

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION**

<p><b>In re:</b></p> <p><b>BRIGGS &amp; STRATTON CORPORATION, <i>et al.</i>,</b></p> <p style="padding-left: 40px;"><b>Debtors.</b></p>	§ § § § § § § § §	<p><b>Chapter 11</b></p> <p><b>Case No. 20-43597-399</b></p> <p><b>(Joint Administration)</b></p>
---	---	---

**SUMMARY SHEET FOR FIRST INTERIM AND FINAL FEE APPLICATION OF  
KING & SPALDING LLP FOR COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS SPECIAL COUNSEL TO THE  
DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD FROM  
JULY 20, 2020 THROUGH ENTRY OF AN ORDER APPROVING THIS APPLICATION**

<b>Name of Applicant:</b>	King & Spalding LLP
<b>Authorized to Provide Professional Services to:</b>	Debtors and Debtors in Possession
<b>Applicant’s Role in Case:</b>	Special Counsel to Briggs & Stratton Corporation, <i>et al.</i>
<b>Date of Retention:</b>	<p><i>Order Provisionally Granting Application of Debtors for an Order Authorizing the Retention and Employment of King &amp; Spalding LLP Effective as of the Petition Date (i.e., July 20, 2020), entered July 27, 2020 [Docket No. 205]</i></p> <p><i>Order Authorizing Debtors to Retain and Employ King &amp; Spalding LLP as Special Counsel to the Debtors, effective as of the Petition Date (i.e., July 20, 2020), entered August 19, 2020 [Docket No. 510]</i></p>



<b>First Interim and Final Compensation Period</b>	
<b>First and Final Period:</b>	July 20, 2020 through and including November 30, 2020 <sup>1</sup>
<b>Amount of Compensation Sought as Actual, Reasonable, and Necessary:</b>	\$593,245.50 for the First and Final Period, plus an estimate of \$15,000 for the period from December 1, 2020 through the entry of an Order approving this Application, for a total of \$608,245.50
<b>Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary:</b>	\$55,867.96
<b>Total Compensation and Expense Reimbursement Requested in this Application:</b>	\$664,113.46
<b>This is a(n):</b> <input type="checkbox"/> Monthly Statement <input checked="" type="checkbox"/> Interim Application <input checked="" type="checkbox"/> Final Application	

<sup>1</sup> On September 21, 2020, the Debtors sold substantially all of their assets to KPS Capital Partners (“**Purchaser**”). In connection with this sale, the Debtors assumed and assigned to the Purchaser certain contracts, including K&S’s engagement letter agreement (“**K&S Contract**”). The K&S Contract was deemed assigned to the Purchaser on October 14, 2020. Accordingly, the Purchaser is responsible for K&S’s fees and expenses (except for fees and expenses related to retention and fee matters) incurred on and after October 14, 2020; the Debtors remain responsible for K&S’s fees and expenses incurred up to and including October 13, 2020 (except for fees and expenses related to retention and fee matters, which remain the responsibility of the Debtors).

Since October 14, 2020, K&S has incurred additional fees in (i) preparing and serving the *Third Monthly Application of King & Spalding LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Counsel to the Debtors and Debtors in Possession for the Period from October 1, 2020 Through October 31, 2020* and (ii) preparing, filing, and seeking approval of this Application. K&S seeks allowance and payment of such amounts herein.

<b>Other Information</b>	
<b>Blended Rate in this Application for Partners and Counsel:</b>	\$998.59
<b>Blended Rate in this Application for Associates:</b>	\$662.87
<b>Blended Rate in this Application for Consultants:</b>	\$840.29
<b>Blended Rate in this Application for Project Assistants:</b>	\$231.57
<b>Blended Rate in this Application for Paraprofessionals:</b>	\$377.78
<b>Blended Rate in this Application for All Attorneys:</b>	\$893.85
<b>Blended Rate in this Application for All Timekeepers:</b>	\$806.48
<b>Number of Professionals Included in this Application</b>	32
<b>Number of Professionals Billing Fewer Than 15 Hours During this Period</b>	21
<b>Are Any Rates Higher Than Those Approved or Disclosed at Retention?</b>	No
<b>This is a(n):</b> <input type="checkbox"/> Monthly Statement <input checked="" type="checkbox"/> Interim Application <input checked="" type="checkbox"/> Final Application	

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>BRIGGS &amp; STRATTON</b>	§	<b>Case No. 20-43597-399</b>
<b>CORPORATION, et al.,</b>	§	
	§	<b>(Joint Administration)</b>
<b>Debtors.</b>	§	
	§	
	§	

**FIRST INTERIM AND FINAL FEE APPLICATION OF KING & SPALDING LLP  
FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT  
OF EXPENSES INCURRED AS SPECIAL COUNSEL TO THE  
DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD FROM  
JULY 20, 2020 THROUGH ENTRY OF AN ORDER APPROVING THIS APPLICATION**

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District of Missouri (the “**Local Rules**”), the Guidelines for Compensation set forth in the appendix to the Procedures Manual for the United States Bankruptcy Court for the Eastern District of Missouri (the “**Local Guidelines**”), the *Order Provisionally Granting Application of Debtors for an Order Authorizing the Retention and Employment of King & Spalding LLP Effective as of the Petition Date*, dated July 27, 2020 [Docket No. 205] (the “**Interim Retention Order**”), and the *Order Authorizing Debtors to Retain and Employ King & Spalding LLP as Special Counsel to the Debtors*, dated August 19, 2020 [Docket No. 510] (the “**Final Retention Order**”), King & Spalding LLP (“**K&S**”), special counsel to the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), submits this *First Interim and Final Fee Application of King & Spalding LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Counsel to the Debtors and Debtors in Possession*

*for the Period from July 20, 2020 Through Entry of an Order Approving this Application* (this “**Application**”).<sup>2</sup> By this Application, K&S seeks (i) compensation in the amount of \$608,245.50, consisting of (a) \$578,381.00 for the period from the Petition Date (as defined herein) through and including October 31, 2020, (b) \$14,864.50 for the period from November 1, 2020 through and including November 30, 2020, and (c) \$15,000,<sup>3</sup> which is an estimate of fees that will be incurred for the period December 1, 2020 through the entry of an order approving this Application (the “**Gap Period**”), and (ii) payment of \$55,867.96 for the actual, necessary expenses that K&S incurred in connection with such services during the Fee Period.

### **Background**

1. On July 20, 2020 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under the Bankruptcy Code. The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On August 5, 2020, the United States Trustee appointed an Official Committee of Unsecured Creditors in these chapter 11 cases. No trustee or examiner has been appointed in these chapter 11 cases. By Order dated July 21, 2020, the Court authorized the joint administration of these chapter 11 cases pursuant to Federal Rule 1015(b) and Local Rule 1015(b).

3. As of the Petition Date, the Debtors, combined with their non-Debtor affiliates (collectively, the “**Company**”), were the world’s largest producer of gasoline engines for

---

<sup>2</sup> The period from July 20, 2020 through and including entry of an order approving this Application is referred to herein as the “**Fee Period**.”

<sup>3</sup> To the extent the amount of fees actually incurred during the Gap Period is less than the amount estimated in this Application, K&S will inform the Debtors and only the actual amount of fees incurred will be paid by the Debtors if this Application is approved. To the extent the amount of fees actually incurred during the Gap Period is more than the amount estimated in this Application, K&S will waive any additional amount of fees incurred during the Gap Period.

residential and commercial outdoor power equipment and a leading designer, manufacturer and marketer of power generation, pressure washer, lawn and garden, turf care and job site products. The Company's products were marketed and serviced in more than 100 countries on six continents through 40,000 authorized dealers and service organizations. Additional information regarding the Debtors is set forth in the *Declaration of Jeffrey Ficks, Financial Advisor of Briggs & Stratton Corporation, in Support of the Debtors' Chapter 11 Petitions and First Day Relief*, sworn to on July 20, 2020, which was filed with the Court on the Petition Date.

**Retention of K&S as Special Counsel to the Debtors and Debtors in Possession**

4. On July 24, 2020, the Debtors filed the *Application of Debtors for an Order Authorizing the Retention and Employment of King & Spalding LLP as Special Counsel to the Debtors Effective as of the Petition Date* [Docket No. 194] (the "**Retention Application**"). The Retention Application was approved on a provisional basis by the Interim Retention Order, and on a final basis by the Final Retention Order.

5. On September 21, 2020, the Debtors sold substantially all of their assets to the Purchaser. In connection with this sale, the Debtors assumed and assigned to the Purchaser certain contracts, including the K&S Contract. The K&S Contract was deemed assigned to the Purchaser on October 14, 2020. Accordingly, the Purchaser is responsible for K&S's fees and expenses (except for fees and expenses related to retention and fee matters) incurred on and after October 14, 2020; the Debtors remain responsible for K&S's fees and expenses incurred up to and including October 13, 2020 (except for fees and expenses related to retention and fee matters, which remain the responsibility of the Debtors). The amounts requested for the Fee Period takes this bifurcation of fees and expenses into account. Given that K&S is no longer providing services to the Debtors,

this Application seeks approval of the fees and expenses incurred by K&S during the Fee Period on a final basis.

6. The Final Retention Order authorizes K&S to represent the Debtors in the Represented Matters (as defined herein) and authorizes the Debtors to compensate and reimburse K&S in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable order or procedures of the Court. The Final Retention Order also authorizes the Debtors to compensate K&S at its ordinary and customary hourly rates charged for services of the type rendered in the chapter 11 cases and to reimburse K&S for its actual and necessary out-of-pocket expenses incurred, pending further application to the Court. K&S submits this Application in accordance with Local Rule 2016.

**K&S's Monthly Applications and Requests for Interim Allowance of Compensation**

7. This Application represents K&S's first interim and final fee application. K&S is not holding a retainer for professional services and expenses.

8. The chart below sets forth a summary of (i) the *Amended First Monthly Application of King & Spalding LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Counsel to the Debtors and Debtors in Possession for the Period from July 20, 2020 Through August 31, 2020* served by K&S on October 8, 2020;<sup>4</sup> (ii) the *Second Monthly Application of King & Spalding LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Counsel to the Debtors and Debtors in Possession for the Period from September 1, 2020 Through September 30, 2020* served by K&S on October 24, 2020; and (iii) the *Third Monthly Application of King & Spalding LLP for Compensation for Services*

---

<sup>4</sup> This application amended the *First Monthly Application of King & Spalding LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Counsel to the Debtors and Debtors in Possession for the Period from July 20, 2020 Through August 31, 2020* served by K&S on September 25, 2020.

*Rendered and Reimbursement of Expenses Incurred as Special Counsel to the Debtors and Debtors in Possession for the Period from October 1, 2020 Through October 31, 2020 served by K&S on November 24, 2020.*

Monthly Statement		Fees & Expenses		Monthly Amounts Requested		Fees & Expenses Received Since the Petition Date
Date Served	Period Covered	Fees 100%	Expenses 100%	Fees 80%	Fees 80% + Expenses 100%	
10/8/2020	7/20/2020 – 8/31/2020	\$271,896.50	\$38,610.71	\$217,517.20	\$256,127.91	\$256,127.91
10/24/2020	9/1/2020 – 9/30/2020	\$223,458.00	\$16,259.75	\$178,766.40	\$195,026.15	\$195,026.15
11/24/2020	10/1/2020 – 10/31/2020	\$83,026.50	\$997.50	\$66,421.20	\$67,418.70	\$67,418.70
<b>TOTALS</b>		\$578,381.00	\$55,867.96	\$462,704.80	\$518,572.76	\$518,572.76

**Relief Requested**

9. By this Application, K&S seeks (i) compensation in the amount of \$608,245.50, consisting of (a) \$578,381.00 for the period from the Petition Date (as defined herein) through and including October 31, 2020, (b) \$14,864.50 for the period from November 1, 2020 through and including November 30, 2020, and (c) \$15,000,<sup>5</sup> which is an estimate of fees that will be incurred during the Gap Period, and (ii) payment of \$55,867.96 for the actual, necessary expenses that K&S incurred in connection with such services during the Fee Period.

10. K&S has received no payment and no promises for payment from any source other than the Debtors for services rendered in connection with these chapter 11 cases. There is no

---

<sup>5</sup> To the extent the amount of fees actually incurred during the Gap Period is less than the amount estimated in this Application, K&S will inform the Debtors and only the actual amount of fees incurred will be paid by the Debtors if this Application is approved. To the extent the amount of fees actually incurred during the Gap Period is more than the amount estimated in this Application, K&S will waive any additional amount of fees incurred during the Gap Period.



agreement or understanding between K&S and any other person (other than members of K&S) for the sharing of compensation to be received for the services rendered in these cases.

11. As more fully set forth in the Declaration of Stephen J. Orava (the “**Orava Declaration**”), attached hereto as **Exhibit A**, all of the services for which compensation is sought herein were rendered for or on behalf of the Debtors solely in connection with these chapter 11 cases.

### **Summary of Services Rendered**

12. K&S has rendered professional services to the Debtors as requested and as necessary and appropriate in furtherance of the interests of the Debtors during the Fee Period. The variety and complexity of the issues in the chapter 11 cases and the need to act or respond to issues on an expedited basis in furtherance of the Debtors’ needs have required the expenditure of substantial time by K&S personnel during the Fee Period (through November 30, 2020).

13. Attached hereto as **Exhibit B** is a chart of the number of hours expended and fees incurred by K&S during the Fee Period (through November 30, 2020) with respect to each of the project categories K&S established in accordance with its internal billing procedures.

14. Attached hereto as **Exhibit C** are charts of K&S professionals and paraprofessionals, including the standard hourly rate for each professional who rendered services to the Debtors in connection with these chapter 11 cases during the Fee Period (through November 30, 2020) and the title, hourly rate, aggregate hours worked, and the amount of fees earned by each professional.

15. Attached hereto as **Exhibit D** is a chart of the blended hourly rate billed by all of K&S’s timekeepers as well as the blended hourly rate of each category of professional that provided services during the Fee Period (through November 30, 2020).

16. Attached hereto as **Exhibit E** is a chart of expenses that K&S incurred or disbursed in connection with providing professional services to the Debtors during the Fee Period (through November 30, 2020). As set forth in the Retention Application, in addition to other expenses, K&S used the consulting firm Capital Trade Incorporated (“**CapTrade**”) for antidumping proceedings to provide advisory services to analyze voluminous and complex sales, financial, and cost information provided by opposing parties. CapTrade is provided these services to K&S (with a 5% discount from its normal rates) as all antidumping proceedings require this type of analysis and technical support, which is frequently outsourced by law firms to a lower-cost consultant such as CapTrade. CapTrade’s invoices have been added to K&S invoices as an expense, and copies of such invoices are attached to the corresponding K&S invoice. All but approximately \$73 of the expenses incurred were pass-through expenses incurred by CapTrade.

17. Attached hereto as **Exhibit F** are the time records of K&S for the Fee Period (through November 30, 2020), organized by project category with a daily time log describing the time spent by each attorney and other professional during the Fee Period (through November 30, 2020) as well as an itemization of expenses.

18. The following summary of services rendered during the Fee Period is not intended to be a detailed description of the work performed, as those day-to-day services and the time expended in performing such services are fully set forth in Exhibit F. Rather, the following summary highlights certain areas in which significant services were rendered to the Debtors during the Fee Period.

*a. CARB Tier IV SORE Rulemaking*

From the Petition Date through and including October 13, 2020, K&S represented the Debtors in connection with a California Air Resource Board (“**CARB**”) rulemaking matter

involving recently proposed changes to CARB's small offroad engine ("SORE") exhaust and evaporative emissions regulations. This CARB SORE rulemaking was of critical importance to the Debtors because the proposed regulations would arbitrarily and capriciously ban the sale of spark-ignition engines in the state of California. The Debtors invested substantial capital and person-hours to develop spark-ignition engines that comply with California's current emissions laws, and these proposed SORE regulations would ban the Debtors (and the Purchaser) from selling these products in California. K&S assisted the Debtors in drafting comments to CARB and advised the Debtors on its engagement strategy with CARB.

*b. Emissions Counseling*

From the Petition Date through and including October 13, 2020, K&S advised the Debtors with respect to regulatory issues involving engine emissions and compliance with U.S. environmental laws. Environmental compliance was of critical importance to the Debtors because they could not sell their products if they were not compliant with environmental laws, and the costs of potential non-compliance included business interruption, reputational damage, and penalties. K&S advised the Debtors' skilled and experienced internal engineering and environmental compliance teams with respect to any complex issues of environmental law that arose where K&S's experience and expertise could provide value to the Debtors. K&S also advised the Debtors on transferring rights and obligations under Certificates of Conformity and Executive Orders issued by the U.S. EPA and CARB, respectively.

*c. EU Regulatory and Industry Association Work*

From the Petition Date through and including October 13, 2020, K&S advised the Debtors on other matters relating to compliance with European Union environmental and safety regulations. Complying with environmental and safety regulations in the EU was necessary for

the Debtors to sell their products, and the costs of potential non-compliance included business interruption, reputational damage, and penalties. K&S advised the Debtors with respect to ensuring their engines' emissions complied with EU environmental regulations and directives. K&S also advised the Debtors on complying with safety regulations and standards in the European Union for battery-started engines and battery-operated engines.

*d. AD/CVD – Large Vertical Engines*

From the Petition Date through and including October 13, 2020, K&S represented the Debtors in connection with two major trade cases which were brought under the antidumping (“AD”) and countervailing duty (“CVD”) laws to determine whether a domestic industry is being harmed by unfairly-traded imports. These two cases involved large vertical shaft engines (the above-referenced matter) and small vertical shaft engines. AD/CVD litigation is highly technical, and K&S has been active in this area of the law for decades. The ultimate goal of the litigation is to obtain relief from unfair trade in the form of significant additional tariffs on imports from China so that the Debtors or the purchaser of their assets will no longer suffer material injury by reason of unfairly-traded imports. History shows that success in such litigation and imposition of duties to remedy the unfair trade often create a more level playing field that puts domestic producers (like the Debtors) in a much stronger competitive position and facilitates substantial improvements in revenue and profitability.

*e. AD/CVD – Small Vertical Engines*

As discussed above, from the Petition Date through and including October 13, 2020, K&S represented the Debtors in connection with two AD/CVD cases regarding imports of vertical shaft engines from China. This matter addressed the second case on imports of small vertical shaft engines from China.

*f. Walk-Behind Lawnmower AD/CVD*

From the Petition Date through and including October 13, 2020, K&S represented the Debtors in connection a third set of AD/CVD cases regarding imports of certain walk behind lawn mowers from China. Following the initiation of the two above-referenced AD/CVD cases regarding imports of vertical shaft engines from China, a U.S. producer of walk-behind lawn mowers filed AD/CVD cases targeting imports of these mowers from China and Vietnam. The Debtors are U.S. producers and U.S. importers of these mowers and, thus, were required to respond to questionnaires and provide other information to the U.S. International Trade Commission. The Debtors were also affected by these cases because they were a major U.S. engine supplier for these mowers.

*g. Opposition to 301 Exclusion Extension*

From the Petition Date through and including October 13, 2020, K&S assisted the Debtors in objecting to extensions of exclusions on tariffs granted by the United States with respect to certain engines imported from China that compete with engines produced by the Debtors.

*h. Retention and Fee Applications*

During the Fee Period (through November 30, 2020), K&S prepared the Retention Application and additional supplemental declarations in connection with the Debtors seeking Court approval to retain and employ K&S in these chapter 11 cases. In addition, K&S attorneys instructed its timekeepers regarding disclosures required pursuant to the Bankruptcy Code, Bankruptcy Rules, Local Rules, and UST Guidelines. Moreover, among other things, K&S prepared and served its monthly fee statements pursuant to the Bankruptcy Code, Local Rules, and UST Guidelines, and prepared this Application (the services for which carried over into December 2020).

19. K&S respectfully submits that the services that it rendered on behalf of the Debtors were necessary, appropriate and have directly contributed to the effective administration of the chapter 11 cases, as well as enhanced the value of the Debtors' business, which was beneficial to the sale of the Debtors' assets to the Purchaser.

**Basis for Relief Requested**

20. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code that govern the Court's award of such compensation. *See* 11 U.S.C. § 331. Section 330 provides that the Court may award a professional employed under section 327 "reasonable compensation for actual, necessary services" and "reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330(a)(3) also outlines specific criteria that the Court shall consider in determining the amount of reasonable compensation, including:

- A. the time spent on such services;
- B. the rates charged for such services;
- C. whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- D. whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- E. with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- F. whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

21. In addition to the factors set forth in Bankruptcy Code section 330(a)(3), in evaluating the reasonableness of attorneys' fees, Local Bankruptcy Rule 2016-1(B)(1) (by reference to the "Guidelines for Compensation" located in the Procedures Manual that accompanies the Local Bankruptcy Rules) requires that all professional fee applications analyze the twelve factors for allowance of compensation as set forth in *Johnson v. Georgia Highway Express*, 388 F.2d 714 (5th Cir. 1974) (the "**Johnson Factors**"); *see also P.A. Novelly v. Palans*, 960 F.2d 728 (8th Cir. 1992); *Chamberlain v. Kula*, 213 B.R. 729, 736–39 (B.A.P. 8th Cir. 1997).

22. K&S submits that this Application satisfies Bankruptcy Code section 330 and the *Johnson Factors*, as outlined below:

- A. The Time and Labor Required. K&S submits that the hours spent were reasonable given the complexity of the issues being addressed by K&S in these cases.
- B. The Novelty and Difficulty of the Questions Involved. As discussed in the Retention Application and above, many of the issues addressed by K&S were novel and difficult.
- C. The Skill Required to Perform the Professional Services Properly. As discussed in the Retention Application and above, the K&S professionals that worked on these cases have the requisite skill and experience to perform the services for the Debtors.
- D. The Preclusion of Other Employment by the Professional Due to Acceptance of the Case. K&S's representation of the Debtors did not preclude its acceptance of new clients.
- E. The Customary Fee. The professional fees sought herein are based upon K&S's normal hourly rates for services of this kind, are consistent with the fees billed to the Debtors prepetition, and such rates were approved by the Final Retention Order. K&S respectfully submits that the professional fees sought herein are not unusual given the magnitude and complexity of the issues involved and the time expended in attending to the representation of the Debtors, and are commensurate with fees K&S has been awarded in other cases, as well as with professional fees charged by other attorneys of comparable experience.

- F. Whether the Fee is Fixed or Contingent. The fees requested in this Application are requested on an hourly basis, as provided in the Final Retention Order. K&S's expectation upon accepting this representation was that it would receive compensation for professional services rendered at its customary hourly rates, as provided in the Retention Application and approved pursuant to the Final Retention Order.
- G. Time Limitations Imposed by the Client or the Circumstances. Certain of the matters upon which K&S was retained were extremely active and time-sensitive.
- H. The Amount Involved and the Results Obtained. The goal of the litigations being handled by K&S for the Debtors was to obtain relief from unfair trade in the form of significant additional tariffs on imports from China so that the Debtors would no longer suffer material injury by reason of unfairly-traded imports. Among other matters, K&S was also representing the Debtors in connection with certain rulemaking issues that were of critical importance to the Debtors. It was important to continue this representation of the Debtors after the Petition Date to preserve the Debtors' rights while they sought to sell substantially all of their assets. As noted, the Purchaser sought to have K&S continue to render such services to it after it purchased substantially all of the Debtors' assets.
- I. The Experience, Reputation and Ability of the Professionals. K&S has been active in the AD and CVD areas of the law for decades and has successfully litigated dozens of AD/CVD cases for domestic producers. In addition, K&S had a track record of representing the Debtors in connection with rulemakings by the California Air Resource Board and the U.S. EPA, and has experience with this process that the Debtors do not have in-house.
- J. The Undesirability of the Case. The case is not undesirable.
- K. The Nature and Length of the Professional Relationship with the Client. Prior to the Petition Date, K&S represented the Debtors for over five years.
- L. Awards in Similar Cases. K&S submits that the fees and expenses for which it seeks compensation and reimbursement in this Application are not excessive and are commensurate with the rates awarded in similar cases for similar services rendered and results obtained. In addition, the fees requested by K&S are consistent with the fees billed to the Debtors prepetition. The fees for this Fee Period are more fully described in the invoices attached hereto as



**Exhibit F.** After taking into consideration the time and labor spent in these chapter 11 cases, and the nature and extent of the representation, K&S believes the allowance sought herein is reasonable and should be approved.

**Notice**

K&S will provide notice of this Application to the following parties: (i) the Debtors; (ii) counsel to the Debtors; (iii) the U.S. Trustee; (iv) counsel to the Official Committee of Unsecured Creditors; (v) counsel to the administrative agent and collateral agent under the DIP Facility and ABL Credit Facility; and (vi) counsel to Wilmington Trust, N.A., as indenture trustee under the Senior Notes. K&S submits that no other or further notice be given.

WHEREFORE, K&S, in connection with services rendered on behalf of the Debtors during the Fee Period, respectfully requests (i) compensation in the amount of \$608,245.50, consisting of (a) \$578,381.00 for the period from the Petition Date (as defined herein) through and including October 31, 2020, (b) \$14,864.50 for the period from November 1, 2020 through and including November 30, 2020, and (c) \$15,000,<sup>6</sup> which is an estimate of fees that will be incurred for the period December 1, 2020 through the entry of an order approving this Application (the “**Gap Period**”), and (ii) payment of \$55,867.96 for the actual, necessary expenses that K&S incurred in connection with such services during the Fee Period.

*[Remainder of Page Intentionally Blank]*

---

<sup>6</sup> To the extent the amount of fees actually incurred during the Gap Period is less than the amount estimated in this Application, K&S will inform the Debtors and only the actual amount of fees incurred will be paid by the Debtors if this Application is approved. To the extent the amount of fees actually incurred during the Gap Period is more than the amount estimated in this Application, K&S will waive any additional amount of fees incurred during the Gap Period.

Dated: December 18, 2020  
New York, New York

**KING & SPALDING LLP**

*/s/ Arthur Steinberg*

---

Arthur Steinberg  
Stephen J. Orava  
Scott Davidson  
1185 Avenue of the Americas  
New York, New York 10036-2601  
Telephone: (212) 556-2100  
Facsimile: (212) 556-2222

*Special Counsel to the Debtors and Debtors in  
Possession*

**Exhibit A**

**ORAVA DECLARATION**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

In re:	§	Chapter 11
	§	
BRIGGS & STRATTON	§	Case No. 20-43597-399
CORPORATION, <i>et al.</i> ,	§	
	§	(Joint Administration)
Debtors.	§	
	§	
	§	

**DECLARATION OF STEPHEN J. ORAVA IN SUPPORT OF THE  
FIRST INTERIM AND FINAL FEE APPLICATION OF KING & SPALDING LLP  
FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT  
OF EXPENSES INCURRED AS SPECIAL COUNSEL TO THE  
DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD FROM  
JULY 20, 2020 THROUGH ENTRY OF AN ORDER APPROVING THIS APPLICATION**

I, STEPHEN J. ORAVA, being duly sworn, state the following under penalty of perjury:

1. I am a partner of the law firm King & Spalding LLP (“K&S”), an international law firm with offices across the United States and internationally. I am admitted, practicing, and a member in good standing of the bars of the State of Virginia and the District of Columbia. There are no disciplinary proceedings pending against me.

2. I have reviewed the *First Interim and Final Fee Application of King & Spalding LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Counsel to the Debtors and Debtors in Possession for the Period from July 20, 2020 Through Entry of an Order Approving This Application* (the “**Application**”)<sup>7</sup> filed contemporaneously herewith. To the best of my knowledge, information and belief, the statements contained in the

---

<sup>7</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Application.

Application are true and correct. In addition, I believe that the Application complies with the Local Bankruptcy Rules.

3. In connection herewith, I also certify that:
  - a. to the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought in the Application are permissible under the relevant rules, court orders and Bankruptcy Code provisions;
  - b. the fees and disbursements sought in the Application are billed at rates customarily employed by K&S and generally accepted by K&S's clients. In addition, none of the professionals seeking compensation varied their hourly rates based on the geographic location of the Debtors' cases;
  - c. K&S did not increase any rates for its professionals or paraprofessionals;
  - d. K&S is (i) not seeking compensation for fees spent preparing, reviewing and revising invoices that would not be compensable outside of bankruptcy and (ii) is not seeking compensation for fees spent reviewing or revising time records other than for redaction of privileged and/or confidential information;
  - e. in providing a reimbursable expense, K&S does not make a profit on that expense, whether the service is performed by K&S in-house or through a third party;
  - f. in accordance with Bankruptcy Rule 2016(a) and Bankruptcy Code section 504, no agreement or understanding exists between K&S and any other person for the sharing of compensation to be received in connection with the chapter 11 cases except as authorized pursuant to the Bankruptcy Code, Bankruptcy Rules and Local Bankruptcy Rules; and
  - g. all services for which compensation is sought were professional services on behalf of the Debtors and not on behalf of any other person.

*[Remainder of Page Intentionally Blank]*

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 and belief.

Dated: December 18,  
2020 Washington, DC

*/s/ Stephen J. Orava*

---

Stephen J. Orava

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW

2nd Floor

Washington, DC 20006-47077

Email: [sorava@kslaw.com](mailto:sorava@kslaw.com)

**Exhibit B**

**COMPENSATION BY MATTER  
JULY 20, 2020 THROUGH NOVEMBER 30, 2020**

<b>Project Category</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
CARB Tier IV SORE Rulemaking	6.6	\$6,120.50
Emissions Counseling	13.1	\$12,126.50
EU Regulatory and Industry Association Work	50.0	\$41,050.50
AD/CVD – Large Vertical Engines	160.9	\$140,359.00
AD/CVD – Small Vertical Engines	358.1	\$260,797.00
Walk-Behind Lawnmower AD/CVD	6.1	\$6,129.00
Opposition to 301 Exclusion Extension	11.9	\$10,465.00
Retention and Fee Applications	128.9	\$116,198.00
<b>TOTALS</b>	<b>735.6</b>	<b>\$593,245.50</b>



**Exhibit C**

**COMPENSATION BY PROFESSIONAL  
JULY 20, 2020 THROUGH NOVEMBER 30, 2020**

The attorneys who rendered professional services in these chapter 11 cases from July 20, 2020 through November 30, 2020 are:

<b>Name of Professional Individual</b>	<b>Position</b>	<b>Department</b>	<b>Year Admitted</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Jamieson Greer	Partner	Government Matters	2007	\$820.00	138.0	\$113,160.00
Ulf Grundmann	Partner	Government Matters	1995	\$855.00	9.1	\$7,780.50
Joelle Herschtel	Partner	Government Matters	1987	\$1,025.00	1.5	\$1,537.50
Logan MacCuish	Partner	Government Matters	2011	\$895.00	4.3	\$3,848.50
Granta Nakayama	Partner	Government Matters	1994	\$1,290.00	0.9	\$1,161.00
Steve Orava	Partner	Government Matters	1993	\$1,080.00	109.1	\$117,828.00
Jeff Spigel	Partner	Government Matters	1992	\$1,175.00	0.5	\$587.50
Brian Stansbury	Partner	Government Matters	2002	\$930.00	20.1	\$18,693.00
Arthur Steinberg	Partner	Corporate, Finance and Investments	1980	\$1,695.00	13.5	\$22,882.50
Jeff Telep	Partner	Government Matters	1990	\$1,040.00	0.7	\$728.00
Stephen Vaughn	Partner	Government Matters	1991	\$1,075.00	60.0	\$64,500.00
Amina Dammann	Counsel	Government Matters	2008	\$845.00	19.6	\$16,562.00
Scott Davidson	Counsel	Corporate, Finance and Investments	1996	\$1,215.00	34.6	\$42,039.00
Daniel Schneiderman	Counsel	Government Matters	1996	\$1,005.00	1.6	\$1,608.00
Jake Jumbeck	Associate	Corporate, Finance and Investments	2017	\$725.00	3.8	\$2,755.00
Elisabeth Kohoutek	Associate	Government Matters	2012	\$715.00	13.0	\$9,295.00
Clint Long	Associate	Government Matters	2013	\$655.00	86.2	\$56,461.00
Mercedes Morno	Associate	Government Matters	2014	\$560.00	15.7	\$8,792.00

<b>Name of Professional Individual</b>	<b>Position</b>	<b>Department</b>	<b>Year Admitted</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Leia Shermohammed	Associate	Corporate, Finance and Investments	2015	\$670.00	59.9	\$40,133.00
Pat Togni	Associate	Government Matters	2004	\$770.00	8.9	\$6,853.00
<b>Total for Attorneys:</b>					<b>601.0</b>	<b>\$537,204.50</b>

The consultants who rendered professional services are:

<b>Name of Professional Individual</b>	<b>Position</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Bonnie Byers	Consultant	Government Matters	\$850.00	30.3	\$25,755.00
Edmond O'Neill	Consultant	Government Matters	\$795.00	6.5	\$5,167.50
<b>Total:</b>				<b>36.8</b>	<b>\$30,922.50</b>

The project assistants who rendered professional services are:

<b>Name of Professional Individual</b>	<b>Position</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Charles DeFilippo	Project Assistant	Government Matters	\$240.00	10.6	\$2,544.00
Daria Fogan	Project Assistant	Government Matters	\$240.00	3.0	\$720.00
Valerie He	Project Assistant	Government Matters	\$250.00	3.8	\$950.00
Morayma Linarez	Project Assistant	Government Matters	\$250.00	9.3	\$2,325.00
Jillian Provost	Project Assistant	Government Matters	\$225.00	54.2	\$12,195.00
<b>Total:</b>				<b>80.9</b>	<b>\$18,734.00</b>

The paraprofessionals who rendered professional services are:

<b>Name of Professional Individual</b>	<b>Position</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Natasha Gadsden	Paralegal	Trial and Global Disputes	\$375.00	12.2	\$4,575.00
John McCullough	Managing Clerk	Trial and Global Disputes	\$440.00	1.0	\$440.00
Kathleen Noebel	Paralegal	Corporate, Finance and Investments	\$435.00	1.3	\$565.50
Ron Palmer	Librarian	Library	\$350.00	1.2	\$420.00
Laurie Rexroad	Paralegal	Trial and Global Disputes	\$320.00	1.2	\$384.00
<b>Total:</b>				<b>16.9</b>	<b>\$6,384.50</b>

**Exhibit D**

**BLENDING HOURLY RATES  
JULY 20, 2020 THROUGH NOVEMBER 30, 2020**

The total fees for the Fee Period (through November 30, 2020) are:

<b>Professionals</b>	<b>Blended Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Partners and Counsel	\$998.59	413.5	\$412,915.50
Associates	\$662.87	187.5	\$124,289.00
Consultants	\$840.29	36.8	\$30,922.50
Project Assistants	\$231.57	80.9	\$18,734.00
Paraprofessionals	\$377.78	16.9	\$6,384.50
<b>Blended Attorney Rate</b>	<b>\$893.85</b>	<b>601.0</b>	<b>\$537,204.50</b>
<b>Total:</b>	<b>\$806.48</b>	<b>735.6</b>	<b>\$593,245.50</b>



**Exhibit E**

**EXPENSE SUMMARY**  
**JULY 20, 2020 THROUGH NOVEMBER 30, 2020**

Expense Category	Total Expenses
CapTrade Professional Fees	\$55,795.37
Document Delivery	\$72.59
<b>TOTAL</b>	<b>\$55,867.96</b>

**Exhibit F**

**K&S DETAILED TIME RECORDS AND EXPENSES**  
**JULY 20, 2020 THROUGH NOVEMBER 30, 2020**

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10370666  
Invoice Date 08/28/20  
Client No. 23067  
Matter No. 735001

RE: CARB Tier IV SORE Rulemaking  
Client Matter Reference: 829

For questions, contact:  
Granta Nakayama 1 202 626 3733

For Professional Services Rendered through 07/31/20:

Fees	\$	4,818.50
<b>Total this Invoice</b>	<b>\$</b>	<b>4,818.50</b>

## Summary of Outstanding Invoices as of 08/21/20

Invoice No.	Invoice Date	Balance Due
10360127	07/03/20	\$ 10,570.00

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
735001 CARB Tier IV SORE Rulemaking  
08/28/20

Invoice No. 10370666  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Task</b>	<b>Activity</b>	<b>Description</b>	<b>Hours</b>
07/20/20	B Stansbury	C300	A104	Review and analyze Trinity and NERA presentations	1.0
07/22/20	B Stansbury	C100	A103	Draft and revise environmental portion of bankruptcy petition	1.0
07/23/20	B Stansbury	C300	A103	Revise bankruptcy petition	0.4
07/29/20	L MacCuish	C300	A108	Calls with ARB and others regarding transferring executive orders and certificates of conformity	0.5
07/29/20	B Stansbury	C100	A108	Confer with J. Booher regarding transfer of EPA and CARB certifications (.3); research transferability of EPA and CARB certifications (1); confer with G. Nakayama regarding transferability of EPA and CARB certifications (.3); confer with attorney Fiat Chrysler regarding transferability of EPA and CARB certifications (.3); draft advice to J. Booher regarding transfer of certificates (.2)	2.1
07/31/20	B Stansbury	C100	A104	Follow up with EPA regarding transfer of certifications	0.2
					5.2

23067 Briggs & Stratton Corporation  
735001 CARB Tier IV SORE Rulemaking  
08/28/20

Invoice No. 10370666

Page 3

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Logan MacCuish	Partner	0.5
Brian Stansbury	Partner	4.7
Total		<hr/> 5.2

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10370666  
Invoice Date 08/28/20  
Client No. 23067  
Matter No. 735001

RE: CARB Tier IV SORE Rulemaking  
Client Matter Reference: 829

For questions, contact:  
Granta Nakayama 1 202 626 3733

## REMITTANCE

*Please return this page with your remittance.*

---

---

**Amount Due This Invoice**

**\$4,818.50**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10377728  
Invoice Date 09/23/20  
Client No. 23067  
Matter No. 044001

RE: Emissions Counseling  
Client Matter Reference: 382

For questions, contact:  
Granta Nakayama 1 202 626 3733

For Professional Services Rendered through 08/31/20:

Fees	\$	6,550.50
<b>Total this Invoice</b>	<b>\$</b>	<b>6,550.50</b>

*Payment is Due Upon Receipt*



23067 Briggs & Stratton Corporation  
044001 Emissions Counseling  
09/23/20

Invoice No. 10377728  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
08/03/20	L MacCuish	Call with ARB emissions compliance Chief A. Lyons regarding transfer of ownership of ARB Executive Orders (.2); call with ARB certification manager J. Lourenco regarding same (.1); draft summary for B. Stansbury (.1)	0.4
08/03/20	G Nakayama	Telephone discussion with EPA (B. Bunker) regarding bankruptcy issues	0.2
08/12/20	L MacCuish	Revise letter regarding transfer of EPA executive orders	0.4
08/12/20	G Nakayama	Respond to question regarding certificate of conformity transfer process	0.2
08/17/20	U Grundmann	Teleconference with A. Dammann and B. Stansbury re German safety issues (.5); review background materials to prepare for call (1)	1.5
08/17/20	B Stansbury	Confer with J. Mourand re: emissions reduction technology (.5); research to prepare for call with J. Mourand (1.0); confer with A. Dammann and U. Grundmann to prepare for call with J. Mourand (.5)	2.0
08/18/20	U Grundmann	Provide legal assessment and GS certification issue	1.8
08/28/20	B Stansbury	Draft and revise letter to EPA	0.1
08/28/20	B Stansbury	Correspond with J. Booher regarding EU and Chinese transfers of certifications	0.1
08/28/20	B Stansbury	Confer with L. MacCuish regarding CARB notice letter	0.1
08/29/20	L MacCuish	Revise letter to ARB regarding transfer of ownership of ARB-issued Executive Orders	0.4
			7.2

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Ulf Grundmann	Partner	3.3
Logan MacCuish	Partner	1.2
Granta Nakayama	Partner	0.4
Brian Stansbury	Partner	2.3
Total		7.2

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

RE: Emissions Counseling  
Client Matter Reference: 382

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10377728
Invoice Date	09/23/20
Client No.	23067
Matter No.	044001

For questions, contact:  
Granta Nakayama 1 202 626 3733

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$6,550.50**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10377729  
Invoice Date 09/23/20  
Client No. 23067  
Matter No. 051001

RE: EU Regulatory and Industry Association Work  
Client Matter Reference: 2006-0529

For questions, contact:  
Granta Nakayama 1 202 626 3733

For Professional Services Rendered through 08/31/20:

Fees	\$	3,096.00
<b>Total this Invoice</b>	<b>\$</b>	<b>3,096.00</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
051001 EU Regulatory and Industry Association Work  
09/23/20

Invoice No. 10377729  
Page 2

### PROFESSIONAL SERVICES

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
08/26/20	U Grundmann	Review documents and assessment under EU laws	1.2
08/28/20	A Dammann	Confer with B. Stansbury and U. Grundmann regarding response to client's questions	0.3
08/28/20	B Stansbury	Review status update and develop action plan	0.3
08/31/20	J Herschtel	Re. change of shareholding-transfer of Emission certificates; Analysis of the ETS regulation; exchange with French registry administrator; drafting a mail of explanation concerning the notification of change in shareholders to the national administrator of ETS registry.	1.5
			<hr/> 3.3

### TIMEKEEPER SUMMARY

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Ulf Grundmann	Partner	1.2
Joëlle Herschtel	Partner	1.5
Brian Stansbury	Partner	0.3
Amina Dammann	Counsel	0.3
Total		<hr/> 3.3

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10377729
Invoice Date	09/23/20
Client No.	23067
Matter No.	051001

RE: EU Regulatory and Industry Association Work  
Client Matter Reference: 2006-0529

For questions, contact:  
Granta Nakayama 1 202 626 3733

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$3,096.00**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10377730  
Invoice Date 09/23/20  
Client No. 23067  
Matter No. 735001

RE: CARB Tier IV SORE Rulemaking  
Client Matter Reference: 829

For questions, contact:  
Granta Nakayama 1 202 626 3733

For Professional Services Rendered through 08/31/20:

Fees	\$	1,302.00
<b>Total this Invoice</b>	<b>\$</b>	<b>1,302.00</b>

## Summary of Outstanding Invoices as of 09/23/20

Invoice No.	Invoice Date	Balance Due
10360127	07/03/20	\$ 10,570.00

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
735001 CARB Tier IV SORE Rulemaking  
09/23/20

Invoice No. 10377730  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Task</b>	<b>Activity</b>	<b>Description</b>	<b>Hours</b>
08/03/20	B Stansbury	C100	A103	Draft and revise overview of how EPA and CARB handle transfer of CoCs and EOs	0.3
08/03/20	B Stansbury	C100	A108	Confer with J. Booher regarding additional discussions with EPA and CARB	0.1
08/03/20	B Stansbury	C100	A108	Correspond with J. Booher regarding EPA and CARB engagement on transfer of CoCs	0.1
08/11/20	B Stansbury	C100	A108	Confer with J. Booher regarding engagement with EPA on COCs	0.1
08/12/20	B Stansbury	C100	A103	Draft and revise letter to EPA re transfer of COCs	0.8
					1.4

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Brian Stansbury	Partner	1.4
Total		1.4

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

RE: CARB Tier IV SORE Rulemaking  
Client Matter Reference: 829

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10377730
Invoice Date	09/23/20
Client No.	23067
Matter No.	735001

For questions, contact:  
Granta Nakayama 1 202 626 3733

## REMITTANCE

*Please return this page with your remittance.*

---

<b>Amount Due This Invoice</b>	<b>\$1,302.00</b>
--------------------------------	-------------------

*Payment is Due Upon Receipt*



# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10375378  
Invoice Date 09/24/20  
Client No. 23067  
Matter No. 184001

RE: AD/CVD - Large Vertical Engines  
Client Matter Reference: 920

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 08/31/20:

Fees	\$	58,069.50
Expenses		16,153.25
<b>Total this Invoice</b>	<b>\$</b>	<b>74,222.75</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
184001 AD/CVD - Large Vertical Engines  
09/24/20Invoice No. 10375378  
Page 2**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
07/20/20	S Orava	Prepare for and teleconference with third party counsel regarding investigation issues (.7); correspondence and teleconferences regarding communication to agencies regarding bankruptcy (1.2); correspondence with Kohler's counsel (.2)	2.1
07/22/20	S Orava	Teleconference with client and counsel regarding steps in bankruptcy	0.6
07/24/20	B Byers	Review creditworthiness allegation in the large engines CVD case	0.4
07/24/20	J Greer	Review and analyze respondent submission (1.3); draft comments on the preliminary determination (2.4)	3.7
07/24/20	S Orava	Prepare for and attend teleconference with counsel for Kohler regarding cooperation at ITC and status of CVD investigation (.6); review Kohler's submission alleging uncreditworthiness of Chinese respondents (.7); review Loncin's pre-preliminary comments and response to questionnaire (.4)	1.7
07/24/20	S Vaughn	Confer with co-counsel regarding next steps in ITC investigations	0.6
07/27/20	J Greer	Review and analyze respondent pre-preliminary comments (.3); analyze the record on surrogate values (2.0); draft comments on preliminary determination (4.5)	6.8
07/27/20	S Vaughn	Analyze issues presented by potential exclusions regarding commercial engines	0.5
07/28/20	J Greer	Analyze surrogate financial statements (1.0); draft pre-preliminary comments (5.5); review analysis from Capital Trade on pre-preliminary comments (.8); review and analyze respondent submissions (1.5)	8.8
07/29/20	C DeFilippo	Distribute documents for review	0.1
07/29/20	J Greer	Draft comments on the preliminary determination (6.2); analyze the record regarding surrogate value inputs (1.1)	7.3
07/30/20	C DeFilippo	Prepare, submit, and serve pre-preliminary comments	1.5
07/30/20	J Greer	Draft comments on the preliminary determination (1.1); review, finalize, and file the same (.8)	1.9
07/30/20	S Orava	Review and revise pre-prelim comments and correspondence with Mr. Greer	1.4
07/31/20	D Fogan	Docket business proprietary documents from the Department of Commerce	0.4
08/05/20	S Vaughn	Teleconference with company official to discuss latest developments in litigation	0.5
08/07/20	S Orava	Draft talking points (1.9); correspondence with Mr. Booher regarding briefing for KPS (.4); teleconference with Briggs and KPS regarding summary and status of AD/CVD investigations (.8); review rebuttal to uncreditworthiness allegations (.3)	3.4

23067 Briggs & Stratton Corporation  
184001 AD/CVD - Large Vertical Engines  
09/24/20Invoice No. 10375378  
Page 3

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
08/07/20	J Provost	Download and distribute memorandum pertaining to correction of deadlines, Letter of Pre-Preliminary Determination Comments, Data requests, and response to data request	0.6
08/10/20	J Greer	Review and analyze respondent pre-preliminary comments	0.4
08/10/20	S Orava	Review documents and correspondence with Mr. Greer regarding rebuttal to pre-preliminary comments of Loncin (.3); review and respond to emails from CBP regarding presenting cases and addressing evasion concerns (.3)	0.6
08/10/20	J Provost	Download and distribute data request and response to Q&V data (.3); download and distribute new subsidy allegation benchmark memorandum (.4)	0.7
08/13/20	J Greer	Review preliminary determination calculations	0.3
08/13/20	S Orava	Teleconferences and correspondence with Commerce, team, and Mr. Booher regarding AD preliminary determination (2.3); review press release and other documents and associated correspondence (1.4)	3.7
08/13/20	J Provost	Distribute memorandum regarding preliminary issues and determinations and unpublished Federal Registrar	0.2
08/14/20	C DeFilippo	Distribute preliminary calculations	1.0
08/14/20	J Greer	Review preliminary determination calculations	0.2
08/14/20	J Provost	Download and circulate documents from DOC docket including three memos pertaining to preliminary calculations, a memorandum regarding separate preliminary rates, a memorandum regarding SV preliminary calculations, and two data attachments	0.5
08/17/20	S Orava	Teleconference with Mr. Vaughn and correspondence regarding comments on ITC questionnaires and underlying data issues (.8); review draft comments on ITC questionnaire and correspondence with Mr. Long (.3)	1.1
08/17/20	J Provost	Distribute business proprietary documents versions regarding Q&V shipment data and other business data	0.3
08/17/20	S Vaughn	Analyze issues to be addressed in the final phase of the ITC's investigation	2.0
08/18/20	J Greer	Review preliminary determination analysis regarding potential ministerial errors (.3); prepare summary of key issues for preliminary determination (.6)	0.9
08/18/20	S Orava	Teleconference with Mr. Booher regarding determinations (.3); correspondence with Mr. Greer and Mr. Booher regarding summary of key technical issues (.5)	0.8
08/18/20	J Provost	Distribute and serve questionnaire	0.2
08/19/20	S Orava	Revise feedback email regarding technical issues for Mr. Booher (.3); review documents and prepare email to Mr. O'Neill regarding import data reports for purposes of preparing for ITC final phase (.6)	0.9
08/19/20	J Provost	Prepare and distribute Audited Financial statements to attorneys	0.4

23067 Briggs & Stratton Corporation  
184001 AD/CVD - Large Vertical Engines  
09/24/20

Invoice No. 10375378  
Page 4

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
08/20/20	J Greer	Analyze respondent ministerial comments (.5); analyze the record regarding the same (.4)	0.9
08/20/20	S Orava	Correspondence with Mr. Greer regarding post-prelim "ministerial error" comments by Zongshen and next steps	0.2
08/20/20	J Provost	Distribute Federal Registrar preliminary notice and ministerial comment errors to attorneys and economic consultants	0.4
08/21/20	J Greer	Review respondent ministerial comments (.6); participate in teleconference with Mr. Anderson regarding the same (.2); draft reply to the same (1.3)	2.1
08/21/20	S Orava	Review reply to post-prelim comments of Zongshen and correspondence with Mr. Greer	0.4
08/21/20	J Provost	Distribute APO and PV versions of Monthly Q&V data memorandum and related excel files for AD and CVD investigations (.6); distribute APO versions of preliminary calculations memorandum and related excel files to Mr. Greer and upload to economic consultants (.5); distribute granting of extension to respondent for late comments on questionnaire response (.1); distribute preliminary ITC letter to attorneys (.2)	1.4
08/24/20	J Greer	Draft, finalize, and file rebuttal comments on respondent submission	0.4
08/24/20	S Orava	Teleconference with Mr. Booher regarding list of open items, including comments on ITC questionnaires, exclusion requests, and commercial developments (.5); correspondence with Mr. Vaughn and Mr. Booher regarding next steps and developments affecting ITC final phase and planning for ITC final phase organizational call (.7); analyze updated import data for engines and mowers and correspondence with Mr. Vaughn (.3)	1.5
08/24/20	J Provost	Prepare document for filing for Mr. Greer (1.2); file document for Mr. Greer (.3)	1.5
08/24/20	S Vaughn	Analyze issues likely to arise in final phase of ITC investigation	1.8
08/25/20	S Orava	Review and respond to emails from CBP and Kohler's counsel regarding enforcement of any AD/CVD orders	0.2
08/25/20	J Provost	Distribute SRA supplemental questionnaire and Public version to attorneys and consultants	0.2
08/28/20	S Vaughn	Analyze responses to draft questionnaires (1.3); identify issues to be addressed in final phase of ITC investigation (.6)	1.9
			69.4

23067 Briggs & Stratton Corporation  
184001 AD/CVD - Large Vertical Engines  
09/24/20

Invoice No. 10375378  
Page 5

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Jamieson Greer	Partner	33.7
Steve Orava	Partner	18.6
Stephen Vaughn	Partner	7.3
Bonnie Byers	Consultant	0.4
Charles DeFilippo	Other	2.6
Daria Fogan	Other	0.4
Jillian Provost	Project Assistant	6.4
Total		69.4

**Expenses Incurred**

08/06/20	Professional Fees - VENDOR: Capital Trade, Inc. INVOICE#: 11236 DATE: 8/6/2020 For professional services rendered	10,569.50
09/09/20	Professional Fees - VENDOR: Capital Trade, Inc. INVOICE#: 11281 DATE: 9/9/2020 For professional services rendered	5,583.75
	Total Expenses	16,153.25

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

RE: AD/CVD - Large Vertical Engines  
Client Matter Reference: 920

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10375378
Invoice Date	09/24/20
Client No.	23067
Matter No.	184001

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$68,639.00**

*Payment is Due Upon Receipt*



August 06, 2020

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

Re: Large Gasoline Engines

Dear Mr. Orava:

The attached invoice covers Capital Trade, Inc.'s fees and expenses for the period July 20 through July 31, 2020, in conjunction with the above referenced matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles L. Anderson", with a long horizontal flourish extending to the right.

Charles L. Anderson

Enclosures



**Capital Trade, Inc.**

1200 18th Street, NW, Suite 601  
Washington, DC 200362526  
Tel: (202) 463-1850 Fax: (202) 463-1855

## Invoice

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

**Invoice Date:** Aug 6, 2020  
**Invoice Num:** 11236  
**Billing Through:** Jul 31, 2020

**Large Gasoline Engines (1085-000:)** - Managed by (CAnderson)

Professional Services:

<u>Employee</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles L. Anderson	18.50	\$570.00	\$10,545.00
<b>Total Services:</b>			<b>\$10,545.00</b>

Reimbursable Expenses:

<u>Expense Type</u>	<u>Amount</u>
Computer Charges	\$24.50
<b>Total Expenses:</b>	<b>\$24.50</b>

**Project (1085-000:) Total Amount Due:** **\$10,569.50**

**Current Month's fee & expenses:** **\$10,569.50**

Past Invoices outstanding:

**Total Current and Outstanding Invoices:** **\$10,569.50**

**Payment is due within 30 days. Please pay by check or wire transfer to:**

**By check :**

Capital Trade, Inc.  
ATTN: Vivienne Ramgeet  
1200 18th Street, NW  
Suite 601  
Washington, D.C. 20036

**By Wire Transfer:**

SunTrust Bank  
900 17th Street, N.W.  
Washington, D.C. 20006  
Bank Routing #: 061 000 104  
Capital Trade Acct # 1000183401693

**Please reference the project matter and invoice numbers on your payment.**





**Capital Trade, Inc.**  
1200 18th Street, NW, Suite 601  
Washington, DC 200362526  
Tel: (202) 463-1850 Fax: (202) 463-1855

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

## Invoice

**Invoice Date:** Aug 6, 2020

**Invoice Num:** 11236

**Billing Through:** Jul 31, 2020

**Large Gasoline Engines** (1085-000:) - Managed by (CAnderson)

**Professional Services:**

<u>Date</u>	<u>Description</u>	<u>Hours</u>
<b>Charles L. Anderson</b>		
07/26/2020	Worked on pre prelim comments (2.20), surrogate values (0.80).	3.00
07/27/2020	Drafted pre-prelim comments.	9.50
07/28/2020	Worked on pre-prelim comments. Put together arguments involving classification of complex parts and components.	6.00
<b>Charles L. Anderson</b>	<b>Total Hours:</b>	<b>18.50</b>



September 09, 2020

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

Re: Large Gasoline Engines

Dear Mr. Orava:

The attached invoice covers Capital Trade, Inc.'s fees and expenses for August 2020, in conjunction with the above referenced matter.

Sincerely,

A handwritten signature in black ink, appearing to be "C. Anderson", with a long horizontal line extending to the right.

Charles L. Anderson

Enclosures



## Invoice

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

**Invoice Date:** Sep 9, 2020  
**Invoice Num:** 11281  
**Billing Through:** Aug 31, 2020

**Large Gasoline Engines (1085-000:)** - Managed by (CAnderson)

Professional Services:

<u>Employee</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles L. Anderson	3.50	\$570.00	\$1,995.00
Mary Ann McCleary	7.50	\$475.00	\$3,562.50
<b>Total Services:</b>			<b>\$5,557.50</b>

Reimbursable Expenses:

<u>Expense Type</u>	<u>Amount</u>
Computer Charges	\$26.25
<b>Total Expenses:</b>	<b>\$26.25</b>

**Project (1085-000:) Total Amount Due:** **\$5,583.75**

**Current Month's fee & expenses:** **\$5,583.75**

Past Invoices outstanding:

**Total Current and Outstanding Invoices: \$5,583.75**

Payment is due within 30 days. Please pay by check or wire transfer to:

**By check :**  
Capital Trade, Inc.  
ATTN: Vivienne Ramgeet  
1200 18th Street, NW  
Suite 601  
Washington, D.C. 20036

**By Wire Transfer:**  
SunTrust Bank  
900 17th Street, N.W.  
Washington, D.C. 20006  
Bank Routing #: 061 000 104  
Capital Trade Acct # 1000183401693

Please reference the project matter and invoice numbers on your payment.



Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

## Invoice

**Invoice Date:** Sep 9, 2020

**Invoice Num:** 11281

**Billing Through:** Aug 31, 2020

**Large Gasoline Engines** (1085-000:) - Managed by (CAnderson)

**Professional Services:**

<u>Date</u>	<u>Description</u>	<u>Hours</u>
<b>Charles L. Anderson</b>		
08/17/2020	Reviewed prelim dumping margins and I & D memo.	1.50
08/21/2020	Reviewed CZ ministerial error allegation.	1.60
08/22/2020	Checked the CZ ministerial calculations against original numbers.	0.40
	<b>Charles L. Anderson</b>	<b>Total Hours: 3.50</b>
<b>Mary Ann McCleary</b>		
08/14/2020	Downloaded preliminary determination disclosure documents for Loncin and Zongchen (0.40), reviewed Loncin calculation memos and SAS programs and output (.80) reviewed Zonchen calculation memos and SAS programs (0.80).	2.00
08/17/2020	Continued review of preliminary determination DOC SAS programs and results for Loncin (0.80) and Zonchen (0.80), recreated SAS program and results using similar methodology for Loncin (1.30) and Zonchen (1.60) and checked for clerical errors for Loncin(0.60) and Zonchen (0.20), wrote up same (0.20).	5.50
	<b>Mary Ann McCleary</b>	<b>Total Hours: 7.50</b>

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10375443  
Invoice Date 09/24/20  
Client No. 23067  
Matter No. 184002

RE: AD/CVD - Small Vertical Engines  
Client Matter Reference: 938

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 08/31/20:

Fees	\$	123,549.50
Expenses		22,457.46
<b>Total this Invoice</b>	<b>\$</b>	<b>146,006.96</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
09/24/20Invoice No. 10375443  
Page 2**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
07/20/20	B Byers	Finalize and file the benchmark submission for small engines	1.0
07/20/20	C DeFilippo	Prepare, submit, and serve benchmark submission (1.1); distribute supplemental questionnaires (.4)	1.5
07/20/20	S Orava	Review submission on benchmarks (.4); correspondence with Ms. Byers regarding same (.1); review Loncin submission (.3); correspondence regarding draft ITC questionnaires (.3)	1.1
07/23/20	S Orava	Teleconference with Mr. Booher regarding potential import of engines from China (.4); teleconference with Mr. Vaughn regarding same (.3); correspondence with Mr. Booher regarding same (.2); review filings and timetable adjustments (.4)	1.3
07/24/20	S Orava	Correspondence with Ms. Byers regarding uncreditworthiness of Chinese respondents	0.2
07/27/20	C DeFilippo	Distribute pre-preliminary comments	0.3
07/27/20	J Greer	Teleconference with Ms. Morno regarding surrogate values submission (.3); teleconference with Mr. Anderson at Capital Trade regarding the same (.2)	0.5
07/27/20	M Morno	Conference with Mr. Greer to discuss surrogate value submission (.4); prepare surrogate value submission for filing in antidumping investigation (2.6)	3.0
07/27/20	M Morno	Prepare surrogate value submission for filing in antidumping investigation	2.6
07/27/20	S Orava	Teleconference with Commerce and follow-up with Mr. Greer regarding AD/CVD alignment and exclusion meeting (.3); review Respondent submissions, including pre-prelim comments (.4); review various filings from Respondents and timetable for responses (.3)	1.0
07/28/20	C DeFilippo	Distribute supplemental questionnaire and supplemental questionnaire response	0.4
07/28/20	J Greer	Prepare for call on scope with the Commerce Department (.7); participate in teleconference with Mr. Orava and Commerce Department staff regarding scope (.3); review supplemental questionnaires for respondents (.5)	1.5
07/28/20	M Morno	Prepare surrogate value submission for filing in antidumping investigation	0.9
07/28/20	S Orava	Teleconference with Mr. Greer and with Commerce staff regarding scope exclusion request (.6); correspondence with interested parties regarding developments on exclusion request and engagement with Commerce (.2)	0.8
07/29/20	M Morno	Prepare surrogate value submission for filing in antidumping investigation	1.1
07/29/20	S Orava	Correspondence and teleconference with counsel for one interested party regarding revision to scope exclusion and	0.4

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
09/24/20Invoice No. 10375443  
Page 3

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
		follow-up teleconference with Mr. Booher	
07/31/20	C DeFilippo	Prepare surrogate value submission	0.3
07/31/20	M Morno	Prepare surrogate value submission, including narrative and accompanying exhibits, for filing in antidumping investigation	3.3
07/31/20	S Orava	Teleconference with Mr. Anderson at CapTrade regarding scope exclusion and dumping estimates (.4); correspondence with counsel for other parties and Mr. Booher regarding revisions to potential scope exclusion (.6)	1.0
08/01/20	J Greer	Review surrogate value submission and exhibits	2.5
08/01/20	M Morno	Revise surrogate value submission for filing in antidumping investigation	0.8
08/02/20	B Byers	Review Kohler pre-prelim comments (.2); review status of questionnaires and extension requests (.1); draft email to Mr. Orava regarding status and next steps (.2)	0.5
08/02/20	D Fogan	Prepare comments for submission to the Department of Commerce	1.4
08/02/20	M Morno	Revise surrogate value submission	0.5
08/02/20	S Orava	Review surrogate values submission and correspondence with Ms. Morno (.4); correspondence with Ms. Byers and Mr. Long regarding drafting submissions in response to Respondents questionnaire responses (.4)	0.8
08/03/20	D Fogan	Prepare document for submission to the Department of Commerce (1.0); submit the document to the Department of Commerce (.2)	1.2
08/03/20	J Greer	Review and analyze respondent submissions	0.6
08/03/20	M Morno	Finalize surrogate value submission for filing in antidumping investigation	0.3
08/03/20	S Orava	Correspondence with Mr. Booher and with Commerce regarding revisions to scope exclusion language (.5); correspondence and teleconference with interested party regarding scope exclusion and report developments to Mr. Booher (.3)	0.8
08/03/20	D Schneiderman	Review and revise proposed scope exclusion language for commercial and heavy commercial engines (.4); correspond with Messrs. Orava and Greer regarding same (.1)	0.5
08/04/20	C DeFilippo	Distribute supplemental questionnaire responses (.6); prepare, submit, and serve request to align determinations (1.3)	1.9
08/04/20	J Greer	Review and analyze respondent submissions (1.3); review request for alignment (.3)	1.6
08/04/20	C Long	Draft pre-preliminary determination comments regarding new subsidy allegation and Government of China's questionnaire responses	4.1
08/04/20	M Morno	Draft and finalize request to align antidumping and countervailing duty investigations	1.1
08/04/20	S Orava	Review and revise submission to align proceedings and	1.8

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
09/24/20Invoice No. 10375443  
Page 4

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
		correspondence with Ms. Morno (.2); correspondence with client team regarding revisions to technical conditions in scope exclusion (.7); correspondence and teleconferences with Mr. Schneiderman and counsel for interested party regarding revisions to scope exclusion (.9)	
08/05/20	B Byers	Begin drafting pre-prelim comments on Kohler for the CVD investigation (1.1); review Kohler pre-prelim comments and initial questionnaire responses (1.4)	2.5
08/05/20	J Greer	Conduct research on surrogate values	0.2
08/05/20	C Long	Draft pre-preliminary determination comments regarding Zongshen's questionnaire responses	6.2
08/05/20	S Orava	Correspondence with client and interested party regarding technical parameters for revised scope exclusion	0.3
08/06/20	B Byers	Work on pre-prelim comments (2.6); confer with Mr. Long regarding same (.3); draft section on Export Buyers' Credit (1.3)	4.2
08/06/20	J Greer	Teleconference with Mr. Anderson at Capital Trade regarding respondent submission (.4); analyze respondent submission (.4)	0.8
08/06/20	C Long	Teleconference with Ms. Byers regarding pre-preliminary determination comments (.3); emails with Mr. DeFilippo regarding revisions to service lists in CVD investigation (0.1); draft pre-preliminary determination comments on electricity and Export Buyer's Credit subsidies (2.8)	3.2
08/06/20	S Orava	Correspondence with Ms. Byers regarding Kohler's deficiencies in CVD response (.2); correspondence with interested parties and Messrs. Greer and Vaughn regarding revisions to scope exclusion and impact on various aspects of case (.8)	1.0
08/07/20	B Byers	Continue drafting pre-prelim comments for filing	4.2
08/07/20	C DeFilippo	Prepare, submit, and serve revised scope comments	0.8
08/07/20	J Greer	Draft comments rebutting respondent submission (2.1); participate in teleconference with Mr. Orava regarding the same (.1)	2.2
08/07/20	C Long	Revise pre-preliminary determination comments (2.1); email with Ms. Byers regarding pre-preliminary determination comments (.1)	2.2
08/07/20	S Orava	Review scope exclusion submissions and correspondence with Mr. Booher (.2); correspondence with interested parties and Commerce regarding scope exclusion (.2); review extension documents, notice postponing determination, and resubmission of exhibits (.5)	0.9
08/07/20	J Provost	Download and distribute response rebuttal comments, memo pertaining to response to scope comments, and new subsidy allegation questionnaires	0.4
08/07/20	S Vaughn	Prepare for and participate in conference call with company officials regarding likely next steps in litigation	1.2
08/08/20	B Byers	Continue drafting pre-prelim comments (3.4); circulate draft to	4.3



23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
09/24/20Invoice No. 10375443  
Page 5

Date	Timekeeper	Description	Hours
		Mr. Long (.2); make edits to document and circulate to Mr. Orava (.7)	
08/08/20	C DeFilippo	Distribute documents for review per Mr. Greer's request	0.3
08/08/20	J Greer	Draft comments rebutting respondent submission	1.6
08/08/20	C Long	Revise pre-preliminary determination comments (1.0); emails with Ms. Byers regarding the same (.2)	1.2
08/09/20	J Greer	Revise comments rebutting respondent submission	0.3
08/09/20	S Orava	Review CVD pre-preliminary comments and supporting exhibits (1.9); correspondence with Ms. Byers and Mr. Long regarding comments and uncreditworthiness allegation (.4); review bullet points from Mr. Booher for Congressional meeting (.1); review and revise rebuttal to Kohler AD responses (.8); correspondence with Mr. Greer regarding same (.1)	3.3
08/10/20	B Byers	Finalize and file pre-prelim comments	3.3
08/10/20	C DeFilippo	Prepare, submit, and serve rebuttal comments (1.3); prepare and submit pre-preliminary comments (.7)	2.0
08/10/20	J Greer	Review, finalize, and file comments rebutting respondent submission	0.9
08/10/20	C Long	Perform bracket check of pre-preliminary determination comments (2.3); email with Ms. Byers regarding the same (.1)	2.4
08/10/20	J Provost	Download and distribute requests for extension and Federal Register notice of postponement of preliminary determination (.4); download and distribute supplemental questionnaires, request for information, narrative corrections, and additional memorandum (.4)	0.8
08/11/20	C DeFilippo	Prepare, submit, and serve pre-preliminary comments	0.3
08/11/20	J Greer	Review respondent submission regarding deficiencies; analyze respondent questionnaire response	0.5
08/11/20	C Long	Phone conversation with Ms. Byers regarding bracketing of pre-preliminary determination comments	0.4
08/11/20	S Orava	Review and forward filing on scope and teleconference with Mr. Booher regarding same and other developments (.4); correspondence with Mr. Greer and review documents regarding Kohler's mis-reporting of data (.4); correspondence with CBP regarding meeting to discuss evasion concerns (.2)	1.0
08/12/20	J Greer	Analyze respondent submission (.2); confer with Mr. Orava regarding the same (.2); teleconference with Mr. Anderson at Capital Trade regarding the same (.2)	0.6
08/12/20	S Orava	Review additional information on distorted reporting by Kohler and correspondence with Mr. Greer	0.3
08/12/20	J Provost	Distribute requests for hearing and 2nd extension for supplemental questionnaire response (.2); distribute documents including letter response to scope comments, letter response to comments, response to bracketing memo, and letter response to comments (.4)	0.6

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
09/24/20

Invoice No. 10375443  
Page 6

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
08/13/20	J Greer	Prepare for and participate in conference call with Commerce analyst regarding respondent submission	0.3
08/13/20	S Orava	Prepare email to CBP regarding timetable of engines cases (.2); review Kohler's rebuttal to Petitioner's pre-prelim comments (.2)	0.4
08/13/20	S Orava	Review Kohler's rebuttal to Petitioner's pre-prelim comments	0.2
08/13/20	J Provost	Download and distribute the public versions of four questionnaires	0.3
08/13/20	S Vaughn	Analyze draft questionnaires for final phase of ITC investigation	2.1
08/14/20	E O'Neill	Prepare updated import reports	0.4
08/14/20	S Orava	Review email from Mr. Vaughn and draft questionnaire regarding proposed comments to ITC (.2); prepare for and teleconference with CBP regarding engines cases and presentation to CBP on enforcement issues (.4); review and forward support letter for scope exclusion (.1)	0.7
08/14/20	J Provost	Download and circulate letter granting extension for questionnaires and letter pertaining to response to petitions pre-preliminary comments	0.3
08/14/20	S Vaughn	Analyze potential issues presented by ITC draft questionnaires (.8); discussion with client regarding next steps (.3)	1.1
08/17/20	J Greer	Review respondent submission	0.1
08/17/20	C Long	Teleconference with Mr. Vaughn regarding comments on International Trade Commission draft questionnaires (.1); draft comments on questionnaires (.9); review docket for preliminary countervailing duty determination (.1)	1.1
08/17/20	S Orava	Review respondent submissions to Commerce and Commerce reports on ex parte meetings	0.8
08/17/20	J Provost	Distribute extension request letter, ex parte phone call memo, public version of supplemental section D questionnaire, and letter extension grant	0.3
08/17/20	S Vaughn	Analyze issues presented by draft questionnaires	1.0
08/18/20	B Byers	Review preliminary determination decision memo (1.2); discussion with Mr. Long regarding same (.3)	1.5
08/18/20	C Long	Teleconference with Ms. Byers regarding countervailing duty preliminary determination and uncreditworthiness allegation (.2); emails with Mr. Vaughn, Ms. Marcus, and Ms. Rexroad regarding filing of comments on International Trade Commission draft questionnaires (.2); review countervailing duty preliminary determination and example of uncreditworthiness allegation (.5)	0.9
08/18/20	S Orava	Teleconferences with Commerce and team regarding preliminary CVD determination (.4); review documents (2.4); and correspondence with Mr. Booher regarding same (.4)	3.2
08/18/20	J Provost	Distribute and serve Preliminary scope comments memo, issues and decisions memo, Federal Register preliminary decisions, preliminary calculations memo, subsidy rates calculations	0.7

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
09/24/20

Invoice No. 10375443  
Page 7

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
		memo, and related business proprietary information documents	
08/18/20	S Vaughn	Analyze issues likely to arise in the ITC's final phase	1.1
08/19/20	B Byers	Review Zongshen calculations for any ministerial errors	1.3
08/19/20	J Greer	Review and analyze scope ruling (.7); analyze respondent submission (.8)	1.5
08/19/20	C Long	Review final version of comments on International Trade Commission draft questionnaires prior to submission (.3); emails with Mr. Vaughn and paralegals regarding submission of comments (.2); begin drafting uncreditworthiness allegation regarding Zongshen (.3); review countervailing duty determination calculations (2.1); teleconference with Ms. Byers regarding calculations (.2)	3.1
08/19/20	S Orava	Review scope memorandum (.3); correspondence with Mr. Booher regarding findings (.3); correspondence with Mr. Greer regarding timetable for briefs and rebuttals (.3)	0.9
08/19/20	J Provost	Distributing Supplemental questionnaire and related exhibits to attorneys and consultants	0.3
08/19/20	L Rexroad	Finalize and prepare for filing comments on ITC Questionnaire (.5); serve comments (.2); update Mr. Long regarding same (.2); process and circulate incoming filings and distribute to case team (.3)	1.2
08/19/20	S Vaughn	Analyze comments on draft questionnaires submitted by other parties (1.8); discussions with company officials regarding same (.5)	2.3
08/20/20	B Byers	Review question from Mr. Orava regarding coverage of mower chassis (.2); review calculation worksheets for Kohler (.9)	1.1
08/20/20	C Long	Teleconference with Mr. Orava and email with Ms. Byers regarding uncreditworthiness allegation	0.1
08/20/20	J Provost	Distribute three memos regarding comments on draft questionnaires and a memo regarding response to subsidy allegations (.3); download, distribute, and serve supplemental questionnaire and public version of supplemental questionnaire response to attorneys and consultants (.3)	0.6
08/20/20	P Togni	Correspondence with Messrs. Orava, Vaughn, and Greer and Ms. Byers regarding customs and scope-related issues (.4); legal research regarding same (.8)	1.2
08/20/20	S Vaughn	Continue to analyze issues raised in comments on the draft ITC questionnaires	1.3
08/21/20	J Greer	Review and analyze respondent supplemental questionnaire responses	1.9
08/21/20	E O'Neill	Prepare updated import reports	1.6
08/21/20	J Provost	Distribute APO and public version of letter regarding resubmission of comments on draft questionnaires for ITC investigation (.2); distribute 3rd supplemental questionnaire for Kohler and APO and PV versions of supplemental questionnaire	0.6

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
09/24/20

Invoice No. 10375443  
Page 8

Date	Timekeeper	Description	Hours
		for Chongqing Zongshen (.4)	
08/21/20	S Vaughn	Continue analyzing arguments likely to be made in final phase of ITC investigation	1.1
08/22/20	S Orava	Review submissions and notices, including comments on ITC questionnaire and findings in the preliminary CVD determination	2.3
08/23/20	S Orava	Continue reviewing submissions and notices (1.1); prepare list of open items to discuss with Mr. Booher (.5)	1.6
08/24/20	C Long	Continue drafting uncreditworthiness allegation	1.2
08/24/20	J Provost	Prepare and distribute ministerial error comment documents and related exhibits to attorneys (.4); distribute request for extension and extension grant document to attorneys (.2)	0.6
08/25/20	J Greer	Review and analyze respondent submissions	1.2
08/25/20	C Long	Continue drafting uncreditworthiness allegation (5.3); review Zongshen's ministerial error comments and calculations (.7); identify regulatory deadlines for remainder of countervailing duty investigation (.4); emails with Ms. Marcus regarding deadlines (.4)	6.8
08/25/20	S Orava	Review and revise draft uncreditworthiness allegation and correspondence with Mr. Long regarding same	0.5
08/25/20	J Provost	Distribute four APO supplemental questionnaires and four public versions of supplemental questionnaires to attorneys and consultants	0.7
08/25/20	S Vaughn	Analyze issues to be addressed in final phase of ITC investigation	1.7
08/26/20	C Long	E-mail with Ms. Byers regarding uncreditworthiness allegation	0.1
08/26/20	J Provost	Distribute letter regarding rejection of public version and cash deposit instructions	0.2
08/27/20	J Greer	Draft rebuttal comments to respondent submission	3.1
08/27/20	J Provost	Prepare exhibits, client and attorney certs, creating bracketing not final draft, public version, and final version for filing (4.5); distribute public version of supplemental questionnaire to attorneys (.2)	4.7
08/28/20	J Greer	Finalize and file rebuttal to respondent submission	0.2
08/28/20	M Morno	Finalize and file petitioner's rebuttal comments and information	0.4
08/28/20	J Provost	Edit document and update final changes (.8); file document at the DOC (.2); distribute APO and public version of supplemental questionnaire response to attorneys and consultants (.3)	1.3
08/28/20	S Vaughn	Continue to analyze responses to draft questionnaires and issues likely to arise in final phase of ITC investigation	1.1
08/29/20	J Greer	Draft rebuttal to respondent submission	2.7
08/30/20	J Greer	Prepare rebuttal comments to respondent submission	0.4
08/30/20	J Provost	Prepare client cert, exhibits, and document for response to	1.3

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
09/24/20

Invoice No. 10375443  
Page 9

Date	Timekeeper	Description	Hours
		Kohler supplemental questionnaire filing	
08/31/20	J Greer	Review, finalize, and file rebuttals to respondent submissions	0.8
08/31/20	M Morno	Finalize final and public versions of August 28, 2020 rebuttal comments and information	0.2
08/31/20	J Provost	Final edits to Public Version and Final Version of Zongshen Supplemental Questionnaire filing (.6); file documents at the DOC (.2); serve public version to counsel listed on public service list (.2); final edits to bracketing not final version of rebuttal to Kohler Supplemental Questionnaire (1.2); file final document at the DOC (.3)	2.5
			168.3

**TIMEKEEPER SUMMARY**

Timekeeper	Status	Hours
Jamieson Greer	Partner	26.0
Steve Orava	Partner	25.7
Stephen Vaughn	Partner	14.0
Daniel Schneiderman	Counsel	0.5
Clint Long	Associate	33.0
Mercedes Morno	Associate	14.2
Pat Togni	Associate	1.2
Bonnie Byers	Consultant	23.9
Edmond O'Neill	Consultant	2.0
Laurie Rexroad	Paralegal	1.2
Charles DeFilippo	Other	7.8
Daria Fogan	Other	2.6
Jillian Provost	Project Assistant	16.2
Total		168.3

**Expenses Incurred**

07/01/20	Document Delivery - VENDOR: Quick Messenger Service INVOICE#: 0610487 DATE: 7/1/2020 Delivery	72.59
08/06/20	Professional Fees - VENDOR: Capital Trade, Inc. INVOICE#: 11237 DATE: 8/6/2020 For professional services rendered	1,383.00
09/09/20	Professional Fees - VENDOR: Capital Trade, Inc. INVOICE#: 11282 DATE: 9/9/2020 For professional services rendered	21,001.87
Total Expenses		22,457.46

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

RE: AD/CVD - Small Vertical Engines  
Client Matter Reference: 938

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10375443
Invoice Date	09/24/20
Client No.	23067
Matter No.	184002

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$146,006.96**

*Payment is Due Upon Receipt*



August 06, 2020

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

Re: Small Gasoline Engines

Dear Mr. Orava:

The attached invoice covers Capital Trade, Inc.'s fees and expenses for the period July 20 through July 31, 2020, in conjunction with the above referenced matter.

Sincerely,

A handwritten signature in black ink, appearing to be "C. Anderson", with a long horizontal line extending to the right.

Charles L. Anderson

Enclosures



## Invoice

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

**Invoice Date:** Aug 6, 2020  
**Invoice Num:** 11237  
**Billing Through:** Jul 31, 2020

**Small Gasoline Engines (1086-000:)** - Managed by (CAnderson)

**Professional Services:**

<u>Employee</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles L. Anderson	1.50	\$570.00	\$855.00
<b>Total Services:</b>			<b>\$855.00</b>

**Reimbursable Expenses:**

<u>Expense Type</u>	<u>Amount</u>
Computer Charges	\$28.00
Reports (Trade Data/Annual Reports)	\$500.00
<b>Total Expenses:</b>	<b>\$528.00</b>

**Project (1086-000:) Total Amount Due:** **\$1,383.00**

**Current Month's fee & expenses:** **\$1,383.00**

**Past Invoices outstanding:**

**Total Current and Outstanding Invoices:** **\$1,383.00**

**Payment is due within 30 days. Please pay by check or wire transfer to:**

**By check :**

Capital Trade, Inc.  
ATTN: Vivienne Ramgeet  
1200 18th Street, NW  
Suite 601  
Washington, D.C. 20036

**By Wire Transfer:**

SunTrust Bank  
900 17th Street, N.W.  
Washington, D.C. 20006  
Bank Routing #: 061 000 104  
Capital Trade Acct # 1000183401693

**Please reference the project matter and invoice numbers on your payment.**





**Capital Trade, Inc.**

1200 18th Street, NW, Suite 601  
Washington, DC 200362526  
Tel: (202) 463-1850 Fax: (202) 463-1855

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

## Invoice

**Invoice Date:** Aug 6, 2020

**Invoice Num:** 11237

**Billing Through:** Jul 31, 2020

**Small Gasoline Engines** (1086-000:) - Managed by (CAnderson)

**Professional Services:**

<u>Date</u>	<u>Description</u>	<u>Hours</u>
<b>Charles L. Anderson</b>		
07/28/2020	Finalized initial surrogate value submission.	1.50
	<b>Charles L. Anderson</b>	<b>Total Hours: 1.50</b>



September 09, 2020

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

Re: Small Gasoline Engines

Dear Mr. Orava:

The attached invoice covers Capital Trade, Inc.'s fees and expenses for August 2020, in conjunction with the above referenced matter.

Sincerely,

A handwritten signature in black ink, appearing to be "C. Anderson", with a long horizontal line extending to the right.

Charles L. Anderson

Enclosures



Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

**Invoice**

**Invoice Date:** Sep 9, 2020  
**Invoice Num:** 11282  
**Billing Through:** Aug 31, 2020

**Small Gasoline Engines (1086-000):** - Managed by (CAnderson)

Professional Services:

<u>Employee</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles L. Anderson	14.50	\$570.00	\$8,265.00
Mary Ann McCleary	9.50	\$475.00	\$4,512.50
Brian Westenbroek	18.50	\$380.00	\$7,030.00
<b>Total Services:</b>			<b>\$19,807.50</b>

Reimbursable Expenses:

<u>Expense Type</u>	<u>Amount</u>
Computer Charges	\$33.25
Reports (Trade Data/Annual Reports)	\$1,161.12
<b>Total Expenses:</b>	<b>\$1,194.37</b>

**Project (1086-000:) Total Amount Due:** **\$21,001.87**

**Current Month's fee & expenses:** **\$21,001.87**

Past Invoices outstanding:

**Total Current and Outstanding Invoices:** **\$21,001.87**

**Payment is due within 30 days. Please pay by check or wire transfer to:**

**By check :**  
Capital Trade, Inc.  
ATTN: Vivienne Ramgeet  
1200 18th Street, NW  
Suite 601  
Washington, D.C. 20036

**By Wire Transfer:**  
SunTrust Bank  
900 17th Street, N.W.  
Washington, D.C. 20006  
Bank Routing #: 061 000 104  
Capital Trade Acct # 1000183401693

**Please reference the project matter and invoice numbers on your payment.**



**Capital Trade, Inc.**  
1200 18th Street, NW, Suite 601  
Washington, DC 200362526  
Tel: (202) 463-1850 Fax: (202) 463-1855

## Invoice

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

**Invoice Date:** Sep 9, 2020  
**Invoice Num:** 11282  
**Billing Through:** Aug 31, 2020

**Small Gasoline Engines (1086-000:)** - Managed by (CAnderson)

**Professional Services:**

<u>Date</u>	<u>Description</u>	<u>Hours</u>
<b>Charles L. Anderson</b>		
08/06/2020	Reviewed Kohler supplemental Section D response (2.25) and calculated dumping margins (1.25).	3.50
08/07/2020	Drafted comments on Kohler supplemental Section D response.	3.00
08/12/2020	Reviewed Kohler rebuttal and provided comments.	1.20
08/21/2020	Reviewed CZ new questionnaire response(1.20) and worked on new AD margin calculations(0.60) .	1.80
08/24/2020	Reviewed Chongqing supplemental Section D questionnaire response.	2.00
08/25/2020	Reviewed Chongqing Section D supplemental response	2.30
08/31/2020	Reviewed Kohler latest Section D response and provided comments.	.70
	<b>Charles L. Anderson</b>	<b>Total Hours: 14.50</b>
<b>Mary Ann McCleary</b>		
08/06/2020	Kohler - set up FOP and SV file (1.00), identified data issues (1.40), set up files with modified field names (0.80), set up margin program with Turkey SVs (1.30).	4.50
08/07/2020	Set up margins using Brazil SVs (0.80) Ran alternative margins with same (1.20)	2.00
08/21/2020	Chongzhen - set up supplemental data bases (0.40), ran margin scenarios (0.50), identified additional factors for SV research (0.30).	1.20
08/23/2020	Updated margin analysis programs with new CZ factors (0.70), ran alternative margin scenarios (0.80), and compiled table of results (0.30).	1.80
	<b>Mary Ann McCleary</b>	<b>Total Hours: 9.50</b>
<b>Brian Westenbroek</b>		
08/24/2020	Reviewed Chongqing supplemental D questionnaire response (1.75); analyzed FOP data file (1.50).	3.25
08/25/2020	Researched and classified new Chongqing FOPs.	5.00
08/26/2020	Researched and classified new Chongqing FOPs (2.40); compiled surrogate value data (3.25); provided items for deficiency comments (0.60).	6.25
08/27/2020	Prepared exhibits for new surrogate values for Chongqing.	4.00
	<b>Brian Westenbroek</b>	<b>Total Hours: 18.50</b>

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10375450  
Invoice Date 09/23/20  
Client No. 23067  
Matter No. 184003

RE: Walk-Behind Lawnmower AD/CVD  
Client Matter Reference: 989

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 08/31/20:

Fees	\$	5,932.50
<b>Total this Invoice</b>	<b>\$</b>	<b>5,932.50</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
184003 Walk-Behind Lawnmower AD/CVD  
09/23/20

Invoice No. 10375450  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
07/27/20	C DeFilippo	Distribute documents for the review	0.2
07/27/20	S Orava	Review request and backup documents requesting statement to Commerce and correspondence with Mr. Booher	0.3
08/05/20	S Orava	Correspondence and teleconference with Messrs. Booher and Vaughn regarding questions on application of duties	0.8
08/20/20	J Greer	Analyze scope of the investigation (.4); correspondence with internal team regarding same (.2)	0.6
08/20/20	S Orava	Correspondence and teleconferences regarding question from Mr. Booher regarding walk-behind lawn mower investigations (.7); prepare analysis for Mr. Booher (1.7)	2.4
08/20/20	S Vaughn	Analyzed issues presented by scope of walk-behind mower litigation	1.5
			5.8

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Jamieson Greer	Partner	0.6
Steve Orava	Partner	3.5
Stephen Vaughn	Partner	1.5
Charles DeFilippo	Other	0.2
Total		5.8

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10375450
Invoice Date	09/23/20
Client No.	23067
Matter No.	184003

RE: Walk-Behind Lawnmower AD/CVD  
Client Matter Reference: 989

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$5,932.50**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10375449  
Invoice Date 09/23/20  
Client No. 23067  
Matter No. 184004

RE: Retention and Fee Applications

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 08/31/20:

Fees	\$	59,022.00
<b>Total this Invoice</b>	<b>\$</b>	<b>59,022.00</b>

*Payment is Due Upon Receipt*



23067 Briggs & Stratton Corporation  
184004 Retention and Fee Applications  
09/23/20Invoice No. 10375449  
Page 2**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
07/22/20	L Shermohammed	Conduct conflicts review in connection with the firm's special counsel retention application to be filed in the Briggs & Stratton bankruptcy case	3.1
07/22/20	A Steinberg	Teleconference with Briggs and Stratton regarding retention (.6); correspondence with Mr. Davidson regarding same (.6); teleconference with Mr. Orava regarding same (.8)	2.0
07/23/20	S Davidson	Review Mr. Orava's email with information for retention pleadings (.7); revise retention pleadings to incorporate additional information (1.4); circulate revised draft of retention pleadings (.2); review comments on retention pleadings and revise (.5); emails with Weil regarding status of retention pleadings (.2); review Mr. Steinberg's comments on retention pleadings and revise same (.4); prepare proposed order (.4); circulate same (.1); conference call with Messrs. Steinberg and Orava regarding status (.3); finalize drafts and circulate same to Weil (.4); emails regarding connection search	4.6
07/23/20	J Jumbeck	Review conflicts search regarding parties in interest for BK disclosures	3.3
07/23/20	L Shermohammed	Conduct conflicts review in connection with the firm's special counsel retention application to be filed in the Briggs & Stratton bankruptcy case	4.2
07/23/20	A Steinberg	Review retention pleadings (.9); teleconference with Messrs. Orava and Davidson regarding same (.5)	1.4
07/24/20	S Davidson	E-mails with Weil regarding status of retention pleadings (.3); review comments on retention pleadings and revise same (.4); circulate revised drafts of retention pleadings (.2); emails regarding draft of retention order (.2); review comments on retention order and email regarding same (.3); emails with Weil regarding status of retention pleadings and filing of same (.5)	1.9
07/24/20	L Shermohammed	Continue conflicts review in connection with the firm's special counsel retention application to be filed in the Briggs & Stratton bankruptcy case	7.5
07/24/20	A Steinberg	Review draft of revised retention application and order (.8); teleconference with Mr. Davidson regarding same (.2)	1.0
07/27/20	S Davidson	Draft supplemental declaration (.9); emails with Ms. Shermohammed regarding draft supplemental declaration and connections list (.3); emails with Mr. McCullough and Ms. Noebel regarding notice of appearance (.2); review draft notice of appearance and provide comments (.3); emails with Mr. McCullough and Ms. Noebel regarding filing of notice of appearance (.2); review revised draft of supplemental declaration, with appendices and revise (.2); circulate draft of supplemental declaration to Messrs. Steinberg and Orava (.1); emails with Weil regarding provisional order, and review same	3.2

23067 Briggs & Stratton Corporation  
184004 Retention and Fee Applications  
09/23/20

Invoice No. 10375449  
Page 3

Date	Timekeeper	Description	Hours
		(.2); review Mr. Steinberg's comments on draft supplemental declaration and emails and phone conversation regarding same (.5); revise draft supplemental declaration and circulate to Weil for review (.3)	
07/27/20	J McCullough	Exchange emails Mr. Davidson and Ms. Noebel regarding ECF account at MOE Bankruptcy (.2); register Mr. Steinberg for electronic filing in MOE Bankruptcy Court (.4); electronically file Notice of Appearance and Request for Papers (.4)	1.0
07/27/20	K Noebel	Prepare Notice of Appearance for Messrs. Steinberg and Davidson	1.3
07/27/20	L Shermohammed	Review and revise Orava declaration (.8); review conflicts reports and finalize declaration disclosures (3.5)	4.3
07/27/20	A Steinberg	Review Orava declaration (.4); review correspondence regarding same (.1); teleconference with Mr. Davidson regarding same (.2)	0.7
07/28/20	S Davidson	E-mails with Weil regarding draft of supplemental declaration (.3); review comments on draft of supplemental declaration (.2); emails with Ms. Shermohammed and Mr. Steinberg regarding connections list (.4); emails with Weil regarding same (.3)	1.2
07/28/20	J Jumbeck	Review Briggs & Stratton disclosure regarding Weil Gotschal and Ernst & Young representations (.2); update Ms. Shermohammed regarding finds of same (.3)	0.5
07/28/20	L Shermohammed	Draft summary regarding certain retention application disclosures	1.2
07/28/20	A Steinberg	Correspondence on retention (.3); teleconference with Mr. Orava regarding same (.2)	0.5
07/29/20	S Davidson	E-mails with Weil regarding supplemental declaration and filing of same (.4); review filed version of supplemental declaration (.2)	0.6
07/29/20	A Steinberg	Correspondence with Mr. Davidson regarding retention pleadings	0.3
07/30/20	A Steinberg	Review correspondence on retention pleadings (.3); note to Mr. Orava regarding same (.2)	0.5
07/31/20	L Shermohammed	Conduct supplemental conflicts review	0.3
07/31/20	A Steinberg	Correspondence on retention	0.2
08/03/20	L Shermohammed	Review and analyze supplemental conflicts reports related to additional parties in interest	1.2
08/04/20	L Shermohammed	Review and analyze supplemental conflicts reports related to additional parties in interest	2.3
08/04/20	A Steinberg	Correspondence with Mr. Davidson regarding supplemental declaration	0.3
08/05/20	S Davidson	E-mails with Weil regarding additional parties in interest (.2); emails with Ms. Shermohammed regarding same (.3); draft second supplemental declaration (.7); review comments from Mr. Steinberg on second supplemental declaration, revise and	1.6

23067 Briggs & Stratton Corporation  
184004 Retention and Fee Applications  
09/23/20

Invoice No. 10375449  
Page 4

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
		circulate to Weil (.4)	
08/05/20	S Orava	Review and revise supplement to retention application and correspondence with Mr. Davidson	0.2
08/05/20	L Shermohammed	Review and analyze supplemental conflicts reports related to additional parties in interest (.6); correspond with Mr. Davidson regarding same (.2)	0.8
08/05/20	A Steinberg	Correspondence with Mr. Orava	0.4
08/06/20	S Davidson	Review email from Weil regarding declaration (.1); revise second supplemental declaration and circulate to Weil for filing (.4); emails regarding filing of same and review as filed version of declaration (.2)	0.7
08/06/20	A Steinberg	Note to Mr. Orava regarding status	0.3
08/11/20	A Steinberg	Note to Mr. Orava regarding status	0.3
08/12/20	S Davidson	E-mails with Weil regarding K&S retention application and upcoming hearing	0.3
08/14/20	S Davidson	Review email from Weil regarding additional party in interest, and have search run (.2); emails with Weil regarding same (.2)	0.4
08/17/20	S Davidson	Review docket and agenda (.3); assemble K&S retention pleadings for hearing (.3)	0.6
08/17/20	A Steinberg	Teleconference with Mr. Davidson regarding upcoming hearing	0.2
08/18/20	S Davidson	Review K&S retention pleadings in anticipating for hearing (.9); attend hearing on K&S retention (1.6); emails regarding same (.2); review docket (.2)	2.9
08/18/20	A Steinberg	Teleconference with Mr. Davidson regarding hearing; note to Mr. Davidson regarding same	0.3
08/19/20	S Davidson	Review docket entries (.2); review as-entered K&S retention order and emails regarding same (.4)	0.6
08/19/20	A Steinberg	Notes from Messrs. Orava and Davidson regarding retention order	0.3
08/20/20	A Steinberg	Correspondence with Mr. Davidson regarding status	0.3
08/31/20	A Steinberg	Teleconference with Mr. Orava regarding status	0.3
			59.1

23067 Briggs & Stratton Corporation  
184004 Retention and Fee Applications  
09/23/20

Invoice No. 10375449  
Page 5

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Steve Orava	Partner	0.2
Arthur Steinberg	Partner	9.3
Scott Davidson	Counsel	18.6
Jake Jumbeck	Associate	3.8
Leia Shermohammed	Associate	24.9
Kathleen Noebel	Paralegal	1.3
John McCullough	Paralegal	1.0
Total		<hr/> 59.1

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10375449  
Invoice Date 09/23/20  
Client No. 23067  
Matter No. 184004

RE: Retention and Fee Applications

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$59,022.00**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10375451  
Invoice Date 09/23/20  
Client No. 23067  
Matter No. 184005

RE: Opposition to 301 Exclusion Extension

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 08/31/20:

Fees	\$	9,556.00
<b>Total this Invoice</b>	<b>\$</b>	<b>9,556.00</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
184005 Opposition to 301 Exclusion Extension  
09/23/20

Invoice No. 10375451  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
07/20/20	S Orava	Teleconference with Mr. Togni regarding section 301 exclusion objection	0.5
07/20/20	S Orava	Revise and send email to Mr. Booher regarding Section 301 exclusions	0.5
07/20/20	P Togni	Prepare correspondence regarding opposition to extension of exclusions from Section 301 China tariffs (1.0); conference with Mr. Orava regarding same (.6)	1.6
07/21/20	S Orava	Teleconference with Mr. Booher regarding status of exclusions, section 301 matter, and schedule; correspondence	0.6
07/27/20	S Orava	Teleconference with Mr. Togni regarding Section 301 exclusion submission (.3); review and revise draft comments objecting to extension of Section 301 duties on certain engines and correspondence with Mr. Togni (.4)	0.7
07/27/20	P Togni	Prepare comments in opposition to certain product-specific exclusions from Section 301 China tariffs (.7); correspondence with Messrs. Booher, Orava, and Vaughn regarding same (.3); conference with Messrs. Orava and Vaughn regarding same (.1)	1.1
07/28/20	S Orava	Review draft submissions and corrections (.4); correspondence with Mr. Togni regarding objections to Section 301 exclusion extension (.3); Teleconference with Mr. Booher regarding Section 301 exclusion filing and related matters (.3)	1.0
07/28/20	P Togni	Correspondence with Messrs. Booher, Orava, and Vaughn regarding comments in opposition to extension of exclusions from Section 301 China tariffs (.3); finalize and file same (1.6)	1.9
07/29/20	P Togni	Correspondence with Messrs. Booher, Orava, and Vaughn regarding USTR Federal Register notice on extension of exclusions from Section 301 China tariffs (.2); review docket regarding same (.4)	0.6
08/02/20	S Orava	Correspondence with Mr. Togni regarding notice of extensions on Section 301 duties	0.1
08/03/20	S Orava	Review 301 exclusion notice and correspondence with Messrs. Togni and Mr. Booher regarding potential extensions	0.3
08/10/20	S Orava	Review portions of 301 notices and correspondence with Mr. Togni	0.3
08/10/20	P Togni	Review USTR notices of product exclusions (.9); review requests for comments regarding extension of same (.6); correspondence with Mr. Orava regarding same (.1)	1.6

---

10.8

23067 Briggs & Stratton Corporation  
184005 Opposition to 301 Exclusion Extension  
09/23/20

Invoice No. 10375451

Page 3

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Steve Orava	Partner	4.0
Pat Togni	Associate	6.8
Total		<hr/> 10.8



# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10375451
Invoice Date	09/23/20
Client No.	23067
Matter No.	184005

RE: Opposition to 301 Exclusion Extension

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$9,556.00**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10384137  
Invoice Date 10/19/20  
Client No. 23067  
Matter No. 184001

RE: AD/CVD - Large Vertical Engines  
Client Matter Reference: 920

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 09/30/20:

Fees	\$	54,163.00
<b>Total this Invoice</b>	<b>\$</b>	<b>54,163.00</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
184001 AD/CVD - Large Vertical Engines  
10/19/20Invoice No. 10384137  
Page 2**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
09/02/20	S Orava	Correspondence and teleconference with Mr. Vaughn regarding talking points for KPS and Briggs and other developments	0.5
09/02/20	J Provost	Distributing APO and PV version of draft questionnaires to attorneys and consultants	0.4
09/02/20	S Vaughn	Analyze key issues in ITC investigation (.8); prepare talking points regarding same (.8); analyzing comments on draft ITC questionnaires (1.5)	3.1
09/03/20	S Orava	Draft and revise talking points regarding key issues (.5); correspondence with Mr. Booher regarding key messaging (.2); teleconference with Mr. Booher regarding developments and talking points (.2)	0.9
09/03/20	S Vaughn	Revise talking points regarding ITC investigation	0.6
09/04/20	J Greer	Review case status and advise Mr. Orava regarding the same (.3); analyze scope issues (.3)	0.6
09/04/20	S Orava	Draft and revise agenda with Mr. Vaughn for ITC final phase strategy call; (.4); prepare for and attend teleconference with Messrs. Ballard, Booher, and Vaughn regarding developments and ITC final phase (2.3); follow-up and correspondence with Mr. Booher regarding CBP presentation (.1); review MTD comments on ITC draft questionnaires and supporting material (.6); correspondence with Mr. Booher (.2); correspondence with Mr. Long regarding preparation of presentation to CBP regarding enforcement of AD/CVD orders (.3)	3.9
09/04/20	S Vaughn	Analyze key issues likely to arise in ITC investigation (.9); participate in teleconference with company officials regarding same (1.3)	2.2
09/08/20	S Orava	Review information from CBP and teleconference with Messrs. Greer and Long regarding evasion presentation	0.7
09/08/20	S Vaughn	Continue analyzing issues likely to arise in final phase of ITC investigation	2.0
09/09/20	S Orava	Review materials and correspondence with CBP regarding enforcement of engines provisional duties (.2); correspondence with Mr. Booher regarding CBP outreach and scheduling (.1)	0.3
09/12/20	S Orava	Review updated import data and analyze impact on various ITC arguments	1.3
09/14/20	S Orava	Teleconference with Mr. Booher regarding consultant and related developments	0.3
09/15/20	J Provost	Download and distribute confidential version and public version of shipment data and related excel spreadsheets (.3); download and distribute schedule for ITC final phase of investigation (.2); prepare and update service list and cover letter for filing (.4)	0.9
09/15/20	S Vaughn	Analyze relationship between AD/CVD litigation and other developments	1.5

23067 Briggs & Stratton Corporation  
184001 AD/CVD - Large Vertical Engines  
10/19/20

Invoice No. 10384137  
Page 3

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
09/16/20	S Orava	Review correspondence and teleconference with Mr. Vaughn regarding timetable and questionnaires	0.4
09/16/20	S Vaughn	Analyze next steps in ITC investigation (1.7); prepare materials for company regarding same (.4); confer with company official regarding next steps in the ITC investigation (.5)	2.6
09/18/20	J Greer	Review presentation for Customs and Border Protection (.1); analyze Toro comments on scope (.5)	0.6
09/18/20	V He	Download and distribute three Requests for hearing and Letter in Lieu of Brief on Scope Issues	0.4
09/18/20	C Long	Draft presentation for Customs and Border Protection (2.0); communicate with Messrs. Orava and Greer regarding presentation (0.1); review final phase injury U.S. Producers' Questionnaire (0.7)	2.8
09/18/20	S Orava	Correspondence with Kohler counsel and follow-up on CBP presentation (.4); review portions of large engines ITC questionnaires and correspondence (.8); review scope brief and correspondence regarding rebuttal (.6)	1.8
09/18/20	J Provost	Prepare and circulate document for filing to attorneys (.3); correspond with Ms. Morno to finalize certificate of service (.2); file document at the Department of Commerce (.2); distribute request for hearing to attorneys (.2)	0.9
09/20/20	S Orava	Review potential arguments and prior precedent regarding other market developments and impact on Commission analysis	1.4
09/21/20	C Long	Revise presentation for Customs and Border Protection (1.0); communicate with co-counsel regarding presentation (0.3); communicate with Messrs. Orava and Greer regarding presentation (0.3)	1.6
09/21/20	S Orava	Review options and correspondence with Mr. Long regarding product information for CBP presentation (0.4); correspondence with Mr. Booher regarding presentations (0.3); review developments regarding ITC questionnaires and preparations (0.7); correspondence with Mr. Greer regarding scope rebuttal (0.1)	1.5
09/21/20	S Vaughn	Analyze issues presented by upcoming ITC investigation	1.3
09/22/20	C Long	Communicate with Customs and Border Protection, co-counsel, and Mr. Orava regarding presentation and attendees (0.6); revise presentation (0.3)	0.9
09/22/20	J Provost	Download and distribute monthly data exhibits and Q&V monthly shipment data for AD and CVD case to attorneys	0.4
09/22/20	S Vaughn	Continue working on ITC issues	1.0
09/23/20	C Long	Teleconference with Customs and Border Protection regarding ongoing investigations	1.2
09/23/20	S Orava	Prepare for and attend presentation to CBP regarding potential circumvention issues in large engines case (1.4); review request for hearing (0.1); teleconference with Mr. Booher regarding ITC	1.9

23067 Briggs & Stratton Corporation  
184001 AD/CVD - Large Vertical Engines  
10/19/20

Invoice No. 10384137  
Page 4

Date	Timekeeper	Description	Hours
		questionnaires and other matters (0.3); correspondence with Mr. Vaughn (0.1)	
09/24/20	S Orava	Teleconference and correspondence with Mr. Vaughn regarding responding to questionnaires	0.2
09/25/20	C Long	Communicate with Mr. Vaughn regarding questionnaires (0.1); review importers' questionnaire (0.1)	0.2
09/25/20	S Orava	Correspondence with Customs and Mr. Booher regarding follow-up to presentation (0.2); teleconference with Mr. Vaughn and review correspondence and documents regarding development of ITC case (1.2)	1.4
09/27/20	S Orava	Review prior ITC submissions and analysis in advance of preparing questionnaire responses	1.6
09/28/20	C Long	Review importers' questionnaire and identify differences with preliminary phase questionnaire (1.0); prepare materials for teleconference (0.3)	1.3
09/28/20	S Vaughn	Analyze issues likely to arise in final phase of ITC investigation	2.5
09/29/20	S Vaughn	Analyze issues presented by ITC questionnaires and key issues to be addressed in ITC final phase	2.2
09/30/20	C Long	Teleconference with Briggs & Stratton and Mr. Vaughn regarding questionnaire responses (1.7); revise comparisons of preliminary and final phase questionnaires (0.5); draft notices of name change for Commerce and International Trade Commission investigations (0.5); draft notices of name change for Commerce and International Trade Commission investigations (0.5); review entries of appearance to identify necessary amendments (0.2); communicate with Ms. Marcus regarding issue with APO service list (0.1)	3.4
09/30/20	S Orava	Correspondence with Kohler counsel regarding experts (.1); correspondence with Messrs. Booher and Long regarding successor in interest filings across all investigations (.2)	0.3
09/30/20	S Vaughn	Continue analyzing ITC questionnaires, including changes from the preliminary phase (1.1); prepare for and participate in call with company officials (1.5); analyze potential issues relating to pricing (.7); work on issues presented by use of economic expert (1.1)	4.4

---

57.4

23067 Briggs & Stratton Corporation  
184001 AD/CVD - Large Vertical Engines  
10/19/20

Invoice No. 10384137  
Page 5

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Jamieson Greer	Partner	1.2
Steve Orava	Partner	18.4
Stephen Vaughn	Partner	23.4
Clint Long	Associate	11.4
Valerie He	Project Assistant	0.4
Jillian Provost	Project Assistant	2.6
Total		<hr/> 57.4

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

RE: AD/CVD - Large Vertical Engines  
Client Matter Reference: 920

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10384137
Invoice Date	10/19/20
Client No.	23067
Matter No.	184001

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$54,163.00**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10384138  
Invoice Date 10/21/20  
Client No. 23067  
Matter No. 184002

RE: AD/CVD - Small Vertical Engines  
Client Matter Reference: 938

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 09/30/20:

Fees	\$	92,820.50
Expenses		16,259.75
<b>Total this Invoice</b>	<b>\$</b>	<b>109,080.25</b>

*Payment is Due Upon Receipt*



23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
10/21/20Invoice No. 10384138  
Page 2**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
09/01/20	B Byers	Work on creditworthiness issue (1.2); review allegation from large engines case (.3)	1.5
09/01/20	J Greer	Review, finalize, and file comments on respondent submission	0.1
09/01/20	C Long	E-mail with Ms. Byers regarding uncreditworthiness allegation	0.1
09/01/20	J Provost	Updating headers, inserting company certs, and completing final edits to the public version and final version for the Kohler supplemental questionnaire filing (.8); filing documents at the DOC (.4)	1.2
09/02/20	C Long	Review dockets to identify upcoming deadlines (.4); revise uncreditworthiness allegation (.4)	0.8
09/02/20	S Orava	Review documents and correspondence (.4); teleconference with Mr. Booher regarding status of developments regarding investigations and CBP scheduling (.3)	0.7
09/02/20	J Provost	Distribute memo regarding the establishment of third party case numbers to attorneys	0.2
09/03/20	B Byers	Teleconference with Mr. Long to go over the uncreditworthiness allegation for Zongshen	0.8
09/03/20	C Long	Teleconference with Ms. Byers and Ms. Marcus regarding uncreditworthiness allegation (.5); revise uncreditworthiness allegation and calculations (3.7)	4.2
09/03/20	J Provost	Downloading, profiling, and docketing ITC questionnaire responses	0.8
09/04/20	B Byers	Review/edit revised creditworthiness allegation for Zongshen	1.3
09/04/20	J Greer	Draft submission on surrogate values (3.1); confer with Mr. Anderson at Capital Trade regarding the same (.1); review case status and advise Mr. Orava regarding the same (.3)	3.5
09/04/20	C Long	E-mails with Messrs. Orava, Taylor, Togni, and O'Neill and Ms. Byers regarding presentations to Customs & Border Protection	0.4
09/04/20	E O'Neill	Assist Mr. Long with background information regarding presentations to CBP regarding circumvention and other case issues	0.1
09/04/20	S Orava	Review submissions and updated timelines from Mr. Greer	0.6
09/08/20	J Greer	Confer with Mr. Anderson at Capital Trade regarding submissions (.2); analyze potential critical circumstances allegation (.1); participate in telephone conference with Messrs. Orava and Long regarding presentation to Customs and Border Protection (.2); conduct research regarding the same (.4)	0.9
09/08/20	C Long	Teleconference with Messrs. Orava and Greer regarding presentations for Customs and Border Protection	0.3
09/08/20	S Orava	Review Zongshen questionnaire responses and related materials	0.3
09/08/20	J Provost	Distribute public version of supplemental questionnaire response to attorneys	0.1

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
10/21/20

Invoice No. 10384138  
Page 3

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
09/09/20	C Long	E-mails with Ms. Byers and Ms. Provost regarding supplemental questionnaire responses (.2); draft presentation on small engines for Customs and Border Protection (1.0)	1.2
09/09/20	J Provost	Download and distribute second supplemental questionnaire and associated exhibits and public version of questionnaire	0.4
09/10/20	J Greer	Analyze critical circumstances data (.2); analyze supplemental questionnaire (.2); prepare final surrogate values submission (.9)	1.3
09/10/20	C Long	Review Zongshen's supplemental questionnaire response (.5); e-mails with Mr. Orava and Ms. Byers regarding supplemental questionnaire response (.1)	0.6
09/10/20	E O'Neill	Teleconference with Mr. Greer regarding preparation of critical circumstances allegation (.1); begin accessing data regarding same (.1)	0.2
09/10/20	S Orava	Review Kohler submissions (.6); correspondence with Mr. Greer regarding addressing certain issues (.3)	0.9
09/10/20	J Provost	Distribute public version and confidential version of third supplemental questionnaire	0.2
09/11/20	J Greer	Review case documents and submissions	0.7
09/11/20	C Long	E-mails with Ms. Byers and Ms. Marcus regarding respondents' supplemental questionnaire responses	0.1
09/11/20	E O'Neill	Prepare updated monthly import report (1.0); prepare first draft of data analysis for critical circumstances submission (2.3)	3.3
09/11/20	S Orava	Teleconference with Mr. Booher regarding market and case developments (.5); correspondence with Mr. Greer regarding developments with Commerce (.2)	0.7
09/11/20	J Provost	Prepare documents and exhibits for filing (.4); correspond with Ms. Morno and Mr. Greer regarding filing; (.3); draft attorney and client certification (.4), prepare service list (.3)	1.4
09/11/20	S Vaughn	Analyze key issues for final phase of ITC investigation, such as potential benefits of using expert witness	1.7
09/13/20	S Orava	Review submissions and correspondence regarding rebuttal to questionnaire responses on new subsidy allegations (.9); review data and analysis regarding critical circumstances and correspondence with Mr. O'Neill (.6)	1.5
09/14/20	M Morno	Draft request for hearing in antidumping investigation (.5); finalize petitioner's submission of surrogate value information for filing with Commerce (.6)	1.1
09/14/20	S Orava	Review submissions and consult with Mr. Greer regarding deadlines for rebuttal (1.0); teleconference with Mr. Booher regarding developments, assessment of consultant, and market conditions (.4)	1.4
09/14/20	J Provost	Add final edits to document (.8); correspond with Ms. Morno and Mr. Greer to finalize filing and file at the Department of Commerce (.4); serve documents through email (.3); download and distribute confidential and public version of a supplemental	1.7

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
10/21/20

Invoice No. 10384138  
Page 4

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
		questionnaire and a request for extension (.2)	
09/15/20	J Greer	Review supplemental questionnaire (.3); analyze potential critical circumstances allegation (.5)	0.8
09/15/20	C Long	Continue drafting presentation for Customs and Border Protection	0.8
09/15/20	E O'Neill	Continued preparation of critical circumstances analyses	0.2
09/16/20	J Greer	Review and analyze critical circumstances filing (2.0); confer with Mr. Anderson at Capital Trade regarding small engines evidence (.3); analyze surrogate value submission by respondents (1.0); review and edit compliance materials for Customs and Border Protection (1.2)	4.5
09/16/20	C Long	Continue drafting presentation for Customs and Border Protection (5.7); e-mails with Messrs. Orava and Greer regarding the same (.1)	5.8
09/16/20	E O'Neill	Provide calculations to Mr. Greer regarding critical circumstances allegation	0.7
09/16/20	J Provost	Download and distribute the confidential and public versions of a surrogate values and factual information submission and related exhibits	0.5
09/17/20	J Greer	Review Capital Trade analysis of surrogate value issues (.2); prepare critical circumstances allegation (2.2)	2.4
09/17/20	C Long	Communicate with Ms. Marcus regarding filings docket	0.1
09/17/20	S Orava	Review data and correspondence (.4) teleconference regarding critical circumstances (.3)	0.7
09/18/20	J Greer	Analyze potential rebuttal materials regarding surrogate values (1.4); review and analyze respondent questionnaire response (.3)	1.7
09/18/20	M Morno	Finalize request for hearing for filing in antidumping duty investigation	0.2
09/18/20	J Provost	Distribute second supplemental questionnaire response and corresponding exhibits	0.2
09/21/20	J Greer	Draft pre-preliminary comments (2.6); analyze surrogate value submission by respondent (.2)	2.8
09/21/20	C Long	Communicate with Mr. Orava and Ms. Byers regarding countervailing duty hearing request (.1); draft hearing request (.5); communicate with Mr. Orava regarding presentation to Customs and Border Protection (.2)	0.8
09/21/20	S Orava	Review data and correspondence with Mr. Booher regarding critical circumstances allegation (.4); correspondence with Mr. Long regarding hearing request (.1); teleconference with Mr. Booher regarding various developments, including critical circumstances filing (.3)	0.8
09/22/20	J Greer	Review and comment on presentation for Customs and Border Protection; draft surrogate value rebuttal submission	1.7
09/22/20	C Long	Communicate with Brigg & Stratton, Customs and Border Protection, and Mr. Orava regarding presentation and attendees	2.5

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
10/21/20

Invoice No. 10384138  
Page 5

Date	Timekeeper	Description	Hours
		(1.0); revise presentation (.4); teleconference with Customs and Border protection regarding presentation (.7); revise countervailing duty hearing request (.3); communicate with Ms. Byers regarding creditworthiness allegation (.1)	
09/22/20	S Orava	Correspondence with Mr. Greer regarding critical circumstances allegation (.2); research and correspondence regarding India and other matters (.4); correspondence with CBP and Mr. Long regarding evasion presentation (.3)	0.9
09/23/20	B Byers	Work on issues related to critical circumstances (.9); review scope submissions (.4)	1.3
09/23/20	J Greer	Draft critical circumstances allegation (4.7); review and analyze Toro scope comments (.9)	5.6
09/23/20	C Long	Teleconference with Customs and Border Protection regarding ongoing investigations (.8); teleconference and communicate with Mr. Greer regarding critical circumstances allegation (.3); research and draft portion of countervailing duty critical circumstances allegation (2.7); revise creditworthiness allegation (.3); revise and finalize submission of countervailing duty hearing request (.4)	4.5
09/23/20	S Orava	Prepare for and conference with CBP regarding evasion issues for small engines and background on product scope and industry (.9); review and comment on surrogate value submission (.4); teleconference with Commerce regarding deadlines for filings (.2); correspondence with Mr. Greer regarding Commerce and scope rebuttal (.4)	1.9
09/23/20	J Provost	Prepare attorney and client certifications for two filings (.4); combine documents (.2); update service lists (.3); correspond with Mr. Greer to review (.3); edit documents (.4); prepare request for hearing document for filing (.5); update service list (.2); correspond with Mr. Long to review document (.1); file document at the Department of Commerce with C. Hyner (.3); service document to parties on certificate of service (.3)	3.0
09/24/20	J Greer	Finalize and file surrogate value rebuttal comments (.2); finalize and file critical circumstances allegation (.2); analyze respondent brief on scope and draft brief regarding the same (1.9)	2.3
09/24/20	C Long	Communicate with Mr. Orava regarding creditworthiness allegation (.2); review final version of critical circumstances filing (.1)	0.3
09/24/20	M Morno	Finalize rebuttal to surrogate value information for filing in antidumping duty investigation	0.2
09/24/20	S Orava	Review background information and revise critical circumstances allegation (.5); correspondence with Mr. Greer (.1); review and revise uncreditworthiness allegation and supporting documents (.7)	1.3

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
10/21/20

Invoice No. 10384138  
Page 6

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
09/24/20	J Provost	Finalize document for filing (.6); correspond with Mr. Greer to review and edit document (.2); file document with Ms. Morno at the Department of Commerce (.2); send service email to parties on service list (.2)	1.2
09/25/20	J Greer	Draft rebuttal comments on scope	7.3
09/25/20	V He	Download and distribute two questionnaires, two supplemental documents and extension request	0.3
09/25/20	C Long	Revise bracketing in creditworthiness allegation (.3); provide draft to and communicate with Ms. Provost regarding filing of creditworthiness allegation (.1); review Commerce's quantity and value questionnaires (.1)	0.5
09/25/20	J Provost	Download and distribute supplemental questionnaire to attorneys and consultants	0.2
09/27/20	S Orava	Review Commerce questionnaire responses and related AD developments (1.3); review submissions and revise scope rebuttal (.8)	2.1
09/28/20	B Byers	Work on issues related to MTD and the critical circumstances allegation	0.6
09/28/20	J Greer	Finalize and file rebuttal comments on scope issues (.7); draft comments on preliminary determination (6.3); review and analyze respondent submissions (1.5)	8.5
09/28/20	C Long	Finalize submission of creditworthiness allegation (.5); review bracketing of creditworthiness allegation (.5)	1.0
09/28/20	S Orava	Teleconferences and correspondence regarding developments with MTD	0.4
09/28/20	J Provost	Prepare two documents for filings (.4); update service lists (.2); correspond with Mr. Greer to review documents (.1); file documents at the Department of Commerce (.2); service documents through email to parties on the service list (.2); prepare business proprietary document for Petitioner's uncreditworthiness allegation filing (.5); bracket exhibits (.3); stamp narrative and exhibits (.1); correspond with Mr. Long to review document (.1); edit document (.2); file document at the Department of Commerce (.1); prepare public version of filing (.2); download supplemental questionnaire response and 10 related exhibits (.2); distribute to attorneys (.1); upload to the FTP site for consultants (.1)	3.0
09/29/20	J Greer	Draft comments on the preliminary determination (4.9); confer with Mr. Anderson at Capital Trade regarding the same (.3); confer with Mr. Orava regarding critical circumstances (.1)	5.3
09/29/20	C Long	Finalize bracket check and review of creditworthiness submission (.6); draft summary of key procedural steps and deadlines for critical circumstances allegation and revising name of petitioner in trade remedy investigations (2.0)	2.6
09/29/20	S Orava	Review correspondence regarding activities of Chinese producer	1.8

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
10/21/20

Invoice No. 10384138  
Page 7

Date	Timekeeper	Description	Hours
		(.2); correspondence with CBP and Mr. Booher regarding responding to questions (.4); teleconferences with Mr. Booher and Mr. Vaughn regarding critical circumstances submission (.6); correspondence with Mr. Booher regarding communications and additional information (.6)	
09/29/20	J Provost	Edit and update brackets on final version and public version of filing (.4); correspond with Mr. Long to review updates and edit documents (.2); file documents at the Department of Commerce (.2); serve public version to parties on the certificate of service (.2)	1.0
09/30/20	J Greer	Finalize and file comments on preliminary determination; review and analyze respondent submissions	0.6
09/30/20	C Long	Draft notices of name change for Commerce and International Trade Commission investigations	1.0
09/30/20	S Orava	Review summary of critical circumstances timeline and correspondence with Mr. Booher (.3); review and revise pre-preliminary comments (1.1); correspondence with Mr. Greer (.1)	1.5
09/30/20	J Provost	Prepare, bracket, and stamp exhibits (.8); draft attorney certification (.4); update certificate of service (.1); edit, prepare, and stamp cover letter and combine documents (.4); correspond with Mr. Greer to edit document (.1); file at the Department of Commerce (.2); prepare public version of document (.4)	2.0
			125.7

Capital Trade Inc. \$ 16,259.75

**TIMEKEEPER SUMMARY**

Timekeeper	Status	Hours
Jamieson Greer	Partner	50.0
Steve Orava	Partner	17.5
Stephen Vaughn	Partner	1.7
Clint Long	Associate	27.6
Mercedes Morno	Associate	1.5
Bonnie Byers	Consultant	5.5
Edmond O'Neill	Consultant	4.5
Valerie He	Project Assistant	0.3
Jillian Provost	Project Assistant	17.1
Total		125.7

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

RE: AD/CVD - Small Vertical Engines  
Client Matter Reference: 938

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10384138
Invoice Date	10/21/20
Client No.	23067
Matter No.	184002

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$109,080.25**

*Payment is Due Upon Receipt*



October 08, 2020

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

Re: Small Gasoline Engines

Dear Mr. Orava:

The attached invoice covers Capital Trade, Inc.'s fees and expenses for September 2020, in conjunction with the above referenced matter.

Sincerely,

A handwritten signature in black ink, appearing to be "Charles L. Anderson", with a long horizontal line extending to the right.

Charles L. Anderson

Enclosures





## Invoice

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

**Invoice Date:** Oct 8, 2020  
**Invoice Num:** 11304  
**Billing Through:** Sep 30, 2020

**Small Gasoline Engines (1086-000):** - Managed by (CAnderson)

**Professional Services:**

<u>Employee</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles L. Anderson	15.75	\$570.00	\$8,977.50
Mary Ann McCleary	11.25	\$475.00	\$5,343.75
Brian Westenbroek	4.00	\$380.00	\$1,520.00
Cole J. Kyle	1.00	\$380.00	\$380.00
<b>Total Services:</b>			<b>\$16,221.25</b>

**Reimbursable Expenses:**

<u>Expense Type</u>	<u>Amount</u>
Computer Charges	\$38.50
<b>Total Expenses:</b>	<b>\$38.50</b>

**Project (1086-000:) Total Amount Due:** **\$16,259.75**

**Current Month's fee & expenses:** **\$16,259.75**

**Total Current Invoices:** **\$16,259.75**

**Payment is due within 30 days. Please pay by check or wire transfer to:**

**By check :**

Capital Trade, Inc.  
ATTN: Vivienne Ramgeet  
1200 18th Street, NW  
Suite 601  
Washington, D.C. 20036

**By Wire Transfer:**

SunTrust Bank  
900 17th Street, N.W.  
Washington, D.C. 20006  
Bank Routing #: 061 000 104  
Capital Trade Acct # 1000183401693

**Please reference the project matter and invoice numbers on your payment.**



## Invoice

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

**Invoice Date:** Oct 8, 2020

**Invoice Num:** 11304

**Billing Through:** Sep 30, 2020

**Small Gasoline Engines (1086-000):** - Managed by (CAnderson)

**Professional Services:**

<u>Date</u>	<u>Description</u>	<u>Hours</u>
<b>Charles L. Anderson</b>		
09/08/2020	Reviewed margin calculations for Kohler.	1.20
09/17/2020	Reviewed CZ latest submission and provided comments.	1.70
09/18/2020	Analyzed CZ's latest submissions and provided comments.	2.25
09/19/2020	Worked on price allocation issue for subject/non-subject.	3.60
09/20/2020	Further work on CZ submitted financials for financial surrogate ratio calculations (1.5), price allocation issue (1).	2.50
09/21/2020	Provided comments on CZ pre prelim factual information filing.	2.00
09/29/2020	Reviewed draft pre-prelim comments and provided comments on same (1.5); reviewed alternative dumping margin calculations for Kohler and CZ (1).	2.50
	<b>Charles L. Anderson</b>	<b>Total Hours: 35.75</b>
<b>Mary Ann McCleary</b>		
09/01/2020	Set up and ran margins for Chongqing with updated and expanded surrogate values.	1.50
09/07/2020	Kohler - set up margin calculation new FOP file and Turkish SVs (1.90). Prepared Excel model of same (.60).	2.50
09/17/2020	Reviewed respondent surrogate values (.25), ran revised margin calculations using proposed method (2.80) and ran alternative scenarios (.70).	3.75
09/18/2020	Analyzed SVs and normal value split method by factor subject vs non-subject (1.90), calculated ratios for mounted products (.85).	2.75
09/29/2020	Ran margins for Chongqing for possible argument.	0.75
	<b>Mary Ann McCleary</b>	<b>Total Hours: 11.25</b>
<b>Brian Westenbroek</b>		
09/17/2020	Reviewed Chongqing submission (0.25) call w/C. Anderson re: answering questions from counsel on Chongqing submission (0.5).	0.75
09/18/2020	Compared surrogate values proposed by Chongqing to petitioners (1.75); compared surrogate values proposed to those used in preliminary of large engines case (0.75).	2.50
09/21/2020	Compared Chongqing's surrogate ratios and calculations to petitioners (0.5); compared Chongqing's ocean freight quotes to those used in large engines preliminary determination (0.25).	0.75
	<b>Brian Westenbroek</b>	<b>Total Hours: 4.00</b>
<b>Cole J. Kyle</b>		
09/21/2020	Reviewed financial statements to determine whether the "government assistance" was countervailable.	1.00



**Capital Trade, Inc.**

1200 18th Street, NW, Suite 601  
Washington, DC 200362526  
Tel: (202) 463-1850 Fax: (202) 463-1855

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

## Invoice

**Invoice Date:** Oct 8, 2020

**Invoice Num:** 11304

**Billing Through:** Sep 30, 2020

**Small Gasoline Engines** (1086-000:) - Managed by (CAnderson)

**Professional Services:**

<u>Date</u>	<u>Description</u>	<u>Hours</u>
	Cole J. Kyle	
<b>Total Hours:</b>		<b>1.00</b>

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10384139  
Invoice Date 10/20/20  
Client No. 23067  
Matter No. 184004

RE: Retention and Fee Applications

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 09/30/20:

Fees	\$	32,497.00
<b>Total this Invoice</b>	<b>\$</b>	<b>32,497.00</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
184004 Retention and Fee Applications  
10/20/20

Invoice No. 10384139  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
09/01/20	S Davidson	Review Weil memo regarding compensation procedures for case (.6); e-mail to Messrs. Steinberg and Orava regarding same (.1); e-mails with Ms. Shermohammed regarding fee procedures (.2)	0.9
09/08/20	L Shermohammed	Review supplemental parties in interest list and analyze related conflicts reports	0.5
09/10/20	S Davidson	E-mails with Ms. Shermohammed regarding additional parties to search for connections (.2); draft third supplemental declaration (.5); e-mails with Ms. Shermohammed regarding schedules for declaration (.2); review schedules (.2); e-mails with Weil and Ms. Shermohammed regarding certain additional parties and proper names (.3); revise third supplemental declaration and circulate for review (.3); finalize third supplemental declaration and e-mails with Weil regarding declaration and filing of same (.3)	2.0
09/10/20	S Orava	Correspondence and teleconference with Mr. Steinberg regarding status of proceedings (.2); review third supplemental declaration and correspondence with Mr. Davidson (.3)	0.5
09/10/20	L Shermohammed	Review conflicts reports (3.1); draft schedule disclosing client relationships (.4)	3.5
09/10/20	A Steinberg	Revise declaration (.2); teleconference with Mr. Davidson regarding same (.2)	0.4
09/14/20	L Shermohammed	Draft first monthly fee statement	2.9
09/22/20	S Davidson	E-mail and phone conversation with Mr. Orava regarding monthly fee statement (.4); e-mails with Ms. Shermohammed regarding certain information for monthly fee statement (.2)	0.6
09/22/20	L Shermohammed	Continue to draft first monthly fee application	4.5
09/23/20	S Davidson	Review Weil memo regarding interim comp procedures (.4); e-mails with Weil and Ms. Shermohammed regarding questions on procedures (.5); review draft of Monthly Fee Statement and provide comments (.7); review revised draft of monthly fee statement and provide additional comments (.3); e-mails with Ms. Shermohammed and Mr. Steinberg regarding same (.4); review revised draft of Monthly Fee Statement and provide certain additional comments (.5); e-mails regarding same and additional comments (.4); review updated draft of monthly fee statement (.3)	3.5
09/23/20	L Shermohammed	Revise monthly fee statement	3.7
09/24/20	S Davidson	E-mails with Mr. Steinberg, Mr. Orava and Ms. Shermohammed regarding current draft of Monthly Fee Statement (.3); e-mails with Mr. Orava regarding information for Monthly Fee Statement (.3); e-mail to Ms. Shermohammed regarding same (.1); review current draft of Monthly Fee Statement (.4); review revised information for Monthly fee Statement (.8); e-mail to Mr. Orava regarding same (.2); e-mails and revisions to	2.6

23067 Briggs & Stratton Corporation  
184004 Retention and Fee Applications  
10/20/20

Invoice No. 10384139  
Page 3

Date	Timekeeper	Description	Hours
		Monthly Fee Statement (.5)	
09/24/20	S Orava	Review and revise fee application and supporting documents (.6); correspondence with Mr. Davidson regarding same (.2)	0.8
09/24/20	L Shermohammed	Draft exhibits to monthly fee statement	3.9
09/24/20	A Steinberg	Teleconference with Mr. Davidson regarding fee statement (.2); revise fee application (.2)	0.4
09/25/20	S Davidson	Review revised draft of Monthly Fee Statement and provide additional comments (.9); teleconference with Mr. Steinberg regarding same (.3); e-mails with Ms. Shermohammed regarding Monthly Fee Statement and finalizing and serving same (.7); review final version of Monthly Fee Statement and service e-mail (.3)	2.2
09/25/20	S Orava	Follow-up on outstanding issues with fee application (.6); revise and finalize fee application for July-August (.5)	1.1
09/25/20	L Shermohammed	Finalize and serve monthly fee statement	1.2
09/25/20	A Steinberg	Correspondence with Mr. Davidson regarding fee application	0.4
			35.6

**TIMEKEEPER SUMMARY**

Timekeeper	Status	Hours
Steve Orava	Partner	2.4
Arthur Steinberg	Partner	1.2
Scott Davidson	Counsel	11.8
Leia Shermohammed	Associate	20.2
Total		35.6

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10384139
Invoice Date	10/20/20
Client No.	23067
Matter No.	184004

RE: Retention and Fee Applications

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$32,497.00**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10384140  
Invoice Date 10/19/20  
Client No. 23067  
Matter No. 184005

RE: Opposition to 301 Exclusion Extension

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 09/30/20:

Fees	\$	447.00
<b>Total this Invoice</b>	<b>\$</b>	<b>447.00</b>

*Payment is Due Upon Receipt*



23067 Briggs & Stratton Corporation  
184005 Opposition to 301 Exclusion Extension  
10/19/20

Invoice No. 10384140  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
09/16/20	P Togni	Correspondence with Messrs. Orava and Vaughn regarding denial of requests to extend certain exclusions from Section 301 tariffs	0.3
09/17/20	S Orava	Review confirmation documents regarding rejection of extension of exclusion	0.2
			<hr/> 0.5

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Steve Orava	Partner	0.2
Pat Togni	Associate	0.3
Total		<hr/> 0.5

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10384140
Invoice Date	10/19/20
Client No.	23067
Matter No.	184005

RE: Opposition to 301 Exclusion Extension

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$447.00**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10381516  
Invoice Date 10/08/20  
Client No. 23067  
Matter No. 044001

RE: Emissions Counseling  
Client Matter Reference: 382

For questions, contact:  
Granta Nakayama 1 202 626 3733

For Professional Services Rendered through 09/30/20:

Fees	\$	5,576.00
<b>Total this Invoice</b>	<b>\$</b>	<b>5,576.00</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
044001 Emissions Counseling  
10/08/20

Invoice No. 10381516  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
09/01/20	B Stansbury	Review and revise CARB variance notice	0.2
09/02/20	B Stansbury	Revise letters to EPA and CARB	0.3
09/10/20	B Stansbury	Review and comment on letters to EPA and CARB notifying them of transfer of assets	0.1
09/24/20	G Nakayama	Conference call with Briggs & Stratton regarding process for transferring emission certifications to new entity	0.5
09/24/20	B Stansbury	Confer with J. Booher and G. Nakayama regarding CARB EO transfer prep call	0.5
09/24/20	B Stansbury	Prepare for call with client regarding transfer of EOs	0.1
09/25/20	B Stansbury	Confer with client, G. Nakayama, and CARB regarding transfer of EOs	0.4
09/29/20	L MacCuish	Revise status update to ARB regarding compliance with ARB variances	1.4
09/29/20	B Stansbury	Correspond with L. MacCuish regarding variance notice	0.1
09/30/20	L MacCuish	Revise letter to ARB regarding status of plan to bring certain engines into compliance with the terms of a variance	0.7
09/30/20	L MacCuish	Call with client regarding draft status update letter to CARB pertaining to evaporative emissions	0.5
09/30/20	B Stansbury	Review revised submission to CARB	0.1
09/30/20	B Stansbury	Confer with D. St. Martin, J. Booher, and L. MacCuish regarding variance submission	0.5
09/30/20	B Stansbury	Review and revise notice regarding variance	0.5
			5.9

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Logan MacCuish	Partner	2.6
Granta Nakayama	Partner	0.5
Brian Stansbury	Partner	2.8
Total		5.9

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

RE: Emissions Counseling  
Client Matter Reference: 382

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10381516
Invoice Date	10/08/20
Client No.	23067
Matter No.	044001

For questions, contact:  
Granta Nakayama 1 202 626 3733

## REMITTANCE

*Please return this page with your remittance.*

---

<b>Amount Due This Invoice</b>	<b>\$5,576.00</b>
--------------------------------	-------------------

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10381517  
Invoice Date 10/08/20  
Client No. 23067  
Matter No. 051001

RE: EU Regulatory and Industry Association Work  
Client Matter Reference: 2006-0529

For questions, contact:  
Granta Nakayama 1 202 626 3733

For Professional Services Rendered through 09/30/20:

Fees	\$	37,954.50
<b>Total this Invoice</b>	<b>\$</b>	<b>37,954.50</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
051001 EU Regulatory and Industry Association Work  
10/08/20

Invoice No. 10381517  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
09/08/20	A Dammann	Review EU and German product safety regulations applicable to battery safety	1.0
09/08/20	B Stansbury	Review background information (.3); research German safety regulations to prepare for all with client (.7)	1.0
09/09/20	A Dammann	Attend client call (0.7); review EU and German product safety regulations and ZLS decisions applicable to battery safety (0.6)	1.3
09/09/20	R Palmer	Research for A. Dammann re European battery standards	1.2
09/09/20	B Stansbury	Confer with J. Mourand, J. Booher, A. Dammann, and J. Engelen regarding GS marks (.7); confer with A. Dammann to prepare for client call (.2)	0.9
09/10/20	B Stansbury	Confer with potential technical expert for InStart product analysis	0.3
09/11/20	A Dammann	Review materials provided by client (.7); review EK9 decisions (1.5); conduct case research regarding interpretation of “battery operated” products under EU and German law (2.4); review EU and German product safety regulations (2.1)	6.7
09/11/20	B Stansbury	Analyze background information provided by client	0.3
09/14/20	A Dammann	Confer with B. Stansbury regarding next steps (0.3); confer with U. Grundmann regarding same (0.3)	0.6
09/14/20	B Stansbury	Prepare for call to discuss GS strategy (.2); confer with A. Dammann regarding research and plan for contacting testing labs (.4); confer with U. Grunman, A. Dammann, and E. Kohoutek regarding outreach to testing labs (.7)	1.3
09/15/20	A Dammann	Conduct calls to GS-testing houses (1.6); confer with B. Stansbury regarding next steps (0.3)	1.9
09/15/20	B Stansbury	Confer with A. Dammann regarding discussions with German testing labs and potential strategy	0.3
09/16/20	A Dammann	Confer with B. Stansbury in preparation for client conference (0.3); work on talking points for client call (.4)	0.7
09/16/20	E Kohoutek	Identifying GS-testing houses with expertise re. lawnmowers.	2.8
09/16/20	B Stansbury	Confer with A. Dammann regarding GS strategy (.3); draft and revise talking points for client meeting (.5)	0.8
09/17/20	A Dammann	Attend client conference call regarding next steps	0.9
09/17/20	U Grundmann	Review statement, documents and legal Assessment re pathway for obtaining a GS mark	2.5
09/17/20	E Kohoutek	Reviewing potential routes of litigation challenging ZLS decision affecting lawnmowers.	2.5
09/17/20	B Stansbury	Confer with K&S team and revise talking points to prepare for call with client (.6); Confer with J. Booher, J. Mourand, J. Engelen, and A. Dammann regarding InStart/GS strategy (.9)	1.5
09/18/20	A Dammann	Draft and revise memorandum	3.7

23067 Briggs & Stratton Corporation  
051001 EU Regulatory and Industry Association Work  
10/08/20

Invoice No. 10381517  
Page 3

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
09/18/20	E Kohoutek	Drafting memorandum on options to challenge the implementation of EK9-BE-101.	4.5
09/19/20	B Stansbury	Revise memo regarding GS-mark	0.5
09/20/20	A Dammann	Review and revise draft memorandum	0.8
09/20/20	B Stansbury	Draft and revise memo regarding GS Marks	1.0
09/21/20	A Dammann	Review and revise draft memorandum	0.7
09/21/20	E Kohoutek	Drafting memorandum on options to challenge the implementation of EK9-BE-101.	3.2
09/21/20	B Stansbury	Revise memo regarding GS marks	0.3
09/22/20	A Dammann	Review and revise draft memorandum	0.6
09/22/20	U Grundmann	Review and revise memorandum	2.1
09/22/20	B Stansbury	Draft and revise memo re GS-marks	0.4
09/25/20	A Dammann	Finalize memorandum	0.4
			46.7

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Ulf Grundmann	Partner	4.6
Brian Stansbury	Partner	8.6
Amina Dammann	Counsel	19.3
Elisabeth Kohoutek	Associate	13.0
Ron Palmer	Librarian	1.2
Total		46.7



# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10381517
Invoice Date	10/08/20
Client No.	23067
Matter No.	051001

RE: EU Regulatory and Industry Association Work  
Client Matter Reference: 2006-0529

For questions, contact:  
Granta Nakayama 1 202 626 3733

## REMITTANCE

*Please return this page with your remittance.*

---

<b>Amount Due This Invoice</b>	<b>\$37,954.50</b>
--------------------------------	--------------------

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10391742  
Invoice Date 11/23/20  
Client No. 23067  
Matter No. 184001

RE: AD/CVD - Large Vertical Engines  
Client Matter Reference: 920

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 10/13/20:

Fees	\$	28,126.50
<b>Total this Invoice</b>	<b>\$</b>	<b>28,126.50</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
184001 AD/CVD - Large Vertical Engines  
11/23/20Invoice No. 10391742  
Page 2**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
10/01/20	M Linarez	Prepare APO Amendment (1.8); submit APO Amendment (0.7)	2.5
10/01/20	S Orava	Review talking points and developments for preparatory call to discuss CEO briefing (0.7); teleconference with Mr. Booher regarding same (0.4); correspondence regarding APO application for expert, Mr. Kaplan, and next steps (0.3); correspondence and review documents regarding successor in interest (0.5); correspondence with interested party's counsel (0.1); correspondence with Mr. Spigel regarding legal questions (0.4)	2.4
10/02/20	J Greer	Review Commerce decision on critical circumstances	0.1
10/02/20	S Orava	Prepare for and teleconference with CEO regarding trade case update (0.7); correspondence regarding assessment of discussions with interested party (0.4); correspondence with counsel to interested party (0.2); teleconference with Mr. Booher regarding same (0.4)	1.7
10/05/20	C Long	Oversee filing of name change submission to International Trade Commission (0.1); communicate with Ms. Provost regarding filing of name change submission (0.1)	0.2
10/06/20	V He	File APO amendment to add Capital Trade Inc.	0.6
10/06/20	C Long	Draft response to U.S. Producers' Questionnaire	1.2
10/06/20	J Provost	Submit two entry of appearances and two APO applications for the small and large engines cases on the Department of Commerce website to reflect the client's name change	1.0
10/06/20	S Vaughn	Analyze issues presented by ITC questionnaires	1.2
10/07/20	V He	Prepare and submit amendment to application for APO	1.2
10/07/20	C Long	Continue drafting response to U.S. Producers' Questionnaire	0.5
10/07/20	S Orava	Teleconferences with Mr. Booher regarding case information (0.3); correspondence to confirm any likely changes in margins and subsidy rates (0.2); correspondence with client (0.3); review materials for questionnaire response and hearing arguments (0.8)	1.6
10/08/20	C Long	Finish drafting responses to U.S. Producers' Questionnaire and U.S. Importers' Questionnaire (1.9); send draft responses and summary of issues to Mr. Vaughn (0.4); identify relevant deadlines for countervailing duty investigation docket (0.1)	2.4
10/09/20	S Vaughn	Continue analyzing issues presented by final phase of ITC investigation	2.2
10/12/20	C Long	Teleconference with Mr. Vaughn regarding questionnaire responses (0.3); revise responses to U.S. Producers' Questionnaire and U.S. Purchasers' Questionnaire (1.0)	1.3
10/12/20	S Orava	Review documents and proposed key points (0.4); teleconference with Messrs. Vaughn, Kaplan, and Pickard	2.1

23067 Briggs & Stratton Corporation  
184001 AD/CVD - Large Vertical Engines  
11/23/20

Invoice No. 10391742  
Page 3

Date	Timekeeper	Description	Hours
		regarding strategy of ITC final phase (0.9); teleconferences with Messrs. Booher, Vaughn, and Ballard regarding developments with customers (0.8)	
10/12/20	S Vaughn	Analyze strategy issues presented by ITC investigation (1.7); confer with expert and counsel for Kohler regarding same (0.4)	2.1
10/13/20	C Long	Teleconference with Briggs & Stratton regarding questionnaire responses (1.5); teleconference with Mr. Vaughn regarding questionnaire responses (0.1); identify outstanding items from questionnaire responses (0.8); continue drafting response to U.S. Purchasers' Questionnaire (1.2); revise response to U.S. Producers' Questionnaire (0.7)	4.3
10/13/20	S Orava	Correspondence with Mr. Booher regarding developments (0.3); teleconference with Mr. Booher regarding CEO call and other pending issues (0.2); prepare for and attend teleconference with client team regarding key issues and responses to ITC's questionnaires (1.7)	2.2
10/13/20	S Vaughn	Analyze draft narrative responses to ITC questionnaires (2.8); confer with company officials regarding data issues and upcoming points in ITC litigation (0.5)	3.3
			34.1

**TIMEKEEPER SUMMARY**

Timekeeper	Status	Hours
Jamieson Greer	Partner	0.1
Steve Orava	Partner	10.0
Stephen Vaughn	Partner	8.8
Clint Long	Associate	9.9
Valerie He	Project Assistant	1.8
Morayma Linarez	Project Assistant	2.5
Jillian Provost	Project Assistant	1.0
Total		34.1

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

RE: AD/CVD - Large Vertical Engines  
Client Matter Reference: 920

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10391742
Invoice Date	11/23/20
Client No.	23067
Matter No.	184001

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$28,126.50**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10391743  
Invoice Date 11/20/20  
Client No. 23067  
Matter No. 184002

RE: AD/CVD - Small Vertical Engines  
Client Matter Reference: 938

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 10/13/20:

Fees	\$	44,427.00
Expenses		997.50
<b>Total this Invoice</b>	<b>\$</b>	<b>45,424.50</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
11/20/20

Invoice No. 10391743  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
10/01/20	J Greer	Review respondent submissions (1.8); review and edit successor in interest notices (0.8)	2.6
10/01/20	C Long	Communicate with Mr. Greer regarding submission of notices of name change	0.4
10/01/20	J Spigel	Assess antitrust issues arising from proposed agreement and email regarding same	0.5
10/01/20	S Vaughn	Work on issues presented by critical circumstances filing	1.3
10/02/20	J Greer	Review and analyze critical circumstances submissions (1.0); review and analyze respondent submissions (2.8); confer with Mr. Andersen regarding margin analysis (0.1)	3.9
10/02/20	J Provost	Download supplemental questionnaire response and related exhibits for circulation to attorneys (0.5); create public version and final version of pre-preliminary comments filing (0.3); prepare attorney certification (0.2); update service list (0.2); correspond with Mr. Greer to review document (0.1); file at the Department of Commerce (0.2)	1.5
10/02/20	S Vaughn	Analyze issues relating to critical circumstances (1.1); confer with company officials regarding potential next steps (0.9)	2.0
10/04/20	B Byers	Review draft agreement	0.5
10/04/20	J Greer	Review and comment on draft critical circumstances agreement	0.2
10/04/20	S Orava	Draft document regarding commercial issue for client (2.4); correspondence with Mr. Vaughn regarding same (0.3); correspondence with Ms. Byers regarding critical circumstances (0.2)	2.9
10/05/20	J Greer	Conduct research and analysis on critical circumstances and name change issues (1.7); confer with Mr. Orava regarding the same (0.3)	2.0
10/05/20	C Long	Correspondence with Mr. Greer regarding filing of name change submissions and requirements for certifications (0.3); research samples of name change submissions at International Trade Commission (0.2); oversee filing of name change submission to International Trade Commission (0.1)	0.6
10/05/20	S Orava	Teleconferences and correspondence with Mr. Greer regarding critical circumstances developments (0.3); review draft documents in relation to customer (0.4); correspondence and teleconferences with Messrs. Vaughn and Greer and with client regarding same (0.7)	1.4
10/05/20	J Provost	Upload supplemental questionnaire response and related documents to Capital Trade (0.3); resend documents for attorneys (0.2); prepare APO amendments and Entry of Appearance amendments for small engines, large engines, and walk behind lawn mower cases at the ITC and Commerce (2.2); update service lists for ITC filings (0.8); correspondence with	4.5

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
11/20/20

Invoice No. 10391743  
Page 3

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
		Mr. Greer to review documents (0.2); file request to amend at the International Trade Commission (0.8)	
10/06/20	J Greer	Review and analyze respondent submissions and conduct research regarding the same	2.2
10/06/20	S Orava	Teleconference with Mr. Booher and follow-up correspondence regarding negotiations with customer	0.3
10/07/20	J Greer	Conduct research and analysis on critical circumstances (0.8); review and analyze respondent submissions (0.4)	1.2
10/07/20	C Long	Review draft letter regarding critical circumstances (0.1); communicate with Mr. Greer regarding the same (0.1)	0.2
10/07/20	S Orava	Teleconferences and correspondence regarding questions on critical circumstances and duty deposits	0.6
10/07/20	J Provost	Download and distribute supplemental questionnaire response and related exhibits for attorneys	0.4
10/07/20	D Schneiderman	Conduct legal research regarding potential options for withdrawing a critical circumstances allegation and timing for the refund of deposits (0.4); correspond with Mr. Orava regarding same (0.4)	0.8
10/08/20	J Greer	Conduct research and analysis on critical circumstances (0.7); review and analyze respondent submissions (0.2)	0.9
10/08/20	S Orava	Teleconferences and correspondence with team regarding questions on duty deposits and withdrawal of critical circumstances allegation (0.7); correspondence regarding scope issue (0.2); review documents (0.3)	1.2
10/08/20	J Provost	Upload public version of supplemental Section D Questionnaire Response for Kohler, Pre-preliminary comments and data exhibit, SRA questionnaire response, 3rd supplemental questionnaire response, and a phone call with counsel memorandum	0.5
10/08/20	D Schneiderman	Correspondence with Mr. Orava and Mr. Greer regarding potential options for withdrawing a critical circumstances allegation and timing for the refund of deposits	0.3
10/08/20	J Telep	Telephone conference with Mr. Orava regarding effect of critical circumstances allegations on importers (0.2); review research regarding same (0.2); review and revise draft email to client regarding same (0.3)	0.7
10/09/20	J Greer	Review and analyze respondent submissions (1.1); draft rebuttal comments regarding the same (2.6)	3.7
10/09/20	V He	Download and distribute data exhibits and revised questionnaire	0.6
10/09/20	V He	Download and distribute supplementary questionnaires	0.7
10/09/20	C Long	Revise bracketing of creditworthiness allegation per Department of Commerce's instructions	1.4
10/09/20	S Orava	Teleconferences and correspondence with team regarding submissions and deadlines in advance of preliminary determination (0.4); teleconference with Commerce regarding	1.1



23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
11/20/20

Invoice No. 10391743  
Page 4

Date	Timekeeper	Description	Hours
		creditworthiness allegation (0.2); correspondence with Mr. Long (0.1); review update on status and corresponding documents (0.4)	
10/10/20	J Greer	Draft rebuttal comments to respondent submissions	2.1
10/12/20	J Greer	Draft rebuttal to respondent submission	6.4
10/12/20	M Linarez	Draft, revise, and finalize a rebuttal	3.0
10/12/20	C Long	Review and revise bracketing in creditworthiness allegation (0.6); teleconference with Ms. Byers regarding bracketing (0.2); draft cover letter for allegation (0.1); communicate internally regarding letter and allegation (0.1)	1.0
10/12/20	S Orava	Review and revise bracketing correction documents (0.3); correspondence with Mr. Long (0.1); review and revise comments on Zongshen supplemental questionnaire response (0.4); correspondence with Mr. Greer and follow-up (0.3)	1.1
10/13/20	J Greer	Finalize and file rebuttal to respondent submission	1.2
10/13/20	M Linarez	Revise rebuttal filing (1.7); submit rebuttal filing (0.4); create public version of the rebuttal filing (1.7)	3.8
10/13/20	C Long	Finalize submission of revised creditworthiness allegation (0.2); teleconference with Ms. Provost regarding the same (0.2)	0.4
10/13/20	J Provost	Prepare, stamp, and combine bracketing not final version of rebracketing filing (1.1); update service list (0.3); correspond with Mr. Long to review documents (0.2); file documents at the Department of Commerce (0.5); prepare public version of file (1.1); redact, stamp, sanitize, and prepare public version (0.3); redact and stamp exhibits (0.3); update public service list (0.2)	4.0
			64.1

**TIMEKEEPER SUMMARY**

Timekeeper	Status	Hours
Jamieson Greer	Partner	26.4
Steve Orava	Partner	8.6
Jeff Spigel	Partner	0.5
Jeff Telep	Partner	0.7
Stephen Vaughn	Partner	3.3
Daniel Schneiderman	Counsel	1.1
Clint Long	Associate	4.0
Bonnie Byers	Consultant	0.5
Valerie He	Project Assistant	1.3
Morayma Linarez	Project Assistant	6.8
Jillian Provost	Project Assistant	10.9
Total		64.1

23067 Briggs & Stratton Corporation  
184002 AD/CVD - Small Vertical Engines  
11/20/20

Invoice No. 10391743  
Page 5

**Expenses Incurred**

11/06/20	Professional Fees - VENDOR: Capital Trade, Inc. INVOICE#: 11372A	997.50
	DATE: 11/6/2020	
	For professional services rendered	
	Total Expenses	<hr/> 997.50

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

RE: AD/CVD - Small Vertical Engines  
Client Matter Reference: 938

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10391743
Invoice Date	11/20/20
Client No.	23067
Matter No.	184002

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

<b>Amount Due This Invoice</b>	<b>\$45,424.50</b>
--------------------------------	--------------------

*Payment is Due Upon Receipt*



November 06, 2020

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

Re: Small Gasoline Engines

Dear Mr. Orava:

The attached invoice covers Capital Trade, Inc.'s fees and expenses for the period October 1 – 13, 2020, in conjunction with the above referenced matter.

Sincerely,

A handwritten signature in black ink, appearing to be "Charles L. Anderson", with a long horizontal line extending to the right.

Charles L. Anderson

Enclosures



## Invoice

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

**Invoice Date:** Nov 6, 2020

**Invoice Num:** 11372-A

**Billing Through:** Oct 1 - 13, 2020

**Small Gasoline Engines (1086-000:)** - Managed by (CAnderson)

**Professional Services:**

<u>Employee</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles L. Anderson	1.50	\$570.00	\$855.00
Mary Ann McCleary	.30	\$475.00	\$142.50
<b>Total Services:</b>			<b>\$997.50</b>
<b>Project (1086-000:) Total Amount Due:</b>			<b>\$997.50</b>
<b>Current Month's fee &amp; expenses:</b>			<b>\$997.50</b>

**Past Invoices outstanding:**

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Invoice Amount</u>	<u>Payment/Credit</u>	<u>Current Balance</u>
11224	08/06/2020	\$32,442.50	\$0.00	\$32,442.50
11304	10/08/2020	\$16,259.75	\$0.00	\$16,259.75
<b>Total Current and Outstanding Invoices:</b>				<b>\$49,699.75</b>

**Payment is due within 30 days. Please pay by check or wire transfer to:**

**By check :**

Capital Trade, Inc.  
ATTN: Vivienne Ramgeet  
1200 18th Street, NW  
Suite 601  
Washington, D.C. 20036

**By Wire Transfer:**

SunTrust Bank  
900 17th Street, N.W.  
Washington, D.C. 20006  
Bank Routing #: 061 000 104  
Capital Trade Acct # 1000183401693

**Please reference the project matter and invoice numbers on your payment.**



**Capital Trade, Inc.**  
1200 18th Street, NW, Suite 601  
Washington, DC 200362526  
Tel: (202) 463-1850 Fax: (202) 463-1855

Mr. Stephen J Orava  
King & Spalding  
1700 Pennsylvania Avenue, N.W.  
Washington, DC 20006-4706

## Invoice

**Invoice Date:** Nov 6, 2020  
**Invoice Num:** 11372-A  
**Billing Through:** Oct 1-13, 2020

**Small Gasoline Engines** (1086-000:) - Managed by (CAnderson)

**Professional Services:**

<u>Date</u>	<u>Description</u>	<u>Hours</u>
<b>Charles L. Anderson</b>		
10/12/2020	Reviewed latest CZ questionnaire data and estimated margin impact	1.50
	<b>Charles L. Anderson</b>	<b>Total Hours: 1.50</b>
<b>Mary Ann McCleary</b>		
10/05/2020	Reviewed new Chongqing supplemental data base and checked changes .	0.30
	<b>Mary Ann McCleary</b>	<b>Total Hours: .30</b>

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10391744  
Invoice Date 11/20/20  
Client No. 23067  
Matter No. 184003

RE: Walk-Behind Lawnmower AD/CVD  
Client Matter Reference: 989

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 10/13/20:

Fees	\$	196.50
<b>Total this Invoice</b>	<b>\$</b>	<b>196.50</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
184003 Walk-Behind Lawnmower AD/CVD  
11/20/20

Invoice No. 10391744  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
10/01/20	C Long	Communicate with Mr. Orava regarding notice of name change at Department of Commerce (0.1); review docket at Department of Commerce to identify requirements for notice of name change (0.1)	0.2
10/05/20	C Long	Oversee filing of name change submission to International Trade Commission (0.1)	0.1
			<hr/> 0.3

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Clint Long	Associate	0.3
Total		<hr/> 0.3



# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10391744  
Invoice Date 11/20/20  
Client No. 23067  
Matter No. 184003

RE: Walk-Behind Lawnmower AD/CVD  
Client Matter Reference: 989

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$196.50**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10392216  
Invoice Date 11/20/20  
Client No. 23067  
Matter No. 184004

RE: Retention and Fee Applications

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 10/31/20:

Fees	\$	9,814.50
<b>Total this Invoice</b>	<b>\$</b>	<b>9,814.50</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
184004 Retention and Fee Applications  
11/20/20

Invoice No. 10392216  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
10/01/20	A Steinberg	Note to Mr. Orava regarding fee application	0.3
10/08/20	L Shermohammed	Prepare, finalize, and serve amended first monthly fee statement	1.3
10/08/20	A Steinberg	Correspondence regarding monthly fee application	0.3
10/19/20	A Steinberg	Note from Mr. Davidson regarding fee application	0.2
10/20/20	A Steinberg	Correspondence to Mr. Davidson regarding monthly fee application	0.4
10/22/20	S Davidson	Review draft of Second Monthly Fee Statement and provide comments	0.4
10/22/20	N Gadsden	Prepare exhibits to monthly fee statement	4.6
10/22/20	L Shermohammed	Draft second monthly fee application	1.8
10/23/20	S Davidson	Review revised draft of Second Monthly Fee Statement and e-mails regarding same	0.6
10/23/20	N Gadsden	Prepare exhibits to monthly fee statement	1.0
10/23/20	L Shermohammed	Continue drafting and finalize second monthly fee application	2.3
10/25/20	A Steinberg	Review monthly fee application	0.3
10/26/20	A Steinberg	Note to Mr. Davidson regarding monthly fee application	0.2
			13.7

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Arthur Steinberg	Partner	1.7
Scott Davidson	Counsel	1.0
Leia Shermohammed	Associate	5.4
Natasha Gadsden	Paralegal	5.6
Total		13.7

# KING & SPALDING

FEDERAL I.D. 58-0520153

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Invoice No.	10392216
Invoice Date	11/20/20
Client No.	23067
Matter No.	184004

RE: Retention and Fee Applications

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$9,814.50**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10391747  
Invoice Date 11/20/20  
Client No. 23067  
Matter No. 184005

RE: Opposition to 301 Exclusion Extension

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 10/13/20:

Fees	\$	462.00
<b>Total this Invoice</b>	<b>\$</b>	<b>462.00</b>

*Payment is Due Upon Receipt*

23067 Briggs & Stratton Corporation  
184005 Opposition to 301 Exclusion Extension  
11/20/20

Invoice No. 10391747  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
10/02/20	P Togni	Review Section 301 exclusion renewals (0.5); correspondence with Mr. Orava regarding same (0.1)	0.6
			<hr/> 0.6

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Pat Togni	Associate	0.6
Total		<hr/> 0.6

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10391747  
Invoice Date 11/20/20  
Client No. 23067  
Matter No. 184005

RE: Opposition to 301 Exclusion Extension

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$462.00**

*Payment is Due Upon Receipt*

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10396440  
Invoice Date 12/07/20  
Client No. 23067  
Matter No. 184004

RE: Retention and Fee Applications

For questions, contact:  
Steve Orava 1 202 661 7937

For Professional Services Rendered through 11/30/20:

Fees	\$	14,864.50
<b>Total this Invoice</b>	<b>\$</b>	<b>14,864.50</b>

*Payment is Due Upon Receipt*



23067 Briggs & Stratton Corporation  
184004 Retention and Fee Applications  
12/07/20

Invoice No. 10396440  
Page 2

**PROFESSIONAL SERVICES**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>
11/06/20	S Davidson	E-mails with Messrs. Steinberg and Orava regarding monthly fee statement and interim fee application (.5); e-mail with Weil Gotshal regarding procedures for fee applications (.3)	0.8
11/09/20	S Davidson	E-mails with Messrs. Steinberg and Orava regarding monthly fee statement and interim fee application (.5); e-mail with Weil Gotshal regarding procedures for fee applications (.3)	0.8
11/09/20	A Steinberg	Telephone call with Mr. Davidson regarding monthly fee application	0.3
11/16/20	A Steinberg	Correspondence from Messrs. Davidson and Orava	0.3
11/19/20	A Steinberg	Correspondence regarding fee application	0.3
11/20/20	S Davidson	E-mails with Mr. Orava regarding October fee statement (.2); e-mails with Ms. Shermohammed regarding same (.3)	0.5
11/23/20	N Gadsden	Prepare exhibits to third monthly fee statement	6.6
11/23/20	L Shermohammed	Draft monthly fee statement	3.8
11/24/20	S Davidson	Review and revise draft of October monthly fee statement (.6); e-mails with Ms. Shermohammed regarding same (.2); review additional comments on October monthly fee statement (.2); e-mails regarding same (.1)	1.1
11/24/20	L Shermohammed	Revise and finalize monthly fee statement	1.4
11/24/20	A Steinberg	Review monthly fee application	0.4
11/30/20	L Shermohammed	Draft first and final interim fee application	4.2
			20.5

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Status</b>	<b>Hours</b>
Arthur Steinberg	Partner	1.3
Scott Davidson	Counsel	3.2
Leia Shermohammed	Associate	9.4
Natasha Gadsden	Paralegal	6.6
Total		20.5

# KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:  
King & Spalding LLP  
P.O. Box 116133  
Atlanta, GA 30368-6133

By Wire: SunTrust Bank  
ABA: 061 000 104  
SWIFT: SNTRUS3A  
USD Account: 88003 12475  
Account Name: King & Spalding

Briggs & Stratton Corporation  
ATTN: Kathryn M. Buono  
12301 West Wirth Street  
Wauwatosa, WI 53222

Invoice No. 10396440  
Invoice Date 12/07/20  
Client No. 23067  
Matter No. 184004

RE: Retention and Fee Applications

For questions, contact:  
Steve Orava 1 202 661 7937

## REMITTANCE

*Please return this page with your remittance.*

---

**Amount Due This Invoice**

**\$14,864.50**

*Payment is Due Upon Receipt*