

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

In re

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**SUPPLEMENTAL DECLARATION OF GARLAND S. CASSADA IN SUPPORT OF
DEBTOR'S *EX PARTE* APPLICATION FOR ORDER AUTHORIZING RETENTION
AND EMPLOYMENT OF ROBINSON, BRADSHAW & HINSON, P.A. AS SPECIAL
COUNSEL FOR ASBESTOS CLAIMS ESTIMATION MATTERS AND LOCAL
BANKRUPTCY COUNSEL FOR DEBTOR AS OF THE PETITION DATE**

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), I, Garland S. Cassada, hereby declare that the following is true and correct:

1. I am a shareholder of the firm Robinson, Bradshaw & Hinson, P.A., a professional corporation ("RBH"). RBH maintains offices for the practice of law at (a) 101 North Tryon Street, Suite 1900, Charlotte, North Carolina 28246; (b) 1450 Raleigh Road, Suite 100, Chapel Hill, North Carolina 27517; (c) BB&T Building/Two Hanover Square, 434 Fayetteville Street, Suite 1600, Raleigh, North Carolina 27601; and (d) 202 East Main Street, Suite 201, Rock Hill, South Carolina 29730.

2. The facts set forth in this declaration are personally known to me or have been collected for me under my direction and, if called as a witness, I could and would testify thereto.

3. On January 23, 2020, I submitted the *Declaration of Garland S. Cassada in Support of Debtor's Ex Parte Application for Order Authorizing Retention and Employment of Robinson, Bradshaw & Hinson, P.A., as Special Counsel for Asbestos Claims Estimation Matters and Local*

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.

Bankruptcy Counsel for Debtor as of the Petition Date (the “Cassada Declaration”) as Exhibit A to the *Debtor’s Ex Parte Application for Order Authorizing Retention and Employment of Robinson, Bradshaw & Hinson, P.A., as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel for Debtor as of the Petition Date* (Docket No. 18) (the “Application”).

4. On January 24, 2020, the Court entered its *Ex Parte Order Authorizing Retention and Employment of Robinson, Bradshaw & Hinson, P.A., as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel for Debtor as of the Petition Date* (Docket No. 36) (the “Order”) pursuant to which RBH was authorized to represent the above-captioned debtor and debtor-in-possession (the “Debtor”) as set forth in the Order.

5. I submit this Supplemental Declaration of Garland S. Cassada in Support of Debtor’s Ex Parte Application for Order Authorizing Retention and Employment of Robinson, Bradshaw & Hinson, P.A., as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel for Debtor as of the Petition Date (the “First Supplemental Declaration”) in further support of the Application. Except to the extent supplemented or amended by this First Supplemental Declaration, the statements and disclosures made in the Cassada Declaration remain true and correct as of the date of this First Supplemental Declaration.

6. In connection with the Application, as more particularly described in Paragraph 3 of the Cassada Declaration, RBH researched its computerized client database (the “Initial Conflicts Search”) to ascertain RBH’s “connections,” as that term is used in Rule 2014 of the Bankruptcy Rules, with the Debtor and other parties in interest set forth on a schedule received from the Debtor (collectively, the “Initial Interested Parties”).

7. On or about February 9, 2021, RBH engaged in a process similar to the Initial Conflicts Search by researching its computerized client database for the preceding two years (the “First Supplemental Conflicts Search”) to ascertain RBH’s “connections,” as that term is used in Rule 2014 of the Bankruptcy Rules, with respect to the new parties set forth on a schedule received from the Debtor and attached hereto as Schedule 1 (collectively, the “Schedule 1 Interested Parties”). At the conclusion of that process, RBH determined that it did not need to supplement the Cassada Declaration with respect to the Schedule 1 Interested Parties.

8. On or about November 1, 2021, and November 4, 2021, RBH engaged in a process similar to the Initial Conflicts Search by researching its computerized client database for the period beginning two years preceding the Petition Date (as defined in the Cassada Declaration) and ending on those dates (collectively, the “Second Supplemental Conflicts Search”) to ascertain RBH’s “connections,” as that term is used in Rule 2014 of the Bankruptcy Rules, with respect to (a) the Initial Interested Parties and the Schedule 1 Interested Parties to determine if any information with respect to RBH’s relationship with any of them was inadvertently omitted from the Cassada Declaration or if RBH had undertaken to provide client services to any of them that were not RBH clients at the time of the Cassada Declaration, and (b) the new parties set forth on a schedule received from the Debtor and attached hereto as Schedule 2 (collectively, the “Schedule 2 Interested Parties” and, together with the Initial Interested Parties and the Schedule 1 Interested Parties, the “Interested Parties”). At the conclusion of that process, I determined that I should supplement the Cassada Declaration with respect to the Initial Interested Parties and the Schedule 1 Interested Parties as follows:.

(a) The Amended Exhibit 1 attached to this Declaration should be substituted for Exhibit 1 attached to the Cassada Declaration to reflect that other shareholders of RBH,

attorneys who are “of counsel” to RBH, and associates of RBH have represented Travelers Casualty and Surety Company of America in matters wholly unrelated to the Debtor and the Chapter 11 Case (as defined in the Cassada Declaration). The Debtor has identified Travelers Casualty and Surety Company of America as a major surety of the Debtor.

(b) In Paragraph 7(g) of the Cassada Declaration, I disclosed that shareholders, attorneys who are of counsel and associates of RBH own equity or debt securities in six significant creditors and/or known equity security holders (or their affiliates known to me) of the Debtor or other parties in interest in the Chapter 11 Case. That list should be amended so that it discloses the following:

3M Company
A.O. Smith Corporation
Bank of America, N.A.
General Electric Company
Honeywell International, Inc.
Ingersoll Rand
J.P. Morgan Chase
MetLife, Inc.

However, I have been advised that no individual owns sufficient equity or debt securities of any such creditor, equity security holder or party in interest to influence their respective affairs in any way, and that the value or the ability to dispose of such securities would not be affected in any discernible way by any event in the Chapter 11 Case.

9. Additionally, effective as of June 1, 2021, RBH hired Heather Heath Ryan in an of counsel role at RBH. From November 2016 through March 2, 2020, Ms. Ryan was employed by Ingersoll-Rand Plc in both in-house legal and business capacities in the area of executive compensation and employee benefits and performed services for Ingersoll-Rand Plc and its subsidiaries on matters wholly unrelated to the Debtor and its Chapter 11 Case. As noted above, the Debtor has identified one of those subsidiaries, Ingersoll Rand Company, as a significant co-

defendant of the Debtor in asbestos-related litigation. As a result of a transaction that closed on March 2, 2020, Ingersoll-Rand Plc changed its name and became known as Trane Technologies Plc, at which time Ms. Ryan was employed by Trane Technologies Plc in a business capacity in the area of executive compensation and employee benefits and performed services for Trane Technologies Plc and its subsidiaries on matters wholly unrelated to the Debtor and its Chapter 11 Case.

10. To the best of my knowledge, based on the schedules of Interested Parties received from the Debtor, upon information and belief, RBH represents no interest adverse to the Debtor, its estate, its creditors or the Bankruptcy Administrator, and RBH does not represent any other party with an actual or potential interest in the Chapter 11 Case or such party's respective attorneys or accountants, except as set forth in the Cassada Declaration and herein.

11. I believe that RBH continues to be a "disinterested person," as defined in section 101(14) of title 11 of the United States Code (the "Bankruptcy Code") and required by section 327 of the Bankruptcy Code. The Debtor, however, is a complex entity with numerous creditors and other relationships, and I am unable to state with certainty whether every client representation or other connection has been disclosed. In this regard, if RBH discovers additional information that requires disclosure, it will file an additional supplemental disclosure with the Court.

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

This the 21st day of December, 2021.

/s/ Garland S. Cassada
Garland S. Cassada

SCHEDULE 1

DBMP LLC

**Schedule 1 Interested Parties
New Parties in Interest as of September 14, 2020**

[attached]

DBMP LLC

New Parties in Interest as of September 14, 2020

Debtor's Retained Professionals

Berkeley Research Group LLC

**Counsel to Members of Committee of
Asbestos Personal Injury Claimants**

Cohen, Placitella & Roth, P.C.
Cooney & Conway
Goldberg Persky White, P.C.
Kazan, McClain, Satterly & Greenwood PLC
Law Offices of Peter G. Angelos, P.C.
Maune Raichle Hartley French & Mudd, LLC
Shrader & Associates L.L.P.
SWMW Law, LLC
The Gori Law Firm
The Shepard Law Firm
Weitz & Luxenberg, P.C.

**Professionals to the Committee of
Asbestos Personal Injury Claimants**

Caplin & Drysdale, Chartered
FTI Consulting, Inc.
Hamilton Stephens Steels + Martin PLLC
Legal Analysis Systems, Inc.
Robinson & Cole LLP
Winston & Strawn LLP

Future Claimants' Representative

Sander L. Esserman

**Professionals to the Future Claimants'
Representative**

Ankura Consulting Group LLC
FTI Consulting, Inc.
Hull & Chandler, P.A.
Stutzman, Bromberg, Esserman & Plifka
Young Conaway Stargatt & Taylor LLP

**Significant Co-Defendants in
Asbestos-Related Litigation**

Aldrich Pump LLC
Murray Boiler LLC

Bankruptcy Rule 2002 Appearances

Bergman Draper Oslund Udo
Cheryl L. Bergrud, Individually and as
Personal Representative for the Estate of
Peter L. Bergrud
Bestwall LLC
Brickman, LLC
Dean Omar Branham + Shirley, LLP

Bankruptcy Rule 2002 Appearances (Continued)

Delaware Claims Processing Facility
Essex Richards, P.A.
Estate of Ignacio Galaviz
Honeywell International, Inc.
Manville Personal Injury Settlement Trust
Maune Raichle Hartley French & Mudd LLC
Ron Maxum
Brenda Reimel
Richardson, Patrick, Westbrook & Brickman, LLC
Bryan K. Swiger, Administrator of the Estate of
Lyle E. Swiger
The Jaques Admiralty Law Firm, P.C
Wallace and Graham, P.A.¹

¹ Where the above-listed Bankruptcy Rule 2002 appearances were filed on behalf of identified clients, the clients are listed. Where the Bankruptcy Rule 2002 appearances were filed on behalf of unidentified clients, the filing counsel is listed, to the extent not otherwise listed herein.

SCHEDULE 2

DBMP LLC

**Schedule 2 Interested Parties
New Parties in Interest as of July 26, 2021**

[attached]

Debtor's Retained Professionals

Donlin, Recano and Company, Inc.

Debtor's Significant Ordinary Course Professionals, Consultants and Service Providers

Hunter & Cole
Kean Miller LLP

Professionals to the Future Claimants' Representative

Alexander Ricks PLLC

Other Interested Parties

United States

Bankruptcy Rule 2002 Appearances

Bailey Cowan Heckaman PLLC
Bevan and Associates LPA, Inc.
Brayton Purcell LLP
Flint Law Firm, LLC
Francisco Galaviz
Keller, Fishback and Jackson LLP
Motley Rice LLC
Nass Cancelliere
Nemeroff Law Firm, PC
Rebecca S. Vinocur, P.A.
Reynolds Frizzell LLP
Simmons Hanly Conroy
The Lanier Law Firm
Thornton Law Firm, LLP
Wallace & Graham, P.A.
Waters & Kraus, LLP

AMENDED EXHIBIT 1

List of Creditors, Equity Security Holders, or Other Parties in Interest RBH Has Represented, Now Represents or May in the Future Represent in Matters Wholly Unrelated to the Debtor and/or the Chapter 11 Case and Unrelated to the Employment of RBH by the Debtor Pursuant to 11 U.S.C. § 327(a)

A.O. Smith Corporation

Bank of America, N.A.

CBS Corporation

Ingersoll Rand Company

Honeywell International, Inc.

J.P. Morgan Chase

Travelers Casualty and Surety Company of America