

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

In re:

DBMP LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**EX PARTE APPLICATION FOR ORDER AUTHORIZING THE  
FUTURE CLAIMANTS' REPRESENTATIVE TO RETAIN AND EMPLOY  
HULL & CHANDLER, P.A., AS NORTH CAROLINA COUNSEL**

Sander L. Esserman (the "Future Claimants' Representative"), as the legal representative for persons that have not yet asserted an asbestos-related personal-injury claim against the above-captioned debtor (the "Debtor") but may in the future assert such a claim (the "Future Claimants"), submits this application (the "Application") for an order, pursuant to sections 105(a) and 524(g) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), authorizing the Future Claimants' Representative to retain and employ Hull & Chandler, P.A. ("Hull & Chandler") as his North Carolina counsel, effective as of April 16, 2020. In support of this Application, the Future Claimants' Representative relies upon the Declaration of Felton E. Parrish (the "Parrish Declaration"), attached hereto as Exhibit A, and represents as follows:

**BACKGROUND**

1. On January 23, 2020 (the "Petition Date"), the Debtor commenced this reorganization case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

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

2. On February 14, 2020, the Court entered an order [Docket No. 155] appointing an official committee of asbestos claimants (the “ACC”) in this chapter 11 case.

3. On May 8, 2020, the Debtor submitted a motion to the Court [Docket No. 286] (the “FCR Appointment Motion”) for entry of an order appointing Sander L. Esserman as the Future Claimants’ Representative in this chapter 11 case, effective as of April 16, 2020. At a hearing conducted on June 1, 2020, the Court approved the appointment of Mr. Esserman as the Future Claimants’ Representative [Docket No. 310] (the “FCR Appointment Order”).

### **JURISDICTION**

4. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory predicates for the relief requested herein are sections 105(a) and 524(g) of the Bankruptcy Code, as complemented by Bankruptcy Rule 2014.

### **RELIEF REQUESTED**

5. The Future Claimants’ Representative respectfully requests the entry of an order authorizing him to employ as his attorneys and to retain the law firm of Hull & Chandler, effective as of April 16, 2020.

### **BASIS FOR THE RELIEF SOUGHT**

6. Relying upon section 524(g) of the Bankruptcy Code and Rule 2014, courts in chapter 11 cases in this and other districts have authorized legal representatives for future claimants to retain counsel to assist them in performing their duties. See, e.g., In re Bestwall LLC, Ch. 11 Case No. 17-31795 (Bankr. W.D.N.C. 2017); In re Kaiser Gypsum Company, Inc., Ch. 11 Case No. 16-31602 (JCW) (Bankr. W.D.N.C. 2016); In re Yarway Corporation, Ch. 11 Case No. 13-11025 (BLS) (Bankr. D. Del. 2013); In re Rapid-American Corporation, Ch. 11

Case No. 13-10687 (SMB) (Bankr. S.D.N.Y. 2013); In re Metex Mfg. Corporation, Ch. 11 Case No. 12-14554 (BRL) (Bankr. S.D.N.Y. 2012); In re United Gilsonite Laboratories, Ch. 11 Case No. 11-2032 (Bankr. M.D. Pa. 2011); In re Garlock Sealing Tech., Ch. 11 Case No. 10-31607 (GRH) (Bankr. W.D.N.C. 2010); In re Leslie Controls, Inc., Ch. 11 Case No. 10-12199 (CSS) (Bankr. D. Del. 2010); In re Specialty Products Holding Corp., Ch. 11 Case No. 10-11780 (JKF) (Bankr. D. Del. 2010); In re Durabla Mfg. Company, Ch. 11 Case No. 09-14415 (MFW) (Bankr. D. Del. 2009); In re The Flintkote Company, Ch. 11 Case No. 04-11300 (JKF) (Bankr. D. Del. 2004); In re Mid-Valley, Inc., Ch. 11 Case No. 03-35592 (JKF) (Bankr. W.D. Pa. 2003); In re Met-Coil Systems, Corp., Ch. 11 Case No. 03-12676 (MFW) (Bankr. D. Del. 2003); In re Global Industrial Technologies, Inc., Ch. 11 Case No. 02-21626 (JKF) (Bankr. W.D. Pa. 2002); In re North American Refractories Co., Ch. 11 Case No. 02-20198 (JKF) (Bankr. W.D. Pa. 2002); In re Kaiser Aluminum Corporation, Ch. 11 Case No. 02-10429 (JKF) (Bankr. D. Del. 2002); In re ACandS, Inc., Ch. 11 Case No. 02-12687 (RJN) (Bankr. D. Del. 2002); In re USG Corporation, Ch. 11 Case No. 01-2094 (RJN) (Bankr. D. Del. 2001); In re Federal-Mogul Global Inc., Ch. 11 Case No. 01-10578 (Bankr. D. Del. 2001); In re Pittsburgh Corning Corporation, Ch. 11 Case No. 00-22876 (JKF) (Bankr. W.D. Pa. 2000); In re The Babcock & Wilcox Company, Ch. 11 Case No. 00-10092 (Bankr. E.D. La. 2000); In re Keene Corporation, Ch. 11 Case No. 93-B-46090 (SMB) (Bankr. S.D.N.Y. 1994); and In re Johns-Manville Corporation, Ch. 11 Case No. 82-B-11656 (BRL) (Bankr. S.D.N.Y. 1984).

7. Hull & Chandler is a general practice firm based in Charlotte that maintains a regional and local practice in the areas of corporate, bankruptcy, business litigation, real estate, and personal injury law. Hull & Chandler's bankruptcy practice is led by Felton Parrish, an attorney with twenty years of chapter 11 bankruptcy experience who is admitted to practice in

the Western District of North Carolina. Mr. Parrish has represented chapter 11 debtors, senior secured and debtor-in-possession lenders, purchasers of assets in 363 sales, parties in bankruptcy litigation, and parties in asbestos-related bankruptcy cases. Hull & Chandler is currently serving as North Carolina counsel to the future claimants' representative appointed in the cases of In re Bestwall LLC, Ch. 11 Case No. 17-31795 (Bankr. W.D.N.C. 2017), in which Mr. Esserman serves as the future claimants' representative, and In re Kaiser Gypsum Company, Inc., Ch. 11 Case No. 16-31602 (JCW) (Bankr. W.D.N.C. 2016). Accordingly, the Future Claimants' Representative believes that Hull & Chandler is well qualified to represent him in this chapter 11 case.

#### **SERVICES TO BE PROVIDED**

8. The services that Hull & Chandler will perform will enable the Future Claimants' Representative to execute his duties and responsibilities in connection with this chapter 11 case.

9. Hull & Chandler will be serving as North Carolina counsel to the Future Claimant's Representative. Given its proximity to this Court, Hull & Chandler will be able to respond quickly to emergency matters in this Court. In addition, the appearance by Hull & Chandler in connection with some of the miscellaneous applications, motions and other matters in this chapter 11 case may, in some instances, be more efficient and cost-effective for the estate.

10. Hull & Chandler understands that the Future Claimants' Representative also seeks to retain Young Conaway Stargatt & Taylor, LLP, and Stutzman, Bromberg, Esserman & Plifka, a Professional Corporation, as his counsel in this matter. Hull & Chandler, Young Conaway, and Stutzman Bromberg all will work under the direction of the Future Claimant's Representative. The Future Claimant's Representative is committed to managing professional costs, and Hull & Chandler, Young Conaway, and Stutzman, Bromberg have agreed to work closely with the

Future Claimant's Representative to ensure that there is no unnecessary duplication of effort or cost.

11. Subject to further orders of this Court, Hull & Chandler will render the following services, among others, to the Future Claimants' Representative:

- (a) Providing legal advice with respect to the Future Claimants' Representative's powers and duties as Future Claimants' Representative for the Future Claimants;
- (b) Taking any and all actions necessary to protect and maximize the value of the Debtor's estate for the purpose of making distributions to Future Claimants and to represent the Future Claimants' Representative in connection with negotiating, formulating, drafting, confirming and implementing any plan(s) of reorganization, and performing such functions set forth in section 1103(c) of the Bankruptcy Code as are appropriate for a future claimants' representative, or as are reasonably necessary to effectively represent the interests of the Future Claimants;
- (c) Appearing on behalf of the Future Claimants' Representative at hearings, proceedings before the Court, and meetings and other proceedings in this chapter 11 case, as appropriate;
- (d) Preparing and filing, on behalf of the Future Claimants' Representative, all applications, motions, objections, answers, orders, reports, and other legal papers as may be necessary and as may be authorized by the Future Claimants' Representative in connection with this case;
- (e) Representing and advising the Future Claimants' Representative with

respect to any contested matter, adversary proceeding, lawsuit or other proceeding in which the Future Claimants' Representative may become a party or otherwise appear in connection with this chapter 11 case; and,

- (f) Performing any other legal services and other support requested by the Future Claimants' Representative in connection with this case.

The services listed above are necessary and essential to the Future Claimants' Representative. Hull & Chandler has agreed to act on the Futures Claimants' Representative's behalf in all of these respects upon the terms set forth in this Application.

12. Local Rule 2014-1 generally provides that, absent extraordinary circumstances, retention applications should be filed within thirty days of the commencement of services. Extraordinary circumstances exist in this case because the Future Claimants' Representative, at the request of the Debtor, began conducting due diligence on April 16, 2020, and the FCR Appointment Order authorized the appointment of the Future Claimants' Representative effective as of April 16, 2020. (FCR Appointment Order, at ¶ 2). At the request of the proposed Future Claimants' Representative, Hull & Chandler also began its work conducting due diligence and preparing for its role as proposed counsel to the proposed Future Claimants' Representative on April 16, 2020. However, because the FCR Appointment Order was not entered until June 1, 2020, the Future Claimants' Representative could not file an application to retain Hull & Chandler as counsel prior to that date. This application has been filed as quickly as reasonably practical following entry of the FCR Appointment Order. Accordingly, the Future Claimants' Representative requests that the retention of Hull & Chandler be deemed effective as of April 16, 2020, which is the same date as the effective date of the appointment of the Future Claimants' Representative pursuant to the FCR Appointment Order

13. Hull & Chandler intends to apply for compensation for professional services rendered in connection with this case and for reimbursement of actual and necessary expenses incurred, in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 150] (the “Interim Compensation Order”), and the local rules and further orders of this Court.

14. As noted above, the Hull & Chandler attorney who will be primarily responsible for the representation of the Future Claimant’s Representative is Felton Parrish. Mr. Parrish’s current standard hourly rate is \$425 per hour. Where appropriate, other Hull & Chandler attorneys or paralegals will assist with the representation of the Future Claimant’s Representative. The hourly rates for attorneys with Hull and Chandler currently range from \$275 to \$450 per hour, and the legal rate for paralegals is \$100 to \$125 per hour. These hourly rates are subject to periodic adjustments to reflect economic and other conditions.

15. The hourly rates set forth above are Hull & Chandler’s standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate Hull & Chandler for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. It is Hull & Chandler’s policy to charge its clients in all areas of practice for all other expenses incurred in connection with the client’s case. The expenses charged to clients include, among other things, telephone and facsimile toll and other charges, mail and express mail charges, special or hand delivery charges, document processing, photocopying charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by the firm to outside copying services for use in mass mailings, travel expenses, expenses for working meals, computerized research, transcription costs, as well as non-ordinary overhead expenses such as

secretarial and other overtime. Hull & Chandler will charge for these expenses in a manner and at rates consistent with charges made generally to Hull & Chandler's other clients. Hull & Chandler believes that it is fairer to charge these expenses to the clients incurring them than to increase the hourly rates and spread the expenses among all clients.

16. Hull & Chandler understands that its fees and expenses in these chapter 11 proceedings will be subject to the requirements of sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules and any order entered by this Court establishing procedures for interim compensation and reimbursement of expenses of professionals.

17. Hull & Chandler has informed the Future Claimants' Representative that, except as set forth in the annexed Declaration of Felton E. Parrish, Hull & Chandler represents no other entity in connection with this case, and is disinterested as that term is defined in section §101(14) of the Bankruptcy Code.

### **BEST INTERESTS OF THE ESTATE**

18. For each of the foregoing reasons, the Future Claimants' Representative believes that the retention of Hull & Chandler is in the best interests of the Debtor, its estate and creditors, as well as in the best interests of the Future Claimants.

### **NOTICE**

19. This application is being submitted on an *ex parte* basis pursuant to Local Rule 9013-1(f). Upon entry of an order granting the relief requested, the Future Claimants' Representative will provide notice of entry of the order in accordance with the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [Docket No. 27], and any party in interest shall be entitled to request that the Court reconsider the relief provided within 14 days of service of notice of the order.



WHEREFORE, the Future Claimants' Representative requests entry of an order, substantially in the form attached hereto as Exhibit B, authorizing him to employ and retain the firm of Hull & Chandler to represent him as North Carolina counsel in this chapter 11 case effective as of April 16, 2020, and granting such other and further relief as is just and proper.

Dated: June 9, 2020

Respectfully submitted,

/s/ Felton E. Parrish  
Felton E. Parrish (N.C. Bar No. 25448)  
HULL & CHANDLER, P.A.  
1001 Morehead Square Drive, Suite 450  
Charlotte, NC 28203  
Telephone: 704-375-8488  
Facsimile: 704-375-8487  
Email: fparrish@lawyercarolina.com

-and-

James L. Patton, Jr. (DE Bar No. 2202)  
Edwin J. Harron (DE Bar No. 3396)  
Sharon M. Zieg (N.C. Bar No. 29536, DE Bar No. 4196)  
Travis G. Buchanan (DE Bar No. 5595)  
YOUNG CONAWAY STARGATT & TAYLOR, LLP  
Rodney Square  
1000 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 571-6600  
Facsimile: (302) 571-1253  
Email: jpatton@ycst.com  
eharron@ycst.com  
szieg@ycst.com  
tbuchanan@ycst.com

*Proposed Counsel to the Future Claimants' Representative*

**EXHIBIT A**

**PARRISH DECLARATION**

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

In re:

DBMP LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 20-30080 (LTB)

**DECLARATION OF FELTON E. PARRISH IN SUPPORT OF  
APPLICATION FOR ORDER AUTHORIZING  
FUTURE CLAIMANTS' REPRESENTATIVE TO RETAIN AND EMPLOY  
HULL & CHANDLER, P.A., AND STATEMENT AS  
COUNSEL TO FUTURE CLAIMANTS' REPRESENTATIVE  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2014(a)**

I, FELTON E. PARRISH, hereby state as follows:

1. I am a member of the firm of Hull & Chandler, P.A. ("Hull & Chandler"), 1001 Morehead Square Drive, Suite 450, Charlotte, North Carolina 28203. I am admitted to practice law in the states of North Carolina and Georgia and am admitted to practice in the Western District of North Carolina.

2. I am authorized to make this declaration (the "Declaration") on behalf of Hull & Chandler. This Declaration is submitted pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure in support of the Application of Sander L. Esserman (the "Future Claimants' Representative") in his capacity as the legal representative for future asbestos-related claimants (the "Future Claimants") in the above-captioned chapter 11 case for an order authorizing the employment of Hull & Chandler as North Carolina counsel to the Future Claimants' Representative (the "Application"), effective as of April 16, 2020.

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

3. At the request of the Future Claimants' Representative, Hull & Chandler began its work conducting due diligence and preparing for its role as counsel to the Future Claimants' Representative on April 16, 2020.

#### **DISINTERESTEDNESS OF PROFESSIONALS**

4. Hull & Chandler has conducted searches to identify relationships with the Debtor, creditors, and other parties-in-interest (or potential parties-in-interest) in this chapter 11 case as identified in Exhibit 1. Based upon those searches, Hull & Chandler has determined that it (a) does not hold or represent any adverse interest in connection with the matters upon which Hull & Chandler is to be engaged, and (b) is disinterested.

5. Hull & Chandler is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, in that Hull & Chandler, its partners, counsel and associates:

- a. are not creditors, equity security holders or insiders of the Debtor;
- b. have not been, within two years before the date of the filing of the Debtor's chapter 11 petition, directors, officers or employees of the Debtor; and
- c. do not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason.

6. From 2013 to 2016, I was a partner with Winston & Strawn, LLP ("Winston"). Winston has been retained as special litigation and international counsel by the Official Committee of Asbestos Personal Injury Claimants (the "ACC") in this case. While a

partner with Winston, I had no involvement with the matters for which Winston is being retained as special counsel in this case.

7. An associate with Hull & Chandler, A. Joseph Volta, was employed by the Law Offices of Peter G. Angelos, P.C. (the “Angelos Firm”) first as a clerk, and then as an associate, from August 2012 through July 2019. Mr. Volta joined Hull & Chandler in November 2019 from the law firm of DeMayo Law Offices, L.L.P. Mr. Volta’s father, Armand J. Volta Jr., is a senior attorney with the Angelos Firm, and the Angelos Firm is a member of the ACC in this case. While with the Angelos Firm, Mr. Volta did not assist with any matter related to the Debtor or any of its affiliates. Mr. Volta will not be working on this matter.

8. Hull and Chandler currently represents the legal representative for future claimants in the pending bankruptcy cases of In re Bestwall LLC, Ch. 11 Case No. 17-31795 (Bankr. W.D.N.C. 2017), in which Mr. Esserman is the future claimants’ representative, and In re Kaiser Gypsum Company, Inc., Ch. 11 Case No. 16-31602 (JCW) (Bankr. W.D.N.C. 2016).

9. Neither I nor any other attorney at Hull & Chandler represents any interest adverse either to the Future Claimants’ Representative or the Debtor herein or its estate in the matters upon which Hull & Chandler is to be engaged.

10. Hull & Chandler will periodically review its files during the pendency of this chapter 11 case to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, Hull & Chandler will use reasonable efforts to identify such further developments and will promptly file a Supplemental Declaration as Bankruptcy Rule 2014(a) requires.

### **PROFESSIONAL COMPENSATION**

11. Hull & Chandler intends to apply for compensation for professional

services rendered in connection with this chapter 11 case subject to approval of this Court and in compliance with applicable provisions of the Bankruptcy Code, this Court's Local Rules, and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 150] (the "Interim Compensation Order"), on an hourly basis, plus reimbursement of actual, necessary expenses and other charges that Hull & Chandler incurs. Hull & Chandler will charge hourly rates for its services in this case that are consistent with the rates it charges in bankruptcy and non-bankruptcy matters of this type. I will be the Hull & Chandler attorney primarily responsible for the representation of the Future Claimant's Representative. My current standard hourly rate is \$425 per hour. Where appropriate, other Hull & Chandler attorneys or paralegals will assist with the representation of the Future Claimant's Representative. The hourly rates for attorneys with Hull and Chandler currently ranges from \$275 to \$450 per hour, and the legal rate for paralegals is \$100 to \$125 per hour. These hourly rates are subject to periodic adjustments to reflect economic and other conditions.

12. It is Hull & Chandler's policy to charge its clients in all areas of practice for all other expenses incurred in connection with the client's case. The expenses charged to clients include among other things, photocopying, scanning, witness fees, travel expenses, including airline upgrade certificates, certain secretarial and other overtime expenses, filing and recordation fees, long distance telephone calls, postage, express mail and messenger charges, computerized legal research charges and other computer services, expenses for working meals and facsimile charges. Hull & Chandler will charge for these expenses in a manner and at rates consistent with charges made generally to its other clients. Hull & Chandler believes that it is fairer to charge these expenses to the particular client rather than increasing the hourly rates and spreading the expenses among all clients.

13. No promises have been received by Hull & Chandler nor by any partner, counsel or associate thereof as to compensation in connection with this case other than in accordance with the provisions of the Bankruptcy Code. Hull & Chandler has no agreement with any other entity to share with such entity any compensation received by Hull & Chandler in connection with this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of June, 2020.

/s/ Felton E. Parrish  
Felton E. Parrish (N.C. Bar No. 25448)  
HULL & CHANDLER, P.A.  
1001 Morehead Square Drive, Suite 450  
Charlotte, NC 28203  
Telephone: 704-375-8488  
Facsimile: 704-375-8487  
Email: fparrish@lawyercarolina.com

*Proposed Counsel to the Future Claimants' Representative*

**EXHIBIT 1**  
**TO THE DECLARATION OF FELTON E. PARRISH**



**DMBP LLC**

**INTERESTED PARTIES**

**Debtor**

DMBP LLC

**Direct Equity Owner of Debtor**

CertainTeed Holding Corporation

**Debtor's Direct Non-Debtor Subsidiary**

Millwork & Panel LLC

**Other Non-Debtor Affiliates**

Bayside Port Corporation, Inc.  
Bird Incorporated  
Carborundum Ceramic Holdings, Inc.  
Carborundum Ventures, Inc.  
CertainTeed Canada, Inc.  
CertainTeed Ceilings Corporation  
CertainTeed Gypsum and Ceiling Mfg., Inc.  
CertainTeed Gypsum Mfg, Inc.  
CertainTeed Gypsum NC, Inc.  
CertainTeed Gypsum West Virginia, Inc.  
CertainTeed Gypsum, Inc.  
CertainTeed Holding Corporation  
CertainTeed LLC  
CertainTeed Gypsum and Ceilings USA, Inc.  
Compagnie de Saint-Gobain  
CT Solar Fund I LLC  
CTKC Corporation  
Fluorocarbon Components, Inc.  
Grindwell Norton Ltd.  
GS II, Inc.  
HCS Corporation  
Level Solar Fund IV LLC  
MAG-ISOVER K.K.  
New West Gypsum Recycling, Inc.  
Norton Foreign Affiliates Holding Corporation  
OFI GP Inc.  
OFI L.P.  
Ottawa Fibre GP Inc

Ottawa Fibre L.P.  
P.T. Saint-Gobain Abrasives Indonesia  
Phoenix Coating Resources, Inc.  
Redcliff Fibre L.P.  
Sage Electrochromics, Inc.  
Saint-Gobain (SEA) PTE, Ltd  
Saint-Gobain Abrasives, Inc.  
Saint-Gobain Abrasives. Ltd.  
Saint-Gobain Abrasivos S.A. de C.V.  
Saint-Gobain Adfors America, Inc.  
Saint-Gobain Advanced Ceramics, LLC  
Saint-Gobain Building Distribution Ltd.  
Saint-Gobain Canada, Inc.  
Saint-Gobain Ceramic Materials Pvt. Ltd.  
Saint-Gobain Ceramics & Plastics, Inc.  
Saint-Gobain Corporation  
Saint-Gobain Corporation Foundation  
Saint-Gobain Delaware Corporation  
Saint-Gobain Finance Corporation  
Saint-Gobain Glass Corporation  
Saint-Gobain HyComp LLC  
Saint-Gobain India Foundation  
Saint-Gobain India Pvt. Ltd.  
Saint-Gobain Insurance Ltd.  
Saint-Gobain Interior Building Distribution Company  
Saint-Gobain KK  
Saint-Gobain Materiaux de Construction S.A.S.  
Saint-Gobain Merit, S.De R.L. De C.V.  
Saint-Gobain Performance Plastics (Hangzhou) Co., Ltd.  
Saint-Gobain Performance Plastics Corporation  
Saint-Gobain Receivables Corporation  
Saint-Gobain Research India Pvt. Ltd.  
Saint-Gobain Shared Services Corporation  
Saint-Gobain Solar Gard Australia Pty. Ltd.  
Saint-Gobain Solar Gard, LLC  
Saint-Gobain TM KK  
Sepco Corporation  
Societe de Participations Financieres et Industrielles  
The Grid Company GP, Inc.

The Grid Company Limited Partnership  
The Grid Company, LLC  
Tillsonburg Fibre L.P.  
Vertec SAS  
Vetrotech Saint-Gobain North America,  
Inc.  
VIB L.P.  
Western Mining and Minerals, Inc.  
Zenpure Americas, Inc.  
Zenpure Corporation  
Z-Tech, LLC

**Managers and Officers of the Debtor**

D. Lawrence Rayburn  
Donald J. Melroy  
Joseph N. Bondi  
Michael T. Starczewski  
Robert J. Panaro  
Sean R. Knapp  
Vincent F. DiNenna, III

**Major Current Business Affiliations of Debtor's Managers**

Millwork & Panel LLC  
Pennsylvania Association of Notaries  
Royersford Outreach (d/b/a Open  
Door Ministries)  
Tampa Chapter of the American  
Constitution Society  
Vinyl Siding Institute

**Depository and Disbursement Banks**

Bank of America, N.A.  
J.P. Morgan Chase

**Parties to Material Contracts, Unexpired Leases and License Agreements with the Debtor**

CertainTeed LLC  
CT Corp.  
PACE Claim Services  
PrincetonClaims Services  
Saint-Gobain Corporation  
Saint-Gobain Shared Services Corporation

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

3M Company  
A.O. Smith Corporation  
Carborundum Company  
CBS Corporation  
Crane Company  
Foster Wheeler Energy Corporation  
General Electric Company  
Honeywell International Inc.  
Industrial Holdings Inc.  
Ingersoll Rand Company  
JM Manufacturing Company Inc.  
Metropolitan Life Insurance Company  
Union Carbide Corporation  
Westinghouse Electric Corporation

**Debtor's Retained Professionals and Claims Agent**

Bates White LLC  
Epiq Corporate Restructuring, LLC  
Jones Day  
Robinson, Bradshaw & Hinson, P.A.  
Schiff Hardin LLP

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

Caruso Smith Edell Picini P.C.  
Cetrulo LLP  
Darger Errante Yavitz & Blau LLP  
DeHay & Elliston LLP  
Dentons LLP  
Deutsch Kerrigan LLP  
Foley & Lardner LLP  
Gordon Thomas Honeywell LLP  
Harvey Kruse  
Hawkins & Parnell  
Heyl Royster  
Kalinowski & Chaplinsky  
Maron & Marvel  
Miles & Stockbridge  
Paine Tarwater Bickers & Tillman LLP

Polsinelli LLP  
Swartz Campbell LLC  
Vorys Sater Seymour & Pease LLP  
Wilbraham Lawler & Buba  
Wilson Elser Moskowitz Edelman &  
Dicker LLP

**Known Professionals for Certain  
Non-Debtor Parties in Interest**

Goodwin Procter LLP

**Major Suppliers of Goods and Services**

CertainTeed LLC  
Saint-Gobain Corporation  
Saint-Gobain Shared Services Corporation

**Law Firms with the Most Significant  
Representation of Asbestos Claimants**

Baron & Budd, PC  
Belluck & Fox, LLP  
Brookman, Rosenberg, Brown & Sandler  
Cooney & Conway, LLC  
Early Lucarelli Sweeney  
Flint Law Firm  
George & Farinas, LLP  
Goldberg, Persky & White, P.C.  
Goldenberg Heller Antognoli &  
Rowland, PC  
The Gori Law Firm  
James F. Humphreys & Associates L.C.  
Kazan, McClain, Satterley &  
Greenwood PLC  
Kelley & Ferraro, LLP  
Law Offices of Peter G. Angelos, PC  
Maune Raichle Hartley French  
& Mudd, LLC  
Motley Rice, LLC  
O'Brien Law Firm, PC  
Richardson, Patrick, Westbrook  
& Brickman, LLC

Shrader & Associates, L.P.  
Simmons Hanly Conroy LLC  
SWMW Law, LLC  
The Ferraro Law Firm  
The Law Offices of Peter T. Nicholl  
Weitz & Luxenberg, PC  
Wilentz, Goldman & Spitzer

**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  
Hamilton Stephens Steele + Martin, PLLC  
Robinson & Cole, LLP  
Winston & Strawn, LLP  
FTI Consulting, Inc.

**Proposed Professional to the Committee of  
Asbestos Personal Injury Claimants**

Legal Analysis Systems, Inc.

**Major Sureties**

Travelers Casualty and Surety Company  
of America

**Employees of the Bankruptcy  
Administrator's Office for the Western  
District of North Carolina**

Alexandria Kenny  
Anne Whitley  
David Shepherd  
Katrina Adams  
Sarah Scholz  
Shelley K. Abel

**Bankruptcy Judges for the Western  
District of North Carolina**

Judge George Hodges (Charlotte)  
Judge J. Craig Whitley (Charlotte)  
Judge Laura T. Beyer (Charlotte)

**EXHIBIT B**

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

In re:

DBMP LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 20-30080 (LTB)

***EX PARTE ORDER AUTHORIZING RETENTION AND EMPLOYMENT  
OF HULL & CHANDLER AS NORTH CAROLINA COUNSEL  
FOR THE FUTURE CLAIMANTS' REPRESENTATIVE***

Upon the application of Sander L. Esserman, the legal representative (the “Future Claimants’ Representative”) for future asbestos claimants (the “Future Claimants”) for the issuance and entry of an order, pursuant to sections 105(a) and 524(g) of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”) and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), authorizing and approving the retention and employment of Hull & Chandler, P.A. (“Hull & Chandler”) as attorneys for the Future Claimants’ Representative, effective as of April 16, 2020 [Docket No. \_\_\_\_] (the “Application”); and upon the Declaration of Felton E. Parrish, a partner of Hull & Chandler (the “Parrish Declaration”); and the Court being satisfied that (i) Hull & Chandler does not represent

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

any interest adverse to the above-captioned debtor and debtor-in-possession (the “Debtor”) or its estate, (ii) Hull & Chandler is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code, and (iii) the retention and employment of Hull & Chandler is necessary and would be in the best interests of the Debtor, its estate and creditors as well as in the best interest for the Future Claimants’ Representative and of the Future Claimants; and after due deliberation and sufficient cause appearing therefor; it is hereby

ORDERED, that the Application is hereby granted and approved; and it is further

ORDERED, that in accordance with sections 105(a) and 524(g) of the Bankruptcy Code and Bankruptcy Rule 2014, the Future Claimants’ Representative is authorized and empowered to retain and employ Hull & Chandler as North Carolina counsel to represent him in this case effective as of April 16, 2020; and it is further

ORDERED, that Hull & Chandler shall be compensated in such amounts as may be allowed by this Court upon the filing of appropriate applications for allowance of interim or final compensation in accordance with the procedures set forth in sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, and any order entered by this Court establishing procedures for interim compensation and reimbursement of expenses of professionals; and it is further,

ORDERED, that pursuant to Local Rule 9013-1(f), any party shall be entitled to request a hearing or request that the Court reconsider entry of this Order by filing a motion for reconsideration within fourteen (14) days of service of this Order.