

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF C. MICHAEL EVERT, JR. IN SUPPORT OF
EX PARTE APPLICATION OF THE DEBTORS FOR AN ORDER AUTHORIZING
THEM TO RETAIN AND EMPLOY EVERT WEATHERSBY HOUFF AS OF THE
PETITION DATE**

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rules 2014-1 and 2016-1 of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the "Local Bankruptcy Rules"), I, C. Michael Evert, Jr., hereby declare:

1. I am a name partner with the law firm of Evert Weathersby Houff ("EWH") and am duly authorized to make this supplemental declaration on behalf of EWH. I previously submitted a declaration in support of the *Ex Parte Application of the Debtors for an Order Authorizing Them to Retain and Employ Evert Weathersby Houff as Special Asbestos Litigation Counsel as of the Petition Date* (the "Application") [Dkt. 24].² The Court granted that that Application by an order entered on June 19, 2020 [Dkt. 74].

2. The facts set forth in this declaration are personally known to me and, if called as a witness, I could and would testify thereto.

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Application.



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3. EWH offers this Supplemental Declaration at the request of The Official Committee of Asbestos Personal Injury Claimants.

4. As outlined in my original Declaration, EWH is a boutique law firm specializing in mass tort litigation with three offices and 20 attorneys that has represented the Debtors and certain of their non-debtor affiliates in matters related to the defense of asbestos claims since June 2012. This included, since 2017, serving as national coordinating counsel in regard to asbestos claims being asserted against Aldrich's predecessor, the former Trane Technologies Company LLC, successor by merger to Ingersoll-Rand Company (a former New Jersey corporation) ("Old IRNJ"), and Murray's predecessor, the former Trane U.S. Inc. ("Old Trane"). On May 1, 2020, when Old IRNJ and Old Trane underwent corporate restructurings (together, the "2020 Corporate Restructuring") and ceased to exist, EWH began to represent the newly formed Debtors, Aldrich Pump LLC and Murray Boiler LLC, again in matters related to the defense of asbestos claims. After the filing of this chapter 11 case, EWH has served as the Debtors' special counsel to assist on issues relating to the resolution of asbestos claims, as described in the Application.

5. The above-described representation included legal services related to the Reverse Morris Trust transaction that closed on February 29, 2020 (the "RMT") and the 2020 Corporate Restructuring. To that end, EWH was made aware of both these transactions prior to their closings, and EWH was asked to provide asbestos-litigation related advice, counsel, and litigation coordination to Old IRNJ (in the case of the RMT) and Old IRNJ and Old Trane (in the case of the 2020 Corporate Restructuring) in light of the transactions. As an example, prior to the closing of each transaction, EWH assisted in the drafting and preparation of instructions, protocols, and other documents to be provided to local counsel, insurers, and others concerning

the transactions and potential modifications in the day-to-day defense of asbestos claims asserted against the Debtors and their predecessors.

6. 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: August 17, 2020
Atlanta, Georgia

/s/ C. Michael Evert, Jr.
C. Michael Evert, Jr.
Evert Weathersby Houff