0.3); Work on presentation for discovery motion hearing (1.8); Review and analyze historical claims information (0.7); Emails re historical claims information (0.1).	5.20	3,042.00

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8/6/21	Elizabeth Runyan Geise	Review materials concerning trusts, prior depositions, deposition exhibits, articles concerning trusts, and outline topics for Manville Trust deposition questions (5.9); briefly review discovery from trust counsel (0.5).	6.40	3,808.00
8/6/21	Claudia Banks	Search for documents requested by E. Geise and V Ross.	1.50	285.00
8/9/21	Valerie E. Ross	Review materials and draft potential questions for upcoming deposition of DCPF representative (5.1); Legal research in connection with same (0.8); Multiple emails re same (0.2).	6.10	3,568.50
8/9/21	Elizabeth Runyan Geise	Review documents; ask library to find additional articles and materials; draft outline of questions for Manville Trust deposition.	6.90	4,105.50
8/9/21	Claudia Banks	Search for documents requested by E. Geise.	0.80	152.00
8/10/21	Elizabeth Runyan Geise	Draft questions for Manville Trust deposition and review and assemble materials re same (4.3); discuss with Ms. Ross (0.2).	4.50	2,677.50
8/10/21	Valerie E. Ross	Continue review of materials and drafting of potential questions for upcoming deposition of DCPF representative (3.6); Call with Betsy Geise re same and related matters (0.2).	3.80	2,223.00
8/10/21	Elizabeth Runyan Geise	Review historical case files for relevant information.	2.20	1,309.00
8/11/21	Elizabeth Runyan Geise	Draft and edit outlines for Trust depositions (3.9); emails with library concerning pleadings in other cases (0.5); review pleadings in three cases (1.2); go over DCPF discovery responses (0.6); go over attachments to various declarations submitted in opposition to Trust Discovery motions (1.2).	7.40	4,403.00
8/11/21	Valerie E. Ross	Edit draft of potential questions for upcoming deposition of DCPF representative and continue review of materials in connection with same (2.9); Review and edit draft outline of potential questions for JM Trust representative deposition (2.7); Emails re upcoming depositions (0.3).	5.90	3,451.50
8/11/21	Claudia Banks	Search for documents as requested by E. Geise.	1.50	285.00
8/12/21	Valerie E. Ross	Edit outlines for upcoming DCPF and JM Trust depositions (1.1); Emails re same (0.2); Call with co-counsel and Betsy Geise re upcoming depositions (0.6).	1.90	1,111.50
8/12/21	Elizabeth Runyan Geise	Go over pleadings from prior case (0.3); finalize Manville Trust deposition outline and email regarding same (0.5); call with co-counsel concerning upcoming depositions (0.6).	1.40	833.00
8/12/21	Claudia Banks	Obtain documents as requested by V. Ross.	0.50	95.00

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8/16/21	Valerie E. Ross	Attend deposition of Jared Garelick (4.5); Attend deposition of Richard Winner (3.2); Call re deposition follow-up (0.2).	7.90	4,621.50
8/16/21	Elizabeth Runyan Geise	Participate in depositions of Garelick and Winner (Manville and DCPF trusts), including calls with co-counsel.	7.80	4,641.00
8/16/21	Claudia Banks	Obtain documents as requested by E. Geise.	0.50	95.00
8/17/21	Elizabeth Runyan Geise	Assemble historical case materials for certain cases.	4.10	2,439.50
8/17/21	Elizabeth Runyan Geise	Call regarding assembly of documents for historical settlements (0.2); begin to assemble documents for historical cases (1.8).	2.00	1,190.00
8/19/21	Elizabeth Runyan Geise	Assemble information concerning historical cases for expert.	3.00	1,785.00
8/20/21	Elizabeth Runyan Geise	Review and assemble historical claim documents for retained experts (2.8); email with Ms. Ross regarding same (0.1).	2.90	1,725.50
8/23/21	Elizabeth Runyan Geise	Review briefs in another Chapter 11 case on legal issue (0.8); call with co-counsel on strategy for legal issue (0.7); emails with Mr. Cassada concerning email regarding same (0.4); review Information Brief response filed by the ACC/FCR (0.9).	2.80	1,666.00
8/23/21	Valerie E. Ross	Review and collect historical case information (1.7); Emails with Betsy Geise re same (0.1).	1.80	1,053.00
8/24/21	Elizabeth Runyan Geise	Go over dockets from other Chapter 11 cases for relevant pleadings.	1.00	595.00
8/24/21	Claudia Banks	Obtain and deliver documents as requested by E. Geise.	0.50	95.00
8/25/21	Elizabeth Runyan Geise	Review Information Brief response (0.9); review other briefs, all in preparation for call with co-counsel regarding same (1.9).	2.80	1,666.00
8/26/21	Elizabeth Runyan Geise	Go over docket and pleadings concerning trust discovery in another Chapter 11 case (1.1); assemble information on historical settlement cases (1.1).	2.20	1,309.00
8/26/21	Valerie E. Ross	Call re ACC informational brief and related matters.	0.20	117.00
8/27/21	Elizabeth Runyan Geise	Assemble information on historical claims (2.0); email concerning same (0.1); review information brief response in detail and begin outlining response (2.5).	4.60	2,737.00
8/30/21	Elizabeth Runyan Geise	Review brief and outline reply concerning Informational Brief (2.2); call to Ms. Ross regarding same (0.2); begin drafting sections of reply to Informational Brief (2.9).	5.30	3,153.50

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8/30/21	Elizabeth Runyan Geise	Review materials concerning historical claims (1.0); email to client regarding same (0.1); review additional documents (0.5); email to Ms. Ross regarding same (0.1).	1.70	1,011.50
8/30/21	Valerie E. Ross	Review ACC informational brief (2.8); Call with Betsy Geise re ACC informational brief and related matters (0.2); Review draft motion to continue (0.5); Emails with client and co-counsel re analysis of historical claims (0.3).	3.80	2,223.00
8/31/21	Elizabeth Runyan Geise	Outline and draft section of reply Informational Brief.	4.90	2,915.50
8/31/21	Valerie E. Ross	Begin drafting reply to ACC informational brief (4.5); Emails re same (0.1); Draft letter re information sought in connection with analysis of historical claims (0.3).	4.90	2,866.50
TASK CODE 0718 TOTAL			178.60	\$103,092.50

TASK CODE 0719 - Non-Bankruptcy Litigation Matters

8/5/21	Brett Clements	Review historical documents (1.20); communicate with E. Geise and V. Ross re: historical documents (0.20).	1.40	490.00
8/6/21	Brett Clements	Communicate with E. Geise and V. Ross re: historical documents.	0.10	35.00
8/9/21	Brett Clements	Review historical documents.	2.90	1,015.00
8/10/21	Valerie E. Ross	Emails with protected parties re case status.	0.10	58.50
8/11/21	Valerie E. Ross	Edit status report for Pennsylvania case and emails in connection with same.	0.10	58.50
8/11/21	Elizabeth Runyan Geise	Email concerning case status.	0.10	59.50
8/12/21	Elizabeth Runyan Geise	Email concerning non-bankruptcy case.	0.20	119.00
8/12/21	Valerie E. Ross	Edit status report for Pennsylvania case (0.1); Emails in connection with same (0.1).	0.20	117.00
8/16/21	Elizabeth Runyan Geise	Email concerning non-bankruptcy case.	0.40	238.00
8/17/21	Brett Clements	Review historical documents.	2.10	735.00
8/17/21	Valerie E. Ross	Call with jurisdictional counsel re Washington case.	0.30	175.50
8/18/21	Brett Clements	Review historical documents.	1.90	665.00
8/19/21	Elizabeth Runyan Geise	Review new complaint; edit and finalize letter to counsel regarding same; review order to enclose.	0.70	416.50

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8/30/21	Elizabeth Runyan Geise	Review new complaint and edit letter regarding same.	0.50	297.50
8/31/21	Elizabeth Runyan Geise	Finalize letter concerning preliminary injunction to plaintiffs' counsel (0.3); emails regarding same (0.1).	0.40	238.00

TASK CODE 0719 TOTAL		11.40	\$4,718.00
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TASK CODE 0721 - Fee Application Preparation

8/17/21	Valerie E. Ross	Review and edit July invoice.	1.40	819.00
8/19/21	Elizabeth Runyan Geise	Review and edit July billing.	0.50	297.50
8/19/21	Valerie E. Ross	Edit July invoice.	0.20	117.00
8/23/21	Valerie E. Ross	Review invoice for June time.	0.20	117.00

TASK CODE 0721 TOTAL		2.30	\$1,350.50
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TIMEKEEPER SUMMARY

TIMEKEEPER	HOURS	RATE	FEE AMOUNT
Elizabeth Runyan Geise	142.80	595.00	\$84,966.00
Valerie E. Ross	118.20	585.00	\$69,147.00
Jeffrey D. Skinner	4.40	525.00	\$2,310.00
Brett F. Clements	8.40	350.00	\$2,940.00
Claudia Banks	6.10	190.00	\$1,159.00
James S. Whiteree	9.80	110.00	\$1,078.00
TOTAL	289.70		\$161,600.00

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DISBURSEMENTS/CHARGES:

Delivery Services – Federal Express	\$169.26
Duplicating and Binding – Black/White Copies	\$82.60
Filing Fees	\$252.40
On-Line Research Requested by E. Geise and V. Ross	\$929.55
Investigative Expenses	\$3,283.00
Outside Courier Services – Best Messenger	\$100.60
Outside Duplicating and Binding	\$20.50
Outside On-Line Data Research	\$394.34
eDiscovery Support Services	\$2,074.00
TOTAL DISBURSEMENTS/CHARGES	\$6,932.57
TOTAL INVOICE	\$168,532.57

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REMITTANCE STATEMENT

Client Name: DBMP, LLC

Invoice # 2531009

Total Fees: \$161,600.00

Total Disbursements: \$6,932.57

Current Total: \$168,532.57

Wire Instructions

Payment may be wired to
(Including International Transactions):

For Payment Via ACH:

JPMorgan Chase Bank N.A.
For Credit to: Schiff Hardin LLP
Account # 04233255
ABA # 021000021
Swift Code CHAS US 33
Please reference Invoice # 2531009

Chase
For Credit to: Schiff Hardin LLP
Account # 04233255
ABA # 071000013
Please reference Invoice # 2531009

Remittance Address:

Schiff Hardin LLP
233 S. Wacker Dr.
Suite 7100
Chicago, IL 60606

EXHIBIT B

Proposed Order of the Court

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH
CAROLINA CHARLOTTE DIVISION**

In Re

DBMP LLC,¹

Debtor

Chapter 11

Case No. 20-30080 (JCW)

**ORDER GRANTING THE FIFTH INTERIM APPLICATION OF
SCHIFF HARDIN LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO
THE DEBTOR FOR THE PERIOD FROM MAY 1 THROUGH AUGUST 31, 2021**

This matter coming before the Court on the *Fifth Interim Application of Schiff Hardin LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses as Special Counsel to the Debtor for the Period From May 1, 2021 Through August 31,*

¹ The last four digits of the Debtor's taxpayer identification number are 8817. The Debtor's address is 20 Moores Road, Malvern, Pennsylvania 19355.

2021 (the “Interim Fee Application”)² filed by Schiff Hardin LLP as special counsel to the above-captioned debtor and debtor in possession (the “Debtor”); the Court having reviewed the Interim Fee Application; the Court having found that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (c) notice of the Interim Fee Application and the notice of an opportunity for hearing were served upon the parties required by Local Rule 2002-1(g) and the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 402] (the “Amended Interim Compensation Order”) and no other or further notice is required, (d) the compensation requested in the Interim Fee Application is reasonable and for actual and necessary services rendered by Schiff Hardin LLP on behalf of the Debtor during the period from May 1, 2021 through August 31, 2021 (the “Compensation Period”), the expenses for which reimbursement is sought in the Interim Fee Application are actual and necessary expenses incurred by Schiff Hardin LLP during the Compensation Period on behalf of the Debtor and (f) the Interim Fee Application fully complies with the Interim Compensation Order, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the Compensation Guidelines; and the Court having determined that the legal and factual bases set forth in the Interim Fee Application establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Interim Fee Application is GRANTED.
2. Schiff Hardin LLP is awarded, on an interim basis, compensation for professional services rendered during the Compensation Period in the amount of \$606,026.00,

² Capitalized terms not otherwise defined herein have the meanings given to them in the Interim Fee Application.

and reimbursement for actual and necessary expenses incurred by Schiff Hardin LLP during the Compensation Period in the amount of \$22,228.76.

3. The Debtor and Schiff Hardin LLP are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

4. This Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation, enforcement or interpretation of this Order.

This Order has been signed electronically.
The Judge's signature and court's seal appear
at the top of the Order.

United States Bankruptcy Court

DC:82321798.1