

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re ALDRICH PUMP LLC, <i>et al.</i> , ¹ Debtors,	:	Chapter 11
	:	
	:	No. 20-30608 (JCW)
	:	(Jointly Administered)
	:	
	:	
	:	
ALDRICH PUMP LLC and MURRAY BOILER LLC,	:	
	:	
Plaintiffs,	:	Adversary Proceeding
	:	
v.	:	No. 20-03041 (JCW)
	:	
THOSE PARTIES TO ACTIONS LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1-1000.	:	
	:	
	:	
Defendants.	:	

**STIPULATION REGARDING EVIDENTIARY MATTERS IN CONNECTION WITH
THE MAY 5-7 HEARING**

RECITALS

A. On June 18, 2020 (the “Petition Date”), Aldrich Pump LLC and Murray Boiler LLC (together, the “Debtors”) commenced the above-captioned bankruptcy cases (the “Chapter 11 Cases”) by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code in this Court.

B. On the Petition Date, the Debtors also commenced the above-captioned adversary proceeding in the Chapter 11 Cases (the “Adversary Proceeding”) and filed a related motion [Adv.

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.



Pro. Dkt. 2] (the “PI Motion” or the “Motion”) by which the Debtors seek certain injunctive and/or declaratory relief. In support of the Motion, on the Petition Date, the Debtors filed the *Declaration of Allan Tananbaum in Support of Debtors’ Complaint for Injunctive and Declaratory Relief, Related Motions, and the Chapter 11 Cases* [Adv. Pro. Dkt. 3] (the “Tananbaum Declaration”); and the *Declaration of Ray Pittard in Support of First Day Pleadings* [Dkt. 27] (the “Pittard Declaration”).

C. On June 22, 2020, certain asbestos personal injury claimants filed papers in opposition to the Debtors’ request for a temporary restraining order [Adv. Pro. Dkts. 17, 18, 20]. On that same day, the Court held an emergency hearing on the Motion and, on June 25, 2020, the Court entered the *Temporary Restraining Order* [Adv. Pro. Dkt. 26] (the “TRO”). The TRO ran through and including July 6, 2020.

D. On July 2, 2020, the Debtors filed *The Debtors’ Reply in Support of Their Request for a Temporary Restraining Order* [Adv. Pro. Dkt. 36]. Following a hearing held in the Adversary Proceeding on July 6, 2020, the TRO was extended by the Court through July 23, 2020. [Adv. Pro. Dkt. 51].

E. On July 15, 2020, the Court conducted a hearing to consider, among other things, the entry of an order that provided for an injunction through the date of a full hearing on the Motion. On July 23, 2020, the Court entered an agreed order [Adv. Pro. Dkt. 58] in a form negotiated by the Debtors and the Official Committee of Asbestos Personal Injury Claimants (the “Committee” or the “ACC”), which continued the injunction imposed by the TRO pending a future hearing on the merits.

F. On December 31, 2020, non-debtor affiliates Trane Technologies Company LLC (“New Trane Technologies”), and Trane U.S. Inc. (“New Trane”) filed a response in support of the Motion [Adv. Pro. Dkt. 84].

G. On January 25, 2021, the Debtors filed the *Supplemental Declaration of Allan Tananbaum in Support of Debtors’ Complaint for Injunctive and Declaratory Relief and Related Motions* [Adv. Pro. Dkt. 91] and the *Declaration of John R. Miller, Jr. in Support of Debtors’ Complaint for Injunctive and Declaratory Relief and Related Motions* [Adv. Pro. Dkt. 92].

H. On March 19, 2021, the Future Claimants’ Representative (the “FCR”) filed his initial submission in support of the Motion [Adv. Pro. Dkt. 129].

I. On April 2, 2021, the ACC filed its opposition [Adv. Pro. Dkt. 151] (the “ACC Objection”) and on April 19, 2021, the ACC filed its supplemental memorandum in opposition [Adv. Pro. Dkt. 179] (the “Supplemental ACC Objection”) to the Motion.

J. On April 22, 2021, the Debtors and the ACC exchanged initial exhibit lists (the “Exhibit Lists”) and deposition designations (“Deposition Designations”) in connection with the hearing on the PI Motion.

K. On April 23, 2021, the Debtors, the FCR and, together, New Trane Technologies and New Trane filed replies in response to both the ACC Objection and the Supplemental ACC Objection. See [Adv. Pro. Dkt. 187] (the “FCR’s Reply”), [Adv. Pro. Dkt. 188] (the “Debtors’ Reply”), and [Adv. Pro. Dkt. 193] (the “Non-Debtor Affiliates’ Reply”). Also on April 23, 2021, the Debtors filed the *Notice of Filing of Declaration of Brad B. Erens in Support of Debtors’ Reply in Support of Motion of the Debtors for an Order (I) Preliminarily Enjoining Certain Actions Against Non-Debtors or (II) Declaring that the Automatic Stay Applies to Such Actions, and (III)*

Granting a Temporary Restraining Order Pending a Final Hearing [Adv. Pro. Dkt. 194] (the “Erens Declaration”).

L. On April 29, 2021, the Debtors and the ACC exchanged their responsive exhibit lists (the “Responsive Exhibit Lists”).

M. From May 5 to May 7, 2021, the Court conducted a remote evidentiary hearing on the PI Motion via the Microsoft Teams application (the “Hearing”). In connection with the Hearing, the Debtors and the ACC (collectively, with the FCR, New Trane Technologies and New Trane, the “Parties”) proffered live testimony, deposition designations, and exhibits for the Court’s consideration.

N. The Parties have met and conferred regarding the evidentiary matters raised or that may be raised in connection with the Hearing. As a result of those meet and confers, the Parties have reached the agreement that is memorialized in the below Stipulation.

STIPULATION

IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES THAT:

1. The Parties do not oppose the admission into evidence of: (a) the proffered testimony at the Hearing of live fact witnesses Allan Tananbaum, Amy Roeder, and Chris Kuehn; (b) the proffered testimony at the Hearing of live expert witnesses Laureen Ryan, Dr. Charles Mullin, and Matthew Diaz; and (c) the Deposition Designations, the listing of which is provided in Appendix A, (subparagraphs (a)-(c) are collectively the “Testimony”). The Testimony is admitted into evidence.

2. The Parties further do not oppose the admission into evidence of the exhibits identified in paragraphs 3-4 below (the “Exhibits”), subject to the terms of those paragraphs. (The Exhibits, along with the Testimony, are collectively referred to as the “Evidence”). A detailed listing of the Exhibits is provided in Appendix B.

3. Debtors' Exhibits 1-13, 15-34, 60-64, and 67-78, and ACC's Exhibits 1-14, 16-19, 22, 24-41, 43-53, 55-61, 64-65, 68-72, 74-79, 81-107, 116-122, 125-126, 134-144, 146-150, 152-153, 155-156, 158-159, 162-163, 166-168, 171-174, 176-177, 179-180, 182-186, 190-193, 198-200, 202, 204, 206, 208-209, 211-212, 214, 216, 218-224, 227-228, 231, 236-249, 251, 259-260, 271-272, 275-276, 278-292, 295, 301-313, 316-319, 321, 322, 324-332 are admitted into evidence.

4. The Parties agree that the Court may take judicial notice of the matters set forth in Debtors' Exhibits 79-81 and ACC's Exhibits 130, 133, 188-89, 229-230, 233-34, 252-253, 255-257, 293-294, 296-298, 341-348. These Exhibits are not offered for the truth of the matters asserted but only for the fact that the statements within these Exhibits were made.

5. Debtors' Exhibits 38-44, 51-55, and 58-59, along with the slide decks used in connection with the Testimony of expert witnesses Laureen Ryan and Matthew Diaz at the Hearing, are demonstrative exhibits that are not admitted into evidence. However, the Parties stipulate that these Exhibits are part of the record for purposes of appeal.

6. Notwithstanding the foregoing, any Evidence admitted by virtue of this Stipulation shall be limited to admission solely in connection with the relief sought by the PI Motion. Neither this Stipulation nor the admission of the Evidence in connection with the Court's consideration and resolution of the PI Motion shall serve as a Parties' admission of the veracity of any of the Evidence proffered by its adversary, nor shall entry into this Stipulation affect the Parties' rights to object to the admission of the Evidence with respect to any other motion, contested matter, adversary proceeding, or proceeding in the Debtors' Chapter 11 Cases or any other proceeding. The Debtors, New Trane Technologies and New Trane filed motions to seal on June 4, 2021 [Adv. Pro. Dkt. 278, 281] pursuant to the terms of the *Agreed Protective Order Governing Confidential Information* [Dkt. 345], relating to certain of the Deposition Designations and Exhibits referred to

herein. This Stipulation and the admission of the Evidence pursuant to it is without prejudice to the assertions of confidentiality over those Depositions Designations and Exhibits and the requests to maintain the confidentiality thereof through the referenced motions to seal.

Dated: June 10, 2021
Charlotte, North Carolina

Respectfully submitted,

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**APPENDIX A TO STIPULATION REGARDING EVIDENTIARY MATTERS IN
CONNECTION WITH THE MAY 5-7 HEARING**

Deponent	Deposition Date	Pages/Lines
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Cathleen Bowen	March 5, 2021	12:7-12:13, 16:14-43:3, 43:21-44:3, 44:12-45:22, 46:3-48:12, 48:24-50:2, 50:25-54:6, 54:21-56:12, 56:22-59:1, 60:16-61:1, 61:3-62:20, 62:22-63:8, 63:10-64:3, 64:5-65:4, 65:6-66:5, 66:7-67:7, 67:9-68:14, 68:16-69:6, 69:8-69:19, 69:21-70:6, 70:12-70:21, 70:23-71:15, 72:21-73:11, 73:13-73:13, 73:20-85:23, 86:11-88:17, 88:19-90:23, 91:9-92:3, 93:3-96:18, 96:20-103:12, 103:14-103:24, 105:15-106:25, 107:9-109:3, 109:5-109:21, 110:2-112:6, 112:8-113:4, 113:6-113:15, 113:18-114:13, 114:15-115:23, 116:4-117:12, 118:2-122:25, 123:8-123:22, 123:24-125:3, 125:16-127:23, 128:3-131:8, 131:15-135:7, 135:9-135:13, 135:15-141:25, 142:10-143:9, 144:9-150:10, 152:10-153:23, 153:25-157:9, 157:11-157:11, 157:21-159:11, 159:19-162:2, 162:8-162:12, 162:14-162:14,

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**APPENDIX B TO STIPULATION REGARDING EVIDENTIARY MATTERS
IN CONNECTION WITH THE MAY 5-7 HEARING**

Note: Certain of the exhibits admitted by the Debtors and the ACC are duplicative and/or subsumed within a larger exhibit used by one of the Parties. Because the May 5-7, 2021 hearing proceeded with references to these exhibits using either or both the Debtors and ACC's exhibit numbers, the Parties have included both in an abundance of caution.

I. Exhibits Entered into Evidence

Debtors' Ex. No.	Description
1	DEBTORS_00000001-DEBTORS_00003668
2	DEBTORS_00003669-DEBTORS_00004119
3	Monthly Status Reports for Aldrich Pump LLC and Murray Boiler LLC: Dkt. Nos. 185, 186, 307, 308, 368, 369, 408, 409, 442, 443, 489, 490, 772, 753, 606, 607, 608, 609, 646, 647
4	Periodic Reports Regarding Value, Operations, and Profitability of Entities in which the Estates of Aldrich Pump LLC and Murray Boiler LLC Hold a Substantial or Controlling Interest: Dkt. Nos. 179 and 519
5	Debtors' Corporate Structure Chart Annex 1 to Dkt. No. 27
6	Appendix B to Complaint (Protected Parties List)Appendix B to Dkt. No. 1-2
7	Summary Exhibit - Summary Information regarding ACC Committee Members Claims against non-Debtors
8	Summary Exhibit - Historical Asbestos Claims filed Against Aldrich and Murray
9	Summary Exhibit - Historical Indemnity Payments and Defense Costs for Aldrich and Murray
10	Summary Exhibit - Number of Post Divisional Merger Claims Filed Against Non-Debtor Affiliates
11	Summary Exhibit - Pending Asbestos Claims Against Aldrich and Murray
12	Complaints Against Non-Debtor Affiliates After Divisional Merger, Documents within Debtors' September 24, 2020 production (DEBTORS_001).
13	ACC Discovery Responses
15	DEBTORS_00004120-DEBTORS_00005316
16	DEBTORS_00002359
17	DEBTORS_00000828
18	DEBTORS_00050778
19	DEBTORS_00050782
20	DEBTORS_00050787
21	DEBTORS_00050712
22	DEBTORS_00050791
23	DEBTORS_00050796
24	DEBTORS_00051657
25	DEBTORS_00050802
26	DEBTORS_00050808

Debtors' Ex. No.	Description
27	DEBTORS 00050812
28	DEBTORS 00050818
29	DEBTORS 00001454
30	DEBTORS 00001367
31	DEBTORS 00002999
32	DEBTORS 00003086
33	DEBTORS 0002145
34	DEBTORS 0000654
60	TRANE 00001825
61	DEBTORS 00051474
62	DEBTORS 00051534
63	DEBTORS 00051535
64	DEBTORS 00051530
67	TRANE 00036576
68	TRANE 00036579
69	TRANE 00036583
70	DEBTORS 00051673-DEBTORS 00051676
71	DEBTORS 00052370
72	DEBTORS 00003817
73	DEBTORS 00004097
74	DEBTORS 00051671
75	DEBTORS 00003669
76	DEBTORS 00050617
77	DEBTORS 00003275
78	DEBTORS 00001601

ACC Ex. No.	Description
1	Dkt. No. 27, Annex 1 to Decl. of Ray Pittard in Support of First Day Pleadings
2	TRANE 00000472
3	TRANE 00004923
4	TRANE 00002247
5	TRANE 00003620
6	TRANE 00004495
7	TRANE 00004429
8	TRANE 00002410
9	TRANE 00000461
10	TRANE 00002077
11	TRANE 00000551
12	DEBTORS 00051655
13	DEBTORS 00003817
14	TRANE 00000457
16	TRANE 00012297

ACC Ex. No.	Description
17	TRANE 00012292
18	TRANE 00006711
19	TRANE 00012486
22	TRANE 00007535
24	TRANE 00007587
25	DEBTORS 00002145
26	DEBTORS 00000654
27	DEBTORS 00003336
28	DEBTORS 00050778
29	DEBTORS 00050782
30	TRANE-DEBTORS 00001211
31	DEBTORS 00050787
32	DEBTORS 00050791
33	DEBTORS 00050796
34	DEBTORS 00050802
35	DEBTORS 00050808
36	DEBTORS 00050812
37	DEBTORS 00002025
38	DEBTORS 00050587
39	TRANE 00000023
40	DEBTORS 00003374
41	DEBTORS 00003256
43	DEBTORS 00050595
44	DEBTORS 00050818
45	DEBTORS 00001454
46	DEBTORS 00001367
47	Adv. Dkt. No. 21, including Exhibit A (“Revised Appendix B, List of Protected Parties”)
48	TRANE-DEBTORS 00000496
49	TRANE 00001765
50	TRANE-DEBTORS 00001472
51	TRANE-DEBTORS 00003555
52	TRANE 00009648
53	TRANE 00012489
55	TRANE 00011512
56	TRANE 00004596
57	TRANE 00011582
58	TRANE 00000354
59	TRANE 00000088
60	TRANE 00011592
61	DEBTORS 00003282
64	TRANE 00001769
65	TRANE 00000552

ACC Ex. No.	Description
68	TRANE 00003177
69	DEBTORS 00003397
70	DEBTORS 00000230
71	DEBTORS 00000347
72	TRANE 00013976
74	DEBTORS 00000963
75	TRANE 00004611
76	DEBTORS 00002467
77	DEBTORS 00003275
78	DEBTORS 00000290
79	DEBTORS 00000432
81	DEBTORS 00000367
82	DEBTORS 00000510
83	DEBTORS 00000935
84	DEBTORS 00000529
85	DEBTORS 00001582
86	DEBTORS 00004097
87	DEBTORS 00001881
88	DEBTORS 00003517
89	DEBTORS 00001648
90	DEBTORS 00003328
91	DEBTORS 00001874
92	DEBTORS 00002474
93	DEBTORS 00050617
94	DEBTORS 00001786
95	DEBTORS 00002462
96	DEBTORS 00003483
97	DEBTORS 00001623
98	DEBTORS 00003683
99	DEBTORS 00000948
100	DEBTORS 00001609
101	DEBTORS 00003669
102	DEBTORS 00001805
103	DEBTORS 00003296
104	DEBTORS 00003850
105	DEBTORS 00003310
106	DEBTORS 00051671
107	9/24/20 Letter from Debtors' counsel to Committee's counsel re list of principal participants
116	TRANE 00012291
117	TRANE 00012500
118	TRANE 00004925
119	TRANE 00003517

ACC Ex. No.	Description
120	TRANE 00003519
121	TRANE 00007468
122	TRANE 00007470
125	TRANE 00000130
126	TRANE 00000131
134	TRANE 00014442
135	TRANE 00003725
136	TRANE 00000038
137	TRANE 00001778
138	TRANE 00003861
139	TRANE 00009571
140	TRANE 00000120
141	TRANE-DEBTORS 00000580
142	TRANE 00014429
143	DEBTORS 00001844
144	DEBTORS 00003505
146	TRANE 00003751
147	DEBTORS 00050645
148	TRANE DEBTORS 00001457
149	TRANE 00006904
150	TRANE 00001977
152	TRANE 00001852
153	TRANE 00000125
155	DEBTORS 00002248
156	TRANE 00000155
158	TRANE 00000031
159	TRANE 00000034
162	TRANE 00001661
163	TRANE 00014308
166	TRANE-DEBTORS 00004226
167	TRANE-DEBTORS 00000437
168	TRANE-DEBTORS 00003733
171	DEBTORS 00001272
172	DEBTORS 00001755
173	DEBTORS 00003247
174	TRANE 00013620
176	TRANE 00000018
177	TRANE 00013684
179	TRANE 00014177
180	TRANE 00001977
182	TRANE 00003515
183	TRANE 00003516
184	TRANE 00003690

ACC Ex. No.	Description
185	DEBTORS 00002504
186	TRANE 00003689
190	TRANE 00004154
191	TRANE 00004577
192	TRANE 00014949
193	TRANE 00007526
198	Contingent Liabilities from Trane 2020 10K
199	TRANE 00025745
200	TRANE 00026739
202	TRANE 00025683
204	TRANE 00004529
206	TRANE 00018601
208	TRANE 00000212
209	Trane 10-K from December 2020
211	DEBTORS 00001601
212	TRANE 00036461
214	DEBTORS 00052263
216	TRANE 00004763
218	TRANE 00036538
219	TRANE 00036536
220	TRANE 00036588
221	TRANE 00036537
222	DEBTORS 00051673
223	DEBTORS 00051675
224	TRANE 00036587
227	TRANE 00012077
228	DEBTORS 00000747
231	DEBTORS 00003497
236	DEBTORS 00000001
237	DEBTORS 00000210
238	DEBTORS 00000220
239	DEBTORS 00000261
240	DEBTORS 00000388
241	DEBTORS 00000904
242	DEBTORS 00001311
243	DEBTORS 00001472
244	DEBTORS 00001638
245	DEBTORS 00002488
246	DEBTORS 00002940
247	DEBTORS 00003104
248	DEBTORS 00003322
249	DEBTORS 00003407
251	DEBTORS 00051530

ACC Ex. No.	Description
259	Trane Technologies plc 2Q2020 10-Q
260	Trane Technologies plc 3Q2020 10-Q
271	Ingersoll-Rand PLC 2019 10-K
272	Trane Technologies plc Dividend Press Release
275	TRANE 00000137
276	TRANE 00000147
278	Trane Technologies plc 2020 10-K
279	DEBTORS 00003158
280	DEBTORS 00001708
281	DEBTORS 00002410
282	DEBTORS 00003133
283	DEBTORS 00003137
284	DEBTORS 00002969
285	DEBTORS 00002973
286	DEBTORS 00000410
287	DEBTORS 00000419
288	DEBTORS 00000887
289	DEBTORS 00001340
290	DEBTORS 00001493
291	DEBTORS 00001497
292	DEBTORS 00001344
295	Dkt. No. 404, Order Pursuant to Bankruptcy Rule 9019 Approving the Debtors' Stipulation with Certain Insurers
301	TRANE 00014562
302	DEBTORS 00000087
303	DEBTORS 00000497
304	DEBTORS 00001566
305	DEBTORS 00001717
306	DEBTORS 00001739
307	DEBTORS 00001979
308	DEBTORS 00002791
309	DEBTORS 00003086
310	DEBTORS 00003160
311	DEBTORS 00003661
312	DEBTORS 00003982
313	DEBTORS 00004690
316	DEBTORS 00050824
317	TRANE 00000156
318	TRANE 00000535
319	TRANE 00000536
321	TRANE 00000557
322	TRANE 00000563
324	TRANE 00002233

ACC Ex. No.	Description
325	TRANE 00003278
326	TRANE 00011463
327	TRANE 00014998
328	TRANE 00036583
329	DEBTORS 00052370
330	TRANE 00011883
331	TRANE 00012071
332	DEBTORS 00052369

II. Exhibits For Which the Court May Take Judicial Notice

Debtors' Ex. No.	Description
79	January 6, 2020 Paddock Enterprises, LLC Presentation, Document No. 8 during Matthew Diaz's cross examination
80	April 26, 2021 O-I Glass Article, Document No. 9 during Matthew Diaz's cross examination
81	Declaration of David Gordon in Support of Paddock's Chapter 11 Petition and First Day Pleadings, Document No. 10 during Matthew Diaz's cross examination

ACC Ex. No.	Description
130	Adv. Dkt. No. 1-2, Appendix B - List of Protected Parties
133	Adv. Dkt. No. 2, PI Motion
188	Adv. Dkt. No. 3, Tananbaum Declaration
189	Adv. Dkt. No. 91, Tananbaum Supplemental Declaration
229	Dkt. No. 497, Debtors' Second Motion to Extend Exclusive Periods to File a Plan
230	Dkt. No. 631, Debtors' Second Motion to Extend Period Within Which Debtors Can Remove Actions
233	Adv. Dkt. No. 152, ACC's Opposition to Debtors' Motion for Summary Judgment
234	Adv. Dkt. No. 58, Agreed Order Regarding Debtors' Request for Extension of Automatic Stay
252	Adv. Dkt. No. 51, Order Extending TRO
253	Dkt. No. 5, Informational Brief of Aldrich Pump LLC and Murray Boiler LLC
255	Dkt. No. 207, Schedules of Assets and Liabilities for Aldrich Pump LLC (complete)
256	Murray Dkt. No. 19, Schedules of Assets and Liabilities for Murray Boiler LLC (complete)
257	Adv. Dkt. No. 26, TRO
293	Disclosure Statement for Prenegotiated Plan of Reorganization, In re Duro Dyne Nat'l Corp. , No. 18-27963 (Bankr. D.N.J. Sept. 7, 2018), ECF No. 20

294	Certification for Direct Appeal to the United States Court of Appeals for the Fourth Circuit Under 28 U.S.C. § 158(d)(2), In re Bestwall LLC , No. 17-31795 (Bankr. W.D.N.C. Sept. 11, 2019), ECF No. 987
296	Adv. Dkt. No. 77, CMO
297	Adv. Dkt. No. 115, First Amended CMO
298	Adv. Dkt. No. 166, Second Amended CMO
341	Form of Specialty Products Holding Corp., Asbestos Personal Injury Trust Distribution Procedures, No. 10-11780-LLS (Dkt. 5117-3)
342	Asbestos PI Trust Distribution Procedures, No. 10-12199-CSS (Dkt. 505-3)
343	Order Granting Debtor Kaiser Gypsum Company, Inc.'s and Hanson Permanente Cement, Inc.'s Request for Preliminary Injunctive and Declaratory Relief, In re Kaiser Gypsum Company, Inc., No. 16-31602 (JCW) (Bankr. W.D.N.C. Nov. 4, 2016) (Dkt. 18)
344	Second Agreed Order Regarding Debtors' Request for Extension or Application of the Automatic Stay to Non-Debtor Affiliates, In re Specialty Products Holding Corp., No. 10-51085-JKF (Bankr. D. Del. July 23, 2010) (Dkt. 47)
345	Order Granting Preliminary Injunction, In re Garlock, No. 10-03145 (Bankr. W.D.N.C. June 21, 2010) (Dkt. 14)
346	Term Sheet for Permanent Resolution of All Present and Future GST Asbestos Claims and Coltec Asbestos Claims
347	Bestwall Asbestos Personal Injury Trust Distribution Procedures, No. 17-31795 (Dkt. 1172-2)
348	FCR Slide 2 from PI Hr'g, In re DBMP LLC, No. 20-3004 (Mar. 3, 2021)

III. Demonstratives Made Part of the Record

Debtors' Ex. No.	Description
38	Descriptive statistics for AM Mesothelioma Claimants in Garlock total recovery sample (Figure 1 from Expert Report of Charles Mullin)
39	Descriptive statistics for paid AM Mesothelioma Claimants in Garlock total recovery sample (Figure 2 from Expert Report of Charles Mullin)
40	Distribution of time between claimant's AM tort filing(s) and DCPF trust claims (Figure 3 from Expert Report of Charles Mullin)
41	Law and Economics model of defendant's willingness to pay (Figure 4 from Expert Report of Charles Mullin)
42	Law and Economics model of plaintiff's willingness to accept a settlement (Figure 5 from Expert Report of Charles Mullin)
43	Mesothelioma plaintiff verdicts from 2011 to 2020 for claimants 71 to 75 years old (tabular) (Figure 6 from Expert Report of Charles Mullin)
44	Mesothelioma plaintiff verdicts from 2011 to 2020 for claimants 71 to 75 years old (graphical) (Figure 7 from Expert Report of Charles Mullin)
51	Trane's Financial Performance (excluding Debtors) (Table 1 from Expert Report of Laureen Ryan)
52	Mix of Equipment vs. Aftermarket (Table 2 from Expert Report of Laureen Ryan)

Debtors' Ex. No.	Description
53	Trane Balance Sheet (excluding Debtors) (Table 3 from Expert Report of Laureen Ryan)
54	Trane Guarantor Information (Table 4 from Expert Report of Laureen Ryan)
55	Estimated Advisor Fees (Table 5 from Expert Report of Laureen Ryan)
58	Diaz Pre and Post 2020 Corporate Restructuring Chart Corrected - Aldrich (Figure 1 from Expert Rebuttal Report of Laureen Ryan)
59	Diaz Pre and Post 2020 Corporate Restructuring Chart Corrected - Murray (Figure 2 from Expert Rebuttal Report of Laureen Ryan)
n/a	Slide Deck used for Direct Exam with Expert Witness Laureen Ryan
n/a	Slide Deck used for Direct Exam with Expert Witness Matthew Diaz