

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

**THIRD INTERIM APPLICATION OF CONSILIO LLC
FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS
ORDINARY COURSE PROFESSIONAL TO THE DEBTORS
FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

Name of Applicant:	Consilio LLC
Authorized to Provide Professional Services to:	The above-captioned Debtors and Debtors in Possession
Date of Order Authorizing Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business:	July 15, 2020
Date of Declaration of Ordinary Course Professional:	May 18, 2023
Petition Date:	June 18, 2020
Period for which compensation and reimbursement are sought:	October 1, 2024 through January 31, 2025 ²
Amount of Compensation sought as actual, reasonable, and necessary in excess of the aggregate OCP Fee Limit ³ :	\$90,804.00

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.

² Consilio did not provide any services to the Debtors or incur any expenses during January, 2025.

³ The "OCP Fee Limit" is defined as either monthly fees in excess of \$50,000 or aggregate fees of more than \$500,000 during the pendency of these Chapter 11 Cases.



Amount of Expense Reimbursement sought as actual, reasonable, and necessary in excess of the aggregate OCP Fee Limit:	\$0.00
Total Compensation Approved by OCP Order ⁴ to Date:	\$500,000.00
Total Expenses Approved by OCP Order to Date:	\$0.00
Total Compensation Approved by the Interim Fee Order to Date:	\$395,134.50
Total Expenses Approved by the Interim Fee Order to Date:	\$0.00
Total Allowed Compensation Paid to Date:	\$895,134.50
Total Allowed Expenses Paid to Date:	\$0.00
Compensation Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed:	\$81,723.62
Expenses Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed:	\$0.00

This is a(n): X interim final application

Prior Monthly Fee Statements Submitted During This Period:

Date Submitted	Month Covered	Fees	Expenses
November 15, 2024	October 1, 2024 – October 31, 2024	\$34,684.50	\$0.00
December 12, 2024	November 1, 2024 – November 30, 2024	\$44,053.50	\$0.00
January 16, 2025	December 1, 2024 – December 31, 2024	\$12,066.00	\$0.00
N/A	January 1, 2025 – January 31, 2025	\$0.00	\$0.00

To date, no objections have been received to any prior monthly fee statements.

⁴ The "OCP Order" means the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170].

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

Name of Professional	Position	Hourly Billing Rate	Total Hours Billed	Total Compensation
S. Bier	1st Level Reviewer	\$42.00	350.50	\$14,721.00
J. Hester	1st Level Reviewer	\$42.00	342.50	\$14,385.00
S. A. Laterza	1st Level Reviewer	\$42.00	178.00	\$7,476.00
R. Maxwell	1st Level Reviewer	\$42.00	370.50	\$15,561.00
W. Navarro	1st Level Reviewer	\$42.00	318.00	\$13,356.00
J. Plant	1st Level Reviewer	\$42.00	160.00	\$6,720.00
J. VanDee	Team Lead / QC Review	\$42.00	92.50	\$3,885.00
L. Pierre	Project Manager	\$75.00	5.50	\$412.50
C. Gorman	Project Manager	\$75.00	59.50	\$4,462.50
J. VanDee ¹	Project Manager	\$75.00	131.00	\$9,825.00
TOTAL			2,008.00	\$90,804.00

COMPENSATION BY PROJECT CATEGORY²

PROJECT CATEGORY	Average Billing Rate	Total Hours	Total Fees
Review Management	\$75.00	196.00	\$14,700.00
1st Level Review	\$42.00	1,087.50	\$45,675.00
Team Lead / QC	\$42.00	724.50	\$30,429.00
TOTAL		2,008.00	\$90,804.00

EXPENSE SUMMARY

Expense Category	Service Provider (if applicable)	Total Expenses
TOTAL	N/A	\$0.00

¹ Joyce VanDee engaged in both Review Management, billed at \$75 per hour, and Team Lead / QC Review, billed at \$42 per hour, and therefore appears twice in the summary of hours and compensation.

² The Monthly Fee Statements for this Compensation Period include a fourth Project Category, "Project Management & Support Services." However, as Consilio is not seeking any compensation for the 4.0 hours of work completed in this Project Category, this Project Category and the associated time entries are omitted from this Application.

UNITED STATES BANKRUPTCY COURT
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Consilio LLC ("Consilio"), an ordinary course professional providing contract attorney review services to the above-captioned debtors and debtors in possession (the "Debtors") for documents related to the estimation authorized by the Court pursuant to the *Order Authorizing Estimation of Asbestos Claims* [Dkt. 1127], makes its third interim application for allowance of compensation of \$90,804.00 for the period from October 1, 2024 through January 31, 2025 (the "Compensation Period")² in accordance with the *Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the "Interim Compensation Order"). Consilio did not incur, and, therefore, is not seeking reimbursement of, any expenses for this compensation period. In support of this Application, Consilio respectfully represents as follows:

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.

² Consilio did not provide any services to the Debtors or incur any expenses during January, 2025.

Overview

1. Consilio professionals and staff expended a total of 2,008.00 hours during the Compensation Period for which compensation is requested.
2. During the Compensation Period, Consilio did not receive any payments or promises of payment from any source other than the Debtors for services rendered or to be rendered to the Debtors in any capacity whatsoever in connection with the matters covered by this Application. No agreement or understanding exists between Consilio or any third person for the sharing of compensation, except as allowed by section 504(b) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") with respect to the sharing of compensation between and among the members of Consilio.
3. Pursuant to the Interim Compensation Order, included with this Application are: (a) a schedule identifying all Consilio professionals and staff who have performed services in these chapter 11 cases during the Compensation Period, the capacities in which each individual is employed by Consilio, the hourly billing rate charged by Consilio for the services performed by each such individual, the aggregate number of hours expended in these cases during the Compensation Period for each professional and staff, the total fees billed therefor; (b) a summary of services by billing category for services rendered by Consilio during the Compensation Period; and, to the extent applicable, (c) a schedule summarizing, by category, the actual and necessary disbursements that Consilio incurred during the Compensation Period in connection with the performance of professional services for the Debtors and for which it seeks reimbursement.

4. Attached hereto collectively as part of Exhibit A are Consilio's itemized monthly time records for professionals and staff performing services for the Debtors during the Compensation Period.

5. This Application complies with sections 330 and 331 of title 11 of the United States Code (the "Bankruptcy Code"), the Bankruptcy Rules, the Interim Compensation Order, the OCP Order, the *Guidelines for Compensation and Expense Reimbursement of Professionals* issued by this Court (the "Compensation Guidelines"), and the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the "Local Rules").

Background

6. 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.

7. On June 18, 2020, the Debtors filed the (i) *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion") and (ii) *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the OCP Order granting the relief requested in the OCP Motion. Also on July 15, 2020, the Bankruptcy Court entered the Interim Compensation Order granting the relief requested in the Interim Compensation Motion.

8. Pursuant to paragraph 3(l) of the OCP Order, to the extent that an Ordinary Course Professional (as defined in the OCP Motion) seeks compensation in excess of the aggregate OCP Fee Limit (as defined in the OCP Motion as total fees greater than \$500,000 during the pendency of these Chapter 11 Cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the Compensation Guidelines, and any and all applicable orders of the Court.

9. Consilio is an Ordinary Course Professional that filed its *Declaration of Ordinary Course Professional* on May 18, 2023 [Dkt. 1762] (the "OCP Declaration"). As described in the OCP Declaration, the Debtors retained Consilio to provide contract attorney review services for documents related to the estimation authorized by this Court pursuant to the *Order Authorizing Estimation of Asbestos Claims* [Dkt. 1127]. On or about November 30, 2023, Consilio's aggregate fees in the Chapter 11 Cases reached and exceeded the \$500,000 aggregate OCP Fee Limit established in the OCP Order, and as a result, Consilio is required to now file interim applications for amounts in excess of such aggregate OCP Fee Limit.

10. On July 10, 2024, Consilio filed the *First Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professionals to the Debtors for the Period from December 1, 2023 Through May 31, 2024* [Dkt. 2290] seeking compensation in excess of the aggregate OCP Fee Limit.

11. On July 30, 2024, the Court entered the *Order Granting the First Interim Application of Consilio, LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professionals to the Debtors for the Period from December 1, 2023 Through May 31, 2024* [Dkt. 2330].

12. On November 12, 2024, Consilio filed the *Second Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professional to the Debtors for the Period from June 1, 2024 Through September 30, 2024* [Dkt. 2432] seeking compensation in excess of the aggregate OCP Fee Limit.

13. On December 9, 2024, the Court entered the *Order Granting the Second Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professional to the Debtors for the Period from June 1, 2024 Through September 30, 2024* [Dkt. 2469].

Jurisdiction

14. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for this matter is proper in this district pursuant to 28 U.S.C. § 1409.

Summary of Services

15. The professional services performed by Consilio were necessary and appropriate to the administration of the Debtors' Chapter 11 Cases, as described in detail below and in Exhibit A. These services were in the best interests of the Debtors and other parties in interest. The compensation requested is commensurate with the complexity and nature of the issues and tasks involved.

16. All of the services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Debtors, and not on behalf of any other entity.

Prior Monthly Fee Statements

17. Pursuant to both the OCP Order and the Interim Compensation Order, Consilio has submitted the following monthly fee statements (collectively, the "Prior Monthly Fee Statements") to the Debtors for the four months comprising the Compensation Period, each of which is incorporated herein by reference in its entirety:³

Date Submitted	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
November 15, 2024	October 1, 2024 – October 31, 2024	\$34,684.50	\$0.00	\$31,216.07	\$3,468.43
December 12, 2024	November 1, 2024 – November 30, 2024	\$44,053.50	\$0.00	\$39,648.15	\$4,405.35
January 16, 2025	December 1, 2024 – December 31, 2024	\$12,066.00	\$0.00	\$10,859.40	\$1,206.60
N/A	January 1, 2025 – January 31, 2025	\$0.00	\$0.00	N/A	N/A

18. In total, Consilio has submitted the Prior Monthly Fee Statements during the Compensation Period for total fees of \$90,804.00 and total expenses of \$0.00. As of the date of this Application, no party has objected to any of Consilio's Prior Monthly Fee Statements.

Compensation by Project Category

The following is a summary of the activities performed by Consilio professionals and staff during the Compensation Period, organized by project billing category.⁴

19. Review Management — 196.00 hours — \$14,700.00

During the Compensation Period, Consilio professionals and staff reviewed a significant volume of electronically stored information ("ESI") related to court-ordered estimation. These services included the following:

³ Copies of the Prior Monthly Fee Statements are attached hereto collectively as Exhibit A.

⁴ The summary set forth below is qualified in its entirety by reference to the time and services detail attached to each Prior Monthly Fee Statement.

- participating in conference calls and video meetings with the Debtors' counsel to discuss and review key case developments;
- reviewing document requests related to estimation and conferring with Debtor's counsel;
- providing team management to 1st Level Reviewers and Team Lead/QC team for billable hours, work flow and work product to ensure compliance with Debtors' counsel directives;
- providing weekly updates on progress, scope of review and timelines for completion of project;
- coordinating communications with Debtors' counsel to address any questions, concerns or updates in protocol and provided updated information to 1st Level Review Team and Team Lead/QC team; and
- maintaining data management systems.

Consilio believes that it has adopted appropriate procedures for the effective and efficient management of its review of the voluminous ESI related to estimation in these cases.

20. 1st Level Reviewer — 1,087.50 hours — \$45,675.00

In accordance with industry best-practices, Consilio's review of ESI has been broken down into two stages – (1) 1st Level Reviewer and (2) Team Lead/QC review. The 1st Level Reviewer responsibilities involve:

- analyzing and categorizing ESI based on relevance to document requests from counsel;
- identifying privileged content and assessing level of confidentiality prior to production to opposing counsel based on parameters dictated by Debtors' counsel; and
- reviewing privileged documents withheld from service to identify any documents containing limited privilege such that with proper redaction to documents could otherwise be produced and to prepare itemized privilege log with descriptions to provide sufficient reason for the identification and withholding of documents as privileged.

21. Team Lead/QC — 724.50 hours — \$30,429.00

The Team Lead/QC reviewer responsibilities involve:

- quality control of "responsive" and "not responsive" documents; identification of privileged content and level of confidentiality as initially indicated in 1st Level Review;
- quality control of "tagged" documents;
- quality control of redactions to be applied and privilege descriptions for all privileged content; and
- reviewing randomly-selected batches of documents for each category of 1st Level review.

Expenses Incurred by Consilio

22. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by professionals employed in a chapter 11 case. Consilio did not incur, and, therefore, does not seek reimbursement of any expenses during this Compensation Period.

Conclusion

23. The fees requested herein by Consilio are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market and should be approved on an interim basis pursuant to sections 330 and 331 of the Bankruptcy Code, the OCP Order, the Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules.

Notice

24. This Application has been served in accordance with the Interim Compensation Order on the Notice Parties, as defined therein. In accordance with the Interim Compensation Order, a notice of opportunity for hearing on this Application in accordance with Local Rule 9013-1(e)(7) has been served on the Notice Parties and all parties that have filed a

notice of appearance with the Clerk of this Court and requested such notice. Consilio submits that, in light of the nature of the relief requested, no other or further notice need be provided.

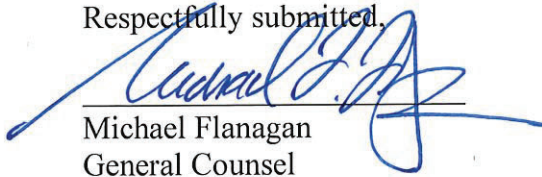
No Prior Request

25. No prior request for the relief sought in this Application has been made to this or any other court.

WHEREFORE, Consilio respectfully requests that, pursuant to sections 330 and 331 of the Bankruptcy Code, the OCP Order, the Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules, the Court (a) enter an order substantially in the form attached hereto as Exhibit B granting the relief requested herein and (b) grant such other and further relief to Consilio as the Court may deem just and proper.

Dated: March 12, 2025
Washington D.C.

Respectfully submitted,



Michael Flanagan
General Counsel
1828 L Street NW, Suite 1070
Washington, DC 20036
Michael.flanagan@consilio.com

EXHIBIT A

Prior Monthly Fee Statements

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,¹
Debtors.

Chapter 11

Case No. 20-30608 (JCW)
(Jointly Administered)

**NOTICE OF ORDINARY COURSE PROFESSIONAL FEES OF
CONSILIO, LLC IN EXCESS OF AGGREGATE OCP FEE LIMIT**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On June 18, 2020, Aldrich Pump LLC and Murray Boiler LLC, as debtors and debtors in possession (together, the "Debtors"), filed (i) the *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion")² and (ii) the *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") granting the relief requested in the OCP Motion. Also on July 15, 2020, the Bankruptcy Court entered the *Order Establishing Procedures for Interim*

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.

² Capitalized terms not otherwise defined herein shall have the meanings given to them in the OCP Motion.

Compensation and Reimbursement of Expenses of Retained Professionals [Dkt. 171] (the "Interim Compensation Order") granting the relief requested in the Interim Compensation Motion.

2. Pursuant to paragraph 3(l) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (i.e., greater than \$500,000 during the pendency of these chapter 11 cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the *Guidelines for Compensation and Expense Reimbursement of Professionals* promulgated by the Court, and any and all applicable orders of the Court.

3. Pursuant to paragraph 2 of the Interim Compensation Order, the party seeking compensation under such order shall serve a "Monthly Statement" on the Notice Parties setting forth the full amount of fees sought in such month. If any Notice Party has an objection to the fees sought in a particular Monthly Statement, such party shall, no later than the 14th day following the service of such Monthly Statement, serve upon the Debtors, the relevant party seeking compensation, and the other Notice Parties a written objection setting forth the nature of the objection (a "Fee Objection"). Under this procedure, the Fee Objection is served on the Notice Parties, but is not filed with the Bankruptcy Court. If no timely Fee Objection is served, the Debtors shall promptly pay an amount (the "Authorized Payment") equal to the lesser of (i) 90% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the "Maximum Payment") and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 2(g) of the Interim Compensation Order.

4. Consilio, LLC ("Consilio") is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on May 18, 2023 [Dkt. 1762]. Consilio provides contract attorney review services to the Debtors for documents related to the estimation authorized by the Court pursuant to the Order Authorizing Estimation of Asbestos Claims [Dkt. 1127]. On or around November 30, 2023, Consilio exceeded the OCP Fee Limit in fees in connection with the services provided to the Debtors in these chapter 11 cases.

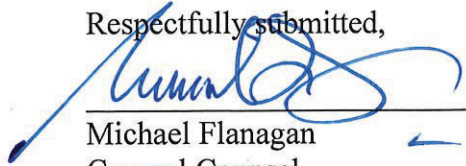
5. In accordance with the procedures established by both the OCP Order and the Interim Compensation Order, Consilio's Monthly Statement for **October 2024** is attached hereto as Exhibit 1. This Monthly Statement details the full amount of fees and expenses sought by Consilio for the month of **October 2024**. For services provided in **October 2024** Consilio has incurred fees totaling **\$34,684.50.00**. During the month of **October 2024**, Consilio **did not incur any reimbursable expenses**.

6. If no Fee Objections are received by the Debtors, Consilio, and the other Notice Parties prior to **November 29, 2024**, the Monthly Statement shall be deemed approved and the OCP Firm may be paid the Authorized Payment under the Interim Compensation Order, which if no objection is served, would be 90% of the fees (**\$31,216.05**) for **October 2024**. Consilio will file Interim Fee Applications with the Bankruptcy Court in accordance with the terms of the Interim Compensation Order.

7. If a timely Fee Objection is received, any disputed portion of Consilio's fees shall be paid only upon resolution by the parties or determination by the Bankruptcy Court as described in both the OCP Order and the Interim Compensation Order.

Dated: **November 14, 2024**
Washington, DC

Respectfully submitted,



Michael Flanagan
General Counsel
Michael.flanagan@consilio.com

EXHIBIT 1

Monthly Statement



Invoice

Corporate Office

Consilio LLC
1828 L Street NW Suite 1070
Washington, DC 20036

Remittance Address

DEPT CH17174
Palatine, IL 60055-7174
United States

Strictly Confidential

Invoice To

Robb Sands
Trane Technologies
800 E Beaty Street
Building E
Davidson NC 28036
United States

Invoice Date	Invoice Number
10/31/2024	INV579425394

Entity Tax ID: 47-4420523

Customer Tax ID:

Engagement No.	Engagement Name	Service Period	Client Billing ID	Payment Terms
339584-344505	Jones Day - Aldrich Pump - Review	10/1/24 - 10/31/24		Net 30

Description	Quantity	Unit of Measure	Unit Price	Extended Price
Project Management & Support Services	0.50	Hour	\$0.000	\$0.00
Managed Review - 1st Level Reviewer	420.50	Hour	\$42.000	\$17,661.00
Managed Review - Team Lead / QC	220.50	Hour	\$42.000	\$9,261.00
Managed Review - Review Management	103.50	Hour	\$75.000	\$7,762.50

TERMS: Unless otherwise covered by a separate written agreement, this invoice is due and payable within 30 days of receipt and past due after that. Client is subject to maximum allowable finance charges on all past due accounts plus any related attorney fees and collection charges incurred by Consilio LLC

Subtotal \$34,684.50

Credit

Tax \$0.00

Amount Paid

Total \$34,684.50 USD

Amount Due \$34,684.50 USD

Bank Information

Bank Name: HSBC
Account Name: Consilio LLC
Account Number: 622000527 / Routing Number: 022000020 / 021001088 / SWIFT Code: MRMDUS33
For electronic payment, kindly send remittance details via email to: accountsreceivable@consilio.com
Please include invoice number(s) to ensure proper credit.

	10/1-10/6	10/7-10/13	10/14-10/20	10/21-10/27	10/28-10/31	TOTAL BILLABLE TIME
Julia Hester	31.00	9.00		40.00	35.50	115.50
William Navarro	32.00			40.00	33.00	105.00
STEVEN BIER	32.00	40.00	38.50	24.00	32.00	166.50
Richard Maxwell	31.50	40.00	38.00	39.00	32.00	180.50
Stephanie A. Laterza	18.00	21.50	16.50		17.50	73.50
						-
						-
Rev Total Hours	144.50	110.50	93.00	143.00	150.00	641.00
Rev Billable Rate	42.00	42.00	42.00	42.00	42.00	42.00
REV TOTAL	6,069.00	4,641.00	3,906.00	6,006.00	6,300.00	26,922.00
Foreign Language Rev Total Hours	-	-	-	-	-	-
Foreign Language Review Rate	75.00	75.00	75.00	75.00	75.00	75.00
REV TOTAL	-	-	-	-	-	-
Joyce VanDee	15.00	22.50	10	8.50	16.00	72.00
Charles Gorman	4.50	5.50	5.5	6.00	8.00	29.50
Laury Pierre	0.50	1.00	0.5			2.00
						-
PM Total Hours	20.00	29.00	16.00	14.50	24.00	103.50
PM Billable Rate	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00
PM TOTAL	1,500.00	2,175.00	1,200.00	1,087.50	1,800.00	7,762.50
TOTAL BILLABLE	7,569.00	6,816.00	5,106.00	7,093.50	8,100.00	34,684.50

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

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(Jointly Administered)

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² Capitalized terms not otherwise defined herein shall have the meanings given to them in the OCP Motion.

Compensation and Reimbursement of Expenses of Retained Professionals [Dkt. 171] (the "Interim Compensation Order") granting the relief requested in the Interim Compensation Motion.

2. Pursuant to paragraph 3(l) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (i.e., greater than \$500,000 during the pendency of these chapter 11 cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the *Guidelines for Compensation and Expense Reimbursement of Professionals* promulgated by the Court, and any and all applicable orders of the Court.

3. Pursuant to paragraph 2 of the Interim Compensation Order, the party seeking compensation under such order shall serve a "Monthly Statement" on the Notice Parties setting forth the full amount of fees sought in such month. If any Notice Party has an objection to the fees sought in a particular Monthly Statement, such party shall, no later than the 14th day following the service of such Monthly Statement, serve upon the Debtors, the relevant party seeking compensation, and the other Notice Parties a written objection setting forth the nature of the objection (a "Fee Objection"). Under this procedure, the Fee Objection is served on the Notice Parties, but is not filed with the Bankruptcy Court. If no timely Fee Objection is served, the Debtors shall promptly pay an amount (the "Authorized Payment") equal to the lesser of (i) 90% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the "Maximum Payment") and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 2(g) of the Interim Compensation Order.

4. Consilio, LLC ("Consilio") is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on May 18, 2023 [Dkt. 1762]. Consilio provides contract attorney review services to the Debtors for documents related to the estimation authorized by the Court pursuant to the Order Authorizing Estimation of Asbestos Claims [Dkt. 1127]. On or around November 30, 2023, Consilio exceeded the OCP Fee Limit in fees in connection with the services provided to the Debtors in these chapter 11 cases.

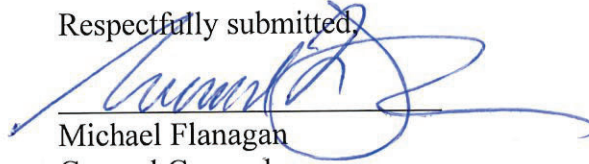
5. In accordance with the procedures established by both the OCP Order and the Interim Compensation Order, Consilio's Monthly Statement for **November 2024** is attached hereto as Exhibit 1. This Monthly Statement details the full amount of fees and expenses sought by Consilio for the month of **November 2024**. For services provided in **November 2024** Consilio has incurred fees totaling **\$44,053.50**. During the month of **November 2024**, Consilio **did not incur any reimbursable expenses**.

6. If no Fee Objections are received by the Debtors, Consilio, and the other Notice Parties prior to **December 27, 2024**, the Monthly Statement shall be deemed approved and the OCP Firm may be paid the Authorized Payment under the Interim Compensation Order, which if no objection is served, would be 90% of the fees (**\$39,648.15**) for **November 2024**. Consilio will file Interim Fee Applications with the Bankruptcy Court in accordance with the terms of the Interim Compensation Order.

7. If a timely Fee Objection is received, any disputed portion of Consilio's fees shall be paid only upon resolution by the parties or determination by the Bankruptcy Court as described in both the OCP Order and the Interim Compensation Order.

Dated: **December 12, 2024**
Washington, DC

Respectfully submitted,



Michael Flanagan
General Counsel
Michael.flanagan@consilio.com

EXHIBIT 1

Monthly Statement

Invoice



Corporate Office

Consilio LLC
1828 L Street NW Suite 1070
Washington, DC 20036

Remittance Address

DEPT CH17174
Palatine, IL 60055-7174
United States

Strictly Confidential

Invoice To

Robb Sands
Trane Technologies
800 E Beaty Street
Building E
Davidson NC 28036
United States

Invoice Date	Invoice Number
11/30/2024	INV579438777

Entity Tax ID: 47-4420523
Customer Tax ID:

Engagement No.	Engagement Name	Service Period	Client Billing ID	Payment Terms
339584-344505	Jones Day - Aldrich Pump - Review	11/1/24 - 11/30/24		Net 30

Description	Quantity	Unit of Measure	Unit Price	Extended Price
Project Management & Support Services	2.00	Hour	\$0.000	\$0.00
Managed Review - 1st Level Reviewer	555.00	Hour	\$42.000	\$23,310.00
Managed Review - Team Lead / QC	380.50	Hour	\$42.000	\$15,981.00
Managed Review - Review Management	63.50	Hour	\$75.000	\$4,762.50

TERMS: Unless otherwise covered by a separate written agreement, this invoice is due and payable within 30 days of receipt and past due after that. Client is subject to maximum allowable finance charges on all past due accounts plus any related attorney fees and collection charges incurred by Consilio LLC

Subtotal	\$44,053.50
Credit	
Tax	\$0.00
Amount Paid	
Total	\$44,053.50 USD
Amount Due	\$44,053.50 USD

Bank Information

Bank Name: HSBC
Account Name: Consilio LLC
Account Number: 622000527 / Routing Number: 022000020 / SWIFT Code: MRMDUS33
For electronic payment, kindly send remittance details via email to: accountsreceivable@consilio.com
Please include invoice number(s) to ensure proper credit.

	11/1-11/3	11/4-11/10	11/11-11/17	11/18-11/24	11/25-11/30	TOTAL BILLABLE TIME
Julia Hester	4.5	40	40	40	40	164.50
William Navarro	7.5	40	40	40	25.5	153.00
STEVEN BIER	8	40	40	40	40	168.00
Richard Maxwell	8	40	40	35.5	32	155.50
Joyce VanDee		15	11	18	19.5	63.50
Stephanie A. Laterza	4	20.5	17.5	32.5	12.5	87.00
John L. Plant	7	40.5	39.5	41	16	144.00
						-
Rev Total Hours	39.00	236.00	228.00	247.00	185.50	935.50
Rev Billable Rate	42.00	42.00	42.00	42.00	42.00	42.00
REV TOTAL	1,638.00	9,912.00	9,576.00	10,374.00	7,791.00	39,291.00
Foreign Language Rev Total Hours	-	-	-	-	-	-
Foreign Language Review Rate	75.00	75.00	75.00	75.00	75.00	75.00
REV TOTAL	-	-	-	-	-	-
Joyce VanDee	1	10	10	10	10	41.00
Charles Gorman	2	5.5	3	5.5	4	20.00
Laury Pierre		0.5	1	1		2.50
						-
PM Total Hours	3.00	16.00	14.00	16.50	14.00	63.50
PM Billable Rate	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00
PM TOTAL	225.00	1,200.00	1,050.00	1,237.50	1,050.00	4,762.50
TOTAL BILLABLE	1,863.00	11,112.00	10,626.00	11,611.50	8,841.00	44,053.50

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

**NOTICE OF ORDINARY COURSE PROFESSIONAL FEES OF
CONSILIO, LLC IN EXCESS OF AGGREGATE OCP FEE LIMIT**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On June 18, 2020, Aldrich Pump LLC and Murray Boiler LLC, as debtors and debtors in possession (together, the "Debtors"), filed (i) the *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion")² and (ii) the *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") granting the relief requested in the OCP Motion. Also on July 15, 2020, the Bankruptcy Court entered the *Order Establishing Procedures for Interim*

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.

² Capitalized terms not otherwise defined herein shall have the meanings given to them in the OCP Motion.

Compensation and Reimbursement of Expenses of Retained Professionals [Dkt. 171] (the "Interim Compensation Order") granting the relief requested in the Interim Compensation Motion.

2. Pursuant to paragraph 3(l) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (i.e., greater than \$500,000 during the pendency of these chapter 11 cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the *Guidelines for Compensation and Expense Reimbursement of Professionals* promulgated by the Court, and any and all applicable orders of the Court.

3. Pursuant to paragraph 2 of the Interim Compensation Order, the party seeking compensation under such order shall serve a "Monthly Statement" on the Notice Parties setting forth the full amount of fees sought in such month. If any Notice Party has an objection to the fees sought in a particular Monthly Statement, such party shall, no later than the 14th day following the service of such Monthly Statement, serve upon the Debtors, the relevant party seeking compensation, and the other Notice Parties a written objection setting forth the nature of the objection (a "Fee Objection"). Under this procedure, the Fee Objection is served on the Notice Parties, but is not filed with the Bankruptcy Court. If no timely Fee Objection is served, the Debtors shall promptly pay an amount (the "Authorized Payment") equal to the lesser of (i) 90% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the "Maximum Payment") and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 2(g) of the Interim Compensation Order.

4. Consilio, LLC ("Consilio") is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on May 18, 2023 [Dkt. 1762]. Consilio provides contract attorney review services to the Debtors for documents related to the estimation authorized by the Court pursuant to the Order Authorizing Estimation of Asbestos Claims [Dkt. 1127]. On or around November 30, 2023, Consilio exceeded the OCP Fee Limit in fees in connection with the services provided to the Debtors in these chapter 11 cases.

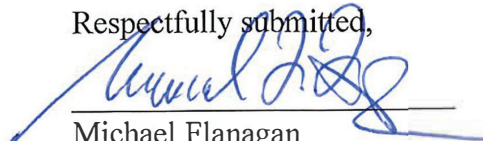
5. In accordance with the procedures established by both the OCP Order and the Interim Compensation Order, Consilio's Monthly Statement for **December 2024** is attached hereto as Exhibit 1. This Monthly Statement details the full amount of fees and expenses sought by Consilio for the month of **December 2024**. For services provided in **December 2024** Consilio has incurred fees totaling **\$12,066.00**. During the month of **December 2024**, Consilio **did not incur any reimbursable expenses**.

6. If no Fee Objections are received by the Debtors, Consilio, and the other Notice Parties prior to **January 30, 2025**, the Monthly Statement shall be deemed approved and the OCP Firm may be paid the Authorized Payment under the Interim Compensation Order, which if no objection is served, would be 90% of the fees (**\$10,859.40**) for **December 2024**. Consilio will file Interim Fee Applications with the Bankruptcy Court in accordance with the terms of the Interim Compensation Order.

7. If a timely Fee Objection is received, any disputed portion of Consilio's fees shall be paid only upon resolution by the parties or determination by the Bankruptcy Court as described in both the OCP Order and the Interim Compensation Order.

Dated: **January 16, 2025**
Washington, DC

Respectfully submitted,



Michael Flanagan
General Counsel
Michael.flanagan@consilio.com

EXHIBIT 1

Monthly Statement

Invoice



Corporate Office
 Consilio LLC
 1828 L Street NW Suite 1070
 Washington, DC 20036

Remittance Address
 DEPT CH17174
 Palatine, IL 60055-7174
 United States

Strictly Confidential

Invoice To

Robb Sands
 Trane Technologies
 800 E Beaty Street
 Building E
 Davidson NC 28036
 United States

Invoice Date	Invoice Number
12/31/2024	INV579451911

Entity Tax ID: 47-4420523
Customer Tax ID:

Engagement No.	Engagement Name	Service Period	Client Billing ID	Payment Terms
339584-344505	Jones Day - Aldrich Pump - Review	12/1/24 - 12/31/24		Net 30

Description	Quantity	Unit of Measure	Unit Price	Extended Price
Project Management & Support Services	1.50	Hour	\$0.000	\$0.00
Managed Review - 1st Level Reviewer	112.00	Hour	\$42.000	\$4,704.00
Managed Review - Team Lead / QC	123.50	Hour	\$42.000	\$5,187.00
Managed Review - Review Management	29.00	Hour	\$75.000	\$2,175.00

TERMS: Unless otherwise covered by a separate written agreement, this invoice is due and payable within 30 days of receipt and past due after that. Client is subject to maximum allowable finance charges on all past due accounts plus any related attorney fees and collection charges incurred by Consilio LLC

Subtotal	\$12,066.00
Credit	
Tax	\$0.00
Amount Paid	

Total	\$12,066.00 USD
Amount Due	\$12,066.00 USD

Bank Information

Bank Name: HSBC
 Account Name: Consilio LLC
 Account Number: 622000527 / Routing Number: 022000020 / 021001088 / SWIFT Code: MRMDUS33
 For electronic payment, kindly send remittance details via email to: accountsreceivable@consilio.com
 Please include invoice number(s) to ensure proper credit.

	12/1/2024	12/2-12/8	12/9-12/15	12/16-12/22	12/23-12/29	12/30-12/31	TOTAL BILLABLE TIME
Julia Hester		40	22.5				62.50
William Navarro		40	20				60.00
STEVEN BIER		16					16.00
Richard Maxwell		34.5					34.50
Joyce VanDee		25.5	3.5				29.00
Stephanie A. Laterza		17.5					17.50
John L. Plant		16					16.00
							-
Rev Total Hours	-	189.50		-	-	-	235.50
Rev Billable Rate	42.00	42.00	42.00	42.00	42.00	42.00	42.00
REV TOTAL	-	7,959.00	-	-	-	-	9,891.00
Foreign Language Rev Total Hours	-	-		-	-	-	-
Foreign Language Review Rate	75.00	75.00	75.00	75.00	75.00	75.00	75.00
REV TOTAL	-	-	-	-	-	-	-
Joyce VanDee		10	8				18.00
Charles Gorman		6.5	3.5				10.00
Laury Pierre		0.5	0.5				1.00
							-
PM Total Hours	-	17.00		-	-	-	29.00
PM Billable Rate	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00
PM TOTAL	-	1,275.00	-	-	-	-	2,175.00
TOTAL BILLABLE	-	9,234.00	-	-	-	-	12,066.00

EXHIBIT B

Proposed Order

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

**ORDER GRANTING THE THIRD INTERIM APPLICATION
OF CONSILIO LLC FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES
AS ORDINARY COURSE PROFESSIONAL TO THE DEBTORS
FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

This matter coming before the Court on the *Third Interim Application of Consilio LLC, for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professionals to the Debtors For the Period From October 1, 2024 Through January 31, 2025* (the "Interim Fee Application")² filed by Consilio as an

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.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Interim Fee Application.

Ordinary Course Professional to the above-captioned debtors and debtors in possession (the "Debtors"); the Court having reviewed the Interim Fee Application; the Court having found that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (iii) notice of the Interim Fee Application and the notice of an opportunity for hearing were served upon the parties required by Local Rule 2002-1(g) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the "Interim Compensation Order") and no other or further notice is required, (iv) the compensation requested in the Interim Fee Application is reasonable and for actual and necessary services rendered by Consilio on behalf of the Debtors during the period from October 1, 2024 through January 31, 2025 (the "Compensation Period"), and (v) the Interim Fee Application fully complies with the Interim Compensation Order, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the OCP Order, and the Compensation Guidelines; and the Court having determined that the legal and factual bases set forth in the Interim Fee Application establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Interim Fee Application is GRANTED.
2. Consilio is awarded, on an interim basis, compensation for professional services rendered during the Compensation Period in the amount of \$90,804.00.
3. The Debtors are authorized and directed to pay promptly to Consilio the amount of fees and expenses approved by this Order, to the extent that such amounts have not previously been paid by the Debtors.
4. The Debtors and Consilio are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

5. This Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation, enforcement, or interpretation 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