

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

----- X
 In re : Chapter 11
 BRIGGS & STRATTON : Case No. 20-43597-399
 CORPORATION, *et al.*, :
 Debtors. : (Jointly Administered)
 ----- X Obj. Deadline: March 31, 2021 at 11:59 p.m. CT

**FINAL FEE APPLICATION OF HANSEN REYNOLDS LLC
FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR PERIOD FROM DECEMBER 1, 2020 THROUGH JANUARY 6, 2021**

Name of Applicant: Hansen Reynolds LLC
 Authorized to Provide Professional Services to: Briggs & Stratton Corporation / Debtors
 Petition Date: July 20, 2020
 Date of Retention: October 5, 2020
 Period for which compensation and reimbursement are sought: December 1, 2020 through January 6, 2021
 Amount of compensation sought as actual, reasonable, and necessary: \$525.00
 Amount of expense reimbursement sought as actual, reasonable, and necessary: \$0.00

This is a(n): ___ monthly ___ interim X final application

**APPLICATION OF HANSEN REDYNOLDS LLC
IN SUPPORT OF ITS FINAL FEE APPLICATION**

Hansen Reynolds LLC (“HR”) was retained by the debtors and debtors in possession (“Debtors”) as special insurance counsel by provisional order of the Court on October 5, 2020. (*See* ECF No. 1020.)

The terms and conditions of HR’s employment, as set forth in the Court’s order, provide that HR will charge Debtors for its services on a mixed-fee arrangement comprised of a reduced hourly rate of \$250/hour for all attorneys plus a contingency fee as set forth in the original Engagement Letter. HR is also entitled to reimbursement of out-of-pocket expenses and other charges incurred on behalf of Debtors. (*See id.* ¶¶ 18-22.) There have been no rate increases since the inception of the case.

This is HR’s second and final fee application since being retained by the Debtors as special insurance counsel. On January 25, 2021, HR served its monthly fee statement (attached as Exhibit A to this application), which, as revised, sought \$2,625.00 as compensation for legal services rendered from December 1, 2020 through December 31, 2020 relating to the insurance coverage action HR is handling on behalf of Debtors. HR has since been paid 80% of those fees. Through this application, HR is seeking payment for the remaining 20% of its fees (\$525.00).

HR is not in possession of any pre-petition retainer or other funds from Debtors that HR could apply against post-petition invoices.

Per the Local Guidelines, HR addresses the twelve factors from *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 71 (5th Cir. 1974), as follows:

- (i) the time and labor required: HR has invested significant time and effort in continuing to pursue the insurance coverage action on behalf of Debtors and to explore potential resolution of that action.
- (ii) the novelty and difficulty of the questions: the coverage action involves multiple defendants, numerous policies, and hundreds of underlying asbestos claims; complex questions of long-tail harm and insurance law; and complex issues at the intersection of insurance law and bankruptcy.
- (iii) the skill requisite to perform the legal service properly: the complexity of the issues identified above demands a high level of skill from counsel.
- (iv) the preclusion of other employment by the attorney due to acceptance of the case: by devoting time and effort to this case, HR has foregone other employment at potentially higher rates.
- (v) the customary fee: as set forth in HR’s Retention Application, HR has rendered services to the Debtors at a reduced hourly rate.
- (vi) whether the fee is fixed or contingent: as set forth in HR’s Retention Application, the agreed fee is a mixed arrangement including a reduced hourly fee plus a contingency fee.
- (vii) time limitations imposed by the client: HR has been handling the coverage action on a budget developed early in the case with the client.

- (viii) the amount involved and the results obtained: in the coverage action Debtors seek to recover millions of dollars. So far, they have survived a motion to dismiss and largely defeated the defendants' counterclaims.
- (ix) the experience, reputation, and ability of the attorneys: HR and its attorneys are highly experienced, expert in complex commercial litigation, and enjoy an excellent reputation.
- (x) the "undesirability" of the case: the coverage action is a desirable case.
- (xi) the nature and length of the professional relationship with the client: HR has had a close relationship with Debtors over the last approximately two years working on the coverage action and other matters.
- (xii) awards in similar cases: HR is unaware of any relevant information at this time.

Significant Events and Major Activity During the Fee Period: The coverage action was stayed after Debtors filed their petition and remains stayed at this time. During the period covered by this fee statement, HR and Debtors have engaged in negotiations with the defendants and related analysis of the coverage action and potential outcomes in that action.

Attached are HR's time records during the Fee Period and a description of expenses for which HR seeks reimbursement.

March 5, 2021

Respectfully submitted:

HANSEN REYNOLDS LLC

s/ John W. McCauley

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Madison, WI 53703

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EXHIBIT A

Monthly Fee Statement

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

----- X
In re : Chapter 11
BRIGGS & STRATTON : Case No. 20-43597-399
CORPORATION, *et al.*, :
Debtors. : (Jointly Administered)
----- X Obj. Deadline: Feb. 7, 2021 at 4:00 p.m. (CT)

**MONTHLY FEE STATEMENT OF HANSEN REYNOLDS LLC
FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR PERIOD FROM DECEMBER 1 THROUGH DECEMBER 31, 2020**

Name of Applicant: Hansen Reynolds LLC
Authorized to Provide Professional Services to: Briggs & Stratton Corporation / Debtors
Petition Date: July 20, 2020
Date of Retention: October 5, 2020
Period for which compensation and reimbursement are sought: December 1, 2020 through December 31, 2020
Amount of compensation sought as actual, reasonable, and necessary: \$2,100 (80% of \$2,625)
Amount of expense reimbursement sought as actual, reasonable, and necessary: \$0.00

This is a(n): X monthly ___ interim ___ final application

**APPLICATION OF HANSEN REDYNOLDS LLC
IN SUPPORT OF ITS MONTHLY FEE STATEMENT**

Hansen Reynolds LLC (“HR”) was retained by the debtors and debtors in possession (“Debtors”) as special insurance counsel by provisional order of the Court on October 5, 2020. (*See* ECF No. 1020.)

The terms and conditions of HR’s employment, as set forth in the Court’s order, provide that HR will charge Debtors for its services on a mixed-fee arrangement comprised of a reduced hourly rate of \$250/hour for all attorneys plus a contingency fee as set forth in the original Engagement Letter. HR is also entitled to reimbursement of out-of-pocket expenses and other charges incurred on behalf of Debtors. (*See id.* ¶¶ 18-22.) There have been no rate increases since the inception of the case.

This is HR’s third monthly fee statement since being retained by the Debtors as special insurance counsel. Through this monthly fee statement, HR is seeking payment of 80% of its fees for services rendered on the insurance coverage action from December 1, 2020 through December 31, 2020. This amounts to \$2,100 (80% of \$2,625).

HR is not in possession of any pre-petition retainer or other funds from Debtors that HR could apply against post-petition invoices.

Per the Local Guidelines, HR addresses the twelve factors from *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 71 (5th Cir. 1974), as follows:

- (i) the time and labor required: HR has invested significant time and effort in continuing to pursue the insurance coverage action on behalf of Debtors and to explore potential resolution of that action.
- (ii) the novelty and difficulty of the questions: the coverage action involves multiple defendants, numerous policies, and hundreds of underlying asbestos claims; complex questions of long-tail harm and insurance law; and complex issues at the intersection of insurance law and bankruptcy.
- (iii) the skill requisite to perform the legal service properly: the complexity of the issues identified above demands a high level of skill from counsel.
- (iv) the preclusion of other employment by the attorney due to acceptance of the case: by devoting time and effort to this case, HR has foregone other employment at potentially higher rates.
- (v) the customary fee: as set forth in HR’s Retention Application, HR has rendered services to the Debtors at a reduced hourly rate.
- (vi) whether the fee is fixed or contingent: as set forth in HR’s Retention Application, the agreed fee is a mixed arrangement including a reduced hourly fee plus a contingency fee.
- (vii) time limitations imposed by the client: HR has been handling the coverage action on a budget developed early in the case with the client.

- (viii) the amount involved and the results obtained: in the coverage action Debtors seek to recover millions of dollars. So far, they have survived a motion to dismiss and largely defeated the defendants' counterclaims.
- (ix) the experience, reputation, and ability of the attorneys: HR and its attorneys are highly experienced, expert in complex commercial litigation, and enjoy an excellent reputation.
- (x) the "undesirability" of the case: the coverage action is a desirable case.
- (xi) the nature and length of the professional relationship with the client: HR has had a close relationship with Debtors over the last approximately two years working on the coverage action and other matters.
- (xii) awards in similar cases: HR is unaware of any relevant information at this time.

Significant Events and Major Activity During the Fee Period: The coverage action was stayed after Debtors filed their petition and remains stayed at this time. During the period covered by this fee statement, HR and Debtors have engaged in negotiations with the defendants and related analysis of the coverage action and potential outcomes in that action.

Attached are HR's time records during the Fee Period and a description of expenses for which HR seeks reimbursement.

January 21, 2021

Respectfully submitted:

HANSEN REYNOLDS LLC

s/ John W. McCauley

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Phone: (414) 455-7676

treynolds@hansenreynolds.com

COMPENSATION BY PROFESSIONAL DECEMBER 1, 2020 - DECEMBER 31, 2020

The attorneys who rendered professional services in these chapter 11 cases from December 1, 2020 through December 31, 2020 (the "Fee Period") are:

Name of Professional	Position	Department	Year Admitted	Hourly Billing Rate	Total Billed Hours	Total Compensation
John McCauley	Partner	Litigation	2007	250	10.50	2,625.00
Total for Attorneys					10.50	\$2,625.00

The paraprofessional who rendered professional services during the Fee Period are:

Name of Professional	Position	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
	Paralegal	Litigation			
	Paralegal	Litigation			
Total				0.00	\$0.00

The total fees for the Fee Period are:

PROFESSIONALS	Blended Rate	Total Billed Hours	Total Compensation
Partners and Counsel	\$250.00	10.50	2,625.00
Associates	\$0.00	0.00	0.00
Paraprofessional	\$0.00	0.00	0.00
Blended Attorney Rate	\$250.00		
Total:		10.50	2,625.00

COMPENSATION BY MATTER DECEMBER 1, 2020 - DECEMBER 31, 2020

PROJECT CATEGORY	Total Billed Hours	Total Compensation
Litigation	10.50	\$2,625.00
Total:	10.50	\$2,625.00

EXPENSE SUMMARY DECEMBER 1, 2020 - DECEMBER 31, 2020

EXPENSE CATEGORY	AMOUNT
Postage	0.00
Travel	
Local Transportation	
Duplicating	
Total:	0.00



INVOICE

Invoice # 7673
Date: 01/20/2021
Due On: 02/19/2021

Hansen Reynolds LLC

301 North Broadway Street, Suite 400
Milwaukee, WI 53202

Briggs & Stratton Corporation
P.O. Box 702
Milwaukee, WI 53201

00940-Briggs & Stratton Corporation-Asbestos Insurance Coverage

Asbestos Insurance Coverage

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	JWM	12/01/2020	Review bankruptcy docket and filings.	0.50	\$250.00	\$125.00
Service	JWM	12/02/2020	Review and analyze bankruptcy filings regarding treatment of insurance policies under proposed plan.	0.50	\$250.00	\$125.00
Service	JWM	12/03/2020	Review correspondence and further information from insurers' counsel regarding potential settlement, AIG's desire to participate in discussions, and policy limits; review insurers' responses to informational requests; consider impact on settlement strategy.	3.00	\$250.00	\$750.00
Service	JWM	12/03/2020	Continue analysis of bankruptcy plan and filings.	0.30	\$250.00	\$75.00
Service	JWM	12/04/2020	Review update from bankruptcy counsel about plans for first interim fee applications.	0.10	\$250.00	\$25.00
Service	JWM	12/07/2020	Review documents regarding coverage case status, potential settlement, and engagement letters.	0.80	\$250.00	\$200.00
Service	JWM	12/09/2020	Review chapter 11 plan and provisions regarding appointment and authority of plan administrator.	1.00	\$250.00	\$250.00
Service	JWM	12/14/2020	Prepare interim fee application, including summary of case status and outstanding invoices; prepare attachments to application; correspond with team and bankruptcy counsel about same.	2.00	\$250.00	\$500.00

Service	JWM	12/14/2020	Review bankruptcy docket and objections to chapter 11 plan.	1.00	\$250.00	\$250.00
Service	JWM	12/16/2020	Review update from bankruptcy counsel about filing of interim fee applications.	0.10	\$250.00	\$25.00
Service	JWM	12/16/2020	Review and analyze insurers' objection to plan.	0.70	\$250.00	\$175.00
Service	JWM	12/18/2020	Review filed interim fee application; correspond with bankruptcy counsel concerning monthly fee statements; prepare estimate of December fees.	0.50	\$250.00	\$125.00
					Subtotal	\$2,625.00
					Total	\$2,625.00

Payment may be made to: Hansen Reynolds LLC