

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**NOTICE OF FILING AND OPPORTUNITY
FOR HEARING ON INTERIM FEE APPLICATIONS**

(No Protest Notice – No Hearing Will Be Held Unless a Request for Hearing Is Filed)

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. The following interim applications for allowance of compensation for services rendered and for reimbursement of expenses (collectively, the “Interim Fee Applications”) have been filed:

- a. *Fifth Interim Application of Jones Day for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtor for the Period From May 1, 2021 through August 31, 2021 [Dkt. 1179];*
- b. *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 [Dkt. 1180];*
- c. *Fifth Interim Application of Schiff Hardin LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Counsel to the Debtor for the Period From May 1, 2021 through August 31, 2021 [Dkt. 1181];*
- d. *Fifth Interim Application of Bates White LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Asbestos Consultants to the Debtor for the Period From May 1, 2021 through August 31, 2021 [Dkt. 1182];*

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.

- e. *Combined Fourth Interim Application of Sander L. Esserman as Legal Representative for Future Claimants and Stutzman, Bromberg, Esserman & Plifka, a Professional Corporation as Counsel to the Legal Representative for Future Claimants for Allowance of Compensation and Reimbursement of Expenses for the Period from May 1, 2021 through August 31, 2021* [Dkt. 1183];
- f. *Fourth Interim Application of Young Conaway Stargatt & Taylor, LLP for Allowance of Compensation and Reimbursement of Expenses for Professional Services Rendered as Counsel to Sander L. Esserman, the Legal Representative for Future Claimants, for the Period from May 1, 2021 through August 31, 2021* [Dkt. 1184];
- g. *Fourth Interim Application of Ankura Consulting Group, LLC For Allowance of Compensation and Reimbursement of Expenses for Professional Services Rendered as Claims Evaluation Consultants to Sander L. Esserman, the Legal Representative for Future Claimants, for the Period from May 1, 2021 through August 31, 2021* [Dkt. 1185]; and
- h. *Second Interim Application of Alexander Ricks PLLC for Allowance of Compensation and Reimbursement of Expenses for Professional Services Rendered as Counsel to Sander L. Esserman, Legal Representative for Future Asbestos Claimants, for the Period of May 1, 2021 through August 31, 2021* [Dkt. 1186].

2. Your rights may be affected. You should read this Notice carefully and discuss it with your attorney. If you do not have an attorney, you may wish to consult one.

3. **IF YOU DO NOT WANT THE BANKRUPTCY COURT TO GRANT THE RELIEF REQUESTED IN AN INTERIM FEE APPLICATION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON ANY OF THE INTERIM FEE APPLICATIONS, THEN YOU MUST:**

- a. (i) On or before **November 10, 2021** (the “Response Deadline”), file a written response with the United States Bankruptcy Court for the Western District of North Carolina (the “Bankruptcy Court”) at:

Clerk, United States Bankruptcy Court
P.O. Box 34189
Charlotte, North Carolina 28234-4189

- (ii) If you have your attorney file a written response on your behalf, then the response should be filed with the Bankruptcy Court by electronic means through the Bankruptcy Court’s website, www.ncwb.uscourts.gov,

under the Debtor's name and case number, as listed above, by the Response Deadline.

- b. Serve a copy of such response, so that it is actually received on or before the Response Deadline, on (i) the undersigned counsel for the Debtor; (ii) all of the Notice Parties, as defined in paragraph 3(a) of the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 402] (the "Amended Interim Compensation Order"), as modified with respect to the Notice Parties by the *Order Authorizing the Official Committee of Asbestos Personal Injury Claimants to Retain and Employ Robinson & Cole, LLP and Caplin & Drysdale, Chartered as Counsel* [Dkt. 278], the *Order Appointing Sander L. Esserman as Legal Representative for Future Asbestos Claimants* [Dkt. 310] and the *Ex Parte Order Authorizing Substitution of Alexander Ricks PLLC as North Carolina Counsel for the Future Claimants' Representative* [Dkt. 653]; (iii) the professional whose Interim Fee Application is the subject of the response; and (iv) any other parties required to be served by law or other orders of the Bankruptcy Court.
- c. Attend the hearing (the "Hearing") scheduled for **Wednesday, November 17, 2021, at 9:30 a.m.** (prevailing Eastern Time), or as soon thereafter as can be heard, before the Honorable Judge J. Craig Whitley at the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division, JCW Courtroom 2-B, 401 West Trade Street, Charlotte, North Carolina 28202.

4. If you or your attorney do not take these steps, a hearing will not be held, and the Bankruptcy Court may decide that you do not oppose the relief requested in the Interim Fee Applications and may enter an order granting the relief requested therein.

5. You need not appear at the Hearing if you do not object to any of the relief requested in the Interim Fee Applications.

6. The Hearing may be continued or adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or at a later hearing.

7. Copies of the Interim Fee Applications and the Amended Interim Compensation Order may be obtained (a) free of charge at the website dedicated to the Debtor's chapter 11 case maintained by its claims and noticing agent, Epiq Corporate Restructuring, LLC, available at <https://dm.epiq11.com/DBMP>, under the tab labeled "Court Docket;" (b) for a nominal fee at the website of the Bankruptcy Court, www.ncwb.uscourts.gov, under the Debtor's

name and case number, as listed above; or (c) by written request directed to the undersigned counsel.

Dated: October 27, 2021
Charlotte, North Carolina

Respectfully submitted,

/s/ Garland S. Cassada

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