

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)

DEBTORS' DESIGNATION OF
ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD
ON APPEAL OF ORDER DENYING ROBERT SEMIAN'S MOTION
FOR RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)

Aldrich Pump LLC ("Aldrich") and Murray Boiler LLC ("Murray"), as debtors and debtors in possession (together, the "Debtors"), pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure and Rule 8009-1 of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina, hereby submits its designation of additional items to be included in the record on appeal, in connection with the appeal by Robert Semian (the "Movant") to the United States District Court for the Western District of North Carolina from the *Order Denying Robert Semian's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)* [Dkt. 2438] entered by the Court on December 18, 2024.

Additional Items

1. On December 11, 2024, the Movant filed the *Statement of Issues on Appeal of Appeal of Order Denying Robert Semian's Motion for Relief from the Automatic Stay*

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.



Pursuant to 11 U.S.C. § 362(d) [Dkt. 2474], designating items to be included in the record on appeal.

2. The Debtors hereby designate the following additional items to be included in the record on appeal, together with all exhibits, attachments, and documents incorporated therein:

	Bankruptcy Docket No.	Docket Entry Date	Docket Description
1.	833	9/24/2021	Motion of the Debtors for Estimation of Prepetition Asbestos Claims.
2.	1127	4/18/2022	Order Authorizing Estimation of Asbestos Claims.
3.	1247	7/7/2022	Motion for Order Directing Parties to Mandatory Mediation and Establishing Mediation Procedures.
4.	1608	2/3/2023	Order Establishing Mediation Protocol.
5.	1885	7/18/2023	Debtors' Opposition to the ACC's Motion <i>In Limine</i> to Exclude from Evidence the Declaration and Certain Anticipated Testimony of Allan Tananbaum.
6.	2047 ²	12/28/2023	Order Denying Motions to Dismiss.
7.	2092	1/31/2024	Debtors' Objection to Requests of the Official Committee of Asbestos Personal Injury and the Claimants of Maune Raichle for Certification for Direct Appeal of Order Denying Motions to Dismiss.
8.	2172	4/3/2024	Robert Semian and All MRHFM's Claimants' Motion to Require the Debtors and Trane to Make Irrevocable, Unequivocal, and Unconditional Admissions About the Enforceability of the Funding Agreements.
9.	2211	4/17/2024	Debtors' Objection to Motion of Maune Raichle Claimants to Require Admissions.

² The Debtors identified a scrivener's error for the docket number listed for the *Order Denying Motion to Dismiss* in the Movant's Designation of Record for Appeals. The Debtors have included the correct docket number to ensure a complete and accurate record.

	Bankruptcy Docket No.	Docket Entry Date	Docket Description
10.	2212	4/17/2024	The Non-Debtor Affiliates' Objection to Robert Semian and All MRHFM's Motion to Require the Debtors and Trane to Make Irrevocable, Unequivocal, and Unconditional Admissions about the Enforceability of the Funding Agreements.
11.	2218	4/22/2024	Robert Semian and All MRHFM's Claimants' Reply in Support of Motion to Require the Debtors and Trane to Make Irrevocable, Unequivocal, and Unconditional Admissions About the Enforceability of the Funding Agreements.
12.	2243	5/9/2024	Shaun and Lisa N. Beaudoin's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d).
13.	2267	6/17/2024	Stipulation with Respect to Shaun and Lisa Beaudoin's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d).
14.	2268	6/17/2024	Notice of Withdrawal of Shaun and Lisa N. Beaudoin's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d).
15.	2439	11/13/2024	Order Denying the Motion of Robert Semian and All MRHFM's Claimants to Require the Debtors and Trane to Make Irrevocable, Unequivocal Admissions About the Enforceability of the Funding Agreements.

	<i>In re Aldrich Pump LLC, Adv. Pro. No. 20-03041 Docket No.</i>	Docket Entry Date	Docket Description
16.	90	1/25/2021	Debtors' Motion for Partial Summary Judgment That All Actions Against the Protected Parties to Recover Aldrich/Murray Asbestos Claims Are Automatically Stayed by Section 362 of the Bankruptcy Code.

	<i>In re Aldrich Pump LLC,</i> Adv. Pro. No. 20-03041 Docket No.	Docket Entry Date	Docket Description
17.	173	4/14/2021	The Debtors' Objection to Official Committee of Asbestos Personal Injury Claimants' Motion to Compel.
18.	176	4/14/2021	Non-Debtor Affiliates' Objection to the Official Committee of Asbestos Personal Injury Claimants' Motion to Compel.
19.	258	5/18/2021	Transcript for Hearing Held on May 5, 2021.
20.	259	5/18/2021	Transcript for Hearing Held on May 6, 2021.
21.	260	5/18/2021	Transcript for Hearing Held on May 7, 2021.

	<i>In re Aldrich Pump LLC,</i> Adv. Pro. No. 21-03029 Docket No.	Docket Entry Date	Docket Description
22.	1	10/18/2021	Complaint for Substantive Consolidation of Debtors' Estates with Certain Nondebtor Affiliates or, Alternatively, to Reallocate Debtors' Asbestos Liabilities to Those Affiliates.

	<i>In re Aldrich Pump LLC,</i> Adv. Pro. No. 22-03028 Docket No.	Docket Entry Date	Docket Description
23.	1	6/18/2022	Complaint by Official Committee of Asbestos Personal Injury Claimants Against Ingersoll-Rand Global Holding, Trane Technologies Holdco Inc., Trane Technologies Company LLC, Trane Inc., TUI Holdings Inc., Trane U.S. Inc., Murray Boiler Holdings LLC.

	<i>In re Aldrich Pump LLC,</i> Adv. Pro. No. 22-03029 Docket No.	Docket Entry Date	Docket Description
24.	1	6/18/2022	Complaint by Official Committee of Asbestos Personal Injury Claimants Against Trane Technologies PLC, Ingersoll-Rand Global Holding Company Limited, Trane Technologies Holdco Inc., Trane Technologies Company LLC, Trane Inc., TUI Holdings Inc., Trane U.S. Inc., Murray Boiler Holdings LLC, Sara Brown, Richard Daudelin, Marc Dufour, Heather Howlett, Christopher Kuehn, Michael Lamach, Ray Pittard, David Regnery, Amy Roeder, Allan Tananbaum, Evan Turtz, Manilo Valdes, Robert Zafari.

	<i>In re Aldrich Pump LLC,</i> Case No. 3:24-cv-00044 (RJC) (WDNC) Docket No.	Docket Entry Date	Docket Description
25.	23	5/28/2024	Response in Opposition of Debtors Aldrich Pump LLC and Murray Boiler LLC to the (A) Motion of the Official Committee of Asbestos Personal Injury Claimants and (B) the Motion of Robert Semian and Other Claimants for Leave to Appeal Order Denying Dismissal.

	<i>In re Aldrich Pump LLC,</i> Case No. 24-129 (4th Cir.) Docket No.	Docket Entry Date	Docket Description
26.	47	4/17/2024	Court Order filed denying Petitions for permission to appeal.
27.	69	5/15/2024	Court Order filed denying petitioners' petition for rehearing and rehearing <i>en banc</i> .

Dated: December 27, 2024
Charlotte, North Carolina

Respectfully submitted,

/s/ John R. Miller, Jr.

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ATTORNEYS FOR DEBTORS AND
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