

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
Charlotte Division**

**In re:**

**GARLOCK SEALING TECHNOLOGIES  
LLC,**

**et al.<sup>1</sup>,**

**Debtors.**

**Case No. 10-31607**

**Chapter 11  
Jointly Administered**

**APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
OF GARLOCK SEALING TECHNOLOGIES LLC, ET AL. TO EMPLOY KATTEN  
MUCHIN ROSENMAN LLP AS ITS ATTORNEYS**

The Official Committee of Unsecured Creditors (the “Committee”) of Garlock Sealing Technologies LLC (“Garlock”), Garrison Litigation Management, Group, Ltd. (“Garrison”) and The Anchor Packing Company (“Anchor”), debtors and debtors-in-possession (collectively, the “Debtors”), hereby submits to the Court its application (the “Application”) for entry of an order authorizing the Committee to retain and employ the law firm of Katten Muchin Rosenman LLP (“Katten”) as its attorneys pursuant to section 1103(a) of Title 11 of the United States Code (the “Bankruptcy Code”), Rules 2014 and 5002 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Local Rule 2016-1(b) of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the “Local Rules”). The facts and circumstances supporting this Application are set forth in the Declaration of Deborah L. Fletcher on behalf of Katten (the “Fletcher Declaration”) filed with this Application and attached hereto as Exhibit A. In further support of this Application, the Committee respectfully shows the Court as follows:

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<sup>1</sup> The Debtors include Garlock Sealing Technologies LLC (Case No. 10-31607), Garrison Litigation Management Group, Ltd. (Case No. 10-31608) and The Anchor Packing Company (Case No. 10-31606).

1. On June 5, 2010 (the “Petition Date”), the Debtors filed voluntary petitions under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Western District of North Carolina (the “Court”).

2. Since the Petition Date, the Debtors are continuing in control of their businesses and manage their property as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

3. On June 17, 2010, the Court entered an Order Appointing Official Creditors’ Committee (Docket No. 104) pursuant to which Ryerson, Inc., Jackson Welding Supply, Dexter Foundry Inc., and Associated Spring, a Business of Barnes Group, were appointed to serve as the Unsecured Creditors’ Committee in these cases.<sup>2</sup>

4. The Committee determined, in connection with the exercise of its powers and the performance of the duties conferred upon it pursuant to section 1103 of the Bankruptcy Code, that it requires legal services and advice. The services of attorneys pursuant to the terms of this Application are necessary in order to enable the Committee to execute their duties in this case.

5. By submission of this Application, the Committee requests that this Court enter an order authorizing the Committee to retain and employ Katten to render legal advice and services to the Committee as described herein and in the concurrently filed Fletcher Declaration.

6. The Unsecured Creditors’ Committee seeks to retain Katten as bankruptcy counsel for the Committee because of the experience and knowledge of the attorneys in the Charlotte office of Katten in the areas of debtors’ and creditors’ rights in cases under Chapter 11 of the Bankruptcy Code, their expertise, experience and knowledge in practicing before this Court, their proximity to this Court, and their ability to respond quickly to emergency hearings and other emergency matters in this Court.

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<sup>2</sup> On June 16, 2010, this Court entered an order appointing an Official Committee of Asbestos Personal Injury Claimants (“Asbestos Committee”) (Docket No. 101). This application does not seek employment as counsel for the Asbestos Committee.

7. Katten has informed the Committee of its desire and willingness to act in this case and render the necessary professional services as counsel to the Committee.

8. Katten has informed the Committee that its 2010 billing rates applicable to its Charlotte office are as follows:

Partners \$405 - \$540  
Associates \$220 - \$365  
Counsel & Special Staff \$465 - \$465  
Of Counsel \$525 - \$540  
Paralegals \$105 - \$215

9. Katten has agreed that its 2010 billable rates applicable to the Charlotte office will apply to its engagement for the Committee throughout this case. The lead attorney at Katten rendering services to the Committee in this case is Deborah L. Fletcher. Ms. Fletcher's 2010 billable rate is \$450 per hour.

10. As reflected in the Fletcher Declaration, which is incorporated herein as Schedule A, the 2010 Charlotte office hourly rates of Katten are consistent with the rates charged by Katten for work performed in 2010 from the Charlotte office in bankruptcy and non-bankruptcy matters of this type.

11. Katten will bill for services rendered and out-of-pocket expenses incurred pursuant to the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, the Guidelines for Compensation and Expense Reimbursement of Professionals, the Local Rules of this Court, and current and future orders of the Court.

12. The Committee is informed and believes that the hourly rates of Katten are consistent with the rates charged by Katten in bankruptcy and non-bankruptcy matters served by attorneys in its Charlotte office of this type and are reasonable for both years in which such rates apply.

13. Subject to Court approval, compensation will be payable to Katten on an hourly basis based upon its hourly rates for any period of application as set forth herein, plus

reimbursement of actual and necessary expenses incurred by the firm pursuant to Katten's normal policies for reimbursement for disbursements and other expenses.

14. The Committee has been advised that Katten has a policy to charge its clients in all areas of practice for expenses incurred in connection with the engagement. These expenses include, without limitation, photocopying, witness fees, travel expenses, filing and recordation fees, long distance telephone calls, postage, express mail and messenger charges, computerized legal research charges, expenses for working meals, and telecopier charges. Katten will charge for expenses and costs incurred in a manner and at rates consistent with charges made generally to its clients.

15. Except as set forth below and in the Fletcher Declaration, it does not appear to the Unsecured Creditors' Committee that Katten has had or presently has any connection with any of the creditors or any other party in interest in the Debtors' cases or the Debtors' attorneys, or any interest adverse to the Committee, the Debtors or the Debtors' estates in the matters upon which the Katten is to be engaged:

1. Katten represents Bank of America and certain of its affiliates in matters wholly unrelated to the Debtors and their bankruptcy cases.
2. Katten represents Cleaver Brooks, Inc., Scapa Dryer Fabrics, Inc. and certain affiliates of Scapa Group, Inc. in North Carolina asbestos litigation, all of which cases are presently pending in multidistrict litigation in the United States District Court for the Eastern District of Pennsylvania (MDL-875). Neither Cleaver Brooks, Inc., Scapa Dryer Fabrics, Inc. and certain affiliates of Scapa Group, Inc. assert any claims against the Debtors.

16. Based upon the foregoing, the Committee believes that Katten is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and that Katten is eligible for employment as attorneys for the Committee.

17. The professional services that Katten will render as bankruptcy counsel to the Committee include, without limitation:

- a. to provide the Committee legal advice with respect to its powers and duties in these cases;

b. to take all necessary action on behalf of the Committee to protect and preserve the collective interests of the unsecured creditors in the Debtors' bankruptcy estates;

c. to prepare and file on behalf of the Committee all applications, answers, orders, reports, motions and notices in these cases;

d. to appear before this Court, and such other courts as may be appropriate, to represent the interests of the Committee in matters that require representation and to represent and assist the Committee in negotiations with other parties in interests in the cases; and

f. to perform other legal services for the Committee as may be necessary in the cases.

26. Pursuant to the Order Establishing Notice Procedures (Docket No. 48) for the cases, notice of this Application has been given to:

a. the Office of the United States Bankruptcy Administrator for the Western District of North Carolina;

b. the Debtors and counsel to the Debtors;

c. counsel for Bank of America, as the Debtors' post-petition senior secured lender;

d. a representative of the local International Association of Machinists and Aerospace Workers ("Union Representative");

e. those persons who have formally appeared and requested service in this case pursuant to Bankruptcy Rule 2002 (the "2002 Parties List");

f. all members of the Committee;

g. members of the Official Committee of Asbestos Personal Injury Claimants and their counsel, if any as of the date of this Application; and

the Western District of North Carolina; and (iv) the Pension Benefit Guaranty Corporation.

27. In light of the nature of the relief requested, the Committee submits that no further notice need be given.

28. No previous application for the relief sought herein has been made to this or any other court.

29. Attached hereto as Exhibit B is a proposed Order approving the engagement of Katten as counsel for the Committee.

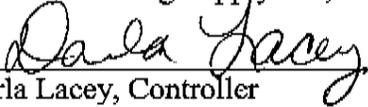
WHEREFORE, the Committee respectfully requests that the Court enter an Order pursuant to substantially in the form of Exhibit B attached hereto authorizing the Committee to retain and employ Katten, and for such other and further relief as may be just and proper under the circumstances.

Dated: July 14, 2010.

Official Committee of Unsecured Creditors of Garlock Sealing Technologies LLC, Garrison Litigation Management, Group, Ltd. and The Anchor Packing Company

By: Its Chair

Jackson Welding Supply Co., Inc.

  
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Darla Lacey, Controller  
535 Buffalo Road  
Rochester, NY 14611