

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

In re

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**FIFTH INTERIM APPLICATION OF ROBINSON, BRADSHAW & HINSON, P.A. FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
PROFESSIONAL SERVICES RENDERED AS SPECIAL COUNSEL FOR ASBESTOS
CLAIMS ESTIMATION MATTERS AND LOCAL BANKRUPTCY COUNSEL FOR
THE DEBTOR FOR THE PERIOD FROM MAY 1, 2021
THROUGH AUGUST 31, 2021**

Name of Applicant: Robinson, Bradshaw & Hinson, P.A.

Authorized to Provide Professional Services to: Debtor

Date of Retention: Order entered on March 17, 2020

Period for which compensation and reimbursement is sought: May 1, 2021 through August 31, 2021

Amount of Compensation sought as actual, reasonable and necessary: \$276,232.50

Amount of Expense Reimbursement sought as actual, reasonable and necessary: \$1,462.41

Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary: \$277,694.91

This is a _____ monthly X interim _____ final application.

This is the fifth interim fee application filed by Robinson, Bradshaw & Hinson, P.A.

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.

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FIFTH INTERIM APPLICATION OF ROBINSON, BRADSHAW & HINSON, P.A. FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR PROFESSIONAL SERVICES RENDERED AS SPECIAL COUNSEL FOR ASBESTOS CLAIMS ESTIMATION MATTERS AND LOCAL BANKRUPTCY COUNSEL FOR THE DEBTOR FOR THE PERIOD FROM MAY 1, 2021 THROUGH AUGUST 31, 2021

Robinson, Bradshaw & Hinson, P.A. (“RBH”) submits this Fifth Interim Application (the “Application”) for Allowance of Compensation and Reimbursement of Expenses for Professional Services Rendered as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel for DBMP LLC (the “Debtor”) for the period from May 1, 2021 through August 31, 2021 (the “Interim Period”) pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure, and this Court’s Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals (the “Compensation Order”) entered February 13, 2020 (Docket No. 150).

By this Application, RBH hereby moves this Court for an order awarding it reasonable compensation for the Interim Period for professional legal services rendered to the Debtor in the amount of \$276,232.50 and reimbursement for actual and necessary expenses incurred in the

² The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

amount of \$1,462.41 for a total of \$277,694.91. In support of this Application, RBH states as follows:

I. BACKGROUND

1. On January 23, 2020, the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

2. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

3. The Debtor is operating its business and managing its affairs as a debtor-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code. No trustee has been appointed in the Debtor's case.

4. On January 23, 2020, the Debtor filed its *Ex Parte* Application for Entry of an Order Authorizing the Employment of Robinson, Bradshaw & Hinson, P.A. as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel for the Debtor as of the Petition Date (Docket No. 18.).

5. On January 24, 2020, the Court entered an Order Approving Employment of Robinson, Bradshaw & Hinson, P.A. as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel for the Debtor as of the Petition Date (Docket No. 36) in this Chapter 11 case. On March 17, 2020, the Court entered an Amended Order Approving Employment of Robinson, Bradshaw & Hinson, P.A. as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel for the Debtor as of the Petition Date (Docket No. 203) in this Chapter 11 case.

6. On February 14, 2020, the Court entered an order appointing an Official Committee of Asbestos Claimants (the "Committee") (Docket No. 155). On June 1, 2020, the

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

7. On June 26, 2020, RBH filed its First Interim Fee Application (Docket No. 355) covering the time period from January 23, 2020 through April 30, 2020.

8. On October 16, 2020, RBH filed its Second Interim Fee Application (Docket No. 531) covering the time period from May 1, 2020 through August 31, 2020.

9. On February 18, 2021, RBH filed its Third Interim Fee Application (Docket No. 681) covering the time period from September 1, 2020 through December 31, 2020.

10. On June 24, 2021, RBH filed its Fourth Interim Fee Application (Docket No. 898) covering the time period from January 1, 2021 through April 30, 2021.

11. After April 30, 2021, RBH has rendered services and incurred reasonable expenses on behalf of the Debtor.

12. The period for which fees and expenses are sought in this Application commences May 1, 2021 through August 31, 2021. Since May 1, 2021, RBH has rendered services and incurred reasonable expenses on behalf of the Debtor.

13. Pursuant to the Compensation Order, professionals may request monthly compensation and reimbursement. Such requests are to be served on certain identified interested parties for review. If no objection to a professional’s request is received within fourteen (14) days of such request, the Debtor is authorized to pay 90% of the fees and 100% of the expenses requested. The Compensation Order also requires each retained professional to file, approximately every four months, an application for interim Court approval and allowance pursuant to section 331 of the Bankruptcy Code of 100% of the compensation and reimbursement expenses for the prior months.

II. COMPENSATION RECEIVED DURING INTERIM PERIOD

14. All services for which RBH seeks compensation were performed for or on behalf of the Debtor. During the Interim Period, RBH received partial monthly payments pursuant to the Compensation Order as follows:

<u>Date of Request</u>	<u>Time Period Covered by Request</u>	<u>Requested Fees</u>	<u>Requested Expenses</u>	<u>Payment* Received</u>
7/28/21	May 1, 2021 through May 31, 2021	\$38,762.50	\$329.80	\$35,216.05
8/11/21	June 1, 2021 through June 30, 2021	\$90,944.00	\$377.85	\$82,227.45
9/15/21	July 1, 2021 through July 31, 2021	\$73,284.50	-0-	\$65,956.05
10/5/21	August 1, 2021 through August 31, 2021	\$73,241.50	\$754.76	-0-
TOTAL	May 1, 2021 through August 31, 2021	\$276,232.50	\$1,462.41	\$183,399.55

*Fees paid at 90% and Expenses at 100% pursuant to Compensation Order

15. RBH's monthly fee requests were served upon certain interested parties for review as directed by the Compensation Order. As of the date of this Application, no interested party has objected to any of RBH's monthly fee requests.

16. There is no agreement or understanding between RBH and any other person, other than the members and associates of RBH, for the sharing of compensation to be received for services rendered in these cases.

III. SUMMARY OF SERVICES RENDERED BY RBH

17. Attached hereto as Exhibits A-1 through A-4 are detailed descriptions of the services performed and expenses incurred by RBH from May 1, 2021 through August 31, 2021. In summary, RBH expended 599.8 hours in rendering necessary legal services involving the Debtor's chapter 11 proceeding for the Interim Period. The fees total \$276,232.50 for the Interim Period (consisting of \$38,762.50 for month of May, 2021; \$90,944.00 for the month of June,

2021; \$73,284.50 for the month of July, 2021; and \$73,241.50 for month of August, 2021). RBH further incurred costs in regard to these proceedings in the amount of \$1,462.41 for the Interim Period (consisting of \$329.90 for month of May, 2021; \$377.85 for month of June, 2021; \$0 for month of July, 2021; and \$754.76 for month of August, 2021). On Exhibit B, RBH has categorized its time by the project categories (the “Project Categories”) consistent with but more detailed than the categories recommended by the Guidelines for Compensation and Expense Reimbursement of Professionals (the “Compensation Guidelines”) as set forth in Appendix A to the Local Rules of the United States Bankruptcy Court for the Western District of North Carolina. On Exhibit C, RBH has itemized the cost and expenses incurred on behalf of the Debtor that were billed during the Interim Period.

18. RBH believes that its billing rates for the Interim Period should be deemed “reasonable billing rates” for purposes of this Court’s determination of the “reasonableness” of the fees for services rendered.

19. Summaries of the professionals/paraprofessionals that have rendered services to the Debtor, which include each professional’s or paraprofessional’s title, hourly rate, total number of hours billed and the fees billed, are attached hereto as Exhibit D.

20. RBH’s detailed invoices attached hereto as Exhibits A-1 through A-4 show, on a daily basis, the professionals recording time for these cases, how much time was charged for each professional and a description of the services rendered. Whenever more than one RBH professional is involved or the RBH professionals show interaction with other professionals for the Debtor, each of the RBH professionals are performing distinct tasks for the Debtor and/or

work to effectively and efficiently represent the Debtor.³ Services are provided for each month of the Interim Period and are divided by category of the task performed. To the extent that charges for services rendered or expenses incurred relate to the Interim Period but were not processed before the preparation of, or otherwise included in, this Application, RBH reserves the right to request additional compensation for such services and reimbursement of such expenses in future applications.

21. RBH believes that the services it provided to the Debtor during this Interim Period were necessary to the administration of and beneficial to the Debtor's estate. Further, RBH believes that the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the tasks addressed.

22. RBH has recorded travel time of its attorneys, when such attorneys have not been actively engaged in work on this matter, at 50% of actual time.

IV. DESCRIPTION OF SERVICES RENDERED DURING THE INTERIM PERIOD

23. As counsel to the Debtor, RBH has assisted the Debtor with a variety of matters in this bankruptcy case, as set forth in the summary description below and in greater detail on Exhibits A-1 through A-4.

24. In documenting the services provided, RBH grouped its services using the eighteen Project Categories. RBH attempted to place the services provided in the category that best related to such services. The following narrative supplements the descriptions in Exhibits A-1 through A-4, and is provided to give the Court a better understanding of services provided by RBH.

³ In some cases, where a RBH professional contacted another RBH professional with a brief question or update, the time may have been recorded by one of the professionals, but not the other.

A. Case Administration and Business Operations

25. During the Interim Period, RBH provided legal services related to case administration and business operation issues affecting the Debtor. Among other things, RBH assisted the Debtor and Jones Day with preparing and filing pleadings, motions, orders, and reports to aid in the Chapter 11 process for the Debtor, including, without limitation, preparing, analyzing, reviewing, serving, and filing monthly and quarterly reports, responses and relies relating to discovery motions under Rule 2004, a motion to estimate the Debtor's aggregate liability for mesothelioma claims, hearing notices and agendas, and other motions and papers. RBH also participated in regular work-in-process and planning conferences

B. Plan of Reorganization/Disclosure Statement

26. During the Interim Period, RBH provided legal services related to the formulation of a plan of reorganization for the Debtor and drafting and filing the Plan of Reorganization of DBMP LLC with related Plan Documents (Dkt 944).

C. Court Hearings

27. During the Interim Period, RBH provided legal services related to court hearings regarding issues affecting the Debtor, including, without limitation preparing for and representing the Debtor at all scheduled hearings before the Bankruptcy Court.

D. Asbestos Matters

28. During the Interim Period, RBH provided legal services in connection with issues related to asbestos claims, including preparation and filing of the Motion of the Debtor for Estimation of Current and Future Mesothelioma Claims (Dkt 949) (the "Estimation Motion"), briefs relating thereto, review and analysis of, and preparation of replies to, the Committee's and FCR's objections to Debtor's Motions for (1) Bankruptcy Rule 2004 Examination of Asbestos

Trusts (Dkt 416) (the “Trust Discovery Motion”) and (2) Order Pursuant to Bankruptcy Rule 2004 Directing Submission of Personal Injury Questionnaires by Pending Mesothelioma Claimants (Dkt 417) (the “PIQ Motion”), review and analysis of, and preparation of replies to, estimation discovery motions filed by the Committee and FCR, depositions related to discovery motions and the Estimation Motion and other papers, analyses, case planning and strategy, claims’ valuation, negotiations, communications, and meetings related to asbestos claims with the Debtor, RBH’s co-counsel and the Debtor’s asbestos claims experts.

E. Reporting

29. During the Interim Period, RBH provided some legal services related to reporting matters affecting the Debtor, including without limitation preparation of operating reports and other reports required by the Bankruptcy Administrator, the Bankruptcy Court, the Bankruptcy Code, the Bankruptcy Rules, or the Local Bankruptcy Rules.

F. Litigation and Adversary Proceedings

30. During the Interim Period, RBH provided legal services related to litigation, including, without limitation assisting in review and analysis of the adversary proceeding complaint filed by the Committee, Official Committee of Asbestos Personal Injury Claimants et al. v. DBMP LLC et al., Adv. Pro. 20-03023, which seeks entry of an order substantively consolidating the bankruptcy estate of DBMP with CertainTeed LLC.

G. Fee Application Preparation

31. During the Interim Period, RBH provided legal services in connection with fee application preparation included the preparation of monthly fee statements for RBH and providing assistance to the Debtor and other professionals relating to other professional’s monthly fee statements.

V. RETAINER SUMMARY

32. The retainer balance at the beginning of this Interim Period was \$0. The retainer balance is currently \$0.

VI. DESCRIPTION OF DISBURSEMENTS AND EXPENSES INCURRED DURING THE INTERIM PERIOD

33. It is RBH's policy to charge its clients for expenses incurred in connection with each client's case. The customary expenses charged to clients include, among other things, filing and court fees, telephone and telecopier charges, regular and express mail charges, special or hand delivery charges, photocopying charges, travel expenses, expenses for "working meals," computerized research charges, and transcription costs. RBH has not requested reimbursement for computerized research charges.

34. RBH requests reimbursement for its actual and necessary expenses incurred during the Interim Period in the amount of \$1,462.41. A detailed breakdown of such expenses is provided in RBH's invoices attached hereto as Exhibits A-1 through A-4. The expenses RBH incurred in rendering professional services were necessary and reasonable under the circumstances to serve the needs of the Debtor.

VII. LEGAL STANDARD

35. This Application is submitted under the standards set forth in a number of decisions of the United States Supreme Court and the U.S. Court of Appeals for the Fourth Circuit: *Hensley v. Eckerhart*, 461 U.S. 424 (1983); *Blum v. Stenson*, 465 U.S. 886 (1984); *Pennsylvania v. Del. Valley Citizens' Council for Clean Air*, 483 U.S. 711 (1987); *Lilly v. Harris-Teeter Supermarket*, 842 F.2d 1496 (4th Cir. 1988); *Daly v. Hill*, 790 F.2d 1071 (4th Cir. 1986); and *Barber v. Kimbrell's, Inc.*, 577 F.2d 216, 226 n. 28 (4th Cir. 1978), *cert. denied*, 439 U.S. 934 (1979) which adopted the standards of *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d

714, 717-19 (5th Cir. 1974). Under the rule of *Barber*, these standards include the time and labor expended; the novelty and difficulty of the questions raised; the skill required to perform properly the legal services rendered; the attorney's opportunity costs in handling the case; the customary fee for like work; the attorney's expectations at the outset of the case; the time limitations imposed by the client or circumstances; the amount in controversy and the results obtained; the experience, reputation and ability of the attorney; the undesirability of the case within the legal community in which the case arose; the nature and length of the professional relationship between attorney and client; and attorneys' fees in similar cases. Under these standards, the compensation and rates requested herein are reasonable for services rendered by RBH in this case.

VIII. NOTICE

36. RBH represents to the Court that it has served a copy of this Application with the attached exhibits and Notice of Opportunity for Hearing on the Debtor, the Debtor's Counsel, the Bankruptcy Administrator, counsel to CertainTeed LLC (the Debtor's non-debtor affiliate), counsel to the Committee, and counsel to the FCR, and on such other parties that the Court may designate.

IX. CONCLUSION

37. Based on the foregoing, RBH makes this Application for an allowance of interim compensation for professional services rendered and reimbursement for actual costs and expenses incurred in the performance of legal services as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel to the Debtor in connection with this chapter 11 proceeding.

WHEREFORE, Robinson, Bradshaw & Hinson, P.A., respectfully requests (a) that RBH be allowed (i) interim compensation of \$276,232.50 as reasonable, actual and necessary professional services rendered by it on behalf of the Debtor during the Interim Period and (ii) interim reimbursement of expenses of \$1,462.41 as reasonable, actual and necessary; (b) that the Debtor be authorized and directed to pay to RBH the amount of \$277,694.91, which is equal to the sum of 100% of RBH's allowed interim compensation and 100% of RBH's allowed expense reimbursement for the Interim Period, less all previous payments received from the Debtor pursuant to the Compensation Order; and (c) such other relief as is just and proper.

This 27th day of October, 2021.

Respectfully submitted,

/s/ Garland S. Cassada

Garland S. Cassada (NC Bar No. 12352)

David M. Schilli (NC Bar No. 17989)

Andrew W.J. Tarr (NC Bar No. 31827)

ROBINSON BRADSHAW & HINSON, P.A.

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atarr@robinsonbradshaw.com

*Special Counsel for Asbestos Claims Estimation
Matters and Local Bankruptcy Counsel for Debtor
DBMP LLC*

EXHIBIT A-1

ROBINSON
BRADSHAW

Robinson Bradshaw
101 North Tryon Street, Suite 1900
Charlotte, NC 28246
t: 704.377.2536
robinsonbradshaw.com

Fed. Tax ID 56-0944079

Leslie Dallas
DBMP LLC
Law Department
20 Moores Road
Malvern, PA 19355

Invoice Date June 30, 2021
Invoice No. 667309

RE: Chapter 11 Case
Client ID: 26969 Matter ID: 00011
Claim Number: SG-008044

Invoice Summary

Total Professional Services This Invoice	\$ 38,762.50
Total Disbursements This Invoice	\$ 329.80
Total Due This Invoice	\$ 39,092.30
Outstanding Balance	\$ 71,908.35

Outstanding Balance on Amounts Previously Billed

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Amount</u>	<u>Payments/Credits</u>	<u>Balance Due</u>
03/26/21	663555	\$91,581.60	\$-82,482.90	\$9,098.70
03/30/21	661749	\$16,982.73	\$-15,326.63	\$1,656.10
04/30/21	664882	\$75,409.80	\$-68,111.05	\$7,298.75
05/31/21	666107	\$53,854.80	\$0.00	\$53,854.80

Total Now Due **\$ 111,000.65**

Payment Options

Check

Make check payable to:
Robinson Bradshaw
101 N. Tryon Street, Suite 1900
Charlotte, NC 28246

Wire/ACH

Bank Name: Bank of America
Bank Address: 100 N. Tryon Street, Charlotte, NC 28255
Account Name: Robinson, Bradshaw & Hinson, PA
ABA No (Wire): 026009593
ABA No (ACH): 053000196
Account No. 237023224173

*Charges due upon receipt of invoice
Please reference invoice or client number on remittance*

ROBINSON
BRADSHAW

Robinson Bradshaw
101 North Tryon Street, Suite 1900
Charlotte, NC 28246
t: 704.377.2536
robinsonbradshaw.com

Fed. Tax ID 56-0944079

Leslie Dallas
DBMP LLC
Law Department
20 Moores Road
Malvern, PA 19355

Invoice Date June 30, 2021
Invoice No. 667309

RE: Chapter 11 Case
Client ID: 26969 Matter ID: 00011
Claim Number: SG-008044

For Professional Services Rendered Through May 31, 2021

Date	Professional	Task	Narrative	Hours	Amount
05/03/21	AWT	1	Communicate with Jones Day re opposition to Rule 2004 request re Amiel Gross OSHA complaint	0.30	159.00
05/03/21	SLR	1	Finalize and e-file opposition to motion for depositions and document requests	0.30	78.00
05/03/21	RCW	1	Confer with experts, co-counsel, and GS Cassada re case tasks	0.40	196.00
05/04/21	GSC	1	Participation in weekly work-in-process conference	0.40	264.00
05/05/21	TCR	1	Review, analyze and distribute court filings	1.40	364.00
05/07/21	SLR	1	Review, analyze, and distribute 4/22 hearing transcript	0.20	52.00
05/07/21	TCR	1	Review, analyze and distribute court filings	0.10	26.00
05/10/21	SLR	1	Finalize and e-file OCP quarterly report	0.20	52.00
05/11/21	AWT	1	Communicate with Jones Day re hearing agenda	0.10	53.00
05/11/21	SLR	1	Finalize and e-file agenda for 5/13 hearing	0.20	52.00
05/11/21	GSC	1	Participation in weekly work-in-process conference	1.30	858.00
05/12/21	AWT	1	Review proposed order granting exclusivity motion and communicate with Jones Day re same	0.10	53.00
05/12/21	AWT	1	Review notice of cancellation of omnibus hearing and communicate with Jones Day re same	0.10	53.00
05/12/21	SLR	1	Upload order re exclusivity period	0.20	52.00
05/13/21	TCR	1	Review, analyze and distribute court filings	0.20	52.00
05/14/21	TCR	1	Review, analyze and distribute court filings	0.30	78.00
05/14/21	AWT	1	Review notice and communicate with Jones Day re same	0.20	106.00

Date	Professional	Task	Narrative	Hours	Amount
05/14/21	SLR	1	Finalize and efile notice of a change of address for Jones Day Atlanta	0.20	52.00
05/18/21	GSC	1	Participation in weekly work-in-process conference with DBMP and co-counsel	0.50	330.00
05/20/21	AWT	1	Communicate with Jones Day re order on ACC Rule 2004 motion	0.10	53.00
05/20/21	TCR	1	Review, analyze and distribute court filings	0.10	26.00
05/21/21	SLR	1	Finalize and upload 2004 order	0.20	52.00
05/21/21	AWT	1	Review and coordinate submission of Bates White second supplemental declaration	0.20	106.00
05/24/21	SLR	1	Finalize and e-file supplemental declaration on application to employ Bates White	0.20	52.00
05/28/21	AWT	1	Communicate with Jones Day re notice of hearing matters for debtor's discovery motions	0.30	159.00
05/28/21	TCR	1	Review, analyze and distribute court filings	0.30	78.00
05/28/21	SLR	1	Finalize and e-file notice of hearing re discovery motions and monthly status report	0.40	104.00
1 Total:					3,560.00
05/10/21	AWT	11	Review, and communicate with Jones Day re, OCP quarterly report	0.20	106.00
05/28/21	AWT	11	Review draft monthly report and communicate with Jones Day re same	0.60	318.00
05/28/21	DMS	11	Review, analyze, communicate with co-counsel and coordinate filing re April monthly status report	0.20	115.00
11 Total:					539.00
05/03/21	GSC	12	Review of debtor's objection to ACC's motion for Rule 2004 examination	1.30	858.00
05/04/21	SLR	12	Coordinate processing and errata deadlines for deposition	0.20	52.00
05/04/21	DMS	12	Review and analyze ACC Rule 2004 motion and debtor's objection in preparation for hearing	0.40	230.00
05/10/21	GSC	12	Review materials to respond to question from case constituent	0.60	396.00
05/10/21	DMS	12	Review and analyze May 4 hearing transcript re Rule 2004 motion filed by ACC	0.50	287.50
05/12/21	GSC	12	Review and comment on draft Rule 2004 order	0.30	198.00
12 Total:					2,021.50
05/18/21	DMS	15	Review, analyze and communicate with GS Cassada re potential supplemental disclosure in support of retention	0.40	230.00
05/18/21	DMS	15	Prepare first amendment to Cassada declaration in support of retention	0.60	345.00
05/19/21	DMS	15	Review and revise first amendment to GS Cassada disclosures	0.90	517.50

Date	Professional	Task	Narrative	Hours	Amount
05/20/21	DMS	15	Further review and revise first amendment to Cassada declaration based on internal comments	0.20	115.00
05/27/21	DMS	15	Confer with GS Cassada re potential supplemental disclosure issues	0.40	230.00
05/27/21	DMS	15	Review, analyze and summarize disclosures by debtors' counsel re retention issues	0.80	460.00
05/27/21	GSC	15	Confer with DM Schilli re potential supplemental disclosure issues	0.40	264.00
05/28/21	DMS	15	Review, analyze and summarize potential supplemental disclosures re retention	1.20	690.00
15 Total:					2,851.50
05/03/21	SLR	16	Work on March fee statement	0.20	52.00
05/11/21	SLR	16	Finalize monthly fee statement for March 2021	0.40	104.00
05/17/21	SLR	16	Work on April monthly fee statement	0.40	104.00
05/24/21	SLR	16	Confer re timing for upcoming fee application filing	0.20	52.00
05/25/21	SLR	16	Finalize and distribute Bates White compensation request	0.20	52.00
05/26/21	SLR	16	Begin drafting interim fee application and the supporting exhibits	1.50	390.00
05/27/21	SLR	16	Continue work on interim fee application	0.40	104.00
05/28/21	GSC	16	Work on April 2020 invoice	0.50	330.00
16 Total:					1,188.00
05/04/21	GSC	7	Appearance for DBMP at hearing on ACC's motion for 2004 examination re deposition of alleged whistleblower	1.50	990.00
05/11/21	DMS	7	Review, revise, communicate with co-counsel and coordinate filing re May 13 omnibus hearing agenda	0.20	115.00
05/28/21	DMS	7	Review and respond to email correspondence from co-counsel re July hearings being in person or virtual and strategy for noticing same	0.30	172.50
7 Total:					1,277.50
05/03/21	KRC	8	Work on asbestos-related discovery tasks	0.40	132.00
05/03/21	GSC	8	Regular update conference with co-counsel and claims experts	0.40	264.00
05/03/21	GSC	8	Work on responses to ACC/FCR's second discovery requests related to PIQ and Trust discovery motions	1.50	990.00
05/03/21	GSC	8	Further work on response to second discovery requests related to discovery motions	0.50	330.00
05/03/21	RCW	8	Review and edit responses to written discovery from ACC and FCR	0.90	441.00
05/04/21	RCW	8	Continue work on written discovery responses	0.10	49.00
05/04/21	RCW	8	Call with client, co-counsel, and GS Cassada re	1.00	490.00

Date	Professional	Task	Narrative	Hours	Amount
			discovery responses		
05/04/21	KRC	8	Work on tasks related to Trust discovery motion	2.70	891.00
05/04/21	JLR	8	Prepare deposition transcripts for attorney review	0.10	21.00
05/04/21	GSC	8	Review and analysis of revised draft responses to ACC/FCR discovery requests related to DBMP discovery motions	0.30	198.00
05/04/21	GSC	8	Participation in conference re review of and input for discovery responses	1.00	660.00
05/04/21	GSC	8	Correspondence re obtaining hearing credentials for bankruptcy court hearings	0.20	132.00
05/04/21	SLR	8	Confer with court re hearing credentials	0.20	52.00
05/05/21	KRC	8	Review and analyze documents related to discovery motions	0.70	231.00
05/06/21	KRC	8	Work on tasks related to PIQ and Trust discovery motions	0.50	165.00
05/06/21	GSC	8	Correspondence re discovery motion hearing dates	0.20	132.00
05/06/21	GSC	8	Correspondence re functions of claims agent	0.20	132.00
05/07/21	KRC	8	Work on tasks related to PIQ and Trust discovery motions	0.90	297.00
05/10/21	GSC	8	Regular estimation project planning conference with RC Worf, co-counsel, and claims experts	0.30	198.00
05/10/21	KRC	8	Work on tasks related to Trust discovery motion	0.20	66.00
05/10/21	GSC	8	Correspondence with DCPF counsel re planning for hearing on trust discovery motion	0.30	198.00
05/10/21	RCW	8	Confer with experts, co-counsel, and GS Cassada re case tasks	0.40	196.00
05/11/21	RCW	8	Call with client, co-counsel, and GS Cassada re case tasks	1.30	637.00
05/11/21	GSC	8	Work on revisions to form of order granting trust data discovery	1.10	726.00
05/11/21	SLP	8	Work on asbestos trust discovery issues	0.80	336.00
05/11/21	KRC	8	Work on tasks related to Trust and PIQ discovery motions	0.10	33.00
05/11/21	SLR	8	Begin drafting errata sheet for Bates deposition	0.50	130.00
05/12/21	KRC	8	Work on tasks related to Trust Discovery motion	0.70	231.00
05/13/21	RCW	8	Confer with GS Cassada re case tasks	0.20	98.00
05/13/21	RCW	8	Confer with co-counsel, client, and GS Cassada re case tasks	1.30	637.00
05/13/21	GSC	8	Conference with DBMP and co-counsel re claims analysis for estimation	1.30	858.00
05/13/21	GSC	8	Conference with claims expert re claims analysis for estimation	0.60	396.00
05/13/21	GSC	8	Confer with RC Worf re case tasks	0.20	132.00
05/14/21	DLB	8	Work on portal project	0.10	35.00
05/14/21	GSC	8	Review and analysis of claims expert project status	0.50	330.00

Date	Professional	Task	Narrative	Hours	Amount
			report		
05/14/21	GSC	8	Review and analysis of deposition and errata sheet	0.50	330.00
05/14/21	KRC	8	Work on tasks related to PIQ and Trust discovery motions	0.10	33.00
05/17/21	KRC	8	Work on asbestos-related discovery tasks	0.10	33.00
05/17/21	SLR	8	Prepare for Bates errata distribution and circulate finalized errata sheet	0.30	78.00
05/17/21	GSC	8	Preparation of discovery response re trust discovery and PIQ motion	2.60	1,716.00
05/17/21	DLB	8	Work on portal project	0.10	35.00
05/18/21	GSC	8	Work on revisions to motion for trust data and proposed for of order	2.20	1,452.00
05/19/21	KRC	8	Work on tasks related to Trust discovery motion	0.10	33.00
05/19/21	GSC	8	Preparation for trust discovery hearing	2.70	1,782.00
05/19/21	GSC	8	Correspondence to DCPF/Manville counsel re hearing on trust discovery motion	0.30	198.00
05/20/21	KRC	8	Work on tasks related to Trust discovery	0.10	33.00
05/20/21	GSC	8	Preparation for and participation in conference with DBMP, co-counsel and claims experts re estimation planning	2.10	1,386.00
05/20/21	RCW	8	Participate in call with client, co-counsel, experts, and GS Cassada re case tasks	0.50	245.00
05/21/21	KRC	8	Work on tasks related to Trust discovery motion	0.10	33.00
05/21/21	GSC	8	Correspondence to DBMP re trust discovery	0.40	264.00
05/21/21	GSC	8	Correspondence with co-counsel re schedule for discovery motions	0.40	264.00
05/21/21	GSC	8	Correspondence to DCPF counsel re trust discovery order	0.30	198.00
05/24/21	SLP	8	Confer with GS Cassada re asbestos trust discovery issues	0.20	84.00
05/24/21	KRC	8	Work on tasks related to Trust Discovery motion	0.10	33.00
05/24/21	GSC	8	Conference with co-counsel and claims expert re estimation project statuses and updates	0.20	132.00
05/24/21	GSC	8	Work on further revisions to trust discovery order and cover message to counsel for DCPF, Manville Trust, ACC, and FCR	1.30	858.00
05/24/21	GSC	8	Confer with SL Pratt re asbestos trust discovery issues	0.20	132.00
05/25/21	GSC	8	Review and analysis of J Rubinstein's correspondence itemizing objections to revised trust discovery order	0.50	330.00
05/25/21	GSC	8	Participation in weekly estimation work-in-process conference	1.40	924.00
05/25/21	GSC	8	Work on discovery requests to ACC/FCR re hearing on DBMP discovery motions	0.40	264.00
05/25/21	GSC	8	Further review and analysis of trust comments to	0.60	396.00

Date	Professional	Task	Narrative	Hours	Amount
			revised trust discovery order		
05/25/21	RCW	8	Call with client, co-counsel, and GS Cassada re case tasks	1.40	686.00
05/25/21	AWT	8	Review correspondence re perpetuation deposition	0.10	53.00
05/25/21	KRC	8	Work on tasks related to Trust discovery motion	0.20	66.00
05/26/21	KRC	8	Work on tasks related to Trust discovery motion	0.30	99.00
05/26/21	KRC	8	Confer with SL Riggins re discovery tasks	0.10	33.00
05/26/21	GSC	8	Analysis of services issues for discovery motion hearing	0.50	330.00
05/26/21	GSC	8	Correspondence with co-counsel re discussions with ACC/FCR counsel re hearing and objection schedule for discovery motions	0.30	198.00
05/26/21	GSC	8	Review and input re discovery letter to FCR counsel	0.60	396.00
05/26/21	RCW	8	Review letter to ACC/FCR re discovery requests	0.60	294.00
05/27/21	SLP	8	Prepare for meet and confer re proposed order on trust discovery motion	0.10	42.00
05/27/21	KRC	8	Work on tasks related to Trust discovery motion	0.10	33.00
05/27/21	SLP	8	Participate in meet and confer re proposed order on trust discovery motion	0.80	336.00
05/27/21	KRC	8	Participate in meet-and-confer call re Trust Discovery motion	0.70	231.00
05/27/21	SLP	8	Confer with GS Cassada re proposed order on trust discovery motion	0.10	42.00
05/27/21	GSC	8	Work on correspondence to chamber re discovery hearing	0.20	132.00
05/27/21	GSC	8	Preparation for meet and confer with DCPF and Manville Trust counsel re form of trust discovery order	0.40	264.00
05/27/21	GSC	8	Participation in meet and confer with DCPF and Manville Trust counsel re form of trust discovery order	0.70	462.00
05/27/21	GSC	8	Participation in conference with DBMP, co-counsel and claims expert re preparation for estimation project	1.00	660.00
05/27/21	GSC	8	Work on discovery requests to ACC re DBMP's discovery motions	0.50	330.00
05/28/21	KRC	8	Work on tasks related to Trust and PIQ discovery motions	0.20	66.00
05/28/21	GSC	8	Conference with DBMP and co-counsel re offensive discovery	0.70	462.00
8 Total:					27,325.00
Total Fees:				\$	38,762.50

Summary of Professional Services

<u>Professional</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jake Raynor	0.10	210.00	21.00
Tamara Redi	2.40	260.00	624.00
Satyra Riggins	6.60	260.00	1,716.00
Kevin Crandall	8.40	330.00	2,772.00
Demi Bostian	0.20	350.00	70.00
Stuart Pratt	2.00	420.00	840.00
Richard Worf, Jr.	8.10	490.00	3,969.00
Andrew Tarr	2.30	530.00	1,219.00
David Schilli	6.10	575.00	3,507.50
Garland Cassada	36.40	660.00	24,024.00
	<u>72.60</u>		<u>\$38,762.50</u>

Disbursements Through May 31, 2021

Date	Description	Amount
05/07/21	Vendor: Janice Russell Transcripts; Invoice#: 21-71; Date: 5/7/2021	329.80

Total Disbursements: \$ 329.80

Total Current Billing: \$ 39,092.30

EXHIBIT A-2

ROBINSON
BRADSHAW

Robinson Bradshaw
101 North Tryon Street, Suite 1900
Charlotte, NC 28246
t: 704.377.2536
robinsonbradshaw.com

Fed. Tax ID 56-0944079

Leslie Dallas
DBMP LLC
Law Department
20 Moores Road
Malvern, PA 19355

Invoice Date September 9, 2021
Invoice No. 668899

RE: Chapter 11 Case
Client ID: 26969 Matter ID: 00011
Claim Number: SG-008044

Invoice Summary

Total Professional Services This Invoice	\$ 90,944.00
Total Disbursements This Invoice	\$ 377.85
Total This Invoice	\$ 91,321.85

Outstanding Balance on Amounts Previously Billed

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Amount</u>	<u>Payments/Credits</u>	<u>Balance Due</u>
06/30/2021	667309	\$39,092.30	\$(35,212.05)	\$3,880.25
Outstanding Balance				\$3,880.25

Total Now Due \$ **95,202.10**

Payment Options

Check

Make check payable to:
Robinson Bradshaw
101 N. Tryon Street, Suite 1900
Charlotte, NC 28246

Wire/ACH

Bank Name: Bank of America
Bank Address: 100 N. Tryon Street, Charlotte, NC 28255
Account Name: Robinson, Bradshaw & Hinson, PA
ABA No (Wire): 026009593
ABA No (ACH): 053000196
Account No. 237023224173
SWIFT Code: BOFAUS3N (International wires only)

*Charges due upon receipt of invoice
Please reference invoice or client number on remittance*

ROBINSON
BRADSHAW

Robinson Bradshaw
101 North Tryon Street, Suite 1900
Charlotte, NC 28246
t: 704.377.2536
robinsonbradshaw.com

Fed. Tax ID 56-0944079

Leslie Dallas
DBMP LLC
Law Department
20 Moores Road
Malvern, PA 19355

Invoice Date September 9, 2021
Invoice No. 668899

RE: Chapter 11 Case
Client ID: 26969 Matter ID: 00011
Claim Number: SG-008044

For Professional Services Rendered Through June 30, 2021

Date	Professional	Task	Narrative	Hours	Amount
06/01/21	GSC	1	Participation in portion of work-in-process call	0.30	198.00
06/07/21	TCR	1	Review, analyze and distribute court filings	0.10	26.00
06/08/21	SLR	1	Finalize and e-file OCP declaration	0.20	52.00
06/08/21	GSC	1	Participation in regular work-in-process and case planning conference	1.20	792.00
06/09/21	SLR	1	Finalize and e-file affidavit of service	0.20	52.00
06/09/21	SLR	1	Finalize and e-file notice of revised trust order and notice of responsive deposition designations	0.60	156.00
06/10/21	TCR	1	Review, analyze and distribute court filings	0.50	130.00
06/11/21	TCR	1	Review, analyze and distribute court filings	1.40	364.00
06/12/21	SLR	1	Download and process court filings	0.80	208.00
06/15/21	SLR	1	Finalize and e-file agenda for 6/17 hearing	0.20	52.00
06/15/21	SLR	1	Review/analyze master calendar of deadlines	0.20	52.00
06/16/21	TCR	1	Review, analyze and distribute court filings	0.30	78.00
06/16/21	SLR	1	Work on docketing matters	0.60	156.00
06/16/21	SLR	1	Finalize and e-file response to motion to reopen record	0.20	52.00
06/17/21	AWT	1	Analyze matters re debtor's response to ACC motion to reopen the record	0.20	106.00
06/18/21	TCR	1	Review, analyze and distribute court filings	0.20	52.00
06/21/21	AWT	1	Review and comment on draft fourth motion to extend removal deadline	0.50	265.00
06/22/21	SLR	1	Finalize and e-file fourth motion to extend removal period with notice of opportunity for hearing	0.30	78.00

Date	Professional	Task	Narrative	Hours	Amount
06/22/21	GSC	1	Participation in weekly work-in-process conference	1.20	792.00
06/23/21	AWT	1	Analyze matters re professional fee applications and other upcoming filings	0.20	106.00
06/23/21	GSC	1	Participation in weekly work-in-process call with DBMP and co-counsel	1.20	792.00
06/25/21	TCR	1	Review, analyze and distribute court filings	1.30	338.00
06/29/21	KRC	1	Confer with client, co-counsel, GS Cassada, and RC Worf re case tasks	1.00	330.00
06/29/21	GSC	1	Participation in weekly work-in-process conference	1.00	660.00
06/29/21	TCR	1	Review, analyze and distribute court filings	0.10	26.00
			1 Total:		5,913.00
06/30/21	AWT	11	Review and comment on draft monthly report	0.40	212.00
06/30/21	SLR	11	Finalize and e-file monthly report	0.20	52.00
			11 Total:		264.00
06/16/21	DMS	12	Review and analyze claimant representatives' motion to seal and motion to reopen record on preliminary injunction motion and stay relief motion re finalizing debtors response thereto and in preparation for hearing	1.30	747.50
06/16/21	DMS	12	Review, revise, communicate with co-counsel and coordinate filing re debtor's response to claimants' representatives motion to reopen record and supporting declaration	2.80	1,610.00
06/21/21	DMS	12	Communicate with Robinson Bradshaw team re motion to extend removal deadline	0.20	115.00
06/22/21	DMS	12	Review, analyze, communicate with co-counsel and coordinate filing re motion to extend removal deadline	0.30	172.50
			12 Total:		2,645.00
06/01/21	DMS	15	Communicate with GS Cassada re potential supplemental disclosures for retention and next steps	0.30	172.50
06/01/21	DMS	15	Review and revise GS Cassada supplemental disclosure	0.40	230.00
06/08/21	DMS	15	Review, analyze, communicate with co-counsel and coordinate filing re ordinary course professional declaration	0.20	115.00
06/23/21	DLB	15	Work on DRC engagement documents	1.00	330.00
06/24/21	RCW	15	Continue preparing potential retention application	2.40	1,176.00
06/29/21	DLB	15	Work on DRC engagement letter	0.40	132.00
			15 Total:		2,155.50
06/02/21	SLR	16	Work on April monthly fee statement	0.20	52.00
06/02/21	SLR	16	Review and revise interim fee application and supporting exhibits	0.60	156.00

Date	Professional	Task	Narrative	Hours	Amount
06/03/21	SLR	16	Finalize April monthly fee statement	0.40	104.00
06/03/21	SLR	16	Revise fee application and supporting exhibits	0.70	182.00
06/07/21	SLR	16	Review correspondence re interim fee application status	0.20	52.00
06/07/21	DMS	16	Communicate with SL Riggins re fourth interim fee application	0.10	57.50
06/11/21	SLR	16	Work on May monthly fee statement	0.80	208.00
06/12/21	SLR	16	Work on May monthly fee statement	0.20	52.00
06/14/21	SLR	16	Prepare documents for attorney and client review	0.30	78.00
06/21/21	SLR	16	Work on invoicing matters	0.20	52.00
06/22/21	SLR	16	Work on interim fee application	0.20	52.00
06/22/21	GSC	16	Work on quarterly fee application	1.00	660.00
06/23/21	DMS	16	Communicate with AW Tarr and SL Riggins re fee application preparation and noticing issues	0.20	115.00
06/24/21	AWT	16	Work on quarterly fee application matters	0.10	53.00
06/24/21	SLR	16	Plan and prepare for interim fee application filings	0.30	78.00
06/24/21	SLR	16	Finalize and efile interim fee applications with notice of opportunity for hearing	0.50	130.00
16 Total:					2,081.50
06/14/21	AWT	7	Analyze new hearing protocols and communication re same to client group and co-counsel	0.10	53.00
06/14/21	DMS	7	Review, analyze and communicate with Robinson Bradshaw team re return of in-person court hearings	0.20	115.00
06/14/21	DMS	7	Communicate with Jones Day team and client re return of in-person court hearings	0.20	115.00
06/14/21	DMS	7	Review, analyze and communicate with SL Riggins re June 17 omnibus hearing calendar issues	0.20	115.00
06/14/21	DMS	7	Review, analyze and communicate with co-counsel re June 17 omnibus hearing calendar issues	0.20	115.00
06/15/21	DMS	7	Review, revise, communicate with co-counsel and coordinate filing re June 17 omnibus hearing agenda	0.20	115.00
06/16/21	DMS	7	Communicate with Bankruptcy Court Chambers re omnibus hearing attendance	0.20	115.00
06/17/21	DMS	7	Represent debtor at omnibus hearing	1.00	575.00
06/17/21	DMS	7	Summarize omnibus hearing outcomes and status report for Robinson Bradshaw team	0.60	345.00
06/29/21	SLR	7	Work on assorted tasks in preparation for 7/15 hearing	0.60	156.00
7 Total:					1,819.00
06/04/21	GSC	8	Finalize and serve discovery on discovery motions	0.50	330.00
06/04/21	GSC	8	Conference with co-counsel re trust motion discovery	0.30	198.00

Date	Professional	Task	Narrative	Hours	Amount
06/04/21	SLR	8	Prepare documents for co-counsel's review	0.30	78.00
06/07/21	SLP	8	Participate in meet and confer re asbestos trust discovery issues	0.20	84.00
06/07/21	GSC	8	Review and analysis of Bates deposition for confidentiality designations	2.10	1,386.00
06/07/21	GSC	8	Correspondence with co-counsel re analysis of Bates deposition for confidentiality designations	0.40	264.00
06/07/21	KRC	8	Confer with GS Cassada re tasks related to Trust and PIQ discovery motions	0.10	33.00
06/07/21	KRC	8	Work on tasks related to PIQ and Trust discovery motions	0.10	33.00
06/07/21	GSC	8	Case update conference with co-counsel, claims expert and RC Worf	0.20	132.00
06/07/21	RCW	8	Confer with experts, co-counsel, and GS Cassada re case tasks	0.20	98.00
06/07/21	RCW	8	Review discovery requests	0.30	147.00
06/07/21	GSC	8	Confer with KR Crandall re tasks related to Trust and PIQ discovery motions	0.10	66.00
06/08/21	KRC	8	Work on tasks related to PIQ and Trust discovery motions	0.90	297.00
06/08/21	SLR	8	Prepare for trust discovery order filing	0.20	52.00
06/08/21	GSC	8	Review of discovery requests re trust data discovery	0.50	330.00
06/08/21	GSC	8	Correspondence to DCPF counsel re DBMP's position on hearing on schedule for trust discovery motion	0.40	264.00
06/08/21	GSC	8	Preparation of revised trust discovery order and cover notice	0.50	330.00
06/08/21	GSC	8	Review and analysis of correspondence from ACC counsel forecasting objections to PIQ motion	0.30	198.00
06/09/21	KRC	8	Work on tasks related to Trust discovery motion	0.50	165.00
06/09/21	KRC	8	Confer with GS Cassada re tasks related to Trust discovery motion	0.20	66.00
06/09/21	GSC	8	Preparation of form of trust discovery order and notice of filing form of order	0.70	462.00
06/09/21	GSC	8	Confer with KR Crandall re tasks related to Trust discovery motion	0.20	132.00
06/10/21	KRC	8	Work on tasks related to Trust discovery motion	0.10	33.00
06/11/21	KRC	8	Work on tasks related to PIQ and Trust discovery motions	1.10	363.00
06/11/21	SLR	8	Download and process filings related to estimation discovery	0.90	234.00
06/11/21	GSC	8	Review of draft discovery requests re trust discovery motion	1.10	726.00
06/11/21	GSC	8	Review and analysis of ACC response to PIQ motion	1.30	858.00

Date	Professional	Task	Narrative	Hours	Amount
06/12/21	GSC	8	Review and analysis of objections to PIQ and Trust Discovery Motions	3.10	2,046.00
06/14/21	KRC	8	Confer with RBH team re case tasks	0.40	132.00
06/14/21	PSR	8	Confer with RBH team re discovery issues	0.40	124.00
06/14/21	SLP	8	Confer with RBH Team re objections to trust discovery and PIQ motions and responses thereto	0.40	168.00
06/14/21	SLR	8	Meeting with RBH team regarding case status and upcoming projects	0.40	104.00
06/14/21	DLB	8	Work on PIQ reply brief	0.30	99.00
06/14/21	GSC	8	Further review and analysis of discovery motion objections	0.80	528.00
06/14/21	GSC	8	Teleconference re objections to discovery motions	0.30	198.00
06/14/21	GSC	8	Conference with RBH team re case project status and planning	0.40	264.00
06/14/21	GSC	8	Correspondence to DBMP and co-counsel re status of discovery motions	0.40	264.00
06/14/21	GSC	8	Conference with co-counsel , claims experts , and RC Worf re case project update	0.50	330.00
06/14/21	DLB	8	Confer with RBH case team re matter development	0.40	132.00
06/14/21	RCW	8	Confer with RBH team re case tasks	0.40	196.00
06/14/21	RCW	8	Confer with experts, co-counsel, and GS Cassada re case tasks	0.50	245.00
06/14/21	RCW	8	Confer with GS Cassada re PIQ and Trust discovery	0.10	49.00
06/14/21	RCW	8	Review objections to PIQ and Trust discovery	1.20	588.00
06/14/21	KRC	8	Work on reply brief in support of Trust discovery motion	3.30	1,089.00
06/14/21	GSC	8	Confer with RC Worf re PIQ and Trust discovery	0.10	66.00
06/15/21	GSC	8	Review and analysis of responses/objections to PIQ and Trust discovery	2.10	1,386.00
06/15/21	DLB	8	Draft PIQ Reply Brief	5.50	1,815.00
06/15/21	KRC	8	Draft reply brief in support of Trust discovery motion	3.80	1,254.00
06/15/21	JLR	8	Work on technical tasks re potential exhibits for estimation discovery hearings	0.20	42.00
06/15/21	SLR	8	Prepare documents for attorney review	0.80	208.00
06/15/21	KRC	8	Confer with client, co-counsel, GS Cassada and RC Worf re case tasks	1.10	363.00
06/15/21	RCW	8	Participate in call with client, co-counsel, GS Cassada, and K Crandall re case tasks	1.10	539.00
06/15/21	RCW	8	Continue review of PIQ and Trust discovery objections	1.30	637.00
06/16/21	DLB	8	Draft PIQ reply brief	7.10	2,343.00
06/16/21	KRC	8	Draft reply brief in support of motion for trust discovery	5.40	1,782.00

Date	Professional	Task	Narrative	Hours	Amount
06/16/21	RCW	8	Work on replies in support of discovery motions	4.60	2,254.00
06/17/21	RCW	8	Confer with client, experts, co-counsel, and GS Cassada re case tasks	0.30	147.00
06/17/21	RCW	8	Confer with DL Bostian re reply in support of PIQ motion	0.40	196.00
06/17/21	RCW	8	Continue work on replies in support of discovery motions	1.80	882.00
06/17/21	DLB	8	Confer with RC Worf re reply in support of PIQ motion	0.40	132.00
06/17/21	PSR	8	Work on reply brief for Trust discovery motion	4.80	1,488.00
06/17/21	DLB	8	Draft PIQ reply brief	6.10	2,013.00
06/17/21	KRC	8	Work on reply brief in support of trust discovery motion	7.80	2,574.00
06/17/21	GSC	8	Conference with DBMP, co-counsel claims expert, and RC Worf re estimation project status	0.30	198.00
06/18/21	PSR	8	Work on reply brief for Trust discovery motion	1.40	434.00
06/18/21	DLB	8	Draft PIQ reply brief	5.70	1,881.00
06/18/21	KRC	8	Work on reply brief in support of trust discovery motion	5.00	1,650.00
06/18/21	KRC	8	Series of calls with PS Rini re reply brief in support of trust discovery motion	0.30	99.00
06/18/21	GSC	8	Review of stipulation re expert witness fees	0.30	198.00
06/18/21	WAS	8	Conduct research; confer with KR Crandall re results	1.30	247.00
06/18/21	RCW	8	Continue work on replies in support of discovery motions	0.70	343.00
06/19/21	DLB	8	Draft PIQ reply	0.40	132.00
06/19/21	KRC	8	Work on reply brief in support of Trust discovery motion	2.80	924.00
06/20/21	KRC	8	Work on reply brief in support of Trust discovery motion	3.30	1,089.00
06/20/21	DLB	8	Draft PIQ Reply	0.60	198.00
06/21/21	PSR	8	Confer with RBH team re discovery issues	0.30	93.00
06/21/21	DLB	8	Draft PIQ Reply	1.20	396.00
06/21/21	KRC	8	Work on reply brief in support of Trust discovery motion	10.60	3,498.00
06/21/21	GSC	8	Regular case update and project status conference with co-counsel , claims experts, and RC Worf	0.30	198.00
06/21/21	RCW	8	Confer with RBH team re case tasks	0.30	147.00
06/21/21	RCW	8	Confer with experts, co-counsel, and GS Cassada re case tasks	0.30	147.00
06/21/21	RCW	8	Continue work on replies in support of discovery motions	2.80	1,372.00
06/21/21	RCW	8	Work on potential retention application	2.00	980.00
06/21/21	SLR	8	RBH team meeting re case status and upcoming	0.30	78.00

Date	Professional	Task	Narrative	Hours	Amount
			projects		
06/21/21	SLP	8	Confer with RBH Team re PIQ and Trust discovery planning and strategy tasks	0.30	126.00
06/21/21	KRC	8	Confer with RBH team re case tasks	0.30	99.00
06/21/21	DLB	8	Call with RBH team to discuss matter development	0.30	99.00
06/21/21	DLB	8	Email correspondence with R Worf, J Ellman re matter development	0.10	33.00
06/22/21	GSC	8	Conference with co-counsel and claims experts re estimation preparation and planning	1.20	792.00
06/22/21	RCW	8	Continue work on reply in support of discovery motion	2.80	1,372.00
06/22/21	KRC	8	Work on reply brief in support of Trust discovery motion	3.20	1,056.00
06/23/21	KRC	8	Work on tasks related to PIQ and Trust discovery motions	0.10	33.00
06/23/21	GSC	8	Participation in meet and confer re defense counsel PIQ	0.60	396.00
06/23/21	RCW	8	Continue work on reply in support of discovery motion	0.50	245.00
06/23/21	RCW	8	Confer with client, co-counsel, and GS Cassada re case tasks	1.20	588.00
06/24/21	KRC	8	Work on reply in support of Trust discovery motion	0.50	165.00
06/24/21	DLB	8	Work on PIQ project	1.10	363.00
06/24/21	RCW	8	Continue work on reply in support of discovery motion	1.00	490.00
06/24/21	GSC	8	Review and analysis of draft correspondence re subpoena issue	0.40	264.00
06/25/21	KRC	8	Work on reply brief in support of Trust discovery motion	6.30	2,079.00
06/25/21	SLR	8	Review/analyze filings	0.20	52.00
06/25/21	RCW	8	Continue work on reply in support of discovery motion	4.90	2,401.00
06/26/21	DLB	8	Confer with R Worf re PIQ Reply brief	0.10	33.00
06/26/21	RCW	8	Continue work on reply in support of discovery motion	7.40	3,626.00
06/26/21	RCW	8	Confer with DL Bostian re PIQ Reply brief	0.10	49.00
06/27/21	KRC	8	Work on reply brief in support of motion for Trust discovery	3.20	1,056.00
06/28/21	DLB	8	Work on PIQ hearing preparation	4.90	1,617.00
06/28/21	DLB	8	Confer with RBH team re matter development	0.20	66.00
06/28/21	KRC	8	Work on asbestos-related discovery tasks	0.40	132.00
06/28/21	KRC	8	Work on reply brief in support of Trust discovery	0.70	231.00
06/28/21	SLR	8	Work on items for upcoming hearing on discovery motions	0.40	104.00
06/28/21	KRC	8	Confer with RBH team re case tasks	0.20	66.00

Date	Professional	Task	Narrative	Hours	Amount
06/28/21	GSC	8	Review and analysis of ACC objections to motion for trust discovery	1.20	792.00
06/28/21	SLR	8	Meeting with RBH team re case status and upcoming projects	0.30	78.00
06/28/21	GSC	8	Case planning and coordination conference with RBH Team	0.20	132.00
06/28/21	RCW	8	Confer with RBH team re case tasks	0.20	98.00
06/28/21	PSR	8	Confer with RBH Team re discovery	0.20	62.00
06/29/21	KRC	8	Work on tasks related to Trust discovery motion	2.30	759.00
06/29/21	KRC	8	Work on asbestos-related discovery tasks	0.20	66.00
06/29/21	KRC	8	Confer with GS Cassada re tasks related to Trust discovery motion	0.20	66.00
06/29/21	RCW	8	Confer with client, co-counsel, and GS Cassada re case tasks	0.90	441.00
06/29/21	GSC	8	Confer with KR Crandall re tasks related to Trust discovery motion	0.20	132.00
06/29/21	GSC	8	Conference with KR Crandall re tasks related to Trust discovery	1.10	726.00
06/29/21	GSC	8	Conference with K. Crandall re preparation for 7/15 hearing on trust discovery motion	1.00	660.00
06/29/21	GSC	8	Further work on trust discovery reply	1.80	1,188.00
06/29/21	KRC	8	Conference with GS Cassada re tasks related to Trust discovery	1.10	363.00
06/29/21	GSC	8	Work on reply to objections to trust discovery motion	2.10	1,386.00
06/30/21	DLB	8	Work on PIQ hearing slide deck	0.60	198.00
06/30/21	KRC	8	Work on tasks related to Trust discovery motion	4.20	1,386.00
06/30/21	KRC	8	Confer with GS Cassada re tasks related to Trust discovery motion	0.30	99.00
06/30/21	GSC	8	Confer with client, co-counsel, GS Cassada and KR Crandall re case tasks	1.10	726.00
06/30/21	RCW	8	Confer with client, co-counsel, GS Cassada and KR Crandall re case tasks	1.10	539.00
06/30/21	GSC	8	Teleconference with K Crandall re preparation of trust discovery reply	0.30	198.00
8 Total:					76,066.00
Total Fees:				\$	90,944.00

Summary of Professional Services

<u>Professional</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Walter Short	1.30	190.00	247.00
Jake Raynor	0.20	210.00	42.00
Tamara Redi	3.90	260.00	1,014.00

Summary of Professional Services

<u>Professional</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Satyra Riggins	12.50	260.00	3,250.00
Preetha Rini	7.10	310.00	2,201.00
Kevin Crandall	71.00	330.00	23,430.00
Demi Bostian	36.40	330.00	12,012.00
Stuart Pratt	0.90	420.00	378.00
Richard Worf, Jr.	40.80	490.00	19,992.00
Andrew Tarr	1.50	530.00	795.00
David Schilli	8.60	575.00	4,945.00
Garland Cassada	34.30	660.00	22,638.00
	<u>218.50</u>		<u>\$90,944.00</u>

Disbursements Through June 30, 2021

Date	Description	Amount
06/23/21	Vendor: Janice Russell Transcripts; Invoice#: 21-87; Date: 6/23/2021	150.35
06/25/21	Pacer Database Search	227.50
	Total Disbursements:	\$ 377.85

Total Current Billing: \$ 91,321.85

EXHIBIT A-3

ROBINSON
BRADSHAW

Robinson Bradshaw
101 North Tryon Street, Suite 1900
Charlotte, NC 28246
t: 704.377.2536
robinsonbradshaw.com

Fed. Tax ID 56-0944079

Leslie Dallas
DBMP LLC
Law Department
20 Moores Road
Malvern, PA 19355

Invoice Date September 9, 2021
Invoice No. 670383

RE: Chapter 11 Case
Client ID: 26969 Matter ID: 00011
Claim Number: SG-008044

Invoice Summary

Total Professional Services This Invoice	\$ 73,284.50
Total Disbursements This Invoice	\$ 0.00
Total This Invoice	\$ 73,284.50

Outstanding Balance on Amounts Previously Billed

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Amount</u>	<u>Payments/Credits</u>	<u>Balance Due</u>
06/30/2021	667309	\$39,092.30	\$(35,212.05)	\$3,880.25
Outstanding Balance				\$3,880.25

Total Now Due \$ **77,164.75**

Payment Options

Check

Make check payable to:
Robinson Bradshaw
101 N. Tryon Street, Suite 1900
Charlotte, NC 28246

*Charges due upon receipt of invoice
Please reference invoice or client number on remittance*



Robinson Bradshaw
101 North Tryon Street, Suite 1900
Charlotte, NC 28246
t: 704.377.2536
robinsonbradshaw.com

Fed. Tax ID 56-0944079

Leslie Dallas
DBMP LLC
Law Department
20 Moores Road
Malvern, PA 19355

Invoice Date September 9, 2021
Invoice No. 670383

RE: Chapter 11 Case
Client ID: 26969 Matter ID: 00011
Claim Number: SG-008044

For Professional Services Rendered Through July 31, 2021

Date	Professional	Task	Narrative	Hours	Amount
07/01/21	AWT	1	Analyze issues re potential motion to continue hearing on Committee discovery matters	0.10	53.00
07/02/21	AWT	1	Communicate with Jones Day re motion to continue and motion to shorten notice on motion to continue, and review and comment on motion to continue and motion to shorten notice	0.70	371.00
07/02/21	SLR	1	Finalize and e-file motion to continue DCQ hearing and motion to shorten notice	0.30	78.00
07/02/21	TCR	1	Review, analyze and distribute court filings	0.20	52.00
07/06/21	AWT	1	Analyze issues re court's ruling and order on motion to continue ACC discovery motions	0.10	53.00
07/07/21	SLR	1	Finalize and upload order continuing hearing on discovery motions	0.20	52.00
07/07/21	SLR	1	Update master case calendar re updated deadlines	0.20	52.00
07/08/21	SLR	1	Confer with co-counsel re service of order continuing discovery motions	0.20	52.00
07/09/21	TCR	1	Review, analyze and distribute court filings	0.30	78.00
07/12/21	SLR	1	Finalize and upload order on fourth removal period	0.20	52.00
07/12/21	AWT	1	Communicate re cancellation of July 15 omnibus hearing	0.10	53.00
07/13/21	KRC	1	Confer with client, co-counsel, GS Cassda, and RC Worf, re case tasks	1.20	396.00
07/13/21	SLR	1	Finalize and e-file notice of cancellation of 7/15 hearing and upload order on Jones Day fee application	0.30	78.00
07/13/21	AWT	1	Review and comment on draft notice of	0.20	106.00

Date	Professional	Task	Narrative	Hours	Amount
			cancellation of hearing and draft pro hac vice papers		
07/15/21	AWT	1	Advise re local counsel issues on trust discovery	0.10	53.00
07/16/21	TCR	1	Review, analyze and distribute court filings	0.60	156.00
07/20/21	SLR	1	Upload proposed order for entry	0.20	52.00
07/23/21	TCR	1	Review, analyze and distribute court filings	0.30	78.00
07/30/21	TCR	1	Review, analyze and distribute court filings	0.10	26.00
			1 Total:		1,891.00
07/15/21	DMS	11	Prepare and communicate with client re quarterly fee invoice	0.30	172.50
07/21/21	DMS	11	Review, analyze and communicate with client and co-counsel re revised quarterly fee statement and invoice to client for payment of same	0.40	230.00
07/28/21	SLR	11	Work on preparation for payment of quarterly fees	0.20	52.00
07/28/21	DMS	11	Review, analyze, communicate with co-counsel and coordinate filing re quarterly fee statement and payment of quarterly fee	0.30	172.50
07/30/21	DMS	11	Review, revise, communicate with co-counsel and coordinate filing re monthly status report	0.80	460.00
07/30/21	DMS	11	Review, revise, communicate with co-counsel and coordinate filing re quarterly fee statement	0.10	57.50
07/30/21	SLR	11	Finalize and e-file quarterly fee statement and coordinate deliver off quarterly fees to court	0.50	130.00
07/30/21	SLR	11	Finalize and e-file monthly status report	0.30	78.00
			11 Total:		1,352.50
07/12/21	DMS	12	Review, revise, communicate with co-counsel and coordinate filing re order granting fourth extension of removal deadline	0.20	115.00
07/20/21	DMS	12	Review, revise, communicate with co-counsel and coordinate filing re order authorizing reopening of record in preliminary injunction proceeding and stay relief proceeding	0.20	115.00
			12 Total:		230.00
07/01/21	DLB	15	Revise materials for application to employ DRC	2.10	693.00
07/02/21	DLB	15	Work on Application, Order, and Declaration re DRC engagement	1.20	396.00
07/12/21	DLB	15	Work on application to employ Donlin Recano	0.20	66.00
07/16/21	DLB	15	Revise DRC Application and Order	0.70	231.00
07/20/21	DLB	15	Work on Donlin Application	0.80	264.00
07/21/21	DLB	15	Revise Application to employ Donlin	0.80	264.00
07/22/21	DLB	15	Finalize Application to Employ Donlin materials	0.40	132.00
07/22/21	SLR	15	Review/analyze Donlin retention papers	0.30	78.00
07/22/21	SLR	15	Finalize and e-file application to employ agent for	0.40	104.00

Date	Professional	Task	Narrative	Hours	Amount
			PIQ		
07/23/21	DLB	15	Email correspondence with client re filing of application to employ Donlin	0.10	33.00
			15 Total:		2,261.00
07/06/21	SLR	16	Work on monthly fee statement	0.20	52.00
07/13/21	DMS	16	Review, analyze, communicate with co-counsel and coordinate filing re order approving interim fee applications	0.20	115.00
07/15/21	AWT	16	Communicate re fee applications	0.10	53.00
07/15/21	SLR	16	Finalize and upload orders on fee applications for entry by Court	0.40	104.00
07/28/21	SLR	16	Finalize monthly fee statement	0.40	104.00
			16 Total:		428.00
07/11/21	GSC	4	Review, analysis of work on plan of reorganization and plan documents	3.10	2,046.00
07/20/21	GSC	4	Conference with DBMP and co-counsel re plan documents	0.70	462.00
07/20/21	GSC	4	Further work on plan documents	0.80	528.00
07/23/21	KRC	4	Work on tasks related to plan of reorganization	0.80	264.00
07/23/21	GSC	4	Confer with expert, co-counsel, and KR Crandall re plan of reorganization	0.90	594.00
07/23/21	AWT	4	Communicate with Jones Day re plan of reorganization	0.40	212.00
07/23/21	KRC	4	Confer with expert, co-counsel, and GS Cassada re plan of reorganization	0.90	297.00
07/23/21	SLR	4	Finalize and e-file plan of reorganization	0.50	130.00
07/23/21	GSC	4	Conference with co-counsel and claims experts re drafting of plan documents	0.80	528.00
			4 Total:		5,061.00
07/01/21	AWT	7	Prepare for July 15 omnibus hearing	0.10	53.00
07/01/21	DMS	7	Review, analyze and communicate with Robinson Bradshaw team re Rule 2004 discovery motions calendared for July 15 omnibus hearing date	0.50	287.50
07/01/21	DMS	7	Review, analyze and communicate with co-counsel re local rules and local practice for hearing continuance motions	0.40	230.00
07/02/21	DMS	7	Review, analyze and communicate with co-counsel re procedures for seeking expedited hearing on continuance motion	1.20	690.00
07/02/21	DMS	7	Draft correspondence to Bankruptcy Court Chambers re expedited hearing date on debtor's motion to continue	0.40	230.00
07/12/21	DMS	7	Review, analyze and communicate with co-counsel re July 15 omnibus hearing calendar issues	0.40	230.00

Date	Professional	Task	Narrative	Hours	Amount
07/12/21	DMS	7	Review, analyze and communicate with Robinson Bradshaw team re July 15 omnibus hearing calendar issues	0.20	115.00
07/13/21	DMS	7	Review, analyze, communicate with co-counsel and coordinate filing re notice of cancellation of July omnibus hearing	0.20	115.00
07/15/21	GSC	7	Preparation for hearing on trust discovery	0.60	396.00
07/28/21	GSC	7	Review of materilas for 8/12 hearing	0.50	330.00
07/28/21	GSC	7	Conference with co-counsel re preparation for 8/12 trust discovery hearing	1.00	660.00
07/30/21	SLR	7	Work on 8/12 hearing preparations	1.50	390.00
7 Total:					3,726.50
07/01/21	RCW	8	Continue drafting reply in support of discovery motion	1.90	931.00
07/01/21	RCW	8	Confer with claims agent re case tasks	0.50	245.00
07/01/21	KRC	8	Work on tasks related to Trust discovery motion	2.30	759.00
07/02/21	KRC	8	Work on Trust discovery reply brief	3.90	1,287.00
07/02/21	DMS	8	Review, revise, communicate with co-counsel and coordinate filing re motion to continue hearing on ACC's Rule 2004 discovery motion and related motion to shorten notice	1.20	690.00
07/05/21	KRC	8	Work on tasks related to Trust reply brief	1.60	528.00
07/05/21	KRC	8	Confer with RBH team re case tasks	0.20	66.00
07/05/21	DLB	8	Confer with RBH team re case tasks	0.20	66.00
07/05/21	TPM	8	Confer with RBH team re case tasks	0.20	55.00
07/05/21	DMS	8	Review, revise, communicate with co-counsel re Bankruptcy Court's inquiries about motion to shorten notice and motion to continue hearing on ACC's Rule 2004 discovery of debtor's defense counsel	0.50	287.50
07/05/21	SLR	8	Confer with RBH team re case tasks and deadlines	0.20	52.00
07/05/21	RCW	8	Continue drafting replies in support of discovery motions	2.40	1,176.00
07/05/21	RCW	8	Confer with RBH team re case tasks	0.20	98.00
07/06/21	KRC	8	Work on tasks related to Trust discovery motion	2.60	858.00
07/06/21	SLR	8	Assist with exhibits re PIQ reply brief	1.30	338.00
07/06/21	KRC	8	Confer with GS Cassada re Trust reply brief	0.30	99.00
07/06/21	KRC	8	Confer with client, co-counsel, and GS Cassada re case tasks	1.00	330.00
07/06/21	DLB	8	Work on PIQ Reply	2.30	759.00
07/06/21	GSC	8	Confer with KR Crandall re Trust reply brief	0.30	198.00
07/06/21	GSC	8	Confer with client, co-counsel, and KR Crandall re case tasks	1.00	660.00
07/07/21	DLB	8	Correspondence with R Worf re matter development	0.10	33.00

Date	Professional	Task	Narrative	Hours	Amount
07/07/21	DMS	8	Review, revise, communicate with co-counsel and coordinate filing re order continuing July 15 hearings on debtor's Rule 2004 discovery motions	0.30	172.50
07/07/21	KRC	8	Work on tasks related to Trust discovery motion	0.40	132.00
07/08/21	GSC	8	Planning for trust discovery hearing	0.60	396.00
07/08/21	DLB	8	Email correspondence with client re matter development	0.10	33.00
07/08/21	KRC	8	Work on tasks related to PIQ and Trust discovery motions	0.20	66.00
07/09/21	KRC	8	Work on tasks related to PIQ and Trust discovery motions	0.90	297.00
07/12/21	SLP	8	Confer with RBH team re upcoming deadlines and tasks	0.10	42.00
07/12/21	KRC	8	Confer with RBH team re case tasks	0.10	33.00
07/12/21	SLR	8	Attend RBH team meeting case status and upcoming projects	0.10	26.00
07/12/21	TPM	8	Confer with RBH team re case status	0.10	27.50
07/12/21	GSC	8	Status and planning conference with RBH team	0.10	66.00
07/12/21	GSC	8	Review, analysis and input re motion for estimation of debtor's liability for mesothelioma claims	2.50	1,650.00
07/12/21	RCW	8	Confer with RBH team re case tasks	0.10	49.00
07/12/21	PSR	8	Confer with RBH team re discovery related issues	0.10	31.00
07/13/21	KRC	8	Work on discovery tasks related to Trust discovery motion	0.10	33.00
07/13/21	GSC	8	Review and analysis of declarations by DCPF, Manville Trust and ACC supporting discovery positions	1.10	726.00
07/13/21	GSC	8	Participation in weekly work-in-process conference	1.20	792.00
07/14/21	KRC	8	Work on tasks related to Trust discovery motion	0.60	198.00
07/14/21	SLR	8	Draft deposition notice for Peterson deposition	0.40	104.00
07/14/21	GSC	8	Correspondence with co-counsel re discovery re discovery motions	0.50	330.00
07/14/21	GSC	8	Work on notice of Peterson deposition	0.50	330.00
07/14/21	GSC	8	Correspondence to DCPF counsel re discovery depositions	0.50	330.00
07/15/21	GSC	8	Conference with DBMP, co-counsel, and claims experts re case status and planning	0.50	330.00
07/15/21	KRC	8	Work on tasks related to Trust and PIQ discovery motions	0.60	198.00
07/15/21	SLR	8	Prepare logistics for Peterson deposition including revising deposition notice	0.20	52.00
07/15/21	SLR	8	Assist with preparation for discovery motions replies	0.40	104.00
07/16/21	KRC	8	Work on tasks related to Trust discovery	1.50	495.00
07/16/21	KRC	8	Confer with GS Cassada re tasks related to Trust	0.20	66.00

Date	Professional	Task	Narrative	Hours	Amount
			discovery motion		
07/16/21	SLR	8	Finalize Peterson deposition notice and circulate same; confer with court reporter re logistics	0.50	130.00
07/16/21	GSC	8	Correspondence with co-counsel and DCPF counsel re discovery depositions	0.70	462.00
07/16/21	GSC	8	Confer with KR Crandall re tasks related to Trust discovery motion	0.20	132.00
07/19/21	RCW	8	Confer with RBH team re case tasks	0.20	98.00
07/19/21	PSR	8	Confer with RBH team re discovery related issues	0.20	62.00
07/19/21	DLB	8	Confer with RBH team re matter development	0.10	33.00
07/19/21	KRC	8	Continue work on tasks related to Trust discovery motion	0.40	132.00
07/19/21	TPM	8	Attend status update call	0.20	55.00
07/19/21	SLR	8	Meeting with RBH team regarding case tasks and upcoming projects	0.20	52.00
07/19/21	KRC	8	Confer with RBH team re case tasks	0.20	66.00
07/19/21	KRC	8	Confer with GS Cassada re tasks related to Trust discovery motion	0.80	264.00
07/19/21	GSC	8	Conference with RBH team re estimation project update	0.20	132.00
07/19/21	GSC	8	Conference with co-counsel and claims experts re status of case projects	0.30	198.00
07/19/21	GSC	8	Teleconference with K. Crandall re preparation for 8/12 trust discovery hearing	0.80	528.00
07/20/21	KRC	8	Confer with GS Cassada re tasks related to Trust discovery motion	0.40	132.00
07/20/21	KRC	8	Work on tasks related to Trust discovery motion	2.10	693.00
07/20/21	KRC	8	Confer with SL Riggins re upcoming deposition of ACC expert	0.20	66.00
07/20/21	SLR	8	Work on logistics for Peterson deposition including conferring with KR Crandall	0.50	130.00
07/20/21	KRC	8	Confer with client, co-counsel, and GS Cassada re case tasks	1.10	363.00
07/20/21	GSC	8	Estimation discovery planning conference with DBMP and co-counsel	1.10	726.00
07/21/21	KRC	8	Work on tasks related to Trust discovery motion	2.20	726.00
07/21/21	KRC	8	Confer with co-counsel and GS Cassada re tasks related to Trust discovery	1.20	396.00
07/21/21	SLR	8	Draft deposition notices for trust declarants	0.60	156.00
07/22/21	SLR	8	Work on logistics for Peterson deposition	0.20	52.00
07/22/21	KRC	8	Work on tasks related to Trust discovery motion	0.50	165.00
07/23/21	KRC	8	Prepare for deposition of ACC's expert	0.90	297.00
07/23/21	KRC	8	Work on tasks related to Trust discovery	0.70	231.00
07/23/21	GSC	8	Conference with DBMP, co-counsel, and KR Crandall re revisions to proposed trust discovery	0.70	462.00

Date	Professional	Task	Narrative	Hours	Amount
			order and trust subpoenas		
07/23/21	GSC	8	Correspondence to DCPF/Manville Trust counsel re depositions	0.30	198.00
07/23/21	SLR	8	Confer with KR Crandall re preparations for 7/29 filings	0.20	52.00
07/23/21	KRC	8	Confer with GS Cassada re tasks related to Trust discovery	0.10	33.00
07/23/21	KRC	8	Confer with client, co-counsel and GS Cassada re trust discovery motion	0.70	231.00
07/23/21	SLR	8	Work on Peteron deposition logistics and exhibit demo	0.80	208.00
07/23/21	GSC	8	Confer with KR Crandall re tasks related to Trust discovery	0.10	66.00
07/24/21	KRC	8	Prepare for deposition of ACC's expert	0.30	99.00
07/25/21	GSC	8	Preparation for discovery deposition	3.80	2,508.00
07/25/21	RCW	8	Edit motion for estimation of mesothelioma claims	3.10	1,519.00
07/26/21	SLR	8	Meeting with RBH team re case status and upcoming projects	0.10	26.00
07/26/21	SLR	8	Work on Peterson deposition logistics	0.90	234.00
07/26/21	KRC	8	Confer with RBH team re case tasks	0.10	33.00
07/26/21	KRC	8	Work on tasks related to motion for estimation	0.10	33.00
07/26/21	DLB	8	Conference with RBH litigation team re matter development	0.10	33.00
07/26/21	KRC	8	Work on tasks related to Trust discovery	0.40	132.00
07/26/21	GSC	8	Case status and planning conference with co-counsel and claims experts	0.40	264.00
07/26/21	TPM	8	Attend status update call with bankruptcy team	0.10	27.50
07/26/21	GSC	8	Estimation update and project status conference with RBH team	0.10	66.00
07/26/21	GSC	8	Teleconference with K Crandall re deposition preparation	0.80	528.00
07/26/21	GSC	8	Further work on form of trust discovery order	0.40	264.00
07/26/21	GSC	8	Correspondence to DCPF/Manville Trust counsel re revised for of order, requests for meet and confer	0.50	330.00
07/26/21	GSC	8	Preparation for deposition	3.40	2,244.00
07/26/21	RCW	8	Confer with K Crandall re Peterson deposition	0.10	49.00
07/26/21	RCW	8	Confer with experts, co-counsel, and GS Cassada re case tasks	0.40	196.00
07/26/21	RCW	8	Confer with RBH team re case tasks	0.10	49.00
07/26/21	PSR	8	Confer with RBH team re briefing deadlines	0.10	31.00
07/26/21	DLB	8	Work on PIQ slide deck	0.50	165.00
07/26/21	KRC	8	Series of calls with GS Cassada re Trust discovery and other case tasks	0.80	264.00

Date	Professional	Task	Narrative	Hours	Amount
07/26/21	KRC	8	Prepare for deposition of ACC's expert	0.50	165.00
07/26/21	KRC	8	Confer with RC Worf re preparations for deposition of ACC's expert witness	0.10	33.00
07/27/21	DLB	8	Work on PIQ related project	0.10	33.00
07/27/21	KRC	8	Prepare for deposition of ACC's expert	2.40	792.00
07/27/21	KRC	8	Confer with GS Cassada re preparation for deposition of ACC expert	0.30	99.00
07/27/21	SLR	8	Assist with final preparations for Peterson deposition	0.80	208.00
07/27/21	KRC	8	Participate in deposition of ACC's expert	6.10	2,013.00
07/27/21	KRC	8	Work on tasks related to Trust discovery motion	0.10	33.00
07/27/21	GSC	8	Further preparation for deposition includig conferring with KR Crandall	1.40	924.00
07/27/21	GSC	8	Representation of debtor in deposition	6.10	4,026.00
07/28/21	DLB	8	Work on PIQ reply brief	0.60	198.00
07/28/21	PSR	8	Confer re omnibus motion	0.30	93.00
07/28/21	RCW	8	Continue drafting reply in support of questionnaire motion	3.30	1,617.00
07/28/21	KRC	8	Work on reply brief re Trust discovery motion	0.50	165.00
07/28/21	TPM	8	Work on PIQ project	0.90	247.50
07/28/21	SLR	8	Compile exhibits for trust reply	1.50	390.00
07/28/21	KRC	8	Confer with GS Cassada re case tasks	0.10	33.00
07/28/21	GSC	8	Review and comment revised trust discovery order	0.30	198.00
07/29/21	DLB	8	Revise DBMP reply brief	2.10	693.00
07/29/21	KRC	8	Finalize reply brief in support of Trust discovery motion	3.90	1,287.00
07/29/21	TPM	8	Work on PIQ related project	1.40	385.00
07/29/21	SLR	8	Continue work on exhibits to trust reply brief and finalize and file same	3.50	910.00
07/29/21	KRC	8	Confer with GS Cassada re tasks related to Trust discovery reply brief	0.20	66.00
07/29/21	KRC	8	Confer with client, co-counsel, GS Cassada, and RC Worf re case tasks	1.10	363.00
07/29/21	JLR	8	Prepare deposition transcripts and exhibits for attorney review	0.30	63.00
07/29/21	KRC	8	Series of calls with S Riggins re case filings	0.20	66.00
07/29/21	SLR	8	Review, analyze and confirm record citations in PIQ reply brief	0.90	234.00
07/29/21	AWT	8	Review and communicate with Jones Day re estimation motion	0.70	371.00
07/29/21	SLR	8	Finalize and e-file reply in support of trust motion	0.50	130.00
07/29/21	SLR	8	Confer with noticing agent re service of reply briefs	0.30	78.00
07/29/21	RCW	8	Review and edit discovery responses	0.50	245.00

Date	Professional	Task	Narrative	Hours	Amount
07/29/21	RCW	8	Edit and file reply in support of questionnaire motion	1.00	490.00
07/29/21	RCW	8	Confer with client, co-counsel, GS Cassada, and K Crandall re case tasks	1.10	539.00
07/29/21	GSC	8	Review and edit responses to ACC/FCR discovery re discovery motions	1.20	792.00
07/29/21	GSC	8	Participation in weekly work-in-process conference	1.10	726.00
07/29/21	GSC	8	Further work on reply to objections to trust discovery motion including conferring with KR Crandall	2.30	1,518.00
07/29/21	SLR	8	Series of calls with KR Crandall s re case filings	0.20	52.00
07/30/21	DLB	8	Confer with S Riggins re PIQ hearing matters	0.10	33.00
07/30/21	GSC	8	Meet and confer session follow-up with co-counsel	0.60	396.00
07/30/21	GSC	8	Review and analysis of ACC/FCR discovery responses	0.40	264.00
07/30/21	GSC	8	Preparation for depositions	1.30	858.00
07/30/21	SLR	8	Confer with DL Bostian re PIQ hearing matters	0.10	26.00
07/31/21	GSC	8	Preparation for DCPF/Manville depositions	4.60	3,036.00
8 Total:					58,334.50
Total Fees:				\$	73,284.50

Summary of Professional Services

<u>Professional</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jake Raynor	0.30	210.00	63.00
Tamara Redi	1.50	260.00	390.00
Satyra Riggins	20.70	260.00	5,382.00
Timothy Misner	2.90	275.00	797.50
Preetha Rini	0.70	310.00	217.00
Kevin Crandall	48.10	330.00	15,873.00
Demi Bostian	12.60	330.00	4,158.00
Stuart Pratt	0.10	420.00	42.00
Richard Worf, Jr.	14.90	490.00	7,301.00
Andrew Tarr	2.60	530.00	1,378.00
David Schilli	7.80	575.00	4,485.00
Garland Cassada	50.30	660.00	33,198.00
	<u>162.50</u>		<u>\$73,284.50</u>

Total Current Billing: \$ 73,284.50

EXHIBIT A-4

ROBINSON
BRADSHAW

Robinson Bradshaw
101 North Tryon Street, Suite 1900
Charlotte, NC 28246
t: 704.377.2536
robinsonbradshaw.com

Fed. Tax ID 56-0944079

Leslie Dallas
DBMP LLC
Law Department
20 Moores Road
Malvern, PA 19355

Invoice Date September 28, 2021
Invoice No. 670917

RE: Chapter 11 Case
Client ID: 26969 Matter ID: 00011
Claim Number: SG-008044

Invoice Summary

Total Professional Services This Invoice	\$ 73,241.50
Total Disbursements This Invoice	\$ 754.76
Total This Invoice	\$ 73,996.26

Outstanding Balance on Amounts Previously Billed

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Amount</u>	<u>Payments/Credits</u>	<u>Balance Due</u>
06/30/2021	667309	\$39,092.30	\$(35,212.05)	\$3,880.25
09/09/2021	670383	\$73,284.50	\$0.00	\$73,284.50
09/09/2021	668899	\$91,321.85	\$(82,227.45)	\$9,094.40
Outstanding Balance				\$86,259.15

Total Now Due \$ **160,255.41**

Payment Options

Check

Make check payable to:
Robinson Bradshaw
101 N. Tryon Street, Suite 1900
Charlotte, NC 28246

*Charges due upon receipt of invoice
Please reference invoice or client number on remittance*



Robinson Bradshaw
 101 North Tryon Street, Suite 1900
 Charlotte, NC 28246
 t: 704.377.2536
 robinsonbradshaw.com

Fed. Tax ID 56-0944079

Leslie Dallas
 DBMP LLC
 Law Department
 20 Moores Road
 Malvern, PA 19355

Invoice Date September 28, 2021
 Invoice No. 670917

RE: Chapter 11 Case
 Client ID: 26969 Matter ID: 00011
 Claim Number: SG-008044

For Professional Services Rendered Through August 31, 2021

Date	Professional	Task	Narrative	Hours	Amount
08/02/21	TCR	1	Review, analyze and distribute court filings	0.20	52.00
08/05/21	TCR	1	Review, analyze and distribute court filings	0.70	182.00
08/09/21	TCR	1	Review, analyze and distribute court filings	0.90	234.00
08/10/21	SLR	1	Finalize and e-file agenda for 8/12 hearing	0.20	52.00
08/11/21	AWT	1	Review and comment on debtor's objection to ACC and FCR motion to continue discovery motions	0.40	212.00
08/12/21	TCR	1	Review, analyze and distribute court filings	3.10	806.00
08/13/21	TCR	1	Review, analyze and distribute court filings	0.80	208.00
08/16/21	TCR	1	Review, analyze and distribute court filings	1.00	260.00
08/17/21	DMS	1	Revise correspondence to Mr. Walters re DBMP preliminary injunction decision; prepare worksheet re insurance run-off, operations and cash balances	0.90	517.50
08/23/21	TCR	1	Review, analyze and distribute court filings	0.60	156.00
08/24/21	TCR	1	Review, analyze and distribute court filings	1.10	286.00
08/24/21	SLR	1	Finalize and e-file notice or rescheduling 9/15 hearing and updated master calendar re updated court deadlines	0.60	156.00
08/25/21	SLR	1	Finalize and e-file ordinary course professional declaration	0.20	52.00
08/26/21	AWT	1	Communicate with Mr. Gordon, Mr. Ellman, et al. re case strategy matters	0.10	53.00
08/27/21	SLR	1	Confer with co-counsel re returned mailings and conferring with notice agent on same	0.30	78.00
08/27/21	TCR	1	Review, analyze and distribute court filings	0.20	52.00
1 Total:					3,356.50

Date	Professional	Task	Narrative	Hours	Amount
08/06/21	DMS	11	Review, analyze, communicate with co-counsel and coordinate filing re periodic OCP report	0.20	115.00
08/06/21	AWT	11	Review and communicate with Jones Day re ordinary course professionals report	0.20	106.00
08/30/21	AWT	11	Review and comment on monthly status report	0.50	265.00
08/30/21	SLR	11	Finalize and e-file monthly status report	0.20	52.00
08/30/21	DMS	11	Review and analyze monthly status report	0.30	172.50
11 Total:					710.50
08/03/21	DMS	12	Review and analyze email correspondence from Bankruptcy Court, debtor, ACC and FCR re proposed findings and conclusions for preliminary injunction motion and stay relief motion	0.30	172.50
08/10/21	GSC	12	Review and analysis of order declaring automatic stay applies and approving preliminary injunction including some time conferring with RC Worf	2.10	1,386.00
08/10/21	KRC	12	Review opinion re preliminary injunction and automatic stay	0.60	198.00
08/10/21	RCW	12	Review and analyze opinion on automatic stay and preliminary injunction	1.20	588.00
08/10/21	RCW	12	Confer with GS Cassada re opinion on automatic stay and preliminary injunction	0.40	196.00
08/10/21	RCW	12	Second conference with GS Cassada re opinion on automatic stay and preliminary injunction	0.30	147.00
08/11/21	DMS	12	Review and analyze opinion granting preliminary injunction and denying stay relief	1.40	805.00
08/12/21	DMS	12	Review and analyze court decision on preliminary injunction and impact on case strategy	0.50	287.50
08/12/21	RCW	12	Confer with DM Schilli re automatic stay/preliminary injunction opinion	0.60	294.00
08/17/21	JLR	12	Prepare deposition transcripts and exhibits for attorney review	0.20	42.00
08/23/21	DMS	12	Review and analyze complaint and related documents by ACC and FCR re substantive consolidation of debtor with CertainTeed LLC	0.40	230.00
08/23/21	GSC	12	Review of complaint for substantive consolidation and related motions filed by Committee	0.70	462.00
08/24/21	JLR	12	Prepare deposition transcript and exhibits for attorney review	0.20	42.00
08/25/21	DMS	12	Review and analyze recent WDNC decisions questioning divisive mergers under Texas law	0.40	230.00
08/25/21	DMS	12	Review, analyze and communicate with co-counsel re amicus briefing offer on trust transparency issues	0.30	172.50
08/26/21	JLR	12	Prepare synchronized transcripts and videos for attorney review	0.20	42.00
12 Total:					5,294.50

Date	Professional	Task	Narrative	Hours	Amount
08/24/21	DMS	15	Review, revise, communicate with co-counsel and coordinate filing re declaration of ordinary course professional	0.20	115.00
			15 Total:		115.00
08/02/21	SLR	16	Work on June monthly fee statement	1.20	312.00
08/11/21	SLR	16	Finalize and distribute monthly fee statement for June 2021	0.40	104.00
08/17/21	SLR	16	Work on July monthly fee statement	0.70	182.00
			16 Total:		598.00
08/10/21	DMS	7	Review, comment on, communicate with co-counsel and coordinate filing re August 12 omnibus hearing agenda	0.20	115.00
08/10/21	DMS	7	Communicate with GS Cassada re August 12 omnibus hearing agenda issues	0.20	115.00
08/11/21	SLR	7	Confer re preparations for 8/12 hearing	0.40	104.00
08/11/21	RCW	7	Confer with co-counsel and GS Cassada re hearing preparation	0.90	441.00
08/11/21	TCR	7	Conference with SL Riggins re logistics of hearing slides and hearing exhibits	0.80	208.00
08/12/21	KRC	7	Participate in status conference hearing	1.40	462.00
08/12/21	SLR	7	Confer with court reporter re 8/12 hearing transcript	0.10	26.00
08/12/21	RCW	7	Attend status hearing	1.40	686.00
08/12/21	GSC	7	Preparation for status conference	0.30	198.00
08/12/21	GSC	7	Representation of Debtor sat status conference	1.40	924.00
08/13/21	RCW	7	Appear at continued status conference	1.00	490.00
08/13/21	GSC	7	Participation in continued status conference	1.00	660.00
08/24/21	DMS	7	Review, revise, communicate with co-counsel and coordinate filing re notice of rescheduled September omnibus hearing	0.20	115.00
			7 Total:		4,544.00
08/02/21	KRC	8	Confer with co-counsel and GS Cassada re case tasks	1.00	330.00
08/02/21	DMS	8	Review and analyze email correspondence from Bankruptcy Court and various parties re August omnibus hearing motions	0.40	230.00
08/02/21	KRC	8	Confer with RBH team re case tasks	0.10	33.00
08/02/21	RCW	8	Confer with RBH team re case tasks	0.10	49.00
08/02/21	DLB	8	Confer with RBH team re matter development	0.10	33.00
08/02/21	KRC	8	Work on tasks related to Trust discovery	0.40	132.00
08/02/21	SLR	8	Work on logistics for 8/9 depositions	0.50	130.00
08/02/21	SLR	8	Participate in RBH team meeting re case status and updates	0.10	26.00

Date	Professional	Task	Narrative	Hours	Amount
08/02/21	GSC	8	Correspondence with co-counsel re ACC request to continue hearings on discovery motions	0.40	264.00
08/03/21	GSC	8	Confer with KR Crandall re tasks related to Trust discovery motion and other case tasks	0.30	198.00
08/03/21	GSC	8	Participation in case status and planning conference	0.80	528.00
08/03/21	GSC	8	Estimation discovery conference with DBMP, co-counsel and claims experts	1.00	660.00
08/03/21	KRC	8	Work on tasks related to Trust discovery motion	0.80	264.00
08/03/21	KRC	8	Confer with client, co-counsel, GS Cassada, and RC Worf re case tasks	0.80	264.00
08/03/21	KRC	8	Confer with GS Cassada re tasks related to Trust discovery motion and other case tasks	0.30	99.00
08/03/21	KRC	8	Confer with expert, co-counsel, GS Cassada and RC Worf re case tasks	1.00	330.00
08/03/21	SLR	8	Work on deposition preparations	0.60	156.00
08/03/21	RCW	8	Confer with client, co-counsel, experts, and GS Cassada re case tasks	1.00	490.00
08/03/21	RCW	8	Confer with client, co-counsel, and GS Cassada re case tasks	0.80	392.00
08/04/21	SLR	8	Review and revise deposition notices	0.20	52.00
08/04/21	KRC	8	Confer with GS Cassada re preparation for hearing on Trust discovery motion	1.30	429.00
08/04/21	KRC	8	Confer with vendor, co-counsel, and GS Cassada re Trust discovery motion	1.60	528.00
08/04/21	GSC	8	Work on outline for trust discovery argument	0.90	594.00
08/04/21	GSC	8	Conference with K Crandall co-counsel re trust discovery hearing prep	1.60	1,056.00
08/04/21	GSC	8	Preparation and planning for DCPF/Manville Trust Depositions	0.40	264.00
08/04/21	GSC	8	Conference with KR Crandall re preparation of materials for trust discovery argument	1.30	858.00
08/04/21	GSC	8	Review and analysis of documents re trust discovery	0.30	198.00
08/04/21	KRC	8	Work on tasks related to Trust discovery motion	0.60	198.00
08/05/21	KRC	8	Work on tasks related to Trust discovery motion	0.30	99.00
08/05/21	SLR	8	Work on preparations for 8/16 rescheduled depositions	0.20	52.00
08/05/21	GSC	8	Preparation of revised notices of deposition of DCPF/Manville trust declarants	0.20	132.00
08/05/21	GSC	8	Review and analysis of draft power point slides for presentation	0.50	330.00
08/08/21	GSC	8	Preparation for depositions re trust discovery	2.70	1,782.00
08/09/21	SLR	8	Conference with RBH team re case status and upcoming projects	0.10	26.00
08/09/21	KRC	8	Review DCPF's response to discovery requests	0.10	33.00

Date	Professional	Task	Narrative	Hours	Amount
08/09/21	GSC	8	Conference with RBH team re status of and planning for projects	0.10	66.00
08/09/21	GSC	8	Preparation for depositions	0.70	462.00
08/10/21	RCW	8	Confer with client, co-counsel, and GS Cassada re case tasks	1.00	490.00
08/10/21	DLB	8	Email correspondence from R Worf re matter development	0.10	33.00
08/10/21	KRC	8	Confer with client, co-counsel, GS Cassada, and RC Worf re case tasks	1.00	330.00
08/10/21	GSC	8	Participation in case planning and strategy conference with DBMP and co-counsel	1.00	660.00
08/10/21	GSC	8	Correspondence with trust counsel re trust discovery hearing	0.30	198.00
08/11/21	SLR	8	Plan and prepare for 8/16 depositions	0.20	52.00
08/11/21	KRC	8	Prepare for upcoming depositions of DCPF and Manville Trust witnesses	0.50	165.00
08/11/21	GSC	8	Review and analysis of DCPF and ACC/FCR responses to discovery requests	0.70	462.00
08/11/21	DMS	8	Review, revise, communicate with co-counsel and coordinate filing re debtor's response to ACC's motion to continue hearings on discovery motions	2.60	1,495.00
08/11/21	GSC	8	Participation in meet and confer with counsel for FCR and ACC re discovery/estimation plan post-PI ruling	0.60	396.00
08/11/21	SLR	8	Finalize and e-file objection to motion to continue hearing on estimation discovery motions	0.40	104.00
08/11/21	RCW	8	Participate in meet and confer re scheduling with opposing counsel, co-counsel, and GS Cassada	0.60	294.00
08/11/21	RCW	8	Review and edit response on motion to continue discovery motions	0.30	147.00
08/11/21	GSC	8	Review and provide input re DBMP's response to ACC motion to continue hearings on discovery motions	0.40	264.00
08/12/21	KRC	8	Prepare for upcoming depositions of DCPF and Manville witnesses	0.30	99.00
08/12/21	KRC	8	Confer with GS Cassada re deposition of DCPF and Manville witnesses	0.40	132.00
08/12/21	SLR	8	Work on deposition exhibit logistics	1.20	312.00
08/12/21	KRC	8	Confer with co-counsel re upcoming deposition preparations	0.90	297.00
08/12/21	RCW	8	Confer with client, co-counsel, and GS Cassada re status hearing	0.60	294.00
08/12/21	GSC	8	Correspondence with DBMP and co-counsel re scheduling of hearings and response dates	0.60	396.00
08/12/21	GSC	8	Preparation for DCPF/Manville Trust depositions re trust discovery motion	2.40	1,584.00

Date	Professional	Task	Narrative	Hours	Amount
08/12/21	GSC	8	Preparation for DCPF/Manville Trust depositions re trust discovery motions	0.70	462.00
08/13/21	GSC	8	Participation in meet and confer with DCPF/Manville Trust counsel and K Crandall	0.80	528.00
08/13/21	GSC	8	Meet and confer follow-up with K Crandall	0.30	198.00
08/13/21	RCW	8	Confer with co-counsel and GS Cassada re hearing	0.30	147.00
08/13/21	RCW	8	Meet and confer with opposing counsel, co-counsel, and GS Cassada re schedule	0.30	147.00
08/13/21	KRC	8	Prepare for upcoming depositions of DCPF and Manville Trust witnesses	0.50	165.00
08/13/21	SLR	8	Prepare deposition exhibits for 8/16 depositions	0.20	52.00
08/13/21	KRC	8	Confer with GS Cassada re upcoming depositions	0.20	66.00
08/13/21	KRC	8	Participate in meet and confer with DCPF and Manville Trust counsel	0.60	198.00
08/13/21	SLR	8	Continue to prepare for 8/16 depositions	0.40	104.00
08/13/21	GSC	8	Prep for depositions	1.50	990.00
08/15/21	GSC	8	Preparation for Trust depositions	5.50	3,630.00
08/16/21	KRC	8	Work on tasks for deposition of DCPF and Manville Trust witnesses	2.00	660.00
08/16/21	SLR	8	Assist with final deposition preparations for 8/16 depositions	0.50	130.00
08/16/21	KRC	8	Attend depositions of DCPF and Manville Trust witnesses	8.70	2,871.00
08/16/21	GSC	8	Preparation for Trust depositions	1.10	726.00
08/16/21	GSC	8	Representation of Debtor at Trust depositions	8.20	5,412.00
08/16/21	GSC	8	Conference with co-counsel re Trust depositions	0.40	264.00
08/16/21	RCW	8	Confer with co-counsel and experts re case tasks	0.30	147.00
08/17/21	RCW	8	Confer with GS Cassada re estimation and discovery matters	0.20	98.00
08/17/21	KRC	8	Work on tasks related to Rule 2004 discovery motions	0.20	66.00
08/17/21	KRC	8	Confer with client, co-counsel, and GS Cassada re case tasks	0.80	264.00
08/17/21	GSC	8	Preparation of notes re Trust depositions	0.60	396.00
08/17/21	GSC	8	Participation in weekly work-in-process conference with DBMP and co-counsel	0.50	330.00
08/18/21	GSC	8	Correspondence to DCPF counsel re Winner/Gorelick depositions	0.50	330.00
08/20/21	KRC	8	Review correspondence related to Trust discovery motion	0.10	33.00
08/20/21	GSC	8	Correspondence to DCPF/Manville Trust counsel challenging deposition confidentiality designations	0.50	330.00
08/20/21	GSC	8	Conference with DBMP and co-counsel re resolution of discovery disputes	1.40	924.00

Date	Professional	Task	Narrative	Hours	Amount
08/20/21	RCW	8	Prepare for call with client, co-counsel, and GS Cassada re estimation issue	0.20	98.00
08/20/21	RCW	8	Confer with client, co-counsel, and GS Cassada re estimation issue	1.50	735.00
08/23/21	RCW	8	Confer with co-counsel, experts, and GS Cassada re case tasks	0.40	196.00
08/23/21	RCW	8	Prepare for call with client re estimation issue	0.60	294.00
08/23/21	RCW	8	Confer with client, co-counsel, and GS Cassada re estimation issue	0.60	294.00
08/23/21	GSC	8	Conference with DBMP and co-counsel re Committee request for Rule 502(b) agreement re exemplar cases	1.10	726.00
08/23/21	GSC	8	Preparation of correspondence to Committee counsel responding to Rule 502(b) request	0.50	330.00
08/23/21	GSC	8	Conference with co-counsel and claims expert re estimation update and planning	0.40	264.00
08/23/21	GSC	8	Further work on response to Committee request for Rule 502(b) agreement	0.70	462.00
08/24/21	GSC	8	Correspondence to counsel for ACC and FCR re potential for a Rule 502(d) agreement related to production of case files	0.80	528.00
08/24/21	GSC	8	Participation in regular work-in-process conference	1.00	660.00
08/24/21	RCW	8	Confer with client, co-counsel, and GS Cassada re case tasks	1.00	490.00
08/24/21	RCW	8	Prepare for expert witness deposition	1.60	784.00
08/24/21	RCW	8	Review ACC/FCR filings re restructuring	0.10	49.00
08/24/21	SLR	8	Download and prepare court filings for attorney review	0.80	208.00
08/25/21	SLR	8	Prepare files for attorney review	0.90	234.00
08/25/21	SLR	8	Prepare deposition video files for attorney review	0.40	104.00
08/25/21	RCW	8	Confer with expert, co-counsel, and GS Cassada re deposition	2.10	1,029.00
08/25/21	RCW	8	Review filings re restructuring	0.60	294.00
08/25/21	GSC	8	Preparation for deposition re estimation motion	2.10	1,386.00
08/26/21	SLR	8	Prepare logistics for Bates depoosition	0.30	78.00
08/26/21	KRC	8	Confer with expert and GS Cassada re upcoming deposition	0.10	33.00
08/26/21	GSC	8	Conference with DBMP and co-counsel re plan for response to ACC/FCR litigation assault	1.20	792.00
08/26/21	GSC	8	Conference with Bates White re deposition prep	0.60	396.00
08/26/21	RCW	8	Prepare for call with client re filings re restructuring	0.50	245.00
08/26/21	RCW	8	Confer with client, co-counsel, and GS Cassada re restructuring-related filings	1.20	588.00
08/27/21	SLR	8	Prepare recent filings for attorney review and update master calendar re new deadlines	0.80	208.00

Date	Professional	Task	Narrative	Hours	Amount
08/27/21	GSC	8	Review and analysis of motion to compel production Bates White's work product from non-DBMP engagement	0.50	330.00
08/27/21	GSC	8	Preparation for Bates Deposition	2.50	1,650.00
08/27/21	GSC	8	Representation of Debtor re Bates Deposition	4.60	3,036.00
08/27/21	RCW	8	Confer with GS Cassada re expert deposition	0.10	49.00
08/27/21	RCW	8	Assist in defending expert deposition	4.60	2,254.00
08/27/21	KRC	8	Work on tasks related to expert deposition	0.10	33.00
08/27/21	SLR	8	Assist with final preparations for Bates deposition	0.30	78.00
08/30/21	RCW	8	Confer with GS Cassada, K Crandall, DL Bostian, PS Rini, T Misner, and SL Riggins re case tasks	0.10	49.00
8 Total:					58,623.00
Total Fees:				\$	73,241.50

Summary of Professional Services

<u>Professional</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jake Raynor	0.60	210.00	126.00
Tamara Redi	9.40	260.00	2,444.00
Satyra Riggins	12.40	260.00	3,224.00
Kevin Crandall	26.70	330.00	8,811.00
Demi Bostian	0.20	330.00	66.00
Richard Worf, Jr.	26.50	490.00	12,985.00
Andrew Tarr	1.20	530.00	636.00
David Schilli	8.50	575.00	4,887.50
Garland Cassada	60.70	660.00	40,062.00
	146.20		\$73,241.50

Disbursements Through August 31, 2021

Date	Description	Amount
	Black and White Copies	36.33
07/21/21	Binding	6.00
07/21/21	Binding	4.00
07/29/21	Pacer Database Search	74.60
08/12/21	Vendor: Soundpath Conferencing; Invoice#: 7043772536-081221; Date: 8/12/2021	12.05
08/12/21	Vendor: Soundpath Conferencing; Invoice#: 7043772536-081221; Date: 8/12/2021	7.07
08/12/21	Vendor: Soundpath Conferencing; Invoice#: 7043772536-081221; Date: 8/12/2021	11.39
08/12/21	Vendor: Soundpath Conferencing; Invoice#: 7043772536-081221; Date: 8/12/2021	5.00
08/12/21	Vendor: Soundpath Conferencing; Invoice#: 7043772536-081221; Date: 8/12/2021	0.86

Disbursements Through August 31, 2021

Date	Description	Amount
08/17/21	Vendor: Janice Russell Transcripts; Invoice#: 21-113; Date: 8/16/2021	305.55
08/24/21	Vendor: Federal Express Corporation; Invoice#: 7-477-87687; Date: 8/24/2021	38.11
08/31/21	Pacer Database Search	253.80

Total Disbursements: \$ 754.76

Total Current Billing: \$ 73,996.26

EXHIBIT B

May 1, 2021 – August 31, 2021

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

Project Category	Total Hours Billed for Time Period	Total Fees Billed For The Period	Total Fees Billed From The Petition Date
Case Administration/Bus. Op. (1)	39.4	\$14,720.50	\$99,365.50
Automatic Stay (3)	-0-	-0-	\$2,042.50
Plan of Reorganization (4)	8.9	\$5,061.00	\$8,491.00
Court Hearings (7)	21.8	\$11,367.00	\$122,524.00
Asbestos Matters (8)	475.5	\$220,348.50	\$529,491.50
Reporting (11)	5.9	\$2,866.00	\$24,424.00
Litigation and Adv. Procs. (12)	18.1	\$10,191.00	\$121,939.00
Prof. Ret. And Fee Issues (15)	16.8	\$7,383.00	\$23,974.50
Fee Appl. Preparation (16)	13.4	\$4,295.50	\$39,761.50
Nonworking Travel (17)	-0-	-0-	\$4,124.00
Creditor's Inquiries (18)	-0-	-0-	\$924.00
Total	599.8	\$276,232.50	\$977,061.50

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

Expense Category	Total Expenses For the Period	Total Expenses From the Petition Date
Consulting Experts	-0-	-0-
In-house duplicating (\$.10/page)	\$36.33	\$3,740.43
In-house duplicating (color) (\$.25/page)	-0-	\$80.50
Postage	-0-	-0-
Misc. Expenses	\$1,351.60	\$10,234.90
Overnight Delivery	\$38.11	\$62.22
Telephone expense – Long Distance/Teleconferencing	\$36.37	\$92.63
Travel	-0-	\$582.20
Working Meals	-0-	\$129.67
U.S. Bankruptcy Court Filing Fees	-0-	\$5,483.00
Total	\$1,462.41	\$20,405.55

EXHIBIT D

SUMMARY OF PRIOR FEE APPLICATIONS

<u>Application Date</u>	<u>Period Covered</u>	<u>Fees Requested/Allowed</u>	<u>Expenses Requested/Allowed</u>
June 26, 2020	January 23, 2020 through April 30, 2020	\$165,273.00	\$10,976.66
October 16, 2020	May 1, 2020 through August 31, 2020	\$192,004.00	\$1,395.25
February 18, 2021	September 1, 2020 through December 31, 2020	\$110,079.50	\$2,214.80
June 24, 2021	January 1, 2021 through April 30, 2021	\$233,472.50	\$4,356.43

EXHIBIT E

**PROFESSIONALS/PARAPROFESSIONALS INCLUDED IN THIS APPLICATION
May 1, 2021 – August 31, 2021**

NAME	TITLE	BAR ADMISSION	BILLING RATE	TOTAL HOURS BILLED	AMOUNT BILLED
Garland Cassada (GSC)	shareholder	1984	\$640.00/hr	181.7	\$119,922.00
David Schilli (DMS)	shareholder	1991	\$555.00/hr	31	\$17,825.00
Andrew W.J Tarr (AWT)	shareholder	2003	\$510.00/hr	7.6	\$4,028.00
Richard C. Worf (RCW)	shareholder	2007	\$470.00/hr	90.3	\$44,247.00
Stuart L. Pratt (SLP)	shareholder	2011	\$400.00/hr	3	\$1,260.00
Demi Bostian (DLB)	associate	2017	\$330.00/hr	49.4	\$16,306.00
Kevin Crandall (KRC)	associate	2016	\$315.00/hr	154.2	\$50,886.00
Preetha Rini (PSR)	associate	2016	\$310.00/hr	7.8	\$2,418.00
Timothy Misner (TPM)	associate	2020	\$275.00/hr	2.9	\$797.50
Satyra Riggins (SLR)	paralegal	n/a	\$240.00/hr	52.2	\$13,572.00
Tami Redi (TCR)	paralegal	n/a	\$245.00/hr	17.2	\$4,472.00
Jake Raynor (JR)	lit support	n/a	\$200.00/hr	1.2	\$252.00
Walter Short (WAS)	librarian	n/a	\$190.00/hr	1.3	\$247.00
TOTAL				599.8	\$276,232.50

**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 FIFTH INTERIM APPLICATION OF
ROBINSON, BRADSHAW & HINSON, P.A. FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
PROFESSIONAL SERVICES RENDERED AS SPECIAL COUNSEL FOR
ASBESTOS CLAIMS ESTIMATION MATTERS AND LOCAL BANKRUPTCY
COUNSEL FOR THE DEBTOR FOR THE PERIOD
FROM MAY 1, 2021 THROUGH AUGUST 31, 2021**

This matter came before the Court on the Fifth Interim Application of Robinson, Bradshaw & Hinson, P.A. for Allowance of Compensation and Reimbursement of Expenses for Professional Services Rendered as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel for the Debtor for the Period from May 1, 2021 through August 31, 2021 filed on October ---, 2021 (the “Fifth Interim Fee Application”) (DE ---). It appears to the Court 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.

1. The Fifth Interim Fee Application, together with the Notice of Opportunity for Hearing (the “Notice”), was served upon the parties required by Local Bankruptcy Rule 2002-1(g) and the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on February 13, 2020 (the “Compensation Order”). The Court finds that the notice and opportunity for hearing is proper and adequate and that no other or further notice is necessary.

2. Robinson, Bradshaw & Hinson, P.A. (“RBH”) rendered valuable services to the Debtor’s estate during Chapter 11 proceedings as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel from May 1, 2021 through August 31, 2021.

3. RBH incurred reasonable costs and expenses on behalf of the Debtor from May 1, 2021 through August 31, 2021.

4. The amounts requested by RBH are fair and reasonable given (a) the complexity of the cases; (b) the time expended; (c) the nature and extent of the services rendered; (d) the value of such services; and (e) the costs of comparable services other than in a case under this title.

5. Thus, RBH is entitled to interim approval of fees of 276,232.50, which such fees were incurred for reasonable, actual and necessary professional services rendered by RBH on the behalf of the Debtor during the Interim Period.

6. RBH is entitled to interim reimbursement of expenses incurred during the Interim Period of \$1,462.41, which such expenses are reasonable, actual and necessary.

Based upon the foregoing and for good cause shown, it is therefore ORDERED
that:

A. The Fifth Interim Fee Application is GRANTED, and RBH is allowed compensation and reimbursement of expenses for the Interim Period in the amounts set forth above.

B. RBH is hereby allowed and awarded, and the Debtor is authorized and directed to pay RBH, professional fees in the amount of \$276,232.50 and expenses in the amount of \$1,462.41 for a total of \$277,694.91 on an interim basis including (a) all amounts already paid to RBH for the Interim Period pursuant to the Compensation Order and RBH's monthly requests during the Interim Period, and (b) the 10% portion of RBH's fees which were held back during the Interim Period pursuant to the Compensation Order and 11 U.S.C. § 331.

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