

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re

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

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

**DEBTORS' MOTION TO AMEND CASE MANAGEMENT ORDER  
FOR ESTIMATION OF ASBESTOS CLAIMS**

Aldrich Pump LLC ("Aldrich") and Murray Boiler LLC ("Murray"), the debtors and debtors in possession in the above-captioned chapter 11 cases (the "Debtors"), hereby move this Court for entry of an order in the form appended hereto as Exhibit A (the "Proposed Second Amended Estimation CMO").

On January 30, 2025, the Court held a hearing to address the current status of the estimation efforts and the related discovery issues.<sup>2</sup> This Motion follows the Court's instructions to the parties to re-establish deadlines associated with estimation-related written discovery and to consider ways also to make additional progress in the estimation proceeding during this period. The Debtors' Proposed Second Amended Estimation CMO seeks to address both of these goals.

The Proposed Second Amended Estimation CMO preserves the framework that was established by the *Case Management Order for Estimation of Asbestos Claims* [Dkt. 1302] (the "Initial Estimation CMO") and re-establishes a proposed deadline for the completion of written discovery, as well as other deadlines related thereto. In addition, the Proposed Second

<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.

<sup>2</sup> See [Dkt. 2535].



Amended Estimation CMO seeks to capitalize on the work that has already been done in these cases to this point to make additional progress during the period of written discovery. This proposed dual track approach will, in the Debtors' view, drive meaningful progress in these cases in several areas related to estimation. In short, the proposal is designed to complete the discovery phase that is already under way while at the same time making progress on the issue that matters most in these cases, namely the parties' respective views on the Debtors' liability for valid current and future asbestos claims.

In support of this Motion, the Debtors respectfully state as follows:

### **BACKGROUND**

1. On June 18, 2020 (the "Petition Date"), the Debtors commenced their reorganization cases (the "Chapter 11 Cases") by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. These Chapter 11 Cases have been consolidated for procedural purposes only and are being administered jointly.

2. On September 24, 2021, the Debtors filed the *Motion of the Debtors for Estimation of Prepetition Asbestos Claims* [Dkt. 833] (the "Estimation Motion").

3. After briefing and oral argument at multiple hearings, the Court announced it would grant the Estimation Motion, and that an estimation proceeding would take place to estimate the Debtors' aggregate liability for all current and future asbestos-related personal injury claims, consisting of an estimation of mesothelioma claims, plus the application of a "gross-up" for non-mesothelioma claims. On April 18, 2022, this Court entered the *Order Authorizing Estimation of Asbestos Claims* [Dkt. 1127] (the "Estimation Order").

4. On August 2, 2022, the Court entered the Initial Estimation CMO, setting forth the initial schedule and procedures that would apply to the contested estimation proceeding

that this Court ordered would take place pursuant to the Estimation Order (the "Estimation Proceeding").

5. The Initial Estimation CMO established a protocol for collection and production of electronically stored information ("ESI") and provided that all written discovery shall be served such that the response time for said discovery expired no later than 365 days after the entry of the Initial Estimation CMO (this period ending on August 2, 2023).

6. Shortly thereafter, the ACC served Interrogatories and Requests for Production on the Debtors addressing numerous topics, including the Debtors' manufacture and sale of equipment that incorporated asbestos-containing component parts, the Debtors' asbestos related product literature, certain corporate and expert witness materials, and other underlying asbestos litigation exhibits and materials.

7. In response to the ACC's discovery requests, the Debtors searched various sources, including custodial hard copy documents and ESI, began meet and confer efforts, responded in writing, and began production. To date, the Debtors have produced over 10,000 documents, totaling over 167,000 pages in response to discovery requests submitted by the ACC that relate to the various issues surrounding the Debtors' historical litigation of asbestos claims: asbestos product use history, witnesses used, experts retained, etc. In addition, the Debtors produced their extensive historical claims database maintained by PACE, which chronicles the entire asbestos-related claims history of the Debtors. The database contains substantial information regarding the claims filed against and resolved by the Debtors, including claim jurisdiction and venue, Plaintiffs' firms, resolution dates and amounts, and numerous other data points regarding claims asserted against the Debtors.

8. To the Debtors' knowledge, various meet and confers among the parties and the Debtors' responses and productions resolved all of the ACC's discovery requests with the exception of those relating to Interrogatory #1 and Document Request #1. By these two requests, the ACC seeks information that it claims it requires in order to counter the Debtors' position that historical tort system settlements of mesothelioma claims are not a reliable proxy for the Debtors' legal liability because there was exposure information that was undisclosed to the Debtors at the time the settlements were negotiated. To that end, Interrogatory #1 and Document Request #1, in pertinent part, request identification and production of all documents related to:

all resolved mesothelioma claims against Old Trane, Old IRNJ, or the Debtors (i) for which the Debtors contend that the plaintiff's identification of Old Trane's or Old IRNJ's product was false, incomplete, or misleading, (ii) for which the Debtors contend that the plaintiff did not disclose, or did not fully disclose, their potential exposure to asbestos-containing products of other manufacturers, (iii) for which the Debtors contend that the plaintiff did not disclose, or did not fully disclose, claims made to asbestos personal injury trusts, (iv) that the Debtors (or any counsel or expert for the Debtors) have reviewed to date in connection with this Estimation Proceeding and (v) that the Debtors' counsel or experts have requested.

Initial Estimation CMO ¶ 9 (establishing language for Interrogatory #1).

9. The parties had numerous disagreements over the scope and breadth of these requests, which delayed the process of collecting the massive amount of potentially responsive information. As a result, on May 18, 2023, the major parties to this bankruptcy submitted the *Agreed Motion to Amend Case Management Order for Estimation of Asbestos Claims* [Dkt. 1766] (the "Motion to Amend the Initial Estimation CMO"). The parties' Motion to Amend the Initial Estimation CMO proposed that the deadline for the completion of written discovery be extended by one year so that the parties could resolve their disputes and provided for commensurate extensions of related deadlines within the Initial Estimation CMO.

10. On June 12, 2023, the Court granted the Motion to Amend the Initial Estimation CMO, entering the *First Amended Case Management Order for Estimation of Asbestos Claims* (the "Amended Estimation CMO") [Dkt. 1804], which changed the written discovery deadline to August 2, 2024, and extended all commensurate deadlines within the Initial Estimation CMO.

11. After continued negotiations over the scope of the ACC's discovery requests, and consistent with the desires expressed by the FCR in his motion requesting the Court establish a protocol for determining the representative sample to be used in the claims file discovery [Dkt. 1342], on December 28, 2023, the parties submitted, and the Court entered, their *Agreed Order with Respect to Resolved Claims Sampling for Purposes of Estimation Discovery* [Dkt. 2048]. Through that order, the parties agreed on a sample of approximately 1,400 mesothelioma claims subject to discovery for purposes of estimation.

12. While the parties had agreed on the number and identity of the claims files subject to discovery, there nevertheless remained significant disagreement over what documents were necessary or appropriate for collection concerning that claim sample. As the parties continued to meet and confer and negotiate protocols governing the collection and production of particular documents "within" each claims file, on April 25, 2024, the Court entered the *Order Suspending the Deadlines Established by the Agreed Case Management Order for Estimation of the Debtors' Current and Future Mesothelioma Claims* (the "Order Suspending Estimation Deadlines") [Dkt. 2229].

13. Roughly eight months thereafter, the parties reached an agreement on the terms of the protocol (the "Claims File Protocol") and presented it to this Court at the hearing on January 30, 2025. While the parties reserved their rights to attack or defend collection under the

Claims File Protocol, the hope is that the protocol minimizes disputes during the Estimation Proceeding over adequacy of the method by which the documents were collected.

14. Given that nearly all the documents related to underlying asbestos claims are going to be collected from the Debtors' current and former lawyers, a FRE 502(d) order was necessary to prevent privilege and work product waiver as a result of producing claims file documents. As a result, the parties presented a proposed order to the Court at the January 30, 2025 hearing, and on February 18, 2025, the Court entered the *Consent Order Pursuant to Rule 502(d) of the Federal Rules of Evidence* [Dkt. 2546] (the "502(d) Order"), limiting the disclosure and production of otherwise privileged claims file documents to those (1) relating to settlement evaluation of sampled claims, or (2) relating to alternative asbestos exposures.

15. Significant progress has been made in these cases over the past several years, most recently with the agreed Claims File Protocol and 502(d) Order. By this Motion, the Debtors seek entry of the Debtors' Proposed Second Amended Estimation CMO, which is attached hereto as Exhibit A.

### **BASIS FOR THE RELIEF REQUESTED**

#### **I. THE COURT SHOULD ENTER AN AMENDED CASE MANAGEMENT ORDER FOR THE COMPLETION OF THE REMAINING CLAIMS FILE DISCOVERY.**

16. As detailed in Paragraph 7 *supra*, the Debtors have compiled and produced substantial information through the course of estimation discovery (e.g., proofs of claim, personal injury questionnaires ("PIQs"), trust discovery, the claims database, and more than 167,000 pages of historical records). Thus, a significant amount of written discovery has been completed.

17. Now that the Claims File Protocol has been finalized, and the 502(d) Order has been entered, the Debtors have commenced the final, albeit most time-consuming part

of the estimation discovery process: the collection of the claims file materials. The Debtors are not yet in a position to make a precise estimate of the number of documents that will be collected and reviewed as part of this process, but information obtained to date continues to point toward the likelihood that several million documents will need to be collected and reviewed. Predicting the timing of that collection and review is further complicated by the fact that:

- The Debtors had four different firms act as National Coordinating Counsel ("NCC") associated with claims in the sample. This fact alone will result in seventeen e-mail custodians who must each search for all of the approximately 1,400 claimants in the claims sample.
- The Debtors had thirty-three different law firms serve as Jurisdictional Counsel ("JC") for claims with the sample, ten of which have not been employed by the Debtors for many years. One-hundred twelve (112) different venues are implicated by the sample, and ninety-two (92) JC e-mail custodians have been identified.

18. Documents collected will have to be reviewed internally by the NCC or JC for privileges held by other clients of these firms that they represented on the same matters as they represented the Debtors.<sup>3</sup> The Debtors have limited ability to control the pace or priority of each individual law firm's collection of documents and privilege review, as the NCC and JC firms all have various methods of electronic and hard copy file organization and document management systems. Once the voluminous documents are reviewed for privilege by counsel and produced to the Debtors, the Debtors themselves will need to review the documents for responsiveness and privilege.

19. As a result, as the Court will see in the Debtors' Proposed Second Amended Estimation CMO, the Debtors, cognizant of the massive discovery project ahead,

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<sup>3</sup> As the Court is aware, for cost and efficiency's sake, defense firms in the asbestos tort system frequently represented multiple clients in a single lawsuit.

propose March 27, 2026 as the deadline for the completion of written discovery (the "Written Discovery Deadline").

20. The adoption of this date would essentially be a return to the original plan in this case for the timing of estimation discovery. At the time Judge Whitley entered the Initial Estimation CMO, the parties contemplated one year to complete written discovery. Although the Debtors are still unsure of the time that will be required for the collection and review of the relevant materials, they were likewise unsure at the time the Initial Estimation CMO was entered. Given what the Debtors know now, the Debtors believe this is a reasonable estimate, and should it not be enough time, it will certainly allow enough time for the parties to make great strides and be well-informed should another adjustment become necessary. As with before, the Written Discovery Deadline in the Proposed Second Amended Estimation CMO will carry along with it some associated deadlines related to estimation.

21. This proposed Written Discovery Deadline is reasonable under the circumstances in that it provides the parties the time that is necessary to work through the complicated discovery issues that lie ahead, while also ensuring that these cases continue to progress.

**II. THE DEBTORS ALSO PROPOSE THE COMPLETION OF OTHER ESTIMATION-RELATED TASKS NOT TIED TO THE CLAIMS FILE COLLECTION PROCESS THAT WILL MATERIALLY ADVANCE THE CASE ON THE PARTIES' VIEWS OF THE ASBESTOS LIABILITY.**

22. The parties have significant disagreement about the appropriate methodology the Court should use for estimation. From comments and positions taken by the ACC, the Debtors anticipate that, at the contested estimation proceeding, the ACC will present an estimation methodology that relies on the Debtors' historical settlement information and



extrapolates those results into the future.<sup>4</sup> The ACC has indicated that it believes extrapolating directly from the Debtors' historical tort system settlements is the appropriate way to estimate the value of current and future mesothelioma claims. The ACC advances this position despite Judge Hodges' finding to the contrary in Garlock, where he found that historical tort system settlements were "unreliable as a predictor of [their] true liability" because exposure evidence was undisclosed to the debtor at the time of settlement of the cases that debtor faced in the tort system and many of those cases were settled predominantly to avoid defense costs. In re Garlock Sealing Techs., LLC, 504 B.R. 71, 87 (Bankr. W.D.N.C. 2014).<sup>5</sup> Likewise, the Debtors here will argue that past settlements are not a proxy for liability as it is well established, in both Garlock and the scientific literature relating to Law and Economics, that parties enter into settlements for a number of reasons that have nothing to do with liability.

23. Regardless of who turns out to ultimately be correct concerning these competing estimation methodologies, what is important for current purposes is that the ACC's proposed estimation methodology does *not* require the completion, or even the commencement, of the ACC's claims files discovery requests. Instead, the ACC's estimation methodology relies on the myriad of information that the ACC has already received in the discovery produced to date, in particular the claims file database, detailed in Paragraph 7 *supra*. The ACC's expert on this issue, Legal Analysis Systems, Inc. ("LAS"), has been retained since November of 2021 [Dkt. 901] and has access to all of this information.

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<sup>4</sup> See Tr. of Jan. 30, 2025 Hr'g [Dkt. 2535] at 35:07–09 (MR. WRIGHT: "The focus of estimation, I, I think it is true that we have contended that settlement history is a useful metric for determining estimation.").

<sup>5</sup> Indeed, Judge Hodges held, "estimates of Garlock's aggregate liability that are based on its historic settlement values are not reliable because those values are infected with the impropriety of some law firms and inflated by the cost of defense. The best evidence of Garlock's aggregate responsibility is the projection of its legal liability that takes into consideration causation, limited exposure and the contribution of exposures to other products." In re Garlock, 504 B.R. at 87.

24. As a result, the Debtors propose that, while claims file discovery is proceeding, the parties also be required to make progress on a major aspect of these cases for which they already have substantial information: namely, that they file and produce initial expert reports setting forth their estimate of the Debtors' liability for current and future asbestos claims (the "Initial Expert Reports").<sup>6</sup> Progress can be made by the parties producing their initial analyses and valuations based on the discovery completed to date. Indeed, the parties' view of the Debtors' liability is the major issue in the case, and one on which, despite the fact the fact that the Debtors and FCR have proposed a plan of reorganization with a proposed \$545 million in funding, the ACC has never taken a position.

25. Producing Initial Expert Reports and the claims file discovery process can proceed in tandem. One will not slow down the other, and both ultimately need to be accomplished. Indeed, production of Initial Expert Reports may well provide some clarity to the disputes over estimation methodology and associated discovery, which may serve to further focus and potentially narrow the issues in the case.

26. To be sure, additional written and fact discovery is ongoing and remains to be done, and important information may be revealed in that process. As a result, the Debtors propose allowing any party to provide a supplemental expert report after the close of fact discovery, to take into account new information discovered after the Court enters the Proposed Second Amended Estimation CMO (each, a "Supplemental Expert Report"). This ensures that, to the extent that newly discovered information creates a need for a party to update its Initial

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<sup>6</sup> See Tr. of Oct. 24, 2024 Hr'g [Dkt. 2416] at 145:21–146:4. (MS. RAMSEY: "These parties are all sophisticated. All of the experts that are involved, estimation experts in these cases, know each other. We know the debtors' expert extremely well. The debtors' expert is an experienced expert, does estimations outside of bankruptcy, inside of bankruptcy. When the experts get together, they can figure out pretty closely, at least Dr. Bates can figure out, within a range what the claimants would assume liability is. These are not big secrets.").

Expert Report and liability estimation, the party can add the newly discovered facts and issue a Supplemental Expert Report after the conclusion of fact discovery. Any necessary depositions or other discovery on the Initial Expert Report and any Supplemental Expert Report can be pursued at that time (i.e., during expert discovery in preparation for the estimation trial).

27. Starting now on having the parties produce their expert positions on the most critical issue in these Chapter 11 Cases—the Debtors' asbestos liability—will greatly help to clarify and perhaps narrow the main dispute in these cases. The Debtors believe that defining the parties' positions on liability will also be of great benefit to the Court, as the Court will then have more information and context with which to prepare for the estimation trial and guide the actions of the parties. In connection with the filing of the Initial Expert Reports, although the Debtors would anticipate that they may contain some confidential information, that information could be redacted, or the parties could easily provide the Court with an "Executive Summary" of the Initial Expert Reports that does not contain confidential information.

28. Proceeding on this proposed dual track will bring these Chapter 11 Cases one step closer to an estimation trial, the next major milestone in these cases. The Proposed Second Amended Estimation CMO establishes the deadline of August 15, 2025 by which the parties are to file and produce their Initial Expert Reports, which the Debtors believe is sufficient time for the parties to complete such task.

29. The Order Suspending Estimation Deadlines provides, in Paragraph 1, that, "the deadlines established in the Estimation Case Management Order are suspended pending agreement by the Parties on an amended Estimation Case Management Order *or until otherwise ordered by the Court.*" For the foregoing reasons, the Debtors submit that good cause

exists for the establishment of the deadlines set forth in the Proposed Second Amended Estimation CMO.

**NOTICE**

30. Consistent with the *Order Establishing Certain Notice, Case Management, and Administrative Procedures* [Dkt. 123] (the "Case Management Order"), notice of this Motion has been provided to: (a) the Office of the United States Bankruptcy Administrator for the Western District of North Carolina (the "Bankruptcy Administrator"); (b) counsel to the ACC; (c) counsel to the Debtors' non-debtor affiliates, New Trane Technologies and New Trane; (d) counsel to the FCR; and (e) the other parties on the Service List established by the Case Management Order. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be provided.

**NO PRIOR REQUEST**

31. No prior request for the relief sought herein has been made to this Court or any other court.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Second Amended Estimation CMO, in substantially the form attached hereto as Exhibit A, and for such other and further relief as the Court may deem proper.

*[Remainder of this Page Left Intentionally Blank]*

Dated: March 6, 2025  
Charlotte, North Carolina

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Respectfully submitted,

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ATTORNEYS FOR DEBTORS AND  
DEBTORS IN POSSESSION

**EXHIBIT A**

Proposed Second Amended Estimation CMO

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

In re

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

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

**SECOND AMENDED CASE MANAGEMENT ORDER  
FOR ESTIMATION OF ASBESTOS CLAIMS**

On September 24, 2021, Aldrich Pump LLC ("Aldrich") and Murray Boiler LLC ("Murray"), the debtors and debtors in possession in the above-captioned chapter 11 cases (the "Debtors"), filed a motion pursuant to section 502(c) of title 11 of the United States Code (the "Bankruptcy Code"), seeking authorization of an estimation of all asbestos-related personal injury claims against the Debtors that manifested disease prior to the petition date [Dkt. 833] (the "Estimation Motion").

On January 27, 2022, the Court announced that it was granting the Estimation Motion, but expanded the scope of the estimation to cover all asbestos-related personal injury claims against the Debtors, both prepetition and postpetition. The Court entered its formal order confirming the same on April 18, 2022 [Dkt. 1127] (the "Estimation Order").

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<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.

On June 9, 2022, the Debtors filed their *Motion of the Debtors for an Order Approving the Debtors' Proposed Case Management Order for Estimation* [Dkt. 1205] (the "Debtors' CMO Motion"). Also on June 9, 2022, the Official Committee of Asbestos Claimants (the "ACC") filed its *Motion for Entry of an Order Establishing Case Management Procedures for Estimation* [Dkt. 1207] (the "ACC's CMO Motion" and with the Debtors' CMO Motion, the "Competing CMO Motions").

The Court heard oral argument on the Competing CMO Motions on June 30, 2022, and, on August 2, 2022, the Court entered the *Case Management Order for Estimation of Asbestos Claims* [Dkt. 1302] (the "Initial Estimation CMO"), setting forth the initial schedule and procedures that would apply to the contested estimation proceeding.

On May 18, 2023, the Debtors, along with the ACC, the FCR, Trane U.S. Inc., and Trane Technologies Company LLC submitted the *Agreed Motion to Amend Case Management Order for Estimation of Asbestos Claims* [Dkt. 1766] (the "Motion to Amend the Initial Estimation CMO").

On June 12, 2023, the Court granted the Motion to Amend the Initial Estimation CMO, entering the *First Amended Case Management Order for Estimation of Asbestos Claims* [Dkt. 1804].

On April 25, 2024, the Court entered the *Order Suspending the Deadlines Established by the Agreed Case Management Order for Estimation of the Debtors' Current and Future Mesothelioma Claims* [Dkt. 2229].

NOW THEREFORE, IT IS HEREBY ORDERED THAT:

1. The deadline for completion of all Written Discovery is March 27, 2026 (the "Written Discovery Deadline").



2. The parties shall file and produce their initial expert reports setting forth their estimate of the Debtors' liability for current and future mesothelioma claims, plus the application of a "gross-up" for non-mesothelioma claims (each, an "Initial Expert Report") on or before August 15, 2025. Any party that produces an Initial Expert Report shall have the opportunity to supplement that report (each, a "Supplemental Expert Report") to take into account new facts discovered after the date of this Order. The due date for any Supplemental Expert Report shall be determined in conjunction with the scheduling set forth in Paragraph 8 below.

3. The parties shall serve preliminary disclosures of the identities of fact witnesses they plan to call in their cases-in-chief no later than 90 days before the Written Discovery Deadline as set forth in Paragraph 1 of this Order. The parties shall serve preliminary disclosures of the subjects of expert testimony and fields of expertise (but not the experts' identities), separate from those identified in Paragraph 2 above, for their respective cases-in-chief no later than 90 days before the Written Discovery Deadline set forth in Paragraph 1. A separate schedule for complete disclosures of experts pursuant to Rule 26(a)(2) (other than those referred to in Paragraph 2 above) will be entered at a later time.

4. No later than 90 days prior to the Written Discovery Deadline set forth in Paragraph 1, the Debtors shall respond to the Committee's Interrogatory #1 and Document Request #1, previously served on September 1, 2022. The Debtors will have the right to supplement their responses to the Committee's Interrogatory #1 and Document Request #1 until the Written Discovery Deadline. For any claims identified in the last 90 days before the Written Discovery Deadline, the ACC shall be given an additional 90 days after such disclosure to seek Written Discovery as it relates to those newly disclosed claims.

5. All Written Discovery shall be served such that the response time for said Discovery expires no later than the Written Discovery Deadline set forth in Paragraph 1.

6. Any Motion to compel or other motions directed at compliance with Written Discovery must be served no later than 60 days after the Written Discovery Deadline set forth in Paragraph 1.

7. To the extent any motions directed at compliance with Written Discovery remain pending or to the extent any additional responses to Written Discovery resulting from orders of this Court remain outstanding after the Written Discovery Deadline set forth in Paragraph 1, this Court will extend the deadlines set forth in Paragraph 1 solely for compliance with the outstanding Written Discovery to which the motions are directed.

8. A schedule for fact witness depositions and associated productions, expert witness depositions and associated productions, Supplemental Expert Reports, Rebuttal Expert Reports, and the estimation trial and related pretrial activities will be set by the Court after the Written Discovery Deadline.

9. Upon a showing of good cause by any party, after notice and hearing, the Court may alter or extend any of the deadlines specified herein.

10. Unless otherwise amended herein, all other provisions of the Initial Estimation CMO remain valid and in full force.

11. This Court shall retain jurisdiction to hear and determine all matters involving the interpretation, implementation, or enforcement of this Order.

This Order has been signed electronically.  
The Judge's signature and Court's seal appear  
at the top of the Order.

United States Bankruptcy Court

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

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

**NOTICE OF HEARING**

NOTICE IS HEREBY GIVEN that Aldrich Pump LLC., et al., Debtors in the above-captioned cases, have filed the Debtors' Motion to Amend Case Management Order for Estimation of Asbestos Claims (the "Motion").

If a copy of the Motion is not included with this Notice, a copy may be viewed at the Court's website, [www.ncwb.uscourts.gov](http://www.ncwb.uscourts.gov) under Debtor Aldrich Pump LLC's name and case number, you may obtain a copy of the Motion from the Debtors' claims and noticing agent at [www.kccllc.net/aldrich](http://www.kccllc.net/aldrich), or you may request in writing a copy from the undersigned counsel to the Debtors.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THESE BANKRUPTCY CASES. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)**

**IF YOU DO NOT WANT THE COURT TO GRANT THE RELIEF REQUESTED IN THE MOTION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE MOTION, THEN ON OR BEFORE THURSDAY, MARCH 20, 2025, YOU MUST:**

- (1) A. File with the Bankruptcy Court a written objection at:

Clerk, United States Bankruptcy Court  
401 W. Trade Street  
Charlotte, North Carolina 28202

- B. If you have your attorney file a written objection then the objection should be filed with the Bankruptcy Court by electronic means through the Court's website, [www.ncwb.uscourts.gov](http://www.ncwb.uscourts.gov) under the jointly administered name and case number shown above.

(2) Serve the objection pursuant to the procedures set forth in the Order Establishing Certain Notice, Case Management, and Administrative Procedures (Docket No. 123).

(3) Attend the hearing scheduled for March 27, 2025, at 9:30 a.m. EDT or as soon thereafter as the matter can be heard in the Bankruptcy Courtroom 2B, 401 West Trade Street, Charlotte, North Carolina. You should attend this hearing if you file an objection.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought and may enter an Order granting the relief requested. No further notice of that hearing will be given.

This the 6<sup>th</sup> day of March, 2025.

RAYBURN COOPER & DURHAM, P.A.

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ATTORNEYS FOR DEBTORS