

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

In re:

ALDRICH PUMP LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-30608

(Jointly Administered)

**STIPULATION REGARDING AMENDMENT OF CERTAIN  
PROOFS OF CLAIM FILED BY WEITZ & LUXENBERG, P.C.**

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 Weitz & Luxenberg, P.C. ("Weitz"), 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, Weitz, on behalf of the Claimants, filed Proofs of Claim (the "Weitz Proofs of Claim"), which are detailed on Exhibit 1 and Exhibit 2 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 counsel to the Claimants regarding, among other things, whether the Weitz Proofs of Claim were properly asserted against both Debtors.

WHEREAS, Weitz 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claim, as defined by the Bar Date Order, against Murray and, therefore, those Weitz Proofs of Claim should be withdrawn as to Murray, and remain solely asserted as to Aldrich.

<sup>1</sup> 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.



WHEREAS, Weitz has determined that the Claimants listed on the attached Exhibit 2 do not have a prepetition mesothelioma claim as defined by the Bar Date Order against Aldrich and, therefore, those Weitz Proofs of Claim should be withdrawn as to Aldrich, and remain solely asserted as to Murray.

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

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 The Weitz Proofs of Claim, which are detailed in Exhibit 1 attached hereto, shall be withdrawn as to Murray, and amended to reflect that those Weitz Proofs of Claim are asserted solely against Aldrich.

2. The Weitz Proofs of Claim, which are detailed in Exhibit 2 attached hereto, shall be withdrawn as to Aldrich, and amended to reflect that those Weitz Proofs of Claim are asserted solely against Murray.

3. 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 Weitz Proof of Claim detailed in Exhibit 1 and Exhibit 2 attached hereto to reflect the proper Debtor against which each such Weitz Proof of Claim is asserted in the Debtors' bankruptcy cases.

4. With respect to each Weitz Proof of Claim detailed in Exhibit 1 and Exhibit 2 attached hereto, this Stipulation is intended solely for the purposes of administrative convenience to amend each such Weitz Proof of Claim solely with respect to the Debtor against which it is asserted and not as to the merits of each such Weitz Proof of Claim. Nothing in this Stipulation shall affect the substantive rights of the Debtors, the Claimants, Weitz, or any other party in interest with respect to the Weitz Proofs of Claim detailed in Exhibit 1 and Exhibit 2 attached hereto.

**[Remainder of Page Intentionally Left Blank; Signature Page Follows]**

Dated November 6, 2024

|                                                                                                                                                                                                                                                  |                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Counsel to the Debtors</p> <p>By: <u>/s/ John R. Miller, Jr.</u></p> <p>John R. Miller, Jr. (NC 28689)<br/>RAYBURN COOPER &amp; DURHAM, P.A.<br/>227 West Trade Street, Suite 1200<br/>Charlotte, North Carolina 28202<br/>(704) 334-0891</p> | <p>Counsel to the Claimants</p> <p>By: <u>/s/ Justine Delaney (with permission)</u></p> <p>Justine Delaney<br/>WEITZ &amp; LUXENBERG, P.C.<br/>700 Broadway<br/>New York, NY 10003<br/>(212) 558-5500</p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**EXHIBIT 1**

**Weitz Proofs of Claim Withdrawn as to Murray**

| Claimant Name       | Claim Number(s) |
|---------------------|-----------------|
| AMSLER, ROBERT      | 5378            |
| ANDREWS, JOAN       | 3883            |
| BAINTO, NELSON      | 1920            |
| BEGANYI, LOUIS      | 5000            |
| BODDY, FRED         | 4336            |
| BOURGAULT, LEO      | 4782            |
| BRISTER, DEMPSEY    | 4962            |
| BUTCHER, ROBERT     | 2040            |
| CAPTAN, GEORGE      | 4005            |
| CHASE, ROBERT       | 4456            |
| CHILL, WILLIAM      | 3371            |
| CUFFARO, FRANK      | 4413            |
| CURTIS, ELSIE       | 4438            |
| CZERMINSKI, LILLIAN | 4821            |
| DEBOL, MICHAEL      | 1935            |
| DENNIS, GEORGE      | 4578            |
| DMOCHOWSKI, JOHN    | 4803            |
| DRESSLER, WILLIAM   | 4504            |
| DUFRENE, DIANA      | 4361            |
| EDMUNDS, ROBERT     | 5254            |
| ESPOSITO, MARIO     | 5238            |
| EYCLERS, RICHARD    | 4470            |
| FAHEY, FRANK        | 4443            |
| FERRENBACH, PAULA   | 3652            |
| FIRMIN, DALE        | 4825            |
| GLOWACKI, LISETTE   | 3703            |
| HALL, FRED          | 4695            |
| HARRINGTON, JAMES   | 4682            |
| HAUGH, JOHN         | 3913            |
| HAZARD, CHARLES     | 4806            |
| INDORATO, MARIA     | 3628            |
| JANOUSEK, JERRY     | 3583            |
| KARAARDIC, ISIK     | 4558            |
| KELLEY, WILBURN     | 4559            |
| KING, CONLEY        | 3987            |
| LACLAIR, BRIAN      | 4698            |
| MACDONALD, MARTHA   | 3653            |
| MARCH, JOHN         | 4970            |
| MARTINO, FRANK      | 4091            |
| MAUPAI, EUGENE      | 4290            |

| Claimant Name       | Claim Number(s) |
|---------------------|-----------------|
| MCDERMOTT, THOMAS   | 4850            |
| MORLEY, RUTH        | 4560            |
| MORRONE, CYNTHIA    | 4132            |
| MURPHY, ANTONIA     | 3707            |
| ORNER, DONALD       | 4168            |
| PARNELL, ROBERT     | 3979            |
| PRASINOS, MARK      | 4880            |
| PREGITZER, KARL     | 2005            |
| REID, KENNETH       | 4016            |
| RICCIARDO, BRIGIDA  | 4017            |
| ROGERS, JOE         | 1638            |
| ROOT, DONALD        | 4014            |
| ROSSOW, ALFRED      | 5184            |
| SCHLESINGER, IRVING | 5151            |
| SCHULMAN, PHILIP    | 5153            |
| SELLITTI, ANTHONY   | 4497            |
| TONDROWSKI, NORMAN  | 5024, 4968      |
| TURNER, LEWIS       | 5108            |
| VALA, ERNEST        | 5106            |
| VANARSDALE, EDWARD  | 3680            |
| VENTURA, BONA       | 4546            |
| VIGLIOTTI, FRANK    | 5102            |
| WEBSTER, LELAND     | 4906            |
| WEISS, RUTH         | 3502            |
| WILKINSON, THOMAS   | 3630            |

**EXHIBIT 2**

**Weitz Proofs of Claim Withdrawn as to Aldrich**

| Claimant Name      | Claim Number(s) |
|--------------------|-----------------|
| ALEXANDER, ROBERT  | 3673            |
| BAUER, NORMAN      | 5035            |
| BOGIN, JOHN        | 4813            |
| BRENNAN, JOSEPH    | 4783            |
| CISCO, ROBERT      | 4925            |
| COLLINS, WILLIAM   | 3829            |
| COSTELLO, JAMES    | 3779            |
| DAVIS, KENNETH     | 4791            |
| DEDON, ELMO        | 2115            |
| DUKE, HENRY        | 4455            |
| EGAN, MIRIAM       | 3397            |
| ESPOSITO, FRANK    | 5261            |
| EYLER, JOHN        | 3748            |
| FLORIANO, RAYMOND  | 4431            |
| FREDRICKSON, STEVE | 4751            |
| GARLAND, HORACE    | 1617            |
| HAHN, GERALD       | 5654            |
| HARE, DALE         | 1643            |
| HORNER, FRANK      | 4484            |
| HUGHES, RICHARD    | 4258            |
| JEMIOLO, EDWARD    | 4138            |
| KAMINSKI, STANLEY  | 1992            |
| KANIA, EDWARD      | 4153            |
| KELLER, BURLEIGH   | 4365            |
| KELLY, FRANK       | 4561            |
| KELLY, PETER       | 4387            |
| KIEFER, JOHN       | 2083            |
| KLAUS, JERROLD     | 2002            |
| LAINE, CHARLES     | 4298            |
| LAMPKIN, GLENN     | 4321            |
| LAPLANTE, LESTER   | 4097            |
| LAUFER, JAMES      | 5241            |
| LOWE, ROBERT       | 4326            |
| MCCAFFREY, JOHN    | 5011            |
| MCGOWAN, DANIEL    | 4118            |
| MCWILLIAMS, JAMES  | 1851            |
| MILLER, STEPHEN    | 4556            |
| MURPHY, HARRY      | 2111            |
| NEWTON, FRANK      | 4006            |



| Claimant Name      | Claim Number(s) |
|--------------------|-----------------|
| NICHTERN, LEO      | 4015            |
| OAKLEY, JAMES      | 4408            |
| PAFUNDI, JOSEPH    | 3931            |
| PARK, ROBERT       | 4868            |
| PATTERSON, GEORGE  | 4366            |
| PAUL, ANDREW       | 4327            |
| PAWELSKI, JOHN     | 3503            |
| PILLA, MILDRED     | 4362            |
| REDFEARN, EVERETT  | 4350            |
| REILLY, JOSEPH     | 5216            |
| ROSENBERG, ALLEN   | 4235            |
| RUSSANO, GENNARO   | 4373            |
| SCHNEIDER, LEONARD | 3753            |
| SCHOLZ, OSCAR      | 4319            |
| SHIRLEY, JAMES     | 4418            |
| SININGER, LEONARD  | 4307            |
| SNYDER, FRED       | 4343            |
| SULLIVAN, CHARLES  | 3578            |
| TOTO, LUCAS        | 5020            |
| URBANSKI, WALTER   | 4324            |
| VALLOT, THOMAS     | 5094            |
| WALKER, JERRY      | 4305            |
| WARD, JOHN         | 5075            |
| WARREN, RICHARD    | 4323            |
| WILSON, JACK       | 4919            |