

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re:

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**EX PARTE APPLICATION FOR ORDER AUTHORIZING THE FUTURE
CLAIMANTS' REPRESENTATIVE TO RETAIN AND EMPLOY ANKURA
CONSULTING GROUP, LLC AS CLAIMS-EVALUATION CONSULTANTS**

Sander L. Esserman (the “Future Claimants’ Representative”), as the legal representative for persons who 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 “Ankura 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 Ankura Consulting Group, LLC (“Ankura”) as claims-evaluation consultants, effective as of June 1, 2020. In support of this Application, the Future Claimants’ Representative relies upon the Declaration of Thomas Vasquez, Ph.D. (the “Vasquez Declaration”), attached hereto as Exhibit A, and represents 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.

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.

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

3. On June 1, 2020, the Court entered an order [Docket No. 310] appointing Sander L. Esserman as the Future Claimants’ Representative in this chapter 11 case, effective as of April 16, 2020.

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 that the Court enter an order, pursuant to sections 105(a) and 524(g) of the Bankruptcy Code and Rule 2014 of the Bankruptcy Rules, authorizing him to retain and employ Ankura as claims-evaluation consultants in connection with this case, effective as of June 1, 2020.

ANKURA’S QUALIFICATIONS

6. Ankura is well suited to act as a claims-evaluation consultant. Ankura is a business advisory and expert services firm, headquartered in Washington, D.C. The team at Ankura that will work on this matter include professionals with more than 40 years of experience

providing law firms, corporations, governments, and non-profit groups with advisory services relating to economic, financial, statistical, business-analytics and operational expertise. This Ankura Application will use the term “Ankura Professionals” to refer collectively to the current team of professionals at Ankura, although the specific cases and experience listed below include matters that members of the team have worked on both prior to and since joining Ankura.

7. As set forth in the Vasquez Declaration, Ankura Professionals have been engaged in many of the largest personal-injury and property-damages cases in U.S. history over the past several decades. During this period, Ankura Professionals were retained in litigation arising from asbestos, breast implants, Albuterol asthma medication, the Dalkon Shield IUD, the Love Canal waste site, the Three Mile Island nuclear incident, and numerous superfund sites. During the course of these various retentions, Ankura professionals have assisted in the development of reorganization plans and have been retained as expert witnesses for the quantification of liability in bankruptcy cases. Ankura Professionals have provided claims-evaluation and consulting services for future claimants’ representatives in numerous other matters.

8. Based on Ankura’s significant experience in this field, and its familiarity with asbestos-related liability issues, Mr. Esserman is confident that Ankura’s retention as claims-evaluation consultant to the Future Claimants’ Representative is in the best interest of the Debtor’s estate and its creditors, and is also in the best interest of the Future Claimants.

SERVICES TO BE PROVIDED BY ANKURA

9. The Future Claimants’ Representative anticipates that Ankura will render consulting services to the Future Claimants’ Representative as needed throughout the course of this case, including but not limited to:

- a. estimating the number and value of present and future asbestos-related personal-injury claims and demands;
- b. developing claims procedures to be used in connection with a claims-resolution trust;
- c. evaluating reports and opinions of experts and consultants retained by other parties-in-interest to the bankruptcy proceeding;
- d. analyzing and responding to issues related to providing notice to asbestos-related personal-injury claimants and reviewing such notice procedures;
- e. providing expert testimony and reports related to the foregoing and assisting the Future Claimants' Representative in preparing and evaluating reports and testimony by other experts and consultants; and
- f. providing such other consulting services as may be requested by the Future Claimants' Representative.

ANKURA'S COMPENSATION

10. Ankura has agreed to accept as compensation for its services in this case such sums as may be allowed by this Court in accordance with law, based upon the services rendered, the results achieved, the difficulties encountered, the complexities involved, and other appropriate factors. Ankura understands that its fees and expenses in this proceeding will be subject to the requirements of sections 330 and 331 of the Bankruptcy Code, as well as the rules of the Court and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 132] (the "Interim Compensation Order"). The Future Claimants' Representative shall not be personally responsible for providing compensation or expense reimbursements to Ankura under any circumstance.

11. Ankura intends to apply for compensation for professional services rendered in accordance with its normal billing practices, subject to allowance by the Court in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the local rules of the Court, and the Interim Compensation Order. The hourly rates for Ankura professionals are

\$550–\$750 for Senior Managing Directors, \$450–\$550 for Managing Directors, \$350–\$450 for Senior Directors, \$275–\$350 for Directors, and \$150–\$275 for Senior Associates and Associates. Expenses for travel and consumables are billed at cost to the client. Charges are not accumulated or billed to the client for non-professional or clerical staff. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions.

12. In addition, also subject to allowance by the Court in accordance with applicable law, Ankura shall bill the Debtor for reimbursement of all of its reasonable and necessary out-of-pocket expenses incurred in connection with its employment.

DISCLOSURE CONCERNING CONFLICTS

13. Ankura has informed the Future Claimants’ Representative that, except as otherwise described in the Vasquez Declaration, Ankura believes (a) it is independent of the Debtors and the persons identified by the debtor as interested parties (“Interested Parties”); (b) none of the matters disclosed in the Vasquez Declaration has had or will have an adverse effect on Ankura’s ability to advise the Future Claimants’ Representative in carrying out his duties to loyally and effectively represent the Future Claimants; and (c) Ankura does not have any interest that is materially adverse to the Future Claimants’ Representative or the Future Claimants. Moreover, the retention and employment of Ankura is necessary and in the best interests of the Future Claimants, the Debtor and its estate and other creditors.

14. Mr. Esserman currently serves as the Future Claimants’ Representative for the NGC Bodily Injury Trust. Mr. Vasquez serves as Mr. Esserman’s claims-evaluation expert in connection with the NGC Bodily Injury Trust.

15. Mr. Esserman currently serves as the Future Claimants' Representative in the bankruptcy case of In re Bestwall, LLC, Case No. 17-31795 (Bankr. W.D.N.C.). Ankura serves as claims-evaluation expert for Mr. Esserman in that capacity.

16. As set forth in the Vasquez Declaration, Ankura has not shared or agreed to share any of its compensation with any other person, other than a professional or employee of Ankura, as permitted by section 504 of the Bankruptcy Code.

NOTICE

17. 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 Federal Rules of Bankruptcy Procedure, 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.

PRIOR REQUEST FOR RELIEF

18. No previous application for the relief sought in this Application has been made to this or any other court.

WHEREFORE, the Future Claimants' Representative respectfully requests that the Court enter an order, substantially in the form attached hereto as Exhibit B, (i) authorizing the retention and employment of Ankura as claims-evaluation consultants pursuant to the terms outlined in this Application, effective as of June 1, 2020, and (ii) granting such further and other relief as the Court deems just and proper.

Dated: June 11, 2020

Respectfully submitted,

/s/ Felton E. Parrish

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Counsel to the Future Claimants' Representative

EXHIBIT A

Declaration of Thomas Vasquez, Ph.D.

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

In re:

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

DECLARATION OF THOMAS VASQUEZ, Ph.D.

Pursuant to 28 U.S.C. § 1746, Thomas Vasquez, Ph.D., hereby declares as follows:

1. I am a Senior Managing Director at Ankura Consulting Group, LLC (“Ankura”).
2. Sander L. Esserman (the “Future Claimants’ Representative”), the legal representative for persons who have not yet asserted an asbestos-related personal-injury claim against the Debtor in the above-captioned case but may in the future assert such a claim (the “Future Claimants”), has requested that Ankura provide claims-evaluation consulting services, and Ankura has agreed to provide such services during this bankruptcy proceeding. The Future Claimants’ Representative selected Ankura because Ankura professionals have extensive experience estimating asbestos liabilities.
3. Ankura is a business-advisory and expert-services firm, headquartered in Washington, D.C. The team at Ankura that will work on this matter include professionals with more than 40 years of experience providing law firms, corporations, governments, and non-profit groups with advisory services relating to economic, financial, statistical, business-analytics and operational expertise. I will use the term “Ankura Professionals” to refer collectively to the current team of professionals at Ankura, although the specific cases and experience discussed

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below include matters that members of the team have worked on both prior to and since joining Ankura.

4. Ankura Professionals were retained to assist the debtors in the chapter 11 bankruptcy cases of: In re Energy Futures Holding Corp., No. 14-10979 (Bankr. D. Del. 2014); In re The Budd Company Inc., No. 14-11873 (Bankr. N.D. Ill. 2014); In re United Gilsonite Laboratories, No. 11-2032 (RNO) (Bankr. M.D. Pa. 2011); In re W.R. Grace, Inc., No. 01-1139 (JKF) (Bankr. D. Del. 2001); In re Owens Corning, No. 00-3837 (JKF) (Bankr. D. Del. 2000); In re Fuller-Austin Insulation Company, No. 98-2028 (JJF) (Bankr. D. Del. 1998); In re Eagle-Picher Industries, Inc., No. 91-10100 (BP) (Bankr. S.D. Ohio 1991); and In re A. H. Robins Company, Inc., No. 85-31307 (BWS) (Bankr. E.D. Va. 1985). ARPC also performed work on behalf of special counsel to the debtor in the case of In re ACandS, Inc., No. 02-12687 (JKF) (Bankr. D. Del. 2002).

5. Ankura Professionals were retained to assist the Unsecured Creditors Committee in the chapter 11 bankruptcy case of In re National Gypsum Company, No. 90-37213 (SAF) (Bankr. N.D. Tex. 1990).

6. Mr. Esserman currently serves as the Future Claimants' Representative in the bankruptcy case of In re Bestwall, LLC, Case No. 17-31795 (Bankr. W.D.N.C.). Ankura serves as claims-evaluation expert for Mr. Esserman in that capacity.

7. Mr. Esserman currently serves as the Future Claimants' Representative for the NGC Bodily Injury Trust. I serve as Mr. Esserman's claims-evaluation expert in connection with the NGC Bodily Injury Trust.

8. Ankura Professionals were retained as claims-evaluation consultants to the future claimants' representatives in the chapter 11 bankruptcy cases of:² In re Boy Scouts of Am., Case No. 20-10343 (LSS) (Bankr. D. Del. 2020); In re Imerys Talc America, Case No. 19-10289 (LSS) (Bankr. D. Del. 2019); In re Maremont Corp., Case No. 19-10118 (KJC) (Bankr. D. Del. 2019); In re Bestwall LLC, No. 17-31795 (LTB) (Bankr. W.D.N.C. 2017); In re Kaiser Gypsum Company, No. 16-31602 (JCW) (Bankr. W.D.N.C. 2016); In re Yarway Corporation, No. 13-11025 (BLS) (Bankr. D. Del. 2013); In re Metex Mfg. Corporation, No. 12-14554 (BRL) (Bankr. S.D.N.Y. 2012); In re Specialty Products Holding Corp., No. 10-11780 (JKF) (Bankr. D. Del. 2010); In re Leslie Controls, Inc., No. 10-12199 (CSS) (Bankr. D. Del. 2010); In re Durabla Manufacturing Company, No. 09-14415 (MFW) (Bankr. D. Del. 2009); In re The Flintkote Company, No. 04-11300 (JKF) (Bankr. D. Del. 2004); In re Met-Coil Systems Corporation, No. 03-12676 (MFW) (Bankr. D. Del. 2003); In re Mid-Valley, Inc., No. 03-35592 (JKF) (Bankr. W.D. Pa. 2003); In re Plibrico Company, No. 02 B 09952 (Bankr. N.D. Ill. 2002); In re Western Asbestos Co., No. 02-46284 T (Bankr. N.D. Ca. 2002); In re A-Best Products, LLC, No. 02-12734 (JKF) (Bankr. D. Del. 2002); In re Global Industrial Technologies, Inc., No. 02-21626 (JKF) (Bankr. W.D. Pa. 2002); In re North American Refractories Company, No. 02-20198 (JKF) (Bankr. W.D. Pa. 2002); In re Kaiser Aluminum Corporation, No. 02-10429 (JKF) (Bankr. D. Del. 2002); In re United States Mineral Products Co., No. 01-2471 (JKF) (Bankr. D. Del. 2001); In re Federal-Mogul Global, Inc., No. 01-10578 (JKF) (Bankr. D. Del. 2001); In re USG Corporation, No. 01-2094 (JKF) (Bankr. D. Del. 2001); In re Burns and Roe Enterprises, Inc., No. 00-41610 (RG) (D.N.J. 2000); In re Armstrong World Industries, Inc., No. 00-4471 (JKF)

² An application is pending for the future claimants' representative in In re Paddock Enters., LLC, Case No. 20-10028 (LSS) (Bankr. D. Del. 2020) to retain Ankura as claims-evaluation consultant.

(Bankr. D. Del. 2000); In re Babcock & Wilcox Company, No. 00-10992 (JAB) (Bankr. E.D. La. 2000); and In re Pittsburgh Corning Corporation, No. 00-22876 (JKF) (Bankr. W.D. Pa. 2000).

9. Ankura Professionals were retained by each of the following existing asbestos personal-injury trusts to perform assessments of the liabilities facing the trusts and/or provide claims management—consulting services: Amatex Asbestos Trust; Manville Personal Injury Settlement Trust; Pacor Trust; Fuller-Austin Asbestos Trust; UNR Asbestos-Disease Claims Trust; National Gypsum Corporation Settlement Trust; Celotex Asbestos Settlement Trust; Eagle-Picher Personal Injury Settlement Trust; Fibreboard Asbestos Compensation Trust; Claims Processing Facility (formed in connection with the UNR Disease-Claims Trust and the Eagle-Picher Personal Injury Settlement Trust); DII Industries, LLC Asbestos PI Trust; DII Industries, LLC Silica PI Trust; JT Thorpe Successor Trust; Keene Creditor Trust; Western Asbestos Settlement Trust; A-Best Products Company Asbestos Personal Injury Settlement Trust; Babcock and Wilcox Asbestos Personal Injury Settlement Trust; Armstrong World Industries Personal Injury Settlement Trust; United States Gypsum Personal Injury Settlement Trust; Owens Corning/Fibreboard Personal Injury Settlement Trust; Shook and Fletcher Asbestos Settlement Trust; Kaiser Aluminum & Chemical Personal Injury Settlement Trust; US Mineral Products Company Asbestos PI Trust; Raytech Corporation Asbestos Trust; Motors Liquidation Company Asbestos PI Trust; ABB Lummus Global Inc. Asbestos PI Trust; ACandS Asbestos Settlement Trust; and TH Agriculture and Nutrition Asbestos Personal Injury Trust. Ankura Professionals were also retained by the future claimants’ representative to perform assessments of the liabilities facing the Porter Hayden Bodily Injury Trust; the Leslie Controls, Inc. Asbestos Personal Injury Trust; the APG Asbestos Trust; the Combustion Engineering Asbestos PI Trust; the NARCO Asbestos Trust; and the Quigley Asbestos PI Trust.

10. Ankura Professionals were also retained by the future claimants' representative to perform assessments of the liabilities facing the Maremont Asbestos Personal Injury Trust, Porter Hayden Bodily Injury Trust; the Leslie Controls, Inc. Asbestos Personal Injury Trust; the APG Asbestos Trust; the Combustion Engineering Asbestos PI Trust; the NARCO Asbestos Trust; the Quigley Asbestos PI Trust; and the Yarway Asbestos Personal Injury Trust. In certain of these matters, Young Conaway Stargatt & Taylor, LLP, was or is counsel to the future claimants' representative and, in certain of these matters, Stutzman, Bromberg, Esserman & Plifka serves as counsel to the trust.

11. Stutzman, Bromberg, Esserman & Plifka is counsel to the future claimants' representative in connection with the Plant Asbestos Settlement Trust, Western Asbestos Settlement Trust, Thorpe Insulation Settlement Trust, J.T. Thorpe Settlement Trust, and J.T. Thorpe Company Successor Trust. Ankura provides claims forecasting services for those trusts.

12. Stutzman, Bromberg, Esserman & Plifka is counsel to the ABB Lummus Trust, for which Ankura provides forecasting and administrative services.

13. Ankura has conducted a search of its records with respect to the Debtor and the list attached hereto as Exhibit 1 of creditors and other parties in interest. Except as set forth herein, Ankura has no connections with the Interested Parties, and to the best of my knowledge, information, and belief, there are no connections that affect Ankura's independence or ability to serve as consultant to the Future Claimants' Representative.

14. Ankura's records search covered the previous two years through the present. I note that within the past two years, Ankura has undertaken corporate transactions by which it has acquired certain entities. Ankura's records search covers only matters that were active at the time

of or since each acquisition and does not cover historical data relating to an acquired entity prior to the date of acquisition.

15. Ankura maintains electronic and other controls that limit access to information about each matter solely to the team of professionals who are assigned to the matter. Accordingly, the only persons at Ankura who will have access to information about Ankura's work for the Future Claimants' Representative in this case are the professionals assigned to this project. Other than matters relating to bankruptcy cases involving asbestos claims and asbestos settlement trusts, the team of professionals working on this matter for the Future Claimants' Representative do not work on other matters disclosed in this declaration.

16. Among the services Ankura offers is MDLOnline, a secure forum for legal professionals to collect, analyze, and exchange case data. Ankura provides MDLOnline to parties in multi-district litigation, which parties may be required to use MDLOnline pursuant to a court order. When Ankura provides this service, it is provided to all parties in the multi-district litigation and Ankura does not work directly for any one of the parties in providing the service. The only Ankura professionals who can access information pertaining to MDLOnline and information exchanged among its users are the Ankura team that supports MDLOnline, and there is no overlap between that team and the Ankura professionals who work on this matter for the Future Claimants' Representative.

17. I am informed based on Ankura's conflicts records search that the following law firms and other entities listed among the Interested Parties are users of MDLOnline in connection with representing parties in MDL litigation:

- Baron & Budd, P.C.
- The Gori Law Firm
- Motley Rice LLC
- Simmons Hanly Conroy, LLC

- Weitz & Luxenberg, PC
- 3M

18. Ankura currently provides services to the following insurance entities:

Metropolitan Life Insurance Company and Travelers Casualty and Surety Company. None of these matters are related to the Debtors or to asbestos claims. There is no overlap of Ankura professionals who work on these insurance matters and the team of Ankura professionals who work on this matter for the Future Claimants' Representative.

19. The following list discloses entities identified in the Interested Parties list to which Ankura currently provides services or has provided services within the past two years, as indicated. None of the matters involving these entities are related to the Debtor or to asbestos claims:

Search Hit	Current Client	Client w/in Past 2 Yrs
Bank of America, NA	X	X
CBS Corporation	X	
CertainTeed Gypsum, Inc		X
Dentons LLP	X	X
Foley & Lardner LLP	X	X
Foster Wheeler Energy Corporation	X	X
FTI Consulting, Inc	X	X
General Electric Company	X	X
Goodwin Procter LLP	X	X
Gordon Thomas Honeywell LLP	X	
Hamilton Stephens Steele + Martin, PLLC		X
Honeywell International Inc	X	X
Ingersoll Rand Company	X	X
Jones Day	X	X
JP Morgan Chase	X	X
Miles & Stockbridge		X
Polsinelli LLP	X	X
Robinson & Cole, LLP	X	X
Saint-Gobain Corporation		X
Saint-Gobain Glass Corporation		X
Saint-Gobain Performance Plastics		X

Search Hit	Current Client	Client w/in Past 2 Yrs
Schiff Hardin LLP	X	X
The Grid Company, LLC	X	X
Travelers Casualty and Surety Company	X	
Union Carbide Corporation	X	
Vorys Sater Seymour & Pease LLP	X	X
Westinghouse Electric Corporation	X	X
Wilentz, Goldman & Spitzer		X
Wilson Elser Moskowitz Edelman &	X	X
Winston & Strawn, LLP	X	X

20. Ankura further discloses that it has in the past and/or currently does work with and/or against a number of professionals involved in this Chapter 11 Case in connection with matters wholly unrelated to this Chapter 11 Case, including without limitation: Belluck & Fox, LLP; Caplin & Drysdale, Chartered; Robinson & Cole, LLP; Wilentz, Goldman & Spitzer; and Young Conaway Stargatt & Taylor, LLP. Ankura may provide incidental services (such as facilitating meeting space and coordinating certain claim-evaluation services for settlement trusts), and coordinate payment from or to certain of these professionals for those incidental services, but does otherwise not provide services for or receive compensation from these professionals.

21. Ankura discloses that it has a professional relationship with the following banks related to the firms banking and credit card services: Bank of America and JPMorgan Chase Bank.

22. To the extent Ankura discovers new facts or circumstances that bear materially on the matters described herein, Ankura will supplement the information contained in this declaration, as appropriate.

23. Subject to court approval, and in accordance with section 330(a) of the Code and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of*

Retained Professionals [Docket No. 132], compensation will be paid to Ankura on an hourly basis, plus reimbursement of actual and necessary expenses incurred by Ankura. Ankura professionals charge for services by the hour, with the rates depending on the experience and training of the individuals working on the task. The hourly rates for Ankura professionals are \$550–\$750 for Senior Managing Directors, \$450–\$550 for Managing Directors, \$350–\$450 for Senior Directors, \$275–\$350 for Directors, and \$150–\$275 for Senior Associates and Associates. Expenses for travel and consumables are billed at cost to the client. Charges are not accumulated or billed to the client for non-professional or clerical staff.

24. Neither I nor any principal of, or professional employed by, Ankura has agreed to share or will share any portion of the compensation to be received in connection with its retention in this case with any other person other than the principals and regular employees of Ankura.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 10, 2020.

/s/ Thomas Vasquez

Thomas Vasquez, Ph.D.

Senior Managing Director

Ankura Consulting Group, LLC

Exhibit 1

EXHIBIT B

Proposed Order

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

In re:

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**EX PARTE ORDER AUTHORIZING THE FUTURE CLAIMANTS'
REPRESENTATIVE TO RETAIN AND EMPLOY ANKURA CONSULTING
GROUP, LLC AS CLAIMS EVALUATION CONSULTANTS**

Upon the application (the “Application”) of Sander L. Esserman, the legal representative (the “Future Claimants’ Representative”) for persons who have not yet asserted an asbestos-related personal-injury claim against the Debtor but may in the future assert such a claim, for the issuance and entry of 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 employment and retention of Ankura Consulting Group, LLC (“Ankura”) as claims-evaluation consultants, effective as of June 1, 2020; and upon the declaration of Thomas Vasquez, Ph.D., in support thereof (the “Vasquez Declaration”); and this Court being satisfied based on the representations made in the Ankura Application and the Vasquez Declaration that Ankura is independent of the Debtor and Interested Parties and does not hold or represent any interest that would adversely affect Ankura’s ability to advise the FCR in carrying out his duties to loyally and effectively represent the Future Claimants or that is materially adverse to the FCR or Future Claimants; and that Ankura’s involvement in other asbestos cases does not conflict with the obligations of Ankura to the Future Claimants’ Representative in this case; and that Ankura’s employment by the Future

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Claimants' Representative is necessary and in furtherance of the Future Claimants' Representative's duties, and would be in the best interests of the Debtor's estate; and after due deliberation and sufficient cause appearing therefor, it is hereby

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

ORDERED that, in accordance with sections 105 and 524(g) of the Bankruptcy Code, the Future Claimants' Representative is hereby authorized to employ and retain Ankura as claims-evaluation consultants on the terms set forth in the Application and Vasquez Declaration, effective as of June 1, 2020; and it is further

ORDERED that Ankura 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 the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals [Docket No. 132]*. The Future Claimants' Representative shall not be personally responsible for providing compensation or expense reimbursements to Ankura under any circumstance; 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.

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