

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

In re:

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608

(Jointly Administered)

**STIPULATION REGARDING AMENDMENT OF CERTAIN
PROOFS OF CLAIM FILED BY COONEY & CONWAY**

Aldrich Pump LLC ("Aldrich") and Murray Boiler LLC ("Murray"), as debtors and debtors in possession (together, the "Debtors") jointly administered in the above-captioned case, and the Cooney & Conway ("Cooney") law firm, as counsel for certain asbestos claimants (the "Claimants"), hereby stipulate (the "Stipulation") as follows:

WHEREAS, on June 18, 2020, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, and by an order entered on June 25, 2020, the Debtors' cases have been consolidated for procedural purposes only and are being jointly administered under Case No. 30608 [Dkt. 114].

WHEREAS, on April 4, 2022, the Court entered an order ("Bar Date Order") establishing the last date and time for filing certain proofs of claim against the Debtors as July 29, 2022 [Dkt. 1093] (the "Bar Date"). The proof of claim form approved by the Court requires creditors to designate the specific Debtor against which the creditor asserts its claim.

WHEREAS, Cooney, on behalf of the Claimants, filed 98 Proofs of Claim (the "Cooney Proofs of Claim"), which are detailed on Exhibit 1 attached hereto, against both Debtors, asserting various asbestos personal injury related claims.

WHEREAS, upon review of the Debtors' books and records, counsel to the Debtors initiated discussions with Cooney regarding, among other things, whether the Cooney Proofs of Claim were properly asserted against both Debtors.

WHEREAS, Cooney has determined that the Claimants listed on the attached Exhibit 1 do not have a prepetition mesothelioma claim, as defined by the Bar Date Order, against Murray and, therefore, those Cooney Proofs of Claim should be withdrawn as to Murray, and remain solely asserted as to Aldrich.

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.



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NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Debtors and counsel to the Claimants, as follows:

1. The Cooney Proofs of Claim, which are detailed in Exhibit 1 attached hereto, shall be withdrawn as to Murray, and amended to reflect that those Cooney Proofs of Claim are asserted solely against Aldrich.

2. Notwithstanding anything to the contrary set forth in the Bar Date Order, the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, or the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina, this Stipulation shall constitute the amendment of each Cooney Proof of Claim to reflect the proper Debtor against which each such Cooney Proof of Claim is asserted in the Debtors' bankruptcy cases.

3. This Stipulation is intended solely for the purposes of administrative convenience to amend each Cooney Proof of Claim solely with respect to the Debtor against which it is asserted and not as to the merits of each such Cooney Proof of Claim. Nothing in this Stipulation shall affect the substantive rights of the Debtors, the Claimants, Cooney, or any other party in interest with respect to the Cooney Proofs of Claim.

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Dated March 7, 2024

Counsel to the Debtors By: <u>/s/ John R. Miller, Jr.</u> John R. Miller, Jr. (NC 28689) RAYBURN COOPER & DURHAM, P.A. 227 West Trade Street, Suite 1200 Charlotte, North Carolina 28202 (704) 334-0891	Counsel to the Claimants By: <u>/s/ Ryan P. Linsner</u> Ryan P. Linsner (IL Bar No. 6309557) Cooney & Conway 120 North LaSalle Street, 30th floor Chicago, IL 60602 (312) 236-6166
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EXHIBIT 1

Cooney Proofs of Claim Withdrawn as to Murray

Claimant Name	Claim Number
Abraham, Henry	2259
Asplund, Arthur	2864
Ballerini, Mary	2267
Begley, Judy	2758
Bentley, James	2645
Berger, Robert	2778
Birkley, Winifred	2751
Bodish, Sharon	2831
Bray, Leo	2522
Bright, James	2637
Carpenter, Charles	2811
Carroll, Donald	2257
Carver, Judith	2839
Chang, Sae	2545
Check, Roland	2661
Cole, Jack	2845
Cook, Thomas	2838
Cooper, Glen	2256
Curtis, Jeff	2813
Davis, Lee	2843
Davis, Robert	2582
Diedrich, Joachim	2619
Dolaskie, Thomas	2793
Dorais, James	2868
Dornink, Richard	2251
Drabik, William	2802
Dwinell, Gloria	2699
Ewing, John	2821
Farmer, Steven	2772
Felluga, Franco	2262
Fiala, John	2867
Fieser, Rosetta	2809
Fiorello, Marion	2643
Giovannone, Serafino	2833
Glasscock, Gerry	2791
Grosnickle, John	2841
Hargrave, Clayton	2789
Hart, Edward	2771
Hollingshead, Jon	2801
Horton, William	2616
Hurndon, Melvin	2240
Jackson, Thomas	2252

Claimant Name	Claim Number
Jackson, William	2848
Johnson, Leroy	2335
Kanz, Dennis	2683
Katz, Joseph	2710
Katzer, Robert	2740
Kelly, Dennis	2723
Kirchner, Albert	2177
Lardi, John	2812
Lassiter, Foy	2743
Lecoyer, Rene	2377
Lemke, Roger	2540
Lisenby, Dortha	2709
Longnecker, Brooks	2858
Meikle, David	2653
Mendez, Edward	2373
Mikel, James	2326
Mills, Gary	2465
Morrill, Margaret	2271
Nadeau, Andrew	2748
Nedelman, Teresa	2842
Pantel, James	2533
Peck, Armin	2591
Petty, Donald	2814
Plush, Robert	2438
Polivka, Jon	2808
Porter, John	2244
Pry, Steven	2854
Rantala, Thomas	2725
Rospond, Thomas	2866
Ross, Michael	2698
Russell, James	2824
Salemi, Karen	2774
Sandrik, Dexter	2857
Sartori, Joanne	2717
Schuler, Walter	2834
Schweda, James	2844
Shipley, Daniel	2750
Shively, Bernard	2427
Smedo, Robert	2735
Smith, Gary	2647
Smith, Ronald	2715
Snyder, Robert	2314
Stanul, Louise	2817
Starner, Robert	2406

Claimant Name	Claim Number
Steward, Alan	2727
Thornsberry, Virginia	2729
Wade, Joseph	2779
Waggoner, Jane	2503
Waterstradt, Gary	2766
Wierenga, Bruce	2784
Wolterman, Dean	2721
Woodard, James	2785
Wrenn, William	2435
Young, Ezekiel	2788
Zangwill, Willard	2316
Zins, Lawrence	2526