

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

In re:

Chapter 11

ALDRICH PUMP LLC, *et al.*,¹

Case No. 20-30608 (LMJ)

Debtors.

Jointly Administered

**SUMMARY OF FOURTEENTH INTERIM APPLICATION OF ORRICK,
HERRINGTON & SUTCLIFFE LLP FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

Name of Applicant:	Orrick, Herrington & Sutcliffe LLP
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Order Approving Retention:	October 15, 2020, effective as of August 21, 2020 (Doc. No. 394)
Period for which compensation and reimbursement is sought:	October 1, 2024 – January 31, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$432,916.50
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$2,354.83
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$435,271.33

This is a(n) x interim final application.

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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**UNITED STATES BANKRUPTCY COURT
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In re:

Chapter 11

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Case No. 20-30608 (LMJ)

Debtors.

Jointly Administered

**FOURTEENTH INTERIM APPLICATION OF ORRICK, HERRINGTON &
SUTCLIFFE LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO JOSEPH W.
GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE, FOR THE PERIOD
FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

Orrick, Herrington & Sutcliffe LLP (“Orrick”), counsel to Joseph W. Grier, III, the Court-appointed future claimants’ representative in these cases (the “FCR”), hereby brings its fourteenth interim application for allowance of compensation of \$432,916.50 and reimbursement of expenses of \$2,354.83 for the period of October 1, 2024 through January 31, 2025 (the “Interim Period”) in accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals (Doc. No. 171) (the “Fee Procedures Order”), and in support, respectfully represents as follows:

BACKGROUND

1. On June 18, 2020 (the “Petition Date”), the above-captioned Debtors commenced their bankruptcy cases (together, the “Chapter 11 Case”) by filing voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code. On June 25, 2020, the Court entered an Order directing that the Debtors’ cases be jointly administered (Doc. No. 114). The Debtors are

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.

authorized to continue to manage their property and operate their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On July 7, 2020, the Court entered its *Order Appointing the Official Committee of Asbestos Personal Injury Claimants* (Doc. No. 147), appointing a committee (the “ACC”) to represent personal injury claimants in this Chapter 11 Case.

3. On October 14, 2020, the Court entered its *Order Appointing Joseph W. Grier, III as Legal Representative for Future Asbestos Claimants* (Doc. No. 389), appointing the FCR.

4. On October 15, 2020, the Court entered an order authorizing the FCR to retain Orrick as his counsel in this Chapter 11 Case, effective as of August 21, 2020. (Doc. No. 394).

5. Pursuant to the Fee Procedures Order, professionals may request monthly compensation and reimbursement of expenses. Such requests are to be served on certain identified interested parties for review. If no objection to a professional’s request is received within fourteen (14) days of such request, the Debtors are authorized to pay 90% of the fees and 100% of the expenses requested. The Fee Procedures Order also requires each retained professional to file, approximately every four months, an application for interim Court approval and allowance, pursuant to Section 331 of the Bankruptcy Code, of 100% of the compensation and reimbursement of expenses for the prior four-month period.

COMPENSATION RECEIVED DURING THE INTERIM PERIOD

6. Pursuant to the Fee Procedures Order, Orrick has submitted monthly fee statements to the Debtors for the Interim Period. Copies of the relevant monthly fee statements are attached as **Exhibit A-1 and A-4**. Summarized below are the requested professional fees and expenses and payments that Orrick has received on the same.

Date of Monthly Fee Statement	Description	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
11/21/2024	Fiftieth Monthly	10/1/2024 – 10/31/2024	\$205,039.00	\$1,465.15	\$206,132.40	\$371.75
12/5/2024	Fifty-First Monthly	11/1/2024 – 11/30/2024	\$108,483.50	\$267.00	\$97,902.15	\$10,848.35
1/10/2025	Fifty-Second Monthly	12/1/2024 – 12/31/2024	\$44,666.00	\$548.70	\$40,747.81	\$4,466.89
2/11/2025	Fifty-Third Monthly	1/1/2025 – 1/31/2025	\$74,728.00	\$73.98	\$0.00	\$74,801.98
Total:			\$432,916.50	\$2,354.83	\$344,782.36	\$90,488.97

7. In total, Orrick has submitted fee statements during the Interim Period for total fees of \$432,916.50 and total expenses of \$2,354.83. As of the date of this Application, no party has objected to the fee statements circulated by Orrick.

SUMMARY OF SERVICES RENDERED

8. Attached hereto as **Exhibits A-1 through A-4** are Orrick's monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by Orrick during the Interim Period. In summary, during the Interim Period, Orrick expended a total of 412.3 hours rendering necessary services in this Chapter 11 Case and incurred total fees of \$432,916.50 and \$2,354.83 in expenses.

9. As counsel to the FCR, Orrick provided a variety of services in connection with the Chapter 11 Case as set forth in the summary description below and in detail in **Exhibits A-1 through A-4**.

10. Orrick believes that the services it provided to the FCR in the context of the Chapter 11 Case during the Interim Period were necessary and beneficial to the administration of this case. Orrick further believes that its services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the tasks addressed.

11. Orrick has attempted to assign time entries for its professionals to the categories that best relate to those services. The following is a summary of the services provided to the FCR during the Interim Period, organized by project billing category:

A. **Litigation – 387.3 hours, \$409,052.00.** During the Interim Period, counsel for the FCR prepared a status report and an amicus brief and reviewed relevant pleadings in connection therewith. Counsel for the FCR also reviewed dockets, pleadings, and amicus brief issues regarding various appeals in these Cases, the other North Carolina asbestos cases, and the Red River Talc case. In addition, counsel for the FCR communicated with the Debtors and ACC in preparation for various omnibus hearings. Counsel for the FCR also listened in to other hearings in the North Carolina asbestos cases and reviewed pleadings regarding the same.

B. **Orrick Compensation – 4.0 hours, \$4,837.50.** During the Interim Period, counsel for the FCR prepared and circulated Orrick's invoices and monthly fee statements. Counsel for the FCR also prepared and finalized its interim fee application for the period June 1, 2024 through September 30, 2024.

C. **FCR and Other Professionals' Compensation – 8.0 hours, \$9,732.00.** During the Interim Period, counsel for the FCR reviewed and/or prepared monthly fee statements for Anderson Kill, Ankura, TetraRho, the FCR, and the FCR's counsel at Grier Wright Martinez PA, and reviewed interim fee applications regarding the same.

D. **Non-Working Travel – 13.0 hours, \$9,295.00.** During the Interim Period, counsel for the FCR traveled to and from Charlotte, North Carolina for omnibus hearings in these Cases. Pursuant to the Interim Compensation Order, Orrick's time for non-working travel is billed at 50% of the professional's normal hourly rate. Accordingly, Orrick's fees for non-working travel

during the Interim Period have been reduced by \$9,295.00 to reflect a 50% reduction of the professional's normal hourly rate.

12. **Exhibit B** provides a summary of Orrick's time by the project categories recommended by the Guidelines for Compensation and Reimbursement of Professionals referenced in Rule 2016-1 of this Court's Local Rules of Practice and Procedure.

13. **Exhibit C** reflects a summary by category of the expenses that Orrick incurred during the Interim Period, which totaled \$2,354.83.

14. **Exhibit D** provides information as to Orrick's professionals, including years of practice, position, billing rates, and the total number of hours billed during the Interim Period. Orrick maintains that its billing rates for the Interim Period, which reflect its customary hourly rates for 2024 and 2025, should be deemed a "reasonable billing rate" for purposes of this Court's determination of the "reasonableness" of the fees for the services that Orrick has rendered.

15. **Exhibit E** is a summary of Orrick's prior interim applications for compensation in this Chapter 11 Case.

DISBURSEMENTS

16. Orrick must incur certain expenses in the course of rendering services to the FCR. Those expenses may include items such as court fees, copying charges, regular and express mail charges, special or hand delivery charges, photocopying charges, travel expenses, expenses for working meals, computerized research charges, transcription charges, and the like.

17. Orrick requests reimbursement for its actual and necessary expenses incurred during the Interim Period in the amount of \$2,354.83. A detailed breakdown of such expenses were included in Orrick's invoices (attached hereto as **Exhibits A-1 through A-4**) and those expenses are summarized in **Exhibit C**. Orrick's expenses during the Interim Period were

necessary and reasonable under the circumstances of this Chapter 11 Case.

NOTICE

18. Notice of this Application has been provided to: (a) the office of the United States Bankruptcy Administrator for the Western District of North Carolina; (b) counsel for the Debtors; (c) counsel for the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.; (d) counsel to the ACC; and (e) the other parties on the Service List established by the Case Management Order and Fee Procedures Order entered in this Chapter 11 Case. Orrick submits that, in light of the nature of the relief requested, no other or further notice need be provided.

NO PRIOR REQUEST

19. Orrick has not made a prior request for the relief sought in this Application to this or any other Court.

CONCLUSION

20. Based on the foregoing, Orrick makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred in connection with representing the FCR.

WHEREFORE, Orrick respectfully requests that the Court enter an Order:

1) Allowing interim compensation to Orrick in the amount of \$432,916.50 as reasonable, actual and necessary for professional services rendered by it on behalf of the FCR during the Interim Period and interim reimbursement of expenses incurred during the Interim Period of \$2,354.83 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay Orrick the amount of \$435,271.33, which is equal to 100% of Orrick's requested compensation for the Interim Period and 100% of

Orrick's requested expense reimbursement for the Interim Period, less all previous payments made to Orrick pursuant to the Fee Procedures Order; and

3) Granting such further relief as is just and proper.

Dated: March 13, 2025

Respectfully submitted,

/s/ A. Cotten Wright

A. Cotten Wright (State Bar No. 28162)

Grier Wright Martinez, PA

521 E Morehead Street, Suite 440

Charlotte, NC 28202

Telephone: (704) 332-0207

Facsimile: (704) 332-0215

Email: cwright@grierlaw.com

-and-

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com; dfelder@orrick.com

Counsel for Joseph W. Grier, III,

Future Claimants' Representative

EXHIBIT A-1

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

)	
In re:)	Chapter 11
)	
ALDRICH PUMP LLC, <i>et al.</i> , ¹)	Case No. 20-30608
)	
Debtors.)	(Jointly Administered)
)	

**FIFTIETH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
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”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fiftieth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from October 1, 2024 through October 31, 2024* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period October 1, 2024 through October 31, 2024 (the “Fee Statement Period”).

Total Fees and Expenses for the Fee Statement Period

2. The total amounts of fees and expenses incurred by Orrick during the Fee Statement Period are as follows:

Fee Statement Period: October 1, 2024 – October 31, 2024	
Total Fees:	\$205,039.00 ²
Total Expenses:	\$1,465.15
TOTAL:	\$206,494.15

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$186,000.25 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’s fees and (b) 100% of its incurred expenses.

Billing Adjustments

4. Pursuant to the Interim Compensation Order, Orrick’s time for non-working travel will be billed at 50% of the professional’s normal hourly rate. Accordingly, Orrick’s fees for non-working travel during this Fee Statement Period have been reduced by \$4,080.00 to reflect a 50% reduction of the professional’s normal hourly rate.

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, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the

² Orrick’s fees were reduced by \$4,080.00 for non-working travel.

Debtors' counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 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 for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, 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 Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., stacy@cordes-law.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, D.C. 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 Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq.,

gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Orrick, no later than December 5, 2024 (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 Orrick an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required 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 Orrick.

This is the 21st day of November 2024.

/s/ Jonathan P. Guy

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

*Counsel for Joseph W. Grier, III,
Future Claimants' Representative*

Exhibit A



Grier Wright Martinez PA
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

November 20, 2024
Client No. 24998
Invoice No. 2234470

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through October 31, 2024 in connection
with the matters described on the attached pages:

Nonworking travel reduced by 50%

SUBTOTAL:

\$	209,119.00
	<u>(4,080.00)</u>
	205,039.00

DISBURSEMENTS as per attached pages:

1,465.15

TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):

\$	<u>206,504.15</u>
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Matter(s): 24998/2014, 2019, 2021, 2022
ASB-12739487

DUE UPON RECEIPT

The following is for information only:

Previous Balance not included in this invoice: \$19,992.21

If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,
please reference your **INVOICE** and **CLIENT** numbers on your remittance.
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2234470*

**ELECTRONIC FUNDS
TRANSFERS:**

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S
Account Number: 4123701088
*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2234470
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice:
2234470*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



Grier Wright Martinez PA
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

November 20, 2024
Client No. 24998
Invoice No. 2234470

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through October 31, 2024 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation
Matter: ASB-12739487

10/01/24	D. Carnie	Revise status conference report.	2.60	1,807.00
10/01/24	M. Rosenberg	Evaluate and edit status brief for new judge; gather and review additional material for amicus brief.	7.20	8,280.00
10/01/24	J. Guy	Telephone conference with B. Erens, Debtors' counsel regarding pending matters (.3); telephone conference with FCR regarding same and next steps in the case (.3); emails to/from M. Rosenberg and D. Carnie regarding pending status report for Judge James (.2); schedule telephone conference with Debtors and FCR to discuss Bestwall appellate briefing (.2); outline status report (.3).	1.30	1,768.00
10/02/24	D. Carnie	Revise conference status report.	7.60	5,282.00
10/02/24	M. Rosenberg	Draft portions of status memorandum (4.2); review further docket filings (.4); evaluate arguments for amicus brief (1.6).	6.20	7,130.00
10/03/24	D. Carnie	Review relevant pleadings and revise draft of status conference report.	7.00	4,865.00
10/03/24	D. Carnie	Confer with J. Guy regarding district court appeal.	0.20	139.00
10/03/24	M. Rosenberg	Confer with D. Carnie (.3); continue to revise memorandum for submission in advance of status conference (5.5).	5.80	6,670.00



Grier, Joseph W. III. - 24998
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November 20, 2024
Invoice No. 2234470

10/03/24	J. Guy	Emails to/from D. Carnie regarding pending Aldrich appeal before the US District Court (.2); review dockets of pending asbestos bankruptcy cases (collected over separate occasions) (1.5).	1.70	2,312.00
10/04/24	D. Carnie	Revise status conference report.	4.70	3,266.50
10/04/24	M. Rosenberg	Finalize draft of memorandum (5.5); evaluate professional/party crossover in the cases (.3); continue to gather and review material in conjunction with Bestwall amicus brief (2.0).	7.80	8,970.00
10/05/24	J. Guy	Emails to/from M. Rosenberg and D. Carnie regarding status report (.1); initial review of same (.8).	0.90	1,224.00
10/06/24	M. Rosenberg	Evaluate prior Bestwall amicus outline (2.0); confer with D. Carnie regarding next steps (.2).	2.20	2,530.00
10/07/24	A. Eudy	Locate and obtain legislative information for D. Carnie.	0.90	315.00
10/07/24	D. Carnie	Attend and take notes during telephone conference with Debtors' counsel (.5); confer with Orrick team regarding amicus and status conference report (.3).	0.80	556.00
10/07/24	D. Carnie	Confer with J. Guy and M. Rosenberg regarding conference status report and send related research request.	0.20	139.00
10/07/24	D. Carnie	Revise status conference report.	5.00	3,475.00
10/07/24	M. Rosenberg	Confer with counsel from Debtors regarding amicus approaches (.5); revise draft status report (4.3).	4.80	5,520.00
10/07/24	J. Guy	Teams meeting to discuss Bestwall amicus with Debtors, FCR, and Orrick counsel (.5); follow up telephone conference with the FCR to discuss strategy and next steps (.5); review dockets of pending asbestos bankruptcy cases (collected over separate occasions) (1.5); review and revise status report (4.0); emails to/from D. Carnie and M. Rosenberg regarding status report (.2).	6.70	9,112.00
10/08/24	D. Carnie	Revise status conference report.	6.40	4,448.00
10/08/24	M. Rosenberg	Finalize initial draft (3.5); confer with J. Guy and D. Carnie (.3).	3.80	4,370.00
10/08/24	J. Guy	Continued drafting of status report .	2.50	3,400.00



Grier, Joseph W. III. - 24998
page 3

November 20, 2024
Invoice No. 2234470

10/09/24	D. Carnie	Review, revise and prepare status conference report for filing (5.3); review and circulate pleadings in related case to Orrick team (.2).	5.50	3,822.50
10/09/24	M. Rosenberg	Evaluate Debtors' amicus outline (1.2); confer with D. Carnie (.2).	1.40	1,610.00
10/09/24	J. Guy	Continued drafting of status report following conference with FCR.	3.00	4,080.00
10/10/24	D. Carnie	Review draft of status conference report and confer with J. Guy and M. Rosenberg regarding same.	5.50	3,822.50
10/10/24	M. Rosenberg	Confer with D. Carnie (.3); evaluate and finalize status report (1.5).	1.80	2,070.00
10/10/24	J. Guy	Finalize and arrange for filing of status report (3.0); review status reports filed by Debtors, ACC, and Maune Raichle (1.2); review dockets of pending asbestos bankruptcy cases (collected over separate occasions) (1.5).	5.70	7,752.00
10/11/24	J. Guy	Analyze amici brief issues.	0.40	544.00
10/13/24	J. Guy	Meet and confer with Debtors and ACC regarding Oct 24th hearing, format and protocols.	0.40	544.00
10/14/24	D. Carnie	Attend coordination telephone conference for status conference, take notes and circulate same to M. Rosenberg.	0.40	278.00
10/15/24	D. Carnie	Confer with J. Guy and M. Rosenberg regarding amicus brief and next steps.	0.30	208.50
10/15/24	M. Rosenberg	Evaluate legislative history and research by D. Carnie.	0.80	920.00
10/15/24	M. Rosenberg	Discuss amicus briefing with J. Guy and D. Carnie.	0.30	345.00
10/15/24	J. Guy	Zoom conference with D. Carnie and M. Rosenberg regarding amici brief.	0.30	408.00
10/17/24	D. Carnie	Review dockets for notable filings in Aldrich in associated cases.	0.20	139.00
10/17/24	M. Rosenberg	Listen to hearing (5.2), summarize hearing and provide to client (.8), and continue gathering material for amicus brief (1.1).	7.10	8,165.00
10/17/24	J. Guy	Listen to hearing – via telephone (5.0); emails to/from M. Rosenberg and FCR regarding same (.3).	5.30	7,208.00
10/18/24	D. Carnie	Review pleadings in Bestwall and DBMP cases for update to client.	1.00	695.00
10/20/24	D. Carnie	Draft update to client on Aldrich and related cases.	0.30	208.50



Grier, Joseph W. III. - 24998
page 4

November 20, 2024
Invoice No. 2234470

10/21/24	D. Carnie	Draft case updates for client (1.4); listen and take notes during Red River Talc hearing (1.2).	2.60	1,807.00
10/22/24	D. Carnie	Review dockets in Aldrich and related cases and draft updates regarding same and circulate to client.	4.20	2,919.00
10/22/24	M. Rosenberg	Conduct case law and research follow ups for amicus brief.	1.40	1,610.00
10/22/24	J. Guy	Review dockets of pending asbestos bankruptcy cases (collected over separate occasions).	1.50	2,040.00
10/23/24	D. Carnie	Confer with J. Guy regarding status conference hearing.	0.20	139.00
10/23/24	D. Carnie	Review dockets for notable filings.	0.10	69.50
10/23/24	J. Guy	Prepare for 10/24 hearing.	3.50	4,760.00
10/24/24	D. Carnie	Listen to portion of Aldrich hearing; concurrently circulate charts, caselaw excerpts and pleadings to J. Guy and M. Rosenberg in connection with same.	3.60	2,502.00
10/24/24	M. Rosenberg	Listen to status hearing.	5.50	6,325.00
10/24/24	D. Felder	Listen to beginning of omnibus hearing on October 24.	2.20	2,541.00
10/24/24	J. Guy	Continued preparation for hearing (1.5); attend 10/25 hearing (5.2); conference with Debtors regarding oral argument (.7).	7.40	10,064.00
10/25/24	D. Carnie	Review Aldrich docket.	0.20	139.00
10/26/24	M. Rosenberg	Conduct additional case law and historical research for amicus filing.	2.80	3,220.00
10/27/24	D. Carnie	Review dockets regarding amicus brief.	0.20	139.00
10/27/24	M. Rosenberg	Continue to review and distill amicus arguments.	2.60	2,990.00
10/28/24	D. Carnie	Review DBMP district court order.	0.20	139.00
10/28/24	M. Rosenberg	Correspond with D. Carnie and revise amicus outline.	2.00	2,300.00
10/29/24	D. Carnie	Review outline of points regarding amicus brief by M. Rosenberg.	0.50	347.50
10/29/24	D. Carnie	Confer with M. Rosenberg on next steps for revising amicus brief.	0.60	417.00
10/29/24	M. Rosenberg	Telephone conference with J. Guy and B. Erens (.3), continue gathering material for amicus brief (1.5).	1.80	2,070.00



Grier, Joseph W. III. - 24998
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November 20, 2024
Invoice No. 2234470

10/29/24	J. Guy	Telephone conference with D. Carnie and M. Rosenberg regarding amicus brief (.6); strategize regarding next steps in the case (.8); analyze Bestwall appeal arguments (2.4).	3.80	5,168.00
10/30/24	D. Carnie	Revise amicus brief.	0.50	347.50
10/30/24	M. Rosenberg	Draft portions of amicus brief.	5.40	6,210.00
10/31/24	D. Carnie	Confer with J. Guy regarding amicus and hearing (.2); review pleadings in relation to amicus (.3); revise amicus (2.4)	2.90	2,015.50
10/31/24	M. Rosenberg	Continue drafting amicus brief (6.5); conduct additional research (1.1).	7.60	8,740.00
10/31/24	J. Guy	Review dockets of pending asbestos bankruptcy cases (collected over separate occasions).	1.50	2,040.00
Total Hours			190.80	
Total For Services			\$	199,457.50

Timekeeper Summary	Hours	Rate	Amount
Dan Carnie	63.50	695.00	44,132.50
April E. Eudy	0.90	350.00	315.00
Debra L. Felder	2.20	1,155.00	2,541.00
Jonathan P. Guy	45.90	1,360.00	62,424.00
Mike Rosenberg	78.30	1,150.00	90,045.00
Total All Timekeepers	190.80	\$1,045.37	\$199,457.50

Disbursements

Hotel	532.39	
Out of Town Business Meals	70.46	
Parking Expense	70.46	
Public Access to Court Electronic Records	237.80	
Travel Expense, Air Fare	10.00	
Travel Expense, Mileage	544.04	
Total Disbursements		\$1,465.15

Total For This Matter \$200,922.65



Grier, Joseph W. III. - 24998
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November 20, 2024
Invoice No. 2234470

For Legal Services Rendered Through October 31, 2024 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation

Matter: ASB-12739487

10/16/24	D. Felder	Review and finalize Orrick's September 2024 invoice (.2); prepare monthly fee statement and distribute same to notice parties (.4).	0.60	693.00
		Total Hours	0.60	
		Total For Services	\$	693.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
---------------------------	--------------	-------------	---------------

Debra L. Felder	0.60	1,155.00	693.00
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Total All Timekeepers	0.60	\$1,155.00	\$693.00
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Total For This Matter			\$693.00
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Grier, Joseph W. III. - 24998
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November 20, 2024
Invoice No. 2234470

For Legal Services Rendered Through October 31, 2024 in Connection With:

Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation

Matter: ASB-12739487

10/02/24	D. Felder	Prepare and finalize TetraRho's monthly fee statement and invoice for September 2024.	0.50	577.50
10/23/24	D. Felder	Review GWM and J. Grier monthly fee statements and invoices for September 2024.	0.20	231.00
		Total Hours	0.70	
		Total For Services	\$	808.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.70	1,155.00	808.50
Total All Timekeepers	0.70	\$1,155.00	\$808.50

Total For This Matter **\$808.50**



Grier, Joseph W. III. - 24998
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November 20, 2024
Invoice No. 2234470

For Legal Services Rendered Through October 31, 2024 in Connection With:

Matter: 2022 - Aldrich Pump - Non Working Travel

Matter: ASB-12739487

10/23/24	J. Guy	Travel to Charlotte.	3.00	4,080.00
10/24/24	J. Guy	Travel back to DC.	3.00	4,080.00
		Total Hours	6.00	
		Total For Services	\$	8,160.00
		<i>Nonworking travel reduced by 50%</i>	\$	(4,080.00)
		Total For Services	\$	4,080.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jonathan P. Guy	6.00	1,360.00	8,160.00
Total All Timekeepers	6.00	\$1,360.00	\$8,160.00

Total For This Matter **\$4,080.00**

*** * * COMBINED TOTALS * * ***

Total Hours	198.10	
Total Fees, all Matters		\$205,039.00
Total Disbursements, all Matters		\$1,465.15
Total Amount Due		\$206,504.15

EXHIBIT A-2

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

)	
In re:)	Chapter 11
)	
ALDRICH PUMP LLC, <i>et al.</i> , ¹)	Case No. 20-30608
)	
Debtors.)	(Jointly Administered)
)	

**FIFTY-FIRST MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
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”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-First Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from November 1, 2024 through November 30, 2024* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period November 1, 2024 through November 30, 2024 (the “Fee Statement Period”).

Total Fees and Expenses for the Fee Statement Period

2. The total amounts of fees and expenses incurred by Orrick during the Fee Statement Period are as follows:

Fee Statement Period: November 1, 2024 – November 30, 2024	
Total Fees:	\$108,483.50
Total Expenses:	\$267.00
TOTAL:	\$108,750.50

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$97,902.15 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’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, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors’ counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 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 for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel,

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., pamo@mcarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mcarter.com and Phillip S. Pavlick, Esq., ppavlick@mcarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mcarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., stacy@cordes-law.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, D.C. 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 Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Orrick, no later than December 19, 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 Orrick an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required 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 Orrick.

This is the 5th day of December 2024.

/s/ Jonathan P. Guy

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

*Counsel for Joseph W. Grier, III,
Future Claimants' Representative*

Exhibit A



Grier Wright Martinez PA
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

December 4, 2024
Client No. 24998
Invoice No. 2236554

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through November 30, 2024 in connection with the matters described on the attached pages:	\$	108,483.50
DISBURSEMENTS as per attached pages:		267.00
TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):	\$	<u>108,750.50</u>

Matter(s): 24998/2014, 2019, 2021
ASB-12739487

DUE UPON RECEIPT

The following is for information only:
Previous Balance not included in this invoice:
\$19,992.21
If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,
please reference your **INVOICE** and **CLIENT** numbers on your remittance.
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT
To expedite payment processing: Please use our preferred ELECTRONIC FUNDS TRANSFERS method.

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2236554*

ELECTRONIC FUNDS TRANSFERS:

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S
Account Number: 4123701088
*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2236554
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice:
2236554*

**Orrick will cover the
overnight delivery expense.
Please contact us @ 304-231-
2704**

To pay online visit www.e-billexpress.com/ebpp/Orrick/



Grier Wright Martinez PA
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

December 4, 2024
Client No. 24998
Invoice No. 2236554

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through November 30, 2024 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation
Matter: ASB-12739487

11/01/24	D. Carnie	Revise amicus brief.	1.50	1,042.50
11/01/24	M. Rosenberg	Revise amicus brief draft (6.4); evaluate Appellee brief (.8).	7.20	8,280.00
11/03/24	M. Rosenberg	Confer with D. Carnie (.2); expand sections of amicus brief (5.4).	5.60	6,440.00
11/04/24	D. Carnie	Revise draft of amicus brief (1.8); confer with C. Wright on same (.3); confer with staff regarding filing procedure (.1); confer with M. Rosenberg and J. Guy regarding draft amicus brief (.2).	2.40	1,668.00
11/04/24	M. Rosenberg	Review and implement amicus edits.	1.50	1,725.00
11/04/24	J. Guy	Review and revise amicus brief (6.5); emails to/from M. Rosenberg and D. Carnie regarding same (.2); review draft of motion for leave (.4).	7.10	9,656.00
11/05/24	D. Carnie	Revise amicus brief.	8.60	5,977.00
11/05/24	M. Rosenberg	Continue to revise amicus brief and add citations.	4.20	4,830.00
11/05/24	J. Guy	Review latest draft of amicus brief and edit same (1.0); emails to/from M. Rosenberg and D. Carnie regarding brief and next steps (.2).	1.20	1,632.00
11/06/24	D. Carnie	Revise draft amicus brief (3.7); confer with M. Rosenberg regarding same (.7); confer with co-counsel regarding same (.1); implement changes by co-counsel (.8); prepare disclosure statement for same (.2); prepare NOA in relation to same (.1).	5.60	3,892.00



Grier, Joseph W. III. - 24998
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December 4, 2024
Invoice No. 2236554

11/06/24	M. Rosenberg	Evaluate local rules and filing procedure (.3); continue to revise amicus brief (2.1).	2.40	2,760.00
11/06/24	J. Guy	Review and review amicus brief (2.5); multiple emails to/from D. Carnie and M. Rosenberg regarding same (.6).	3.10	4,216.00
11/07/24	M. Rosenberg	Review and revise amicus brief (5.8); correspond with local counsel (.2).	6.00	6,900.00
11/07/24	J. Guy	Telephone conference with Debtors regarding next steps (.3); various emails with Orrick team regarding amicus and next steps and Debtors' counsel (.8); review asbestos bankruptcy dockets (collected over separate occasions) (1.5).	2.60	3,536.00
11/08/24	D. Carnie	Confer with e-filing team and M. Rosenberg regarding amicus filing.	0.20	139.00
11/08/24	M. Rosenberg	Finalize and file amicus brief.	5.70	6,555.00
11/08/24	J. Guy	Numerous emails to/from Orrick team regarding amicus filing (.6); review and comment on drafts on separate occasions (2.0).	2.60	3,536.00
11/11/24	D. Carnie	Circulate pleadings to M. Rosenberg.	0.10	69.50
11/12/24	M. Rosenberg	Evaluate other amici briefs filed in Bestwall.	0.80	920.00
11/12/24	J. Guy	Review and analyze filings made by amici in Bestwall 4th Circuit appeal (separate occasions).	3.20	4,352.00
11/14/24	D. Carnie	Draft updates regarding Aldrich and related cases for client.	0.80	556.00
11/15/24	D. Carnie	Confer with M. Rosenberg regarding update to client (.4); draft updates to client regarding Aldrich and related cases (2.8).	3.20	2,224.00
11/15/24	M. Rosenberg	Meet with D. Carnie and discuss status update.	0.50	575.00
11/15/24	J. Guy	Review and analyze filings made by amici in Bestwall 4th Circuit appeal (separate occasions).	1.50	2,040.00
11/17/24	D. Carnie	Draft updates for client regarding Aldrich and related cases.	0.80	556.00
11/18/24	D. Carnie	Draft and revise updates to client regarding Aldrich and related cases.	3.70	2,571.50
11/18/24	M. Rosenberg	Prepare summaries for client update.	1.80	2,070.00
11/19/24	D. Carnie	Revise updates to client (2.3); analyze and circulate pleadings to client (1.0).	3.30	2,293.50
11/19/24	M. Rosenberg	Review Bestwall docket activity.	0.40	460.00
11/21/24	D. Carnie	Listen to Bestwall hearing and review notes from hearing and reach out to client with update.	2.20	1,529.00



Grier, Joseph W. III. - 24998
page 3

December 4, 2024
Invoice No. 2236554

11/21/24	D. Carnie	Circulate calendar invites for omnibus hearings.	0.20	139.00
11/21/24	J. Guy	Review related filings and listen to hearing (by telephone) (3.0); emails to/from D. Carnie and FCR regarding same (.2).	3.20	4,352.00
11/22/24	J. Guy	Review dockets of various asbestos bankruptcies (collected over separate occasions).	1.50	2,040.00
11/30/24	J. Guy	Review dockets of various bankruptcy asbestos cases for new filings (collected over separate occasions) (1.8); strategize regarding next steps (.8).	2.60	3,536.00
Total Hours			97.30	
Total For Services			\$	103,068.00

Timekeeper Summary	Hours	Rate	Amount
Dan Carnie	32.60	695.00	22,657.00
Jonathan P. Guy	28.60	1,360.00	38,896.00
Mike Rosenberg	36.10	1,150.00	41,515.00
Total All Timekeepers	97.30	\$1,059.28	\$103,068.00

Disbursements

Word Processing

267.00

Total Disbursements

\$267.00

Total For This Matter

\$103,335.00



Grier, Joseph W. III. - 24998
page 4

December 4, 2024
Invoice No. 2236554

For Legal Services Rendered Through November 30, 2024 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation

Matter: ASB-12739487

11/01/24	J. Guy	Prepare and review Orrick invoices (separate occasions).	0.50	680.00
11/12/24	D. Felder	Prepare Orrick's interim fee application for the period June 1, 2024 - September 30, 2024.	1.00	1,155.00
11/20/24	D. Felder	Review and revise Orrick's October invoice and prepare monthly fee statement regarding same.	0.60	693.00
Total Hours			2.10	
Total For Services			\$	2,528.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	1.60	1,155.00	1,848.00
Jonathan P. Guy	0.50	1,360.00	680.00
Total All Timekeepers	2.10	\$1,203.81	\$2,528.00

Total For This Matter **\$2,528.00**



Grier, Joseph W. III. - 24998
page 5

December 4, 2024
Invoice No. 2236554

For Legal Services Rendered Through November 30, 2024 in Connection With:

Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation

Matter: ASB-12739487

11/12/24	D. Felder	Prepare interim fee applications for TetraRho and Ankura for June 1, 2024 through September 30, 2024.	2.50	2,887.50
		Total Hours	2.50	
		Total For Services	\$	2,887.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	2.50	1,155.00	2,887.50
Total All Timekeepers	2.50	\$1,155.00	\$2,887.50
Total For This Matter			\$2,887.50

*** * * COMBINED TOTALS * * ***

Total Hours	101.90	
Total Fees, all Matters		\$108,483.50
Total Disbursements, all Matters		\$267.00
Total Amount Due		\$108,750.50

EXHIBIT A-3

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

In re:)	
)	Chapter 11
)	
ALDRICH PUMP LLC, <i>et al.</i> , ¹)	Case No. 20-30608
)	
Debtors.)	(Jointly Administered)
)	

**FIFTY-SECOND MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
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”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Second Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from December 1, 2024 through December 31, 2024* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period December 1, 2024 through December 31, 2024 (the “Fee Statement Period”).

Total Fees and Expenses for the Fee Statement Period

2. The total amounts of fees and expenses incurred by Orrick during the Fee Statement Period are as follows:

Fee Statement Period: December 1, 2024 – December 31, 2024	
Total Fees:	\$44,666.00
Total Expenses:	\$548.70
TOTAL:	\$45,214.70

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$40,748.10 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’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, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors’ counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 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 for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel,

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., pamo@mcarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mcarter.com and Phillip S. Pavlick, Esq., ppavlick@mcarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mcarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., stacy@cordes-law.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, D.C. 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 Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Orrick, no later than January 24, 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 Orrick an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required 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 Orrick.

This is the 10th day of January 2025.

/s/ Jonathan P. Guy

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

*Counsel for Joseph W. Grier, III,
Future Claimants' Representative*

Exhibit A



Grier, Joseph W. III.
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

January 8, 2025
Client No. 24998
Invoice No. 2245049

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through December 31, 2024 in connection
with the matters described on the attached pages:

\$ 44,666.00

DISBURSEMENTS as per attached pages:

548.70

TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):

\$ 45,214.70

Matter(s): 24998/2014, 2019, 2021
ASB-12739487

DUE UPON RECEIPT

The following is for information only:
Previous Balance not included in this invoice:
\$129,107.06 If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,
please reference your **INVOICE** and **CLIENT** numbers on your remittance.
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2245049*

**ELECTRONIC FUNDS
TRANSFERS:**

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S
Account Number: 4123701088
*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2245049
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice: 2245049*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



Grier, Joseph W. III.
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

January 8, 2025
Client No. 24998
Invoice No. 2245049

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through December 31, 2024 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation
Matter: ASB-12739487

12/02/24	D. Carnie	Circulate notice of appeal and related pleadings to client (.2); review Red River Talc case docket for notable filings (.1).	0.30	208.50
12/02/24	J. Guy	Emails to/from Debtors regarding Bestwall appeal and next steps (separate occasions).	0.30	408.00
12/03/24	J. Guy	Review dockets of pending asbestos bankruptcy cases (collected over separate occasions).	1.50	2,040.00
12/04/24	D. Carnie	Review docket and correspond with J. Guy regarding appeal of lift stay order.	0.30	208.50
12/04/24	J. Guy	Emails to/from D. Carnie regarding Aldrich District Court appeal and next steps (separate occasions).	0.20	272.00
12/05/24	D. Carnie	Review amicus brief and draft email to J. Guy regarding same; attend call with Debtors' counsel and send summary email to J. Guy regarding same.	2.20	1,529.00
12/05/24	J. Guy	Emails to/from D. Carnie regarding Bestwall appeal and next steps (.2); review Aldrich ACC amicus response and analyze same (.8).	1.00	1,360.00
12/06/24	D. Carnie	Confer with J. Guy and review correspondence with Debtors' counsel regarding late amicus brief.	0.50	347.50



Grier, Joseph W. III. - 24998
page 2

January 8, 2025
Invoice No. 2245049

12/06/24	M. Rosenberg	Evaluate Aldrich response to amicus brief (.7); review correspondence regarding same (.2).	0.90	1,035.00
12/06/24	J. Guy	Telephone conference with FCR regarding case status and next steps (.4); emails to/from FCR, Orrick team and Debtors' counsel regarding Bestwall appeal (.1).	0.50	680.00
12/13/24	D. Carnie	Confer with J. Guy regarding hearing in Bestwall.	0.10	69.50
12/15/24	J. Guy	Review dockets of pending asbestos bankruptcy cases (collected over separate occasions).	1.50	2,040.00
12/19/24	D. Carnie	Listen and take notes during Bestwall hearing (3.5); confer with Orrick team and client regarding same (.2); organize notes and circulate summary of hearing (1.0); review notice of related cases in Bestwall appeal, prepare response and confer with Orrick team (.5).	5.20	3,614.00
12/19/24	M. Rosenberg	Listen to portions of Bestwall hearing.	1.80	2,070.00
12/19/24	J. Guy	Listen to Bestwall hearing via telephone (separate occasions).	5.70	7,752.00
12/20/24	D. Carnie	Review dockets for Aldrich and related cases.	2.10	1,459.50
12/20/24	D. Carnie	Draft summary of Bestwall hearing regarding discovery issues (1.7); draft notice of related cases for Bestwall appeal (.2); confer with client regarding same (.2); prepare to file same (.2).	2.30	1,598.50
12/20/24	M. Rosenberg	Confer with D. Carnie regarding filing and weekly client update.	0.40	460.00
12/23/24	D. Carnie	Send update to client regarding appeal.	0.60	417.00
12/23/24	D. Carnie	Confer with M. Rosenberg on updates (.5); upload shared file for updates and circulate to M. Rosenberg (.5).	1.00	695.00
12/23/24	M. Rosenberg	Confer with D. Carnie (.5); evaluate Aldrich committee response to FCR brief in Bestwall (.4); review docket activity in related cases (.5).	1.40	1,610.00
12/26/24	M. Rosenberg	Evaluate filings and hearing minutes in Red River Talc, including second amended plan and FCR opposition.	0.80	920.00
12/27/24	D. Carnie	Review dockets of Aldrich and related cases for update to client and draft update to client.	5.40	3,753.00
12/27/24	M. Rosenberg	Prepare client update (2.0); confer with D. Carnie (.2).	2.20	2,530.00



Grier, Joseph W. III. - 24998
page 3

January 8, 2025
Invoice No. 2245049

12/29/24	D. Carnie	Draft email to J. Guy regarding next steps in Bestwall appeal.	0.20	139.00
12/30/24	D. Carnie	Confer with J. Guy regarding Bestwall appeal (.1); confer with M. Rosenberg regarding same (.1); circulate omnibus hearing dates to M. Rosenberg (.2).	0.40	278.00
12/30/24	J. Guy	Review dockets of pending asbestos bankruptcy cases (collected over separate occasions).	1.50	2,040.00
12/31/24	D. Carnie	Review Fourth Circuit docket in Bestwall appeal (.2); prepare paper copy for service on court (.8); confer with staff to arrange for mail service (.3); confer with court regarding same (.2); confer with staff to finalize mail service (.2).	1.70	1,181.50
12/31/24	D. Carnie	Confer with J. Guy regarding amicus brief.	0.20	139.00
12/31/24	M. Rosenberg	Meet with D. Carnie (.3); review FRAP amicus/oral argument procedure (.2); review case developments (1.0).	1.50	1,725.00
Total Hours			43.70	
Total For Services			\$	42,579.50

Timekeeper Summary	Hours	Rate	Amount
Dan Carnie	22.50	695.00	15,637.50
Jonathan P. Guy	12.20	1,360.00	16,592.00
Mike Rosenberg	9.00	1,150.00	10,350.00
Total All Timekeepers	43.70	\$974.36	\$42,579.50

Disbursements

Deposition/Transcript Expenses	548.70	
Total Disbursements		\$548.70

Total For This Matter **\$43,128.20**



Grier, Joseph W. III. - 24998
page 4

January 8, 2025
Invoice No. 2245049

For Legal Services Rendered Through December 31, 2024 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation

Matter: ASB-12739487

12/04/24	D. Felder	Review and revise Orrick's November invoice (.2); prepare monthly fee statement regarding same (.2).	0.40	462.00
12/04/24	J. Guy	Review Orrick invoices.	0.40	544.00
12/05/24	D. Felder	Finalize and serve Orrick's November monthly fee statement and invoice.	0.20	231.00
Total Hours			1.00	
Total For Services			\$	1,237.00

Timekeeper Summary	Hours	Rate	Amount
Debra L. Felder	0.60	1,155.00	693.00
Jonathan P. Guy	0.40	1,360.00	544.00
Total All Timekeepers	1.00	\$1,237.00	\$1,237.00

Total For This Matter **\$1,237.00**



Grier, Joseph W. III. - 24998
page 5

January 8, 2025
Invoice No. 2245049

For Legal Services Rendered Through December 31, 2024 in Connection With:

Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation

Matter: ASB-12739487

12/04/24	D. Felder	Finalize and serve Tetra Rho's November monthly fee statement and invoice.	0.20	231.00
12/04/24	J. Guy	Review consultant invoices (separate occasions).	0.20	272.00
12/20/24	D. Felder	Review monthly fee statements and invoices for GWM and J. Grier and email with B. Franklin regarding same.	0.30	346.50
Total Hours			0.70	
Total For Services			\$	849.50

Timekeeper Summary	Hours	Rate	Amount
Debra L. Felder	0.50	1,155.00	577.50
Jonathan P. Guy	0.20	1,360.00	272.00
Total All Timekeepers	0.70	\$1,213.57	\$849.50

Total For This Matter \$849.50

***** COMBINED TOTALS *****

Total Hours	45.40	
Total Fees, all Matters		\$44,666.00
Total Disbursements, all Matters		\$548.70
Total Amount Due		\$45,214.70

EXHIBIT A-4

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

In re:)	
)	Chapter 11
)	
ALDRICH PUMP LLC, <i>et al.</i> , ¹)	Case No. 20-30608 (LMJ)
)	
Debtors.)	(Jointly Administered)
)	

**FIFTY-THIRD MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
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”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Third Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from January 1, 2025 through January 31, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period January 1, 2025 through January 31, 2025 (the “Fee Statement Period”).

Total Fees and Expenses for the Fee Statement Period

2. The total amounts of fees and expenses incurred by Orrick during the Fee Statement Period are as follows:

Fee Statement Period: January 1, 2025 – January 31, 2025	
Total Fees:	\$74,728.00 ²
Total Expenses:	\$73.98
TOTAL:	\$74,801.98

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$67,329.18 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’s fees and (b) 100% of its incurred expenses.

Billing Adjustments

4. Pursuant to the Interim Compensation Order, Orrick’s time for non-working travel will be billed at 50% of the professional’s normal hourly rate. Accordingly, Orrick’s fees for non-working travel during this Fee Statement Period have been reduced by \$5,215.00 to reflect a 50% reduction of the professional’s normal hourly rate.

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, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the

² Orrick’s fees were reduced by \$5,215.00 for non-working travel.

Debtors' counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 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 for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, 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 Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., stacy@cordes-law.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, D.C. 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 Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq.,

gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Orrick, no later than February 25, 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 Orrick an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required 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 Orrick.

This is the 11th day of February 2025.

/s/ Jonathan P. Guy

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

*Counsel for Joseph W. Grier, III,
Future Claimants' Representative*

Exhibit A



Grier Wright Martinez PA
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

February 10, 2025
Client No. 24998
Invoice No. 2252136

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through January 31, 2025 in connection
with the matters described on the attached pages:

Nonworking travel reduced by 50%:

SUBTOTAL:

DISBURSEMENTS as per attached pages:

TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):

\$	79,943.00
	<u>(5,215.00)</u>
\$	74,728.00
	<u>73.98</u>
\$	<u>74,801.98</u>

Matter(s): 24998/2013, 2014, 2019, 2021, 2022
ASB-12739487

DUE UPON RECEIPT

The following is for information only:

Previous Balance not included in this invoice:

\$76,427.01

If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,
please reference your **INVOICE** and **CLIENT** numbers on your remittance.
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2252136*

**ELECTRONIC FUNDS
TRANSFERS:**

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S
Account Number: 4123701088

*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2252136
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice:
2252136*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



Grier Wright Martinez PA
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

February 10, 2025
Client No. 24998
Invoice No. 2252136

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through January 31, 2025 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation
Matter: ASB-12739487

01/02/25	D. Carnie	Confer with M. Rosenberg regarding Aldrich, related cases and next steps (.2); confer with J. Guy regarding same (.4); draft updates on Aldrich and related cases to send to client (1.9).	2.50	2,175.00
01/02/25	M. Rosenberg	Confer with J. Guy and D. Carnie regarding next steps.	0.40	500.00
01/02/25	J. Guy	Telephone conference with D. Carnie and M. Rosenberg regarding Bestwall amicus briefing and argument (.3); prepare for same (.2).	0.50	745.00
01/02/25	J. Guy	Review of asbestos bankruptcy dockets (various occasions).	1.50	2,235.00
01/02/25	J. Guy	Various emails to D. Carnie regarding appeal.	0.20	298.00
01/03/25	D. Carnie	Confer with the court and J. Guy regarding paper copies of appellate brief (.8); confer with client and appellate team for Debtor in Bestwall appeal (.3).	1.10	957.00
01/06/25	D. Carnie	Confer with court and with J. Guy and M. Rosenberg regarding receipt of paper copies (1.0); confer with K. Marshall and Debtor's counsel in Bestwall appeal regarding amici briefs.	1.20	1,044.00
01/06/25	J. Guy	Emails to/from D. Carnie and Debtor's counsel regarding amicus filing in Bestwall.	0.20	298.00
01/07/25	D. Carnie	Review appeal docket and confer with J. Guy and Bestwall Debtor's counsel for appeal regarding common interest.	0.50	435.00



Grier, Joseph W. III. - 24998
page 2

February 10, 2025
Invoice No. 2252136

01/08/25	D. Carnie	Confer with J. Guy and M. Rosenberg regarding Bestwall appeal, and meeting with Debtor's counsel.	0.20	174.00
01/09/25	D. Carnie	Confer with J. Guy and with Jones Day regarding meeting regarding Bestwall appeal (.3); attend telephone conference with Bestwall Debtor's counsel regarding appeal (.5); draft email to client regarding same (.7).	1.50	1,305.00
01/09/25	J. Guy	Telephone conference with D. Carnie, M. Rosenberg and Debtor's counsel regarding Bestwall appeal.	0.50	745.00
01/09/25	J. Guy	Prepare for same.	0.40	596.00
01/10/25	D. Carnie	Confer with client regarding Red River Talc case.	0.50	435.00
01/14/25	D. Carnie	Circulate notice of continued oral argument for Bestwall appeal to client and Orrick team.	0.20	174.00
01/15/25	J. Guy	Review of asbestos bankruptcy dockets (various occasions).	1.50	2,235.00
01/17/25	D. Carnie	Review pleadings in Red River Talc case and confer with J. Guy regarding same.	1.00	870.00
01/17/25	J. Guy	Review of developments in the J&J Texas bankruptcy.	1.20	1,788.00
01/17/25	J. Guy	Emails to/from D. Carnie regarding same.	0.20	298.00
01/17/25	J. Guy	Strategize regarding next steps in Aldrich cases.	0.40	596.00
01/20/25	D. Carnie	Review votes cast in Garlock plan from ballot on file and circulate chart to J. Guy.	1.90	1,653.00
01/21/25	D. Carnie	Confer with M. Rosenberg regarding Bestwall hearing.	0.10	87.00
01/22/25	D. Carnie	Confer with J. Guy and D. Felder regarding Aldrich hearing.	0.50	435.00
01/23/25	M. Rosenberg	Listen to Bestwall hearing.	2.80	3,500.00
01/23/25	J. Guy	Emails to/from Debtors regarding next meeting.	0.30	447.00
01/23/25	J. Guy	Strategize regarding next steps.	0.80	1,192.00
01/23/25	J. Guy	Emails to/from various members of Orrick team regarding strategy.	0.20	298.00
01/23/25	J. Guy	Listen to Bestwall omnibus hearing (via telephone).	2.70	4,023.00
01/24/25	J. Guy	Review of asbestos bankruptcy dockets (various occasions).	1.50	2,235.00
01/26/25	J. Guy	Emails to/from Debtors' counsel regarding Jan 30 hearing.	0.20	298.00



Grier, Joseph W. III. - 24998
page 3

February 10, 2025
Invoice No. 2252136

01/27/25	D. Carnie	Confer with the court and C. Wright regarding attendance at hearing (.5); review Red River Talc docket for notable filings (.2).	0.70	609.00
01/27/25	M. Rosenberg	Revise and send hearing summary (1.2); evaluate activity on related dockets (1.0).	2.20	2,750.00
01/28/25	D. Carnie	Confer with J. Guy regarding DBMP appeal (.3); circulate filings from DBMP appeal to client (.3).	0.60	522.00
01/28/25	J. Guy	Review proposed discovery agreement and order.	0.30	447.00
01/28/25	J. Guy	Review DBMP lift stay appeal and analyze related issues.	0.70	1,043.00
01/29/25	D. Carnie	Review Red River Talc docket and confer with J. Guy and M. Rosenberg regarding same.	2.90	2,523.00
01/29/25	J. Guy	Conference with FCR to discuss case and next steps.	0.30	447.00
01/29/25	J. Guy	Emails to Debtors regarding pending matters.	0.20	298.00
01/29/25	J. Guy	Prepare for hearing.	0.70	1,043.00
01/30/25	D. Carnie	Confer with J. Guy regarding researching related cases (.2); review filings in Red River Talc, compile relevant sections into chart and circulate to J. Guy and M. Rosenberg (1.9); attend and take notes during Aldrich hearing (1.4); confer further with J. Guy regarding Red River case (.2); confer with M. Rosenberg regarding same (.2).	3.90	3,393.00
01/30/25	M. Rosenberg	Confer with D. Carnie (.3), prepare client update (1.2), evaluate FCR objection in Red River and other J&J docket material (1.0).	2.50	3,125.00
01/30/25	J. Guy	Prepare for 1/30 omnibus hearing.	0.70	1,043.00
01/30/25	J. Guy	Attend Aldrich hearing for FCR.	1.00	1,490.00
01/30/25	J. Guy	Meet with Debtors to discuss pending matters.	1.00	1,490.00
01/30/25	J. Guy	Strategize regarding next steps.	0.80	1,192.00
01/30/25	J. Guy	Review asbestos bankruptcy dockets (various occasions).	1.50	2,235.00
01/31/25	D. Carnie	Compile updates on Aldrich and related cases and circulate to co-counsel and client.	7.30	6,351.00
01/31/25	M. Rosenberg	Revise case update (1.1); confer with D. Carnie (.4).	1.50	1,875.00
Total Hours			55.50	
Total For Services			\$	63,947.00



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February 10, 2025
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Timekeeper Summary	Hours	Rate	Amount
Dan Carnie	26.60	870.00	23,142.00
Jonathan P. Guy	19.50	1,490.00	29,055.00
Mike Rosenberg	9.40	1,250.00	11,750.00
Total All Timekeepers	55.50	\$1,152.20	\$63,947.00

Disbursements

Express Delivery	36.88	
Public Access to Court Electronic Records	37.10	
Total Disbursements		\$73.98

Total For This Matter **\$64,020.98**



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February 10, 2025
Invoice No. 2252136

For Legal Services Rendered Through January 31, 2025 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation
Matter: ASB-12739487

01/08/25	D. Felder	Review and revise Orrick's December 2024 invoice and prepare monthly fee statement regarding same.	0.30	379.50
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Total Hours	0.30	
Total For Services	\$	379.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.30	1,265.00	379.50
Total All Timekeepers	0.30	\$1,265.00	\$379.50
Total For This Matter			\$379.50



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February 10, 2025
Invoice No. 2252136

For Legal Services Rendered Through January 31, 2025 in Connection With:

Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation
Matter: ASB-12739487

01/03/25	D. Felder	Review TetraRho's December 2024 invoice and prepare monthly fee statement regarding same.	0.30	379.50
01/22/25	D. Felder	Review monthly statements and interim fee applications for all retained professionals and update summary charts regarding same.	2.50	3,162.50
01/22/25	D. Felder	Prepare December 2024 monthly fee statement for Ankura.	0.20	253.00
01/23/25	D. Felder	Review professionals' fees in these cases and update summary charts regarding same.	1.00	1,265.00
01/23/25	D. Felder	Email service of Ankura's December 2024 monthly fee statement.	0.10	126.50
		Total Hours	4.10	
		Total For Services	\$	5,186.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	4.10	1,265.00	5,186.50
Total All Timekeepers	4.10	\$1,265.00	\$5,186.50

Total For This Matter **\$5,186.50**



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February 10, 2025
Invoice No. 2252136

For Legal Services Rendered Through January 31, 2025 in Connection With:

Matter: 2022 - Aldrich Pump - Non Working Travel
Matter: ASB-12739487

01/29/25	J. Guy	Travel to Charlotte for 1/30 hearing.	3.50	5,215.00
01/30/25	J. Guy	Travel to DC following 1/30 hearing.	3.50	5,215.00
		Total Hours	7.00	
		Total For Services	\$	10,430.00
		<i>Nonworking travel reduced by 50%</i>	\$	<i>(5,215.00)</i>
		Total For Services	\$	5,215.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jonathan P. Guy	7.00	1,490.00	10,430.00
Total All Timekeepers	7.00	\$1,490.00	\$10,430.00
Total For This Matter			\$5,215.00

*** * * COMBINED TOTALS * * ***

Total Hours	66.90	
Total Fees, all Matters		\$74,728.00
Total Disbursements, all Matters		\$73.98
Total Amount Due		\$74,801.98

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

October 1, 2024 through January 31, 2025

Project Category	Matter Number	Total Hours for the Interim Period (10/1/2024 - 1/31/2025)	Total Hours from the Petition Date (6/18/2020- 1/31/2025)	Total Fees for the Interim Period (10/1/2024-1/31/2025)	Total Fees from the Petition Date (6/18/2020- 1/31/2025)
Case Administration	2012	0.00	3.10	\$0.00	\$3,878.00
Insurance	2013	0.00	37.80	\$0.00	\$40,402.00
Litigation	2014	387.30	3,105.80	\$409,052.00	\$3,179,487.50
Adversary Proceeding Litigation	2015	0.00	467.20	\$0.00	\$450,032.50
Plan & Disclosure Statement	2016	0.00	204.30	\$0.00	\$213,988.00
Due Diligence	2017	0.00	82.00	\$0.00	\$89,511.50
Orrick Retention	2018	0.00	56.30	\$0.00	\$47,570.00
Orrick Compensation	2019	4.00	107.38	\$4,837.50	\$108,177.50
FCR and Other Professionals - Retention	2020	0.00	67.70	\$0.00	\$67,472.00
FCR and Other Professionals - Compensation	2021	8.00	146.70	\$9,732.00	\$148,959.00
Non-Working Travel	2022	13.00	139.40	\$9,295.00	\$84,645.00
TOTAL:		412.30	4,417.68	\$432,916.50	\$4,434,123.00

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

October 1, 2024 through January 31, 2025

Expense Category	Total Expenses for the Interim Period (10/1/2024-1/31/2025)	Total Expenses from the Petition Date (6/18/2020-1/31/2025)
Deposition Transcripts	\$548.70	\$548.70
Document Reproduction (@ .20/page)	\$0.00	\$506.20
Express Delivery	\$36.88	\$36.88
Hotel	\$532.39	\$8,594.59
Lexis Research	\$0.00	\$1,552.00
Out of Town Business Meals	\$70.46	\$1,319.05
Outside Services – Data Processing of Debtors and Non-Debtors Document Productions	\$0.00	\$2,033.60
PACER Charges	\$274.90	\$7,504.50
Parking Expense	\$70.46	\$905.46
Taxi Expense	\$0.00	\$1,135.58
Travel Expense, Air Fare (coach fare)	\$10.00	\$10,545.20
Travel Expense, Mileage	\$544.04	\$544.04
Westlaw Research	\$0.00	\$23,681.00
Word Processing	\$267.00	\$768.90
TOTAL:	\$2,354.83	\$59,675.70

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

October 1, 2024 through January 31, 2025

Name of Professional	Position - Bar Year	2024 Hourly Billing Rate	2025 Hourly Billing Rate	Total Hours Billed (10/1/2024-1/31/2025)	Total Compensation (10/1/2024 - 1/31/2025)
2024 Hourly Billing Rates					
Jonathan P. Guy	Senior Counsel - 1996	\$1,360	--	93.8	\$123,488.00
Debra L. Felder	Senior Associate - 2002	\$1,155	--	8.7	\$10,048.50
Michael Rosenberg	Senior Associate - 2013	\$1,150	--	123.4	\$141,910.00
Daniel Carnie	Associate – 2023	\$695	--	118.6	\$82,427.00
April Eudy	Research Specialist	\$350	--	0.9	\$315.00
2025 Hourly Billing Rates					
Jonathan P. Guy	Senior Counsel - 1996	--	\$1,490	26.5	\$34,270.00
Debra L. Felder	Senior Associate - 2002	--	\$1,265	4.4	\$5,566.00
Michael Rosenberg	Senior Associate - 2013	--	\$1,250	9.4	\$11,750.00
Daniel Carnie	Associate – 2023	--	\$870	26.6	\$23,142.00
TOTAL:				412.3	\$432,916.50

EXHIBIT E

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

Document	Interim Fee Application Date; Dkt. No.	Period Covered	Fees Requested/ Allowed	Expenses Requested/ Allowed	Order Approving Interim Application
1 st Interim	11/9/2020; Dkt. No. 423	8/21/2020-9/30/2020	\$46,289.00	\$0.00	Dkt. No. 459; 12/3/2020
2 nd Interim	3/11/2021; Dkt. No. 617	10/1/2020-1/31/2021	\$488,022.50	\$5,033.60	Dkt. No. 661; 4/2/2021
3 rd Interim	7/9/2021; Dkt. No. 762	2/1/2021-5/31/2021	\$630,867.00	\$6,609.60	Dkt. No. 795; 8/2/2021
4 th Interim	10/29/2021; Dkt. No. 863	6/1/2021-9/30/2021	\$240,028.50	\$1,488.88	Dkt. No. 928; 12/8/2021
5 th Interim	3/1/2022; Dkt. No. 1008	10/1/2021-1/31/2022	\$251,136.00	\$1,506.62	Dkt. No. 1065; 3/23/2022
6 th Interim	7/11/2022; Dkt. No. 1262	2/1/2022-6/31/2022	\$299,435.00	\$3,405.87	Dkt. No. 1311; 8/3/2022
7 th Interim	11/7/2022; Dkt. No. 1388	1/1/2022-9/30/2022	\$289,310.50	\$5,524.85	Dkt. No. 1458; 12/7/2022
8 th Interim	3/8/2023; Dkt. No. 1631	10/1/2022-1/31/2023	\$212,252.50	\$4,182.20	Dkt. No. 1827; 6/21/2023
9 th Interim	8/3/2023; Dkt. No. 1902	2/1/2023-5/31/2023	\$368,257.00	\$3,956.38	Dkt. No. 1902; 8/2/2023
10 th Interim	11/7/2023; Dkt. No. 1990	6/1/2023-9/30/2023	\$295,603.00	\$5,181.57	Dkt. No. 2026; 11/30/2023
11 th Interim	3/15/2024; Dkt. No. 2146	10/1/2023-1/31/2024	\$115,605.00	\$730.90	Dkt. No. 2193; 4/11/2024
12 th Interim	7/11/2024; Dkt. No. 2300	2/1/2024-5/31/2024	\$563,076.50	\$19,282.50	Dkt. No. 2339; 8/2/2024
13 th Interim	11/13/2024; Dkt. No. 2442	6/1/2024-9/30/2024	\$201,324.00	\$684.90	Dkt. No. 2481; 12/12/2024
TOTAL:			\$4,001,206.50	\$57,587.87	