

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)

**THIRD SUPPLEMENTAL DECLARATION OF DAVID F. MCGONIGLE IN
CONNECTION WITH *EX PARTE* APPLICATION OF THE DEBTORS FOR AN
ORDER AUTHORIZING THEM TO RETAIN AND EMPLOY K&L GATES LLP
AS SPECIAL INSURANCE COUNSEL AS OF THE PETITION DATE**

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2014-1 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, David F. McGonigle, hereby declare:

1. I am an attorney at law admitted and in good standing to practice in the Commonwealth of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States District Court for the Western District of Pennsylvania. I am a partner of K&L Gates LLP (“K&L Gates”) and am duly authorized to make this declaration on behalf of K&L Gates. I make this declaration in connection with the *Ex Parte Application of the Debtors for an Order Authorizing Them to Retain and Employ K&L Gates LLP as Special Insurance Counsel as of the Petition Date* [Dkt. 25] (the “Application”).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.



Third Supplemental Disclosure

2. K&L Gates received a list of additional potentially interested parties from the Debtors, which is attached as Exhibit A hereto.

3. K&L Gates hereby submits the Second Supplement to Schedule 2 to the Application, attached as Exhibit B hereto. Exhibit B reflects supplemental disclosures regarding certain potential parties in interest on Exhibit A and includes supplements to K&L Gates's prior disclosures in accordance with its continuing disclosure obligations.

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: November 25, 2020

Pittsburgh, PA

/s/ David F. McGonigle
David F. McGonigle
K&L Gates LLP

EXHIBIT A

**Aldrich Pump LLC, *et al.*
Additional Potentially Interested Parties**

Known Professionals for Certain Non-Debtor Parties in Interest

Burt & Cordes, PLLC
Caplin & Drysdale, Chartered
Orrick Herrington & Sutcliffe LLP
Robinson & Cole, LLP
Winston & Strawn LLP

Parties That Have Filed A Notice of Appearance and Their Counsel

Bestwall LLC
Davis & Hamrick, LLP
Honeywell International Inc.
King & Spalding LLP

Insurers and Their Counsel

ACE American Insurance Company
ACE Property & Casualty Insurance Company
Accident & Casualty Co.
Accident & Casualty Insurance of Winterthur
AIG Property Casualty Insurance Company
Allianz SPA
Allianz Versicherungs AG, AM, Ins. Co.
American Guarantee & Liability Insurance Company
American Home Assurance Company
Century Indemnity Company
Certain London Market Insurance Companies
Certain Underwriters at Lloyd's of London
Chicago Ins. Co.
Columbia Casualty Company
Continental Casualty Company and Continental Insurance Company
Crowell & Moring LLP
Dairyland Insurance Company
Dentons US LLP
Duane Morris LLP
Evanston Insurance Company
Everest Reinsurance Company
Federal Insurance Company
First State Insurance Company
Government Employees Insurance Company
Insurance Company of the State of Pennsylvania

James, McElroy & Diehl, P.A.
Mays Law Firm, PLLC
Moore & Van Allen, PLLC
Nexsen Pruet PLLC
Pacific Employers Insurance Company
Rivkin Radler LLP
St. Paul Fire and Marine Insurance Company
St. Paul Guardian Insurance Company
St. Paul Surplus Lines Insurance Company
Steptoe & Johnson LLP
The Ocean Marine Insurance Company Limited
Travelers Indemnity Company
Troutman Pepper Hamilton Sanders LLP
Twin City Fire Insurance Company
United States Fidelity and Guaranty Company
Wellfleet New York Insurance Company
Westchester Fire Insurance Company
Willkie Farr & Gallagher LLP
Winterthur Swiss Insurance Company
World Auxiliary Insurance Corporation Limited
Yasuda Fire & Marine Insurance Company (UK) Limited
Zurich American Insurance Company
Zurich Insurance Company Ltd
Zurich Reinsurance Company, Ltd.

Counsel to Certain Asbestos Claimants

Essex Richards, P.A.
Higgins & Owens, PLLC
Richardson, Patrick, Westbrook & Brickman, LLC
Schrader & Associates, LLP
Touchstone Family Law

Contract Counterparties and Their Counsel

Gardner Denver Holdings, Inc.
Kirkland & Ellis LLP

Other Parties

Joseph W. Grier, III
Seth B. Shapiro

EXHIBIT B

Second Supplement to Schedule 2

<u>Name Searched</u>	<u>Relationship to Debtors</u>	<u>Name of Entity and/or Affiliate of Entity that is a K&L Gates Client</u>	<u>Client Status</u>	<u>Nature of Representation</u>
Honeywell International Inc.	Parties That Have Filed A Notice of Appearance and Their Counsel	Honeywell International Inc.; Honeywell International Inc. (ACS); Honeywell International Inc. (HLD); Honeywell China Co., Ltd.; Honeywell Limited; Honeywell Industrial Safety; UOP LLC; Harland Clarke Corp. fka Clarke American Corp; Hand Held Products, Inc. d/b/a Honeywell Scanning & Mobility; Intelligrated Systems, Inc. dba Honeywell Intelligrated; IL&FS Tamil Nadu Power Company Limited	Active Client	Representation in matters unrelated to the Debtors
AIG Property Casualty Insurance Company	Insurers and Their Counsel	AIG Asset Management (U.S.), LLC	Active Client	Representation in matters unrelated to the Debtors
Allianz SPA	Insurers and Their Counsel	Allianz Funds; Allianz Global Investors U.S. LLC; Allianz Global Investors of America, L.P.; Allianz Investment Management LLC; Allianz Global Investors Taiwan Ltd.; Allianz Real Estate GmbH (Italy)	Active Client	Representation in matters unrelated to the Debtors
Dentons US LLP	Insurers and Their Counsel	Dacheng-Dentons; Dentons Rodyk & Davidson LLP	Active Client	Representation in matters unrelated to the Debtors

Troutman Pepper Hamilton Sanders LLP	Insurers and Their Counsel	Troutman Sanders LLP; Pepper Hamilton LLP	Inactive Client	Representation in matters unrelated to the Debtors
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