

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)

**AMENDED FOURTEENTH INTERIM APPLICATION OF K&L GATES LLP FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
FOR REIMBURSEMENT OF EXPENSES AS
SPECIAL INSURANCE COUNSEL TO THE DEBTORS
FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

Name of Applicant:	K&L Gates LLP
Authorized to Provide Professional Services to:	The above-captioned Debtors and Debtors in Possession
Date of Order Approving Retention:	June 19, 2020 (as of the Petition Date), and amended on August 18, 2020
Petition Date:	June 18, 2020
Period for which compensation and reimbursement are sought:	October 1, 2024 through January 31, 2025
Amount of Compensation sought as actual, reasonable and necessary:	\$78,409.35
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$0.00
Total Compensation Approved by Interim Fee Order to Date:	\$3,272,225.83
Total Expenses Approved by Interim Fee Order to Date:	\$8,199.73

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.



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Total Allowed Compensation Paid to Date: \$3,272,225.83

Total Allowed Expenses Paid to Date: \$8,199.73

Compensation Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed: \$34,605.64

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:

Date Submitted	Month Covered	Fees	Expenses
November 26, 2024	October 2024	\$22,577.85	\$0.00
December 30, 2024	November 2024	\$15,872.85	\$0.00
January 30, 2025	December 2024	\$2,722.05	\$0.00
March 3, 2025	January 2025	\$37,236.60	\$0.00

To date, K&L Gates LLP has not received any objections to any prior monthly fee statements, provided that the objection deadline relating to the *Fifty-Fifth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period from January 1, 2025 Through January 31, 2025* has not yet passed.

SUMMARY OF HOURS AND COMPENSATION

Name	Position - Bar Year	Hourly Billing Rate	Total Hours Billed	Total Compensation
D. F. McGONIGLE	PARTNER (1988)	\$1,200.00	26.7	\$32,040.00
D. F. McGONIGLE	PARTNER (1988)	\$1,165.00	32.5	\$37,862.50
J. C. SAFAR	PARTNER (1997)	\$1,075.00	3.4	\$3,655.00
J. C. SAFAR	PARTNER (1997)	\$995.00	3.5	\$3,482.50
M. WESTBROOK	PARTNER (1996)	\$815.00	0.2	\$163.00
E. STEELE	PARTNER (2014)	\$765.00	0.6	\$459.00
E. STEELE	ASSOCIATE (2014)	\$695.00	6.1	\$4,239.50
K. HEGDE	ASSOCIATE (2021)	\$600.00	7.8	\$4,680.00
M. URICK	PARALEGAL	\$450.00	1.2	\$540.00
TOTAL			82.0	\$87,121.50
TOTAL w/ 10% DISC				\$78,409.35

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
Aldrich Asbestos Insurance Advice	37.2	\$36,494.10
Aldrich Chapter 11 Retention & Compensation	7.1	\$5,697.45
Murray Asbestos Insurance Advice	34.0	\$33,422.40
Murray Chapter 11 Retention and Compensation	3.7	\$2,795.40
TOTAL		\$78,409.35

EXPENSE SUMMARY

None.

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
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In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

**AMENDED FOURTEENTH INTERIM APPLICATION OF K&L GATES LLP FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND FOR
REIMBURSEMENT OF EXPENSES AS
SPECIAL INSURANCE COUNSEL TO THE DEBTORS FOR
THE PERIOD FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

K&L Gates LLP, special insurance counsel to the above-captioned debtors and debtors in possession (the "Debtors"), makes its amended fourteenth interim application for allowance of compensation of \$78,409.35 and reimbursement of expenses of \$0.00 for the period from October 1, 2024 through January 31, 2025 (the "Compensation Period") in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals*, dated July 15, 2020 [Dkt. 171] (the "Interim Compensation Order").

In support of this Application, K&L Gates LLP respectfully represents as follows:

Overview

1. K&L Gates LLP attorneys and paraprofessionals expended a total of 82 hours during the Compensation Period for which compensation is requested.

2. During the Compensation Period, K&L Gates LLP did not receive any payments or promises of payment from any source other than the Debtors for services rendered

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.

or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. No agreement or understanding exists between K&L Gates LLP or any third person for the sharing of compensation, except as allowed by section 504(b) of 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 partners of K&L Gates LLP.

3. Pursuant to the Interim Compensation Order, included with this Application is: (a) a schedule identifying all K&L Gates LLP professionals and paraprofessionals who have performed services in these chapter 11 cases during the Compensation Period, the capacities in which each individual is employed by K&L Gates LLP, the hourly billing rate charged by K&L Gates LLP for the services performed by each such individual, the aggregate number of hours expended in this case during the Compensation Period for each professional and paraprofessional, the total fees billed therefor, and the year in which each professional was first licensed to practice law; (b) a summary of services by billing category for services rendered by K&L Gates LLP during the Compensation Period; and (c) a schedule summarizing, by category, the actual and necessary disbursements that K&L Gates LLP 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 K&L Gates LLP's itemized monthly time records for professionals and paraprofessionals performing services for the Debtors during the Compensation Period and K&L Gates LLP's itemized records detailing any expenses incurred on behalf of 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 *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 *Ex Parte Application of the Debtors for an Order Authorizing Them to Retain and Employ K&L Gates LLP as Special Insurance Counsel as of the Petition Date* [Dkt. 25] (the "Retention Application"), by which the Debtors sought authority to retain and employ K&L Gates LLP as special insurance counsel in the Chapter 11 Cases. On June 19, 2020, the Court entered an order [Dkt. 75] (the "Original Retention Order") authorizing the retention of K&L Gates LLP as the Debtors' special insurance counsel as of the Petition Date.

8. On July 7, 2020, the Court entered an order [Dkt. 147] appointing the official committee of asbestos personal injury claimants (the "Asbestos Committee") in these Chapter 11 Cases.

9. On July 8, 2020, and August 17, 2020, K&L Gates LLP filed its first and second supplemental declarations, respectively, providing additional disclosures related to its role in representation of the predecessor of one of the Debtors and the pre-petition restructuring involving the Debtors [Dkt. 149 and 256]. In addition, the Debtors and the Asbestos Committee agreed on an amendment to the Original Retention Order to reserve certain rights of the Asbestos

Committee. On August 18, 2020, the Court entered the amended retention order agreed upon by the Debtors and the Asbestos Committee [Dkt. 263] (the "K&L Gates Retention Order"), which superseded the Original Retention Order.

10. On November 9, 2020, K&L Gates LLP filed the *First Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 18, 2020 Through September 30, 2020* [Dkt. 425] (the "First Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 18, 2020 through September 30, 2020, in accordance with the Interim Compensation Order.

11. On November 25, 2020, K&L Gates LLP filed its third supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 440].

12. On December 2, 2020, the Court entered an order [Dkt. 453] (the "First Interim Approval Order") granting the First Interim Application.

13. On March 12, 2021, K&L Gates LLP filed the *Second Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2020 Through January 31, 2021* [Dkt. 623] (the "Second Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2020 through January 31, 2021, in accordance with the Interim Compensation Order.

14. On April 5, 2021, the Court entered an order [Dkt. 664] (the "Second Interim Approval Order") granting the Second Interim Application.

15. On July 9, 2021, K&L Gates LLP filed the *Third Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2021 Through May 31, 2021* [Dkt. 768] (the "Third Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2021 through May 31, 2021, in accordance with the Interim Compensation Order.

16. On July 28, 2021, the Court entered an order [Dkt. 791] (the "Third Interim Approval Order") granting the Third Interim Application.

17. On September 30, 2021, K&L Gates LLP filed its fourth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 836].

18. On November 9, 2021, K&L Gates LLP filed its *Fourth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2021 Through September 30, 2021* [Dkt. 878] (the "Fourth Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2021 through September 30, 2021, in accordance with the Interim Compensation Order.

19. On December 8, 2021, the Court entered an order [Dkt. 933] (the "Fourth Interim Approval Order") granting the Fourth Interim Application.

20. On March 11, 2022, K&L Gates LLP filed its *Fifth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2021 Through January 31, 2022* [Dkt. 1039] (the “Fifth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2021 through January 31, 2022, in accordance with the Interim Compensation Order.

21. On April 6, 2022, the Court entered an order [Dkt. 1110] (the “Fifth Interim Approval Order”) granting the Fifth Interim Application.

22. On May 19, 2022, K&L Gates LLP filed its fifth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1181].

23. On June 22, 2022, K&L Gates LLP filed its sixth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1218].

24. On July 11, 2022, K&L Gates LLP filed its *Sixth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2022 Through May 31, 2022* [Dkt. 1267] (the “Sixth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2022 through May 31, 2022, in accordance with the Interim Compensation Order.

25. On July 29, 2022, the Court entered an order [Dkt. 1296] (the “Sixth Interim Approval Order”) granting the Sixth Interim Application.

26. On November 9, 2022, K&L Gates LLP filed its *Seventh Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2022 Through September 30, 2022* [Dkt. 1404] (the “Seventh Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2022 through September 30, 2022, in accordance with the Interim Compensation Order.

27. On December 14, 2022, the Court entered an order [Dkt. 1472] (the “Seventh Interim Approval Order”) granting the Seventh Interim Application.

28. On March 9, 2023, K&L Gates LLP filed its seventh supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1637].

29. On March 13, 2023, K&L Gates LLP filed its *Eighth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2022 Through January 31, 2023* [Dkt. 1644] (the “Eighth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2022 through January 31, 2023, in accordance with the Interim Compensation Order.

30. On March 31, 2023, the Court entered an order [Dkt. 1693] (the “Eighth Interim Approval Order”) granting the Eighth Interim Application.

31. On April 28, 2023, K&L Gates LLP filed its eighth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1727].

32. On July 10, 2023, K&L Gates LLP filed its *Ninth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2023 Through May 31, 2023* [Dkt. 1853] (the “Ninth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2023 through May 31, 2023, in accordance with the Interim Compensation Order.

33. On August 28, 2023, the Court entered an order [Dkt. 1933] (the “Ninth Interim Approval Order”) granting the Ninth Interim Application.

34. On October 10, 2023, K&L Gates LLP filed its ninth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1969].

35. On November 9, 2023, K&L Gates LLP filed its *Tenth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2023 Through September 30, 2023* [Dkt. 1998] (the “Tenth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2023 through September 30, 2023, in accordance with the Interim Compensation Order.

36. On November 29, 2023, the Court entered an order [Dkt. 2022] (the “Tenth Interim Approval Order”) granting the Tenth Interim Application.

37. On March 11, 2024, K&L Gates LLP filed its *Eleventh Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2023 Through January 31, 2024* [Dkt. 2132] (the “Eleventh Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2023 through January 31, 2024, in accordance with the Interim Compensation Order.

38. On March 29, 2024, the Court entered an order [Dkt. 2163] (the “Eleventh Interim Approval Order”) granting the Eleventh Interim Application.

39. On July 10, 2024, K&L Gates LLP filed its *Twelfth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2024 Through May 31, 2024* [Dkt. 2294] (the “Twelfth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2024 through May 31, 2024, in accordance with the Interim Compensation Order.

40. On July 29, 2024, the Court entered an order [Dkt. 2327] (the “Twelfth Interim Approval Order”) granting the Twelfth Interim Application.

41. On October 25, 2024, K&L Gates LLP filed its tenth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 2396].

42. On November 12, K&L Gates LLP filed its *Thirteenth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from*

June 1, 2024 Through September 30, 2024 [Dkt. 2425] (the “Thirteenth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2024 through September 30, 2024, in accordance with the Interim Compensation Order.

43. On December 9, 2024, the Court entered an order [Dkt. 2465] (the “Thirteenth Interim Approval Order”) granting the Thirteenth Interim Application.

44. On December 17, 2024, K&L Gates LLP filed its eleventh supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 2492].

Jurisdiction

45. 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

46. The professional services performed by K&L Gates LLP 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.

47. 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

48. Pursuant to the Interim Compensation Order, K&L Gates LLP 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:²

Date Submitted	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
November 26, 2024	October 1 – October 31, 2024	\$22,577.85	\$0.00	(\$20,320.07)	\$2,257.78
December 30, 2024	November 1 – November 30, 2024	\$15,872.85	\$0.00	(\$14,285.57)	\$1,587.28
January 30, 2025	December 1 – December 31, 2024	\$2,722.05	\$0.00	N/A	\$2,722.05
March 3, 2025	January 1 – January 31, 2025	\$37,236.60	\$0.00	N/A	\$37,236.60

49. In total, K&L Gates LLP has submitted the Prior Monthly Fee Statements during the Compensation Period for total fees of \$78,409.35 and total expenses of \$0.00. As of the date of this Application, no party has objected to any of K&L Gates LLP's Prior Monthly Fee Statements.³

² Copies of the Prior Monthly Fee Statements are attached hereto collectively as Exhibit A.

³ The objection deadline relating to the *Fifty-Fifth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period from January 1, 2025 Through January 31, 2025* has not yet passed.

Compensation by Project Category

The following is a summary of the activities performed by K&L Gates LLP professionals and paraprofessionals during the Compensation Period, organized by project billing category.⁴

50. Asbestos Insurance Advice (Combined for Both Debtors) — 71.2 hours — \$69,916.50

During the Compensation Period, K&L Gates LLP professionals and paraprofessionals counseled and represented the Debtors on insurance coverage issues, particularly in relation to the Debtors' asbestos liabilities. The work performed by K&L Gates LLP included the following activities, among others:

- a) Analyzing and reporting on information relating to the Debtors' historical insurance coverage and related agreements, including working with the Debtors' insurance consultants, and generating work product related thereto;
- b) Assisting the Debtors in addressing requests for insurance-related information from various interested parties in relation to the Chapter 11 Cases;
- c) Reporting to and interacting with the Debtors' insurers in connection with matters relating to the Chapter 11 Cases;
- d) Assisting the Debtors in addressing discovery issues in connection with matters relating to the Chapter 11 Cases;
- e) Participating in strategy and update conferences with the Debtors, general bankruptcy counsel, and special asbestos counsel in relation to the forgoing; and
- f) Attending hearings in connection with the Chapter 11 Cases.

51. Chapter 11 Retention & Compensation (Combined for Both Debtors) — 10.8 hours — \$8,492.85

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. Project billing categories for which no time was charged during the Compensation Period are not listed below.

During the Compensation Period, K&L Gates LLP professionals and paraprofessionals devoted limited time to (a) reviewing and revising the September 2024, October 2024, November 2024 and December 2024 invoices for privilege, to preserve client confidentiality, and to ensure compliance with the Local Rules, (b) drafting, revising and submitting the Fifty-First, Fifty-Second, Fifty-Third and Fifty-Fourth Monthly Fee Statements, (c) drafting, revising and submitting the Thirteenth Interim Application and the Thirteenth Interim Approval Order, and (d) drafting and submitting the eleventh supplemental declaration. K&L Gates LLP intends to seek compensation in connection with reviewing and revising the January 2025 invoices, drafting, revising and submitting the Fifty-Fifth Monthly Fee Statement, and preparing this Application at a later date.

Expenses Incurred by K&L Gates LLP

52. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by professionals employed in a chapter 11 case. Accordingly, K&L Gates LLP seeks reimbursement for expenses ("Expenses") incurred in rendering services to the Debtors during the Compensation Period in the amount of \$0.00. Itemized records detailing the Expenses incurred during the Compensation Period are attached to the Prior Monthly Fee Statements.

Retainer Disclosure

53. Prior to the Petition Date, the Debtors paid K&L Gates LLP retainer amounts totaling \$605,000 for professional services and expenses (together, the "Retainer"). Prior to the commencement of the Chapter 11 Cases, \$324,451.40 of the Retainer was applied to actual and estimated fees and expenses incurred prior to June 18, 2020. As of the Petition Date, the Retainer balance was \$280,922.03, subject to reconciliation of prepetition fees and expenses. Following K&L Gates LLP's final reconciliation of its prepetition fees and expenses in connection with the First Interim Application, at the time of entry of the First Interim Approval Order, the Retainer balance was \$30,484.16.

54. Following the entry of the First Interim Approval Order by the Court, and consistent with paragraph 2(f) of the Interim Compensation Order, the remaining Retainer balance has been applied to payments sought in connection with the First Interim Application (collectively, the "Interim Amounts"). Specifically, K&L Gates LLP applied \$30,484.16 of the Retainer balance to the Interim Amount sought in connection with the September 2020 Monthly Fee Statement. Following the application of this amount, the remaining Retainer balance now is \$0.00. Accordingly, K&L Gates LLP did not apply any Retainer amounts to the Prior Monthly Fee Statements that are the subject of this Application.

Conclusion

55. The fees and expenses requested herein by K&L Gates LLP 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 nonbankruptcy 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 Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules.

Notice

56. 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. K&L Gates LLP submits that, in light of the nature of the relief requested, no other or further notice need be provided.

No Prior Request

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

WHEREFORE, K&L Gates LLP respectfully requests that, pursuant to sections 330 and 331 of the Bankruptcy Code, 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 K&L Gates LLP as the Court may deem just and proper.

Dated: March 12, 2025
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

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(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR
DEBTORS AND DEBTORS IN POSSESSION

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 (LMJ)

(Jointly Administered)

**FIFTY-SECOND MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS
FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Fifty-Second Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From October 1, 2024 Through October 31, 2024* (the "Monthly Fee Statement").

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period October 1, 2024 through October 31, 2024 (the "Statement Period").

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.

Total Fees and Expenses for the Statement Period

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$22,577.85
Total Expenses	\$0.00
TOTAL	\$22,577.85

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$20,320.06 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoam@mccarter.com), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and

Phillip S. Pavlick, Esq., ppavlick@mccarter.com), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@burtcordeslaw.com, (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. MacLay, Esq., kmacLay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com and Todd E. Phillips, Esq., tphillips@capdale.com) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., jgrier@grierlaw.com, A. Cotton Wright, Esq., cwright@grierlaw.com), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., jguy@orrick.com, Debra L. Felder, Esq., dfelder@orrick.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the affected Retained Professional, and upon the other Notice Parties no later than December 10, 2024 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100%

of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: November 26, 2024
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR
DEBTORS AND DEBTORS IN POSSESSION

EXHIBIT A

Invoices

K&L GATES

K&L GATES LLP

K&L GATES CENTER

210 SIXTH AVENUE

PITTSBURGH, PA 15222-2613

T +1 412 355 6500 F +1 412 355 6501 klgates.com

Tax ID No. 25 0921018

Aldrich Pump LLC
Allan Tananbaum, Esquire
800-E Beatty Street
Davidson, North Carolina 28036

Invoice Date: November 1, 2024
Invoice Number: 100099721
K&L Gates Contact: Dave McGonigle

INVOICE SUMMARY**Total USD \$****Asbestos Insurance Advice (00001)**

Fees	11,480.00	
10% Discount	(1,148.00)	
Total Amount Due This Matter		\$ 10,332.00

Chapter 11 Retention and Compensation (00002)

Fees	2,391.50	
10% Discount	(239.15)	
Total Amount Due This Matter		\$ 2,152.35

CURRENT INVOICE DUE - All Matters**\$ 12,484.35**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date: November 1, 2024

Invoice Number: 100099721

K&L Ref. Number: 0246802

Asbestos Insurance Advice - (00001)

\$10,332.00

Professional Services

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
02-OCT-24	Dave McGonigle	1.00	L120	Analysis of insolvent insurer proceedings and course of dealings (0.4) (0.8/2); review and analysis of settlement agreements (0.6) (1.2/2)	1,165.00
07-OCT-24	Dave McGonigle	0.30	L120	Conference with A. Tananbaum regarding insolvent insurer matters and status (0.3) (0.6/2)	349.50
08-OCT-24	Dave McGonigle	1.70	L120	Review and revise draft Case History and Status Report (1.3) (2.6/2); conference with J. Safar regarding draft Case History and Status Report (0.3) (0.5/2); email to A. Tananbaum regarding revised draft status report (0.1)	1,980.50
08-OCT-24	Joe Safar	0.20	L120	Review draft work product (0.2) (0.3/2)	199.00
08-OCT-24	Joe Safar	0.30	L120	Conference with D. McGonigle regarding draft work product (0.3) (0.5/2)	298.50
09-OCT-24	Dave McGonigle	0.10	L120	Emails with A. Tananbaum regarding Case History and Status Report (0.1)	116.50
14-OCT-24	Dave McGonigle	0.60	L120	Review status reports filed by the FCR and ACC (0.5) (1.0/2); emails with B. Erens regarding status and planning (0.1) (0.2/2)	699.00
15-OCT-24	Dave McGonigle	0.60	L120	Communications with B. Erens regarding status and planning (0.2) (0.4/2); analysis of status and hearing preparation (0.1) (0.2/2); communications to insurer representative regarding status and planning (0.1) (0.2/2); conference with J. Safar regarding status (0.1) (0.2/2); emails with A. Tananbaum regarding status (0.1) (0.2/2)	699.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date: November 1, 2024

Invoice Number: 100099721

K&L Ref. Number: 0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
17-OCT-24	Dave McGonigle	0.80	L120	Emails with team regarding status and planning (0.7) (1.3/2); email to insurer representative regarding status and planning (0.1)	932.00
17-OCT-24	Joe Safar	0.20	L120	Conference with D. McGonigle regarding status and strategy (0.2) (0.3/2)	199.00
18-OCT-24	Dave McGonigle	0.50	L120	Review status report on behalf of certain claimants (0.1) (0.2/2); planning for insurer update call (0.2) (0.4/2); email to A. Tananbaum, B. Erens, and M. Evert regarding insurer update call (0.2) (0.4/2)	582.50
18-OCT-24	Joe Safar	0.20	L120	Attend works-in-process call (0.2) (0.4/2)	199.00
22-OCT-24	Dave McGonigle	0.20	L120	Conference with insurer representative regarding status (0.1); communications with team regarding insurer update call (0.1)	233.00
24-OCT-24	Dave McGonigle	2.60	L120	Telephonic attendance at status conference (2.5) (5.0/2); emails with J. Miller regarding status conference (0.1)	3,029.00
28-OCT-24	Dave McGonigle	0.50	L120	Attention to insurer update call and emails with team regarding same (0.1) (0.2/2); attention to 2025 omnibus hearing calendar (0.2) (0.3/2); emails with B. Erens regarding hearing calendar (0.1); conference with J. Safar regarding status and planning (0.1)	582.50
28-OCT-24	Joe Safar	0.10	L120	Conference with D. McGonigle regarding status and planning (0.1)	99.50
30-OCT-24	Dave McGonigle	0.10	L120	Review Stout invoices for privilege and confidentiality (0.1)	116.50
		10.00			\$11,480.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

November 1, 2024

Invoice Number:

100099721

K&L Ref. Number:

0246802

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Joe Safar	1.00	995.00	995.00
Dave McGonigle	9.00	1,165.00	10,485.00
	<u>10.00</u>		<u>\$11,480.00</u>

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	10.00	11,480.00
	Total Fees	<u>10.00</u>	<u>\$11,480.00</u>

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

November 1, 2024

Invoice Number:

100099721

K&L Ref. Number:

0246802

Chapter 11 Retention and Compensation - (00002)**\$2,152.35****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
09-OCT-24	Dave McGonigle	0.10	B160	Conference with M. Cody regarding retention issues (0.1)	116.50
10-OCT-24	Dave McGonigle	0.30	B160	Prepare monthly fee statements (0.2) (0.3/2); attention to retention and disclosure matters (0.1) (0.2/2)	349.50
15-OCT-24	Emily Steele	0.10	B160	Analyze September 2024 invoices for privilege concerns and compliance with rules (0.1) (0.2/2)	69.50
15-OCT-24	Emily Steele	0.10	B160	Draft fifty-first monthly fee statement (September 2024) (0.1) (0.2/2)	69.50
17-OCT-24	Emily Steele	0.20	B160	Draft tenth supplemental declaration in support of retention (0.2) (0.4/2)	139.00
17-OCT-24	Emily Steele	0.60	B160	Begin drafting thirteenth interim fee application (June - September 2024) (0.6) (1.2/2)	417.00
24-OCT-24	Emily Steele	0.20	B160	Review order reassigning case and revise tenth supplemental declaration and interim fee application (0.2) (0.3/2)	139.00
25-OCT-24	Emily Steele	0.10	B160	Revise September 2024 monthly fee statement and correspond regarding same (0.1)	69.50
25-OCT-24	Emily Steele	0.20	B160	Further revise thirteenth interim fee application (0.2) (0.4/2)	139.00
28-OCT-24	Emily Steele	0.20	B160	Further revise interim fee application and correspond regarding same (0.2) (0.3/2)	139.00
29-OCT-24	Dave McGonigle	0.40	B160	Attention to reconciliation of invoices and outstanding matters (0.1); email to A. Tananbaum regarding invoice reconciliation (0.1); review and comment on draft interim fee application (0.2) (0.3/2)	466.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date: November 1, 2024

Invoice Number: 100099721

K&L Ref. Number: 0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
29-OCT-24	Emily Steele	0.20	B160	Attention to matters relating to outstanding fees approved by prior interim court orders (0.2) (0.4/2)	139.00
29-OCT-24	Emily Steele	0.10	B160	Finalize and circulate fifty-first monthly fee statement for September 2024 (0.1) (0.2/2)	69.50
30-OCT-24	Emily Steele	0.10	B160	Further revise thirteenth interim fee application (0.1)	69.50
		<u>2.90</u>			<u>\$2,391.50</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Dave McGonigle	0.80	1,165.00	932.00
Associate			
Emily Steele	<u>2.10</u>	695.00	<u>1,459.50</u>
	2.90		\$2,391.50

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	<u>2.90</u>	<u>2,391.50</u>
Total Fees		2.90	\$2,391.50

EBILLED INVOICE

K&L GATES

K&L GATES LLP

K&L GATES CENTER

210 SIXTH AVENUE

PITTSBURGH, PA 15222-2613

T +1 412 355 6500 F +1 412 355 6501 klgates.com

Tax ID No. 25 0921018

Murray Boiler LLC
Allan Tananbaum, Esquire
800-E Beaty Street
Davidson, NC 28036

Invoice Date: November 1, 2024
Invoice Number: 100099720
K&L Gates Contact: Dave McGonigle

INVOICE SUMMARY**Total USD \$****Asbestos Insurance Advice (00001)**

Fees	9,684.00	
10% Discount	(968.40)	
Total Amount Due This Matter		\$ 8,715.60

Chapter 11 Retention and Compensation (00002)

Fees	1,531.00	
10% Discount	(153.10)	
Total Amount Due This Matter		\$ 1,377.90

CURRENT INVOICE DUE - All Matters**\$ 10,093.50**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

EBILLED INVOICE

Murray Boiler LLC

Invoice Date: November 1, 2024

Invoice Number: 100099720

K&L Ref. Number: 0246801

Asbestos Insurance Advice - (00001)**\$8,715.60****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
02-OCT-24	Dave McGonigle	1.00	L120	Analysis of insolvent insurer proceedings and course of dealings (0.4) (0.8/2); review and analysis of settlement agreements (0.6) (1.2/2)	1,165.00
07-OCT-24	Dave McGonigle	0.30	L120	Conference with A. Tananbaum regarding insolvent insurer matters and status (0.3) (0.6/2)	349.50
08-OCT-24	Dave McGonigle	1.50	L120	Review and revise draft Case History and Status Report (1.3) (2.6/2); conference with J. Safar regarding draft Case History and Status Report (0.2) (0.5/2)	1,747.50
08-OCT-24	Joe Safar	0.20	L120	Conference with D. McGonigle regarding draft work product (0.2) (0.5/2)	199.00
08-OCT-24	Joe Safar	0.10	L120	Review draft work product (0.1) (0.3/2)	99.50
14-OCT-24	Dave McGonigle	0.60	L120	Review status reports filed by the FCR and ACC (0.5) (1.0/2); emails with B. Erens regarding status and planning (0.1) (0.2/2)	699.00
15-OCT-24	Dave McGonigle	0.60	L120	Communications with B. Erens regarding status and planning (0.2) (0.4/2); analysis of status and hearing preparation (0.1) (0.2/2); communications to insurer representative regarding status and planning (0.1) (0.2/2); conference with J. Safar regarding status (0.1) (0.2/2); emails with A. Tananbaum regarding status (0.1) (0.2/2)	699.00
17-OCT-24	Dave McGonigle	0.60	L120	Emails with team regarding status and planning (0.6) (1.3/2)	699.00
17-OCT-24	Joe Safar	0.10	L120	Conference with D. McGonigle regarding status and strategy (0.1) (0.3/2)	99.50

EBILLED INVOICE

Murray Boiler LLC

Invoice Date: November 1, 2024

Invoice Number: 100099720

K&L Ref. Number: 0246801

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
18-OCT-24	Dave McGonigle	0.50	L120	Review status report on behalf of certain claimants (0.1) (0.2/2); planning for insurer update call (0.2) (0.4/2); email to A. Tananbaum, B. Erens, and M. Evert regarding insurer update call (0.2) (0.4/2)	582.50
18-OCT-24	Joe Safar	0.20	L120	Attend works-in-process call (0.2) (0.4/2)	199.00
24-OCT-24	Dave McGonigle	2.50	L120	Telephonic attendance at status conference (2.5) (5.0/2)	2,912.50
28-OCT-24	Dave McGonigle	0.20	L120	Attention to insurer update call and emails with team regarding same (0.1) (0.2/2); attention to 2025 omnibus hearing calendar (0.1) (0.3/2)	233.00
		<u>8.40</u>			<u>\$9,684.00</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Joe Safar	0.60	995.00	597.00
Dave McGonigle	<u>7.80</u>	<u>1,165.00</u>	<u>9,087.00</u>
	8.40		\$9,684.00

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	<u>8.40</u>	<u>9,684.00</u>
Total Fees		8.40	\$9,684.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

November 1, 2024

Invoice Number:

100099720

K&L Ref. Number:

0246801

Chapter 11 Retention and Compensation - (00002)**\$1,377.90****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
10-OCT-24	Dave McGonigle	0.20	B160	Prepare monthly fee statements (0.1) (0.3/2); attention to retention and disclosure matters (0.1) (0.2/2)	233.00
15-OCT-24	Emily Steele	0.10	B160	Analyze September 2024 invoices for privilege concerns and compliance with rules (0.1) (0.2/2)	69.50
15-OCT-24	Emily Steele	0.10	B160	Draft fifty-first monthly fee statement (September 2024) (0.1) (0.2/2)	69.50
17-OCT-24	Emily Steele	0.20	B160	Draft tenth supplemental declaration in support of retention (0.2) (0.4/2)	139.00
17-OCT-24	Emily Steele	0.60	B160	Begin drafting thirteenth interim fee application (June - September 2024) (0.6) (1.2/2)	417.00
24-OCT-24	Emily Steele	0.10	B160	Review order reassigning case and revise tenth supplemental declaration and interim fee application (0.1) (0.3/2)	69.50
25-OCT-24	Emily Steele	0.20	B160	Further revise thirteenth interim fee application (0.2) (0.4/2)	139.00
28-OCT-24	Emily Steele	0.10	B160	Further revise interim fee application and correspond regarding same (0.1) (0.3/2)	69.50
29-OCT-24	Dave McGonigle	0.10	B160	Review and comment on draft interim fee application (0.1) (0.3/2)	116.50
29-OCT-24	Emily Steele	0.20	B160	Attention to matters relating to outstanding fees approved by prior interim court orders (0.2) (0.4/2)	139.00
29-OCT-24	Emily Steele	0.10	B160	Finalize and circulate fifty-first monthly fee statement for September 2024 (0.1) (0.2/2)	69.50
		2.00			\$1,531.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

November 1, 2024

Invoice Number:

100099720

K&L Ref. Number:

0246801

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Dave McGonigle	0.30	1,165.00	349.50
Associate			
Emily Steele	1.70	695.00	1,181.50
	2.00		\$1,531.00

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	2.00	1,531.00
Total Fees		2.00	\$1,531.00

EBILLED INVOICE

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)

**FIFTY-THIRD MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS FOR
THE PERIOD FROM NOVEMBER 1, 2024 THROUGH NOVEMBER 30, 2024**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Fifty-Third Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From November 1, 2024 Through November 30, 2024* (the "Monthly Fee Statement").

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period November 1, 2024 through November 30, 2024 (the "Statement Period").

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.

Total Fees and Expenses for the Statement Period

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$15,872.85
Total Expenses	\$0.00
TOTAL	\$15,872.85

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$14,285.56 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoamccarter.com), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and

Phillip S. Pavlick, Esq., ppavlick@mccarter.com), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@burtcordeslaw.com, (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. MacLay, Esq., kmacLay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com and Todd E. Phillips, Esq., tphillips@capdale.com) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., jgrier@grierlaw.com, A. Cotton Wright, Esq., cwright@grierlaw.com), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., jguy@orrick.com, Debra L. Felder, Esq., dfelder@orrick.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the affected Retained Professional, and upon the other Notice Parties no later than January 13, 2025 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100%

of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: December 30, 2024
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR
DEBTORS AND DEBTORS IN POSSESSION

EXHIBIT A

Invoices

K&L GATESK&L GATES LLP
K&L GATES CENTER

210 SIXTH AVENUE

PITTSBURGH, PA 15222-2613

T +1 412 355 6500 F +1 412 355 6501 klgates.com

Tax ID No. 25 0921018

Aldrich Pump LLC
Allan Tananbaum, Esquire
800-E Beatty Street
Davidson, North Carolina 28036

Invoice Date: December 1, 2024
Invoice Number: 100115751
K&L Gates Contact: Dave McGonigle

INVOICE SUMMARY**Total USD \$****Asbestos Insurance Advice (00001)**

Fees	8,684.00	
10% Discount	(868.40)	
Total Amount Due This Matter		\$ 7,815.60

Chapter 11 Retention and Compensation (00002)

Fees	1,208.00	
10% Discount	(120.80)	
Total Amount Due This Matter		\$ 1,087.20

CURRENT INVOICE DUE - All Matters**\$ 8,902.80**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date: December 1, 2024

Invoice Number: 100115751

K&L Ref. Number: 0246802

Asbestos Insurance Advice - (00001)**\$7,815.60****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
01-NOV-24	Dave McGonigle	0.50	L120	Review docket and omnibus hearing schedule (0.2) (0.3/2); emails with M. Evert and team regarding insurer update call (0.1) (0.2/2); participate in portions of works-in-process call (0.1) (0.2/2); conference with J. Safar regarding status and works-in-process call (0.1) (0.2/2)	582.50
01-NOV-24	Joe Safar	0.50	L120	Attend works-in-process call (0.4) (0.7/2); conference with D. McGonigle regarding works-in-process call (0.1) (0.2/2)	497.50
04-NOV-24	Dave McGonigle	0.30	L120	Attention to information request from insurer representative (0.2) (0.4/2); email to team regarding insurer information request (0.1)	349.50
11-NOV-24	Dave McGonigle	1.40	L120	Review and analysis of recent insurance-related filings (1.1) (2.1/2); conference with D. Aceto regarding recent insurance-related filings (0.1); emails with B. Erens team regarding recent insurance-related developments (0.2) (0.4/2)	1,631.00
12-NOV-24	Dave McGonigle	0.10	L120	Attention to recent filings and omnibus hearing schedule (0.1)	116.50
13-NOV-24	Dave McGonigle	0.20	L120	Attention and response to A. Tananbaum inquiry regarding insolvent insurer status (0.2) (0.4/2)	233.00
14-NOV-24	Dave McGonigle	0.10	L120	Review recent filings and attention to hearing update (0.1)	116.50
14-NOV-24	Dave McGonigle	0.20	L120	Supplemental research regarding insolvent insurer claim status (0.1); email to A. Tananbaum regarding same (0.1) (0.2/2)	233.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date: December 1, 2024

Invoice Number: 100115751

K&L Ref. Number: 0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
18-NOV-24	Dave McGonigle	0.40	L120	Review insurer course of dealings and prepare for insurer update call (0.2) (0.3/2); participate in insurer update call (0.1) (0.2/2); follow-up emails with J. Safar regarding update call (0.1)	466.00
18-NOV-24	Joe Safar	0.50	L120	Prepare for insurer update (0.2) (0.4/2); e-mail with team regarding update (0.1) (0.2/2); attend same update (0.1) (0.2/2); follow-up regarding same (0.1) (0.2/2)	497.50
19-NOV-24	Dave McGonigle	0.10	L120	Communications with M. Uddin regarding status and planning (0.1)	116.50
21-NOV-24	Dave McGonigle	3.10	L120	Research in response to A. Tananbaum regarding insolvent insurer claim information request (2.4); email to A. Tananbaum regarding insolvent insurer claim information (0.7)	3,611.50
22-NOV-24	Dave McGonigle	0.20	L120	Conference with A. Tananbaum regarding insolvent insurer recoveries and status and planning (0.2) (0.3/2)	233.00
		<u>7.60</u>			<u>\$8,684.00</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Joe Safar	1.00	995.00	995.00
Dave McGonigle	<u>6.60</u>	<u>1,165.00</u>	<u>7,689.00</u>
	7.60		\$8,684.00

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	<u>7.60</u>	<u>8,684.00</u>
Total Fees		7.60	\$8,684.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

December 1, 2024

Invoice Number:

100115751

K&L Ref. Number:

0246802

Chapter 11 Retention and Compensation - (00002)**\$1,087.20****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
06-NOV-24	Dave McGonigle	0.10	B160	Attention to interim fee statement (0.1)	116.50
07-NOV-24	Dave McGonigle	0.10	B160	Prepare monthly fee statement (0.1) (0.2/2)	116.50
07-NOV-24	Emily Steele	0.20	B160	Finalize thirteenth interim fee application (0.2) (0.3/2)	139.00
11-NOV-24	Emily Steele	0.10	B160	Revise thirteenth interim fee application and circulate to debtors' counsel (0.1) (0.2/2)	69.50
12-NOV-24	Dave McGonigle	0.10	B160	Review fee applications and emails to team regarding same (0.1) (0.2/2)	116.50
13-NOV-24	Emily Steele	0.30	B160	Analyze and advise regarding billing and fee application related matters (0.3)	208.50
15-NOV-24	Dave McGonigle	0.10	B160	Attention to potential disclosure matters (0.1) (0.2/2)	116.50
15-NOV-24	Dave McGonigle	0.10	B160	Review and approve draft fifty-second monthly fee statement (0.1) (0.2/2)	116.50
15-NOV-24	Emily Steele	0.20	B160	Draft monthly fee statement for October 2024 (0.2) (0.3/2)	139.00
25-NOV-24	Emily Steele	0.10	B160	Circulate monthly fee statement (October 2024) (0.1)	69.50
		<u>1.40</u>			<u>\$1,208.00</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Dave McGonigle	0.50	1,165.00	582.50
Associate			
Emily Steele	<u>0.90</u>	695.00	<u>625.50</u>
	<u>1.40</u>		<u>\$1,208.00</u>

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date: December 1, 2024

Invoice Number: 100115751

K&L Ref. Number: 0246802

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	1.40	1,208.00
Total Fees		1.40	\$1,208.00

EBILLED INVOICE

K&L GATES

K&L GATES LLP

K&L GATES CENTER

210 SIXTH AVENUE

PITTSBURGH, PA 15222-2613

T +1 412 355 6500 F +1 412 355 6501 klgates.com

Tax ID No. 25 0921018

Murray Boiler LLC
Allan Tananbaum, Esquire
800-E Beaty Street
Davidson, NC 28036

Invoice Date: December 1, 2024
Invoice Number: 100115753
K&L Gates Contact: Dave McGonigle

INVOICE SUMMARY**Total USD \$****Asbestos Insurance Advice (00001)**

Fees	7,070.00	
10% Discount	(707.00)	
Total Amount Due This Matter		\$ 6,363.00

Chapter 11 Retention and Compensation (00002)

Fees	674.50	
10% Discount	(67.45)	
Total Amount Due This Matter		\$ 607.05

CURRENT INVOICE DUE - All Matters**\$ 6,970.05**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

EBILLED INVOICE

Murray Boiler LLC

Invoice Date: December 1, 2024

Invoice Number: 100115753

K&L Ref. Number: 0246801

Asbestos Insurance Advice - (00001)**\$6,363.00****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
01-NOV-24	Dave McGonigle	0.40	L120	Review docket and omnibus hearing schedule (0.1) (0.3/2); emails with M. Evert and team regarding insurer update call (0.1) (0.2/2); participate in portions of works-in-process call (0.1) (0.2/2); conference with J. Safar regarding status and works-in-process call (0.1) (0.2/2)	466.00
01-NOV-24	Joe Safar	0.40	L120	Attend works-in-process call (0.3) (0.7/2); conference with D. McGonigle regarding works-in-process call (0.1) (0.2/2)	398.00
04-NOV-24	Dave McGonigle	0.60	L120	Attention to information request from insurer representative (0.2) (0.4/2); correspondence with C. Maisano and team regarding insurer information request (0.1); review information request and correspondence and conference with insurer representative regarding same (0.3)	699.00
11-NOV-24	Dave McGonigle	1.20	L120	Review and analysis of recent insurance-related filings (1.0) (2.1/2); emails with B. Erens team regarding recent insurance-related developments (0.2) (0.4/2)	1,398.00
13-NOV-24	Dave McGonigle	0.20	L120	Attention and response to A. Tananbaum inquiry regarding insolvent insurer status (0.2) (0.4/2)	233.00
14-NOV-24	Dave McGonigle	0.20	L120	Supplemental research regarding insolvent insurer claim status (0.1); email to A. Tananbaum regarding same (0.1) (0.2/2)	233.00
15-NOV-24	Dave McGonigle	1.10	L120	Review course of dealings and status of pending insolvency claim (1.1)	1,281.50

EBILLED INVOICE

Murray Boiler LLC

Invoice Date: December 1, 2024

Invoice Number: 100115753

K&L Ref. Number: 0246801

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
18-NOV-24	Dave McGonigle	0.20	L120	Review insurer course of dealings and prepare for insurer update call (0.1) (0.3/2); participate in insurer update call (0.1) (0.2/2)	233.00
18-NOV-24	Joe Safar	0.50	L120	Prepare for insurer update (0.2) (0.4/2); e-mail with team regarding update (0.1) (0.2/2); attend same update (0.1) (0.2/2); follow-up regarding same (0.1) (0.2/2)	497.50
19-NOV-24	Dave McGonigle	1.30	L120	Emails with A. Tananbaum regarding insolvent insurer payments (1.3)	1,514.50
22-NOV-24	Dave McGonigle	0.10	L120	Conference with A. Tananbaum regarding insolvent insurer recoveries and status and planning (0.1) (0.3/2)	116.50
		<u>6.20</u>			<u>\$7,070.00</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Joe Safar	0.90	995.00	895.50
Dave McGonigle	<u>5.30</u>	<u>1,165.00</u>	<u>6,174.50</u>
	6.20		\$7,070.00

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	<u>6.20</u>	<u>7,070.00</u>
Total Fees		6.20	\$7,070.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

December 1, 2024

Invoice Number:

100115753

K&L Ref. Number:

0246801

Chapter 11 Retention and Compensation - (00002)**\$607.05****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
07-NOV-24	Dave McGonigle	0.10	B160	Prepare monthly fee statement (0.1) (0.2/2)	116.50
07-NOV-24	Emily Steele	0.10	B160	Finalize thirteenth interim fee application (0.1) (0.3/2)	69.50
11-NOV-24	Emily Steele	0.10	B160	Revise thirteenth interim fee application and circulate to debtors' counsel (0.1) (0.2/2)	69.50
12-NOV-24	Dave McGonigle	0.10	B160	Review fee applications and emails to team regarding same (0.1) (0.2/2)	116.50
15-NOV-24	Dave McGonigle	0.10	B160	Review and approve draft fifty-second monthly fee statement (0.1) (0.2/2)	116.50
15-NOV-24	Dave McGonigle	0.10	B160	Attention to potential disclosure matters (0.1) (0.2/2)	116.50
15-NOV-24	Emily Steele	0.10	B160	Draft monthly fee statement for October 2024 (0.1) (0.3/2)	69.50
		<u>0.70</u>			<u>\$674.50</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Dave McGonigle	0.40	1,165.00	466.00
Associate			
Emily Steele	<u>0.30</u>	695.00	<u>208.50</u>
	0.70		\$674.50

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	<u>0.70</u>	<u>674.50</u>
Total Fees		0.70	\$674.50

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 (LMJ)

(Jointly Administered)

**FIFTY-FOURTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS
FOR THE PERIOD FROM DECEMBER 1, 2024 THROUGH DECEMBER 31, 2024**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Fifty-Fourth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From December 1, 2024 Through December 31, 2024* (the "Monthly Fee Statement").

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period December 1, 2024 through December 31, 2024 (the "Statement Period").

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.

Total Fees and Expenses for the Statement Period

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$2,722.05
Total Expenses	\$0.00
TOTAL	\$2,722.05

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$2,449.84 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

Billing Adjustments

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$233.00 in fees will not be charged to the Debtors.

Notice and Objection Procedures

5. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmillerr@rcdlaw.net); (c) the office of the United States Bankruptcy

Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoa@mccarter.com), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and Phillip S. Pavlick, Esq., ppavlick@mccarter.com), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@burtcordeslaw.com, (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., namsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com and Todd E. Phillips, Esq., tphillips@capdale.com) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., jgrier@grierlaw.com, A. Cotton Wright, Esq., cwright@grierlaw.com), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., jguy@orrick.com, Debra L. Felder, Esq., dfelder@orrick.com).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the

affected Retained Professional, and upon the other Notice Parties no later than February 13, 2025 (the “Objection Deadline”). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

7. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

8. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: January 30, 2025
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR
DEBTORS AND DEBTORS IN POSSESSION

EXHIBIT A

Invoices

K&L GATES

K&L GATES LLP

K&L GATES CENTER

210 SIXTH AVENUE

PITTSBURGH, PA 15222-2613

T +1 412 355 6500 F +1 412 355 6501 klgates.com

Tax ID No. 25 0921018

Aldrich Pump LLC
Allan Tananbaum, Esquire
800-E Beatty Street
Davidson, North Carolina 28036

Invoice Date: January 1, 2025
Invoice Number: 100123994
K&L Gates Contact: Dave McGonigle

INVOICE SUMMARY**Total USD \$****Chapter 11 Retention and Compensation (00002)**

Fees	1,465.00	
10% Discount	(146.50)	
Total Amount Due This Matter		\$ 1,318.50

CURRENT INVOICE DUE - All Matters**\$ 1,318.50****EBILLED INVOICE**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

Aldrich Pump LLC

Invoice Date:

January 1, 2025

Invoice Number:

100123994

K&L Ref. Number:

0246802

Chapter 11 Retention and Compensation - (00002)**\$1,318.50****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
04-DEC-24	Margaret Westbrook	0.20	B160	Communicate with counsel for debtors regarding proposed interim order	163.00
09-DEC-24	Emily Steele	0.20	B160	Analyze and advise regarding matters relating to supplemental declaration	139.00
10-DEC-24	Emily Steele	0.10	B160	Draft supplemental declaration (0.1) (0.2/2)	69.50
13-DEC-24	Dave McGonigle	0.20	B160	Review and finalize draft Eleventh Supplemental Declaration in Support of K&L Gates Retention Application (0.1); review Order on interim application for compensation and emails with team regarding same (0.1)	233.00
16-DEC-24	Emily Steele	0.10	B160	Finalize and circulate eleventh supplemental declaration (0.1) (0.2/2)	69.50
19-DEC-24	Dave McGonigle	0.40	B160	Prepare monthly billing statement (0.2) (0.3/2); attention to retention and rate approval correspondence (0.2) (0.3/2)	466.00
21-DEC-24	Emily Steele	0.10	B160	Review November 2024 invoices for confidentiality and privilege concerns and compliance with rules	69.50
21-DEC-24	Emily Steele	0.10	B160	Draft fifty-third monthly fee statement (November 2024) (0.1) (0.2/2)	69.50
26-DEC-24	Dave McGonigle	0.10	B160	Review and finalize monthly fee statement (0.1) (0.2/2)	116.50
29-DEC-24	Emily Steele	0.10	B160	Finalize and circulate monthly fee statement for November 2024 (0.1) (0.2/2)	69.50
		<hr/>			
		1.60			<hr/>
					\$1,465.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

January 1, 2025

Invoice Number:

100123994

K&L Ref. Number:

0246802

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Margaret Westbrook	0.20	815.00	163.00
Dave McGonigle	0.70	1,165.00	815.50
Associate			
Emily Steele	0.70	695.00	486.50
	<u>1.60</u>		<u>\$1,465.00</u>

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	1.60	1,465.00
	Total Fees	<u>1.60</u>	<u>\$1,465.00</u>

EBILLED INVOICE

K&L GATES

K&L GATES LLP

K&L GATES CENTER

210 SIXTH AVENUE

PITTSBURGH, PA 15222-2613

T +1 412 355 6500 F +1 412 355 6501 klgates.com

Tax ID No. 25 0921018

Murray Boiler LLC
Allan Tananbaum, Esquire
800-E Beaty Street
Davidson, NC 28036

Invoice Date: January 1, 2025
Invoice Number: 100123982
K&L Gates Contact: Dave McGonigle

INVOICE SUMMARY**Total USD \$****Asbestos Insurance Advice (00001)**

Fees	932.00	
10% Discount	(93.20)	
Total Amount Due This Matter		\$ 838.80

Chapter 11 Retention and Compensation (00002)

Fees	627.50	
10% Discount	(62.75)	
Total Amount Due This Matter		\$ 564.75

CURRENT INVOICE DUE - All Matters**\$ 1,403.55**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

January 1, 2025

Invoice Number:

100123982

K&L Ref. Number:

0246801

Asbestos Insurance Advice - (00001)**\$838.80****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
19-DEC-24	Dave McGonigle	0.20	L120	E-mails with D. Ramljak regarding insurance insolvencies matters	233.00
20-DEC-24	Dave McGonigle	0.60	L120	Review work product regarding insolvent insurer matters in preparation for conference with D. Ramljak (0.3); conference with D. Ramljak regarding insolvent insurer matters (0.3)	699.00
		<u>0.80</u>			<u>\$932.00</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Dave McGonigle	<u>0.80</u>	1,165.00	<u>932.00</u>
	0.80		\$932.00

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	<u>0.80</u>	<u>932.00</u>
Total Fees		0.80	\$932.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

January 1, 2025

Invoice Number:

100123982

K&L Ref. Number:

0246801

Chapter 11 Retention and Compensation - (00002)**\$564.75****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
10-DEC-24	Emily Steele	0.10	B160	Draft supplemental declaration (0.1) (0.2/2)	69.50
16-DEC-24	Emily Steele	0.10	B160	Finalize and circulate eleventh supplemental declaration (0.1) (0.2/2)	69.50
19-DEC-24	Dave McGonigle	0.20	B160	Prepare monthly billing statement (0.1) (0.3/2); attention to retention and rate approval correspondence (0.1) (0.3/2)	233.00
21-DEC-24	Emily Steele	0.10	B160	Draft fifty-third monthly fee statement (November 2024) (0.1) (0.2/2)	69.50
26-DEC-24	Dave McGonigle	0.10	B160	Review and finalize monthly fee statement (0.1) (0.2/2)	116.50
29-DEC-24	Emily Steele	0.10	B160	Finalize and circulate monthly fee statement for November 2024 (0.1) (0.2/2)	69.50
		<u>0.70</u>			<u>\$627.50</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Dave McGonigle	0.30	1,165.00	349.50
Associate			
Emily Steele	<u>0.40</u>	695.00	<u>278.00</u>
	0.70		\$627.50

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	<u>0.70</u>	<u>627.50</u>
Total Fees		0.70	\$627.50

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 (LMJ)

(Jointly Administered)

**FIFTY-FIFTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS FOR
THE PERIOD FROM JANUARY 1, 2025 THROUGH JANUARY 31, 2025**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Fifty-Fifth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From January 1, 2025 Through January 31, 2025* (the "Monthly Fee Statement").

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period January 1, 2025 through January 31, 2025 (the "Statement Period").

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.

Total Fees and Expenses for the Statement Period

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$37,236.60
Total Expenses	\$0.00
TOTAL	\$37,236.60

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$33,512.94 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

Billing Adjustments

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$2,965.00 in fees will not be charged to the Debtors.

Notice and Objection Procedures

5. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmillerr@rcdlaw.net); (c) the office of the United States Bankruptcy

Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoa@mccarter.com), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and Phillip S. Pavlick, Esq., ppavlick@mccarter.com), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@burtcordeslaw.com, (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com and Todd E. Phillips, Esq., tphillips@capdale.com) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., jgrier@grierlaw.com, A. Cotton Wright, Esq., cwright@grierlaw.com), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., jguy@orrick.com, Debra L. Felder, Esq., dfelder@orrick.com).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the

affected Retained Professional, and upon the other Notice Parties no later than March 17, 2025 (the “Objection Deadline”). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

7. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

8. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: March 3, 2025
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR
DEBTORS AND DEBTORS IN POSSESSION

EXHIBIT A

Invoices

K&L GATES

Aldrich Pump LLC
Allan Tananbaum, Esquire
800-E Beatty Street
Davidson, North Carolina 28036

Invoice Date: February 1, 2025
Invoice Number: 100136131
K&L Gates Contact: Dave McGonigle

INVOICE SUMMARY**Total USD \$****Asbestos Insurance Advice (00001)**

Fees	20,385.00	
10% Discount	(2,038.50)	
Total Amount Due This Matter		\$ 18,346.50

Chapter 11 Retention and Compensation (00002)

Fees	1,266.00	
10% Discount	(126.60)	
Total Amount Due This Matter		\$ 1,139.40

CURRENT INVOICE DUE - All Matters

\$ 19,485.90

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
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Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

BILLED INVOICE

Aldrich Pump LLC

Invoice Date:

February 1, 2025

Invoice Number:

100136131

K&L Ref. Number:

0246802

Asbestos Insurance Advice - (00001)**\$18,346.50****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
03-JAN-25	Dave McGonigle	0.10	L120	Attention to audit inquiry letter (0.1) (0.2/2)	120.00
06-JAN-25	Krishna Hegde	0.20	L120	Review and analyze correspondence on Trane Technologies audit inquiry letter (0.2) (0.3/2)	120.00
07-JAN-25	Dave McGonigle	0.30	L120	Conference with A. Tananbaum regarding status and planning (0.1) (0.2/2); conference with M. Uddin regarding status and planning (0.2) (0.4/2)	360.00
10-JAN-25	Dave McGonigle	1.60	L120	Conference with J. Safar regarding discovery issues (0.1); emails with M. Hirst and team regarding discovery issues (0.2) (0.4/2); email to M. Uddin and planning for Stout update call (0.1) (0.2/2); participate in works-in-process call (0.4) (0.8/2); e-mails with team regarding discovery matters and insurer communications (0.3) (0.5/2); review insurer course of dealings and discovery-related materials (0.4) (0.8/2); email to insurer representative regarding status (0.1)	1,920.00
10-JAN-25	Joe Safar	0.60	L120	Attend works-in-process call (0.4) (0.8/2); confer with D. McGonigle regarding insurance strategy (0.1) (0.2/2); review e-mails with Debtor's counsel regarding insurance strategy (0.1)	645.00
13-JAN-25	Krishna Hegde	0.10	L120	Review and analyze inquiry letter and correspondence regarding response timelines (0.1) (0.2/2)	60.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

February 1, 2025

Invoice Number:

100136131

K&L Ref. Number:

0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
15-JAN-25	Dave McGonigle	0.20	L120	Communications with A. Tananbaum, B. Erens, M. Evert, M. Hirst and J. Safar regarding status and planning (0.1) (0.2/2); e-mails with M. Uddin and team regarding status meeting (0.1) (0.2/2)	240.00
17-JAN-25	Dave McGonigle	0.30	L120	Review insurer course of dealings regarding discovery matters (0.2) (0.4/2); email to M. Evert and M. Hirst regarding discovery matters and status (0.1) (0.2/2)	360.00
17-JAN-25	Krishna Hegde	0.10	L120	Review and analyze Jones Day audit response letter (0.1) (0.2/2)	60.00
21-JAN-25	Dave McGonigle	1.30	L120	Attention to discovery matters (0.6) (1.1/2); emails with team regarding discovery matters (0.7) (1.3/2)	1,560.00
22-JAN-25	Dave McGonigle	1.00	L120	Conference with Stout team and J. Safar regarding status and planning (0.5) (1.0/2); attention to insurer correspondence regarding counsel changes (0.2) (0.4/2); correspondence to insurer group regarding discovery developments (0.3) (0.5/2)	1,200.00
22-JAN-25	Joe Safar	0.70	L120	Conference with D. McGonigle and Stout team regarding work product (0.5) (1.0/2); review work product (0.2) (0.4/2)	752.50
22-JAN-25	Krishna Hegde	0.50	L120	Review and analyze materials for Trane audit inquiry letter (0.2) (0.3/2); correspond internally to obtain relevant timekeepers (0.3) (0.6/2)	300.00
27-JAN-25	Dave McGonigle	2.30	L120	Communications with J. Miller regarding hearing status (0.2) (0.4/2); emails with insurer counsel regarding substitutions (0.2) (0.3/2); analysis of counsel list and required updates (0.1) (0.2/2); communications with M.	2,760.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

February 1, 2025

Invoice Number:

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<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
				Urick regarding required updates to counsel lists (0.2) (0.3/2); conference with J. Safar regarding status and planning (0.1); emails with team regarding status and insurers communications and hearing preparation (1.1) (2.1/2); conference with M. Evert regarding status and hearing preparation (0.1) (0.2/2); conference with A. Tananbaum regarding status and planning (0.1) (0.2/2); email to insurer group regarding hearing and claim file protocol status (0.2) (0.3/2)	
27-JAN-25	Joe Safar	0.30	L120	E-mail and confer with D. McGonigle regarding insurer communications (0.2) (0.4/2); review e-mail with Debtors' counsel regarding same (0.1) (0.2/2)	322.50
27-JAN-25	Krishna Hegde	0.50	L120	Draft and submit requests for Trane Technologies audit inquiry letter (0.3) (0.6/2); review and analyze audit materials (0.2) (0.3/2)	300.00
28-JAN-25	Dave McGonigle	0.50	L120	Attention to audit inquiry letter (0.4) (0.8/2); emails with J. Miller regarding hearing and meeting preparation (0.1) (0.2/2)	600.00
28-JAN-25	Krishna Hegde	0.40	L120	Continue to review and analyze materials for Trane audit inquiry letter (0.1) (0.2/2); draft and submit internal email (0.3) (0.6/2)	240.00
29-JAN-25	Dave McGonigle	2.50	L120	E-mails with J. Miller regarding hearing status and planning (0.1) (0.2/2); conferences with insurer representative regarding upcoming hearing and discovery matters (0.2) (0.4/2); conference with M. Evert regarding upcoming hearing and discovery	3,000.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

February 1, 2025

Invoice Number:

100136131

K&L Ref. Number:

0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
				issues (0.1); conferences with A. Tananbaum regarding upcoming hearing and discovery issues (0.2) (0.4/2); conference with A. Tananbaum and M. Evert regarding upcoming hearing and discovery issues (0.5) (0.9/2); emails with A. Tananbaum and team regarding hearing preparation, discovery and insurance issues (0.7) (1.3/2); emails with insurer representative regarding hearing and discovery issues (0.4) (0.8/2); email to insurer group regarding upcoming hearing and discovery issues (0.2) (0.4/2); attention to audit response letter (0.1) (0.2/2)	
29-JAN-25	Krishna Hegde	1.30	L120	Draft and revise Trane audit response letter (0.8) (1.6/2); correspond internally to collect and evaluate responses (0.2) (0.4/2); review and analyze template instructions (0.2) (0.3/2); compile and submit materials for review (0.1) (0.2/2)	780.00
29-JAN-25	Mark Urick	0.60	L120	Update Counsel lists and the email lists with changes per D. McGonigle (0.6) (1.2/2)	270.00
30-JAN-25	Dave McGonigle	3.00	L120	Prepare for and participate in telephone conference with insurer representative regarding status conference (0.2) (0.4/2); conference with M. Evert regarding status conference preparation (0.1); telephonic attendance at status conference (0.8) (1.5/2); conference with Debtors and Affiliates regarding status and planning (1.1) (2.1/2); conferences with J. Safar regarding status and hearing (0.2) (0.3/2); attention to audit	3,600.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

February 1, 2025

Invoice Number:

100136131

K&L Ref. Number:

0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
				response letter (0.4) (0.8/2); conference with M. Evert regarding hearing and status (0.1) (0.2/2); review hearing slides (0.1) (0.2/2)	
30-JAN-25	Joe Safar	0.20	L120	Conferences with D. McGonigle regarding insurer communications and omnibus follow-up (0.2) (0.3/2)	215.00
30-JAN-25	Krishna Hegde	1.00	L120	Continue to revise draft of Trane audit response letter (0.7) (1.4/2); conference with D. McGonigle on Trane audit response letter (0.1) (0.2/2); correspond internally for audit response letter (0.2) (0.4/2)	600.00
		<u>19.60</u>			<u>\$20,385.00</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Dave McGonigle	13.10	1,200.00	15,720.00
Joe Safar	1.80	1,075.00	1,935.00
Associate			
Krishna Hegde	4.10	600.00	2,460.00
Paralegal			
Mark Urick	<u>0.60</u>	450.00	<u>270.00</u>
	19.60		\$20,385.00

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	<u>19.60</u>	<u>20,385.00</u>
Total Fees		19.60	\$20,385.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

February 1, 2025

Invoice Number:

100136131

K&L Ref. Number:

0246802

Chapter 11 Retention and Compensation - (00002)**\$1,139.40****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
14-JAN-25	Dave McGonigle	0.10	B160	Prepare monthly fee statements (0.1)	120.00
20-JAN-25	Emily Steele	0.20	B160	Analyze invoices and draft fifty-fourth monthly fee statement (December 2024) (0.2) (0.3/2)	153.00
21-JAN-25	Emily Steele	0.10	B160	Revise fifty-fourth monthly fee statement (December 2024) (0.1)	76.50
27-JAN-25	Dave McGonigle	0.60	B160	Analysis of potential retention and disclosure issues (0.1); conference with M. Cody regarding potential retention and associated disclosure issues (0.5)	720.00
28-JAN-25	Dave McGonigle	0.10	B160	Review and approve monthly fee statement (0.1) (0.2/2)	120.00
28-JAN-25	Emily Steele	0.10	B160	Finalize and circulate monthly fee statement for December 2024 (0.1) (0.2/2)	76.50
		<u>1.20</u>			<u>\$1,266.00</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Emily Steele	0.40	765.00	306.00
Dave McGonigle	<u>0.80</u>	<u>1,200.00</u>	<u>960.00</u>
	1.20		\$1,266.00

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	<u>1.20</u>	<u>1,266.00</u>
Total Fees		1.20	\$1,266.00

EBILLED INVOICE

K&L GATES

K&L GATES LLP
K&L GATES CENTER
210 SIXTH AVENUE
PITTSBURGH, PA 15222-2613
T +1 412 355 6500 F +1 412 355 6501 klgates.com
Tax ID No. 25 0921018

Murray Boiler LLC
Allan Tananbaum, Esquire
800-E Beaty Street
Davidson, NC 28036

Invoice Date: February 1, 2025
Invoice Number: 100136130
K&L Gates Contact: Dave McGonigle

INVOICE SUMMARY**Total USD \$****Asbestos Insurance Advice (00001)**

Fees	19,450.00	
10% Discount	(1,945.00)	
Total Amount Due This Matter		\$ 17,505.00

Chapter 11 Retention and Compensation (00002)

Fees	273.00	
10% Discount	(27.30)	
Total Amount Due This Matter		\$ 245.70

CURRENT INVOICE DUE - All Matters**\$ 17,750.70****EBILLED INVOICE**

Due and Payable upon ReceiptMail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

Murray Boiler LLC

Invoice Date:

February 1, 2025

Invoice Number:

100136130

K&L Ref. Number:

0246801

Asbestos Insurance Advice - (00001)**\$17,505.00****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
02-JAN-25	Dave McGonigle	1.40	L120	Attention to insolvent insurer claims status and preparation (1.4)	1,680.00
03-JAN-25	Dave McGonigle	0.10	L120	Attention to audit inquiry letter (0.1) (0.2/2)	120.00
06-JAN-25	Krishna Hegde	0.10	L120	Review and analyze correspondence on Trane Technologies audit inquiry letter (0.1) (0.3/2)	60.00
07-JAN-25	Dave McGonigle	0.30	L120	Conference with A. Tananbaum regarding status and planning (0.1) (0.2/2); conference with M. Uddin regarding status and planning (0.2) (0.4/2)	360.00
10-JAN-25	Dave McGonigle	1.30	L120	Emails with M. Hirst and team regarding discovery issues (0.2) (0.4/2); email to M. Uddin and planning for Stout update call (0.1) (0.2/2); participate in works-in-process call (0.4) (0.8/2); e-mails with team regarding discovery matters and insurer communications (0.2) (0.5/2); review insurer course of dealings and discovery-related materials (0.4) (0.8/2)	1,560.00
10-JAN-25	Joe Safar	0.50	L120	Attend works-in-process call (0.4) (0.8/2); confer with D. McGonigle regarding insurance strategy (0.1) (0.2/2)	537.50
13-JAN-25	Krishna Hegde	0.10	L120	Review and analyze inquiry letter and correspondence regarding response timelines (0.1) (0.2/2)	60.00
15-JAN-25	Dave McGonigle	0.20	L120	Communications with A. Tananbaum, B. Erens, M. Evert, M. Hirst and J. Safar regarding status and planning (0.1) (0.2/2); e-mails with M. Uddin and team regarding status meeting (0.1) (0.2/2)	240.00

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Murray Boiler LLC

Invoice Date:

February 1, 2025

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K&L Ref. Number:

0246801

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
17-JAN-25	Dave McGonigle	0.30	L120	Review insurer course of dealings regarding discovery matters (0.2) (0.4/2); email to M. Evert and M. Hirst regarding discovery matters and status (0.1) (0.2/2)	360.00
17-JAN-25	Krishna Hegde	0.10	L120	Review and analyze Jones Day audit response letter (0.1) (0.2/2)	60.00
21-JAN-25	Dave McGonigle	1.10	L120	Attention to discovery matters (0.5) (1.1/2); emails with team regarding discovery matters (0.6) (1.3/2)	1,320.00
22-JAN-25	Dave McGonigle	0.90	L120	Conference with Stout team and J. Safar regarding status and planning (0.5) (1.0/2); attention to insurer correspondence regarding counsel changes (0.2) (0.4/2); correspondence to insurer group regarding discovery developments (0.2) (0.5/2)	1,080.00
22-JAN-25	Joe Safar	0.70	L120	Conference with D. McGonigle and Stout team regarding work product (0.5) (1.0/2); review work product (0.2) (0.4/2)	752.50
22-JAN-25	Krishna Hegde	0.40	L120	Review and analyze materials for Trane audit inquiry letter (0.1) (0.3/2); correspond internally to obtain relevant timekeepers (0.3) (0.6/2)	240.00
27-JAN-25	Dave McGonigle	1.80	L120	Communications with J. Miller regarding hearing status (0.2) (0.4/2); emails with insurer counsel regarding substitutions (0.1) (0.3/2); analysis of counsel list and required updates (0.1) (0.2/2); communications with M. Urlick regarding required updates to counsel lists (0.1) (0.3/2); emails with team regarding status and insurers communications and hearing preparation (1.0) (2.1/2); conference with M. Evert	2,160.00

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<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
				regarding status and hearing preparation (0.1) (0.2/2); conference with A. Tananbaum regarding status and planning (0.1) (0.2/2); email to insurer group regarding hearing and claim file protocol status (0.1) (0.3/2)	
27-JAN-25	Joe Safar	0.30	L120	E-mail and confer with D. McGonigle regarding insurer communications (0.2) (0.4/2); review e-mail with Debtors' counsel regarding same (0.1) (0.2/2)	322.50
27-JAN-25	Krishna Hegde	0.40	L120	Draft and submit requests for Trane Technologies audit inquiry letter (0.3) (0.6/2); review and analyze audit materials (0.1) (0.3/2)	240.00
28-JAN-25	Dave McGonigle	0.50	L120	Attention to audit inquiry letter (0.4) (0.8/2); emails with J. Miller regarding hearing and meeting preparation (0.1) (0.2/2)	600.00
28-JAN-25	Krishna Hegde	0.40	L120	Continue to review and analyze materials for Trane audit inquiry letter (0.1) (0.2/2); draft and submit internal email (0.3) (0.6/2)	240.00
29-JAN-25	Dave McGonigle	2.20	L120	E-mails with J. Miller regarding hearing status and planning (0.1) (0.2/2); conferences with insurer representative regarding upcoming hearing and discovery matters (0.2) (0.4/2); conferences with A. Tananbaum regarding upcoming hearing and discovery issues (0.2) (0.4/2); conference with A. Tananbaum and M. Evert regarding upcoming hearing and discovery issues (0.4) (0.9/2); emails with A. Tananbaum and team regarding hearing preparation, discovery and insurance issues (0.6) (1.3/2); emails with insurer	2,640.00

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<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
				representative regarding hearing and discovery issues (0.4) (0.8/2); email to insurer group regarding upcoming hearing and discovery issues (0.2) (0.4/2); attention to audit response letter (0.1) (0.2/2)	
29-JAN-25	Krishna Hegde	1.20	L 120	Draft and revise Trane audit response letter (0.8) (1.6/2); correspond internally to collect and evaluate responses (0.2) (0.4/2); review and analyze template instructions (0.1) (0.3/2); compile and submit materials for review (0.1) (0.2/2)	720.00
29-JAN-25	Mark Urick	0.60	L 120	Update Counsel lists and the email lists with changes per D. McGonigle (0.6) (1.2/2)	270.00
30-JAN-25	Dave McGonigle	2.60	L 120	Prepare for and participate in telephone conference with insurer representative regarding status conference (0.2) (0.4/2); telephonic attendance at status conference (0.7) (1.5/2); conference with Debtors and Affiliates regarding status and planning (1.0) (2.1/2); conferences with J. Safar regarding status and hearing (0.1) (0.3/2); attention to audit response letter (0.4) (0.8/2); conference with M. Evert regarding hearing and status (0.1) (0.2/2); review hearing slides (0.1) (0.2/2)	3,120.00
30-JAN-25	Joe Safar	0.10	L 120	Conferences with D. McGonigle regarding insurer communications and omnibus follow-up (0.1) (0.3/2)	107.50

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<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
30-JAN-25	Krishna Hegde	1.00	L120	Continue to revise draft of Trane audit response letter (0.7) (1.4/2); conference with D. McGonigle on Trane audit response letter (0.1) (0.2/2); correspond internally for audit response letter (0.2) (0.4/2)	600.00
		<u>18.60</u>			<u>\$19,450.00</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Dave McGonigle	12.70	1,200.00	15,240.00
Joe Safar	1.60	1,075.00	1,720.00
Associate			
Krishna Hegde	3.70	600.00	2,220.00
Paralegal			
Mark Urick	<u>0.60</u>	450.00	<u>270.00</u>
	18.60		\$19,450.00

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	<u>18.60</u>	<u>19,450.00</u>
Total Fees		18.60	\$19,450.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

February 1, 2025

Invoice Number:

100136130

K&L Ref. Number:

0246801

Chapter 11 Retention and Compensation - (00002)**\$245.70****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
20-JAN-25	Emily Steele	0.10	B160	Analyze invoices and draft fifty-fourth monthly fee statement (December 2024) (0.1) (0.3/2)	76.50
28-JAN-25	Dave McGonigle	0.10	B160	Review and approve monthly fee statement (0.1) (0.2/2)	120.00
28-JAN-25	Emily Steele	0.10	B160	Finalize and circulate monthly fee statement for December 2024 (0.1) (0.2/2)	76.50
		<u>0.30</u>			<u>\$273.00</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partner			
Emily Steele	0.20	765.00	153.00
Dave McGonigle	0.10	1,200.00	120.00
	<u>0.30</u>		<u>\$273.00</u>

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	0.30	273.00
Total Fees		<u>0.30</u>	<u>\$273.00</u>

EBILLED INVOICE

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 AMENDED FOURTEENTH INTERIM APPLICATION OF
K&L GATES LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES
AS SPECIAL INSURANCE COUNSEL TO THE DEBTORS
FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

This matter coming before the Court on the *Amended Fourteenth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period From October 1, 2024 Through January 31, 2025* (the "Interim Fee Application")² filed by

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.

K&L Gates LLP as special insurance counsel to the above-captioned debtors and debtor 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 K&L Gates LLP on behalf of the Debtors during the period from October 1, 2024 through January 31, 2025 (the "Compensation Period"), (v) the expenses for which reimbursement is sought in the Interim Fee Application are actual and necessary expenses incurred by K&L Gates LLP during the Compensation Period on behalf of the Debtors, and (vi) the Interim Fee Application fully complies with the Interim Compensation Order, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, 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. K&L Gates LLP is awarded, on an interim basis, compensation for professional services rendered during the Compensation Period in the amount of \$78,409.35 and reimbursement for actual and necessary expenses incurred by K&L Gates LLP during the Compensation Period in the amount of \$0.00.

3. The Debtors are authorized and directed to pay promptly to K&L Gates LLP 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 K&L Gates LLP 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