

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re	Chapter 11
ALDRICH PUMP LLC, <i>et al.</i> , ¹	Case No. 20-30608 (LMJ)
Debtors.	(Jointly Administered)

SECOND SUPPLEMENTAL DECLARATION OF JOHN R. MILLER, JR. IN SUPPORT OF THE APPLICATION TO EMPLOY RAYBURN COOPER & DURHAM, P.A., AS CO-COUNSEL FOR THE DEBTORS AND DEBTORS-IN-POSSESSION

John R. Miller, Jr., being duly sworn, deposes and says:

1. I am an attorney at law duly admitted to practice in the State of North Carolina and before the United States Bankruptcy Courts of North Carolina, and a member of the firm of Rayburn Cooper & Durham, P.A. (“RCD”). My firm maintains offices for the practice of law at 227 West Trade Street, Suite 1200, Charlotte, North Carolina, 28202. I am authorized to make this declaration on RCD’s behalf.

2. On June 18, 2020, I submitted a declaration in support of the *Ex Parte* Application to Employ Rayburn Cooper & Durham, P.A., as Co-Counsel for the Debtors and Debtors in Possession as of the Petition Date [Dkt. No. 22] (the “Application”). I submitted a Supplemental Declaration in support of the Application on August 17, 2020 [Dkt. No. 255]. I submit this supplemental declaration in further support of the Application. Unless otherwise stated in this declaration, I have personal knowledge of the facts hereinafter set forth. To the extent that any information disclosed herein may require amendment or modification upon RCD’s completion of further analysis or as additional creditor information becomes available to it or if any new relevant facts or relationships are discovered

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.



by RCD or made known to us or arise herein, a supplemental declaration will be submitted to the Court.

3. On June 19, 2020, the Court entered the *Ex Parte* Order Approving Employment of Rayburn Cooper & Durham, P.A. as Attorneys for the Debtors and Debtors-in-Possession as of the Petition Date [Dkt. No. 72].

4. By Order entered on October 14, 2020, Joseph W. Grier, III was appointed as Legal Representative for Future Asbestos Claimants (the “FCR”) in these cases [Dkt. No. 389].

5. By Order entered on October 15, 2020, Grier Wright Martinez, P.A. (“GWM”) was authorized to represent the FCR in these cases [Dkt. No. 393].

6. On October 17, 2024, GWM and Michael L. Martinez, a member of GWM, engaged C. Richard Rayburn, Jr. (“Rayburn”), Ross R. Fulton, (“Fulton”) and RCD to represent GWM and Mr. Martinez in litigation pending before the North Carolina Business Court relative to *Halifax Safeguard Property, LLC v. Michael Martinez and Grier Wright Martinez, PA*, Case No. 24CV045898-590 (the “Halifax Litigation”).

7. The involvement of Martinez and GWM in the Halifax Litigation is unrelated to the Debtors and these Chapter 11 cases.

8. The work that Rayburn, Fulton and RCD will perform in representing Martinez and GWM in the Halifax Litigation is unrelated to the Debtors and these Chapter 11 cases.

9. I do not believe that RCD’s representation of Martinez and GWM in the Halifax Litigation affects RCD’s disinterestedness in these cases.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on this the 25th day of October, 2024.

/s/ John R. Miller, Jr.

John R. Miller, Jr.

N.C. State Bar No.28689

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