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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
Debtors.	Jointly Administered

SUMMARY OF THIRTEENTH INTERIM APPLICATION OF ANDERSON KILL P.C. FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL INSURANCE COUNSEL TO JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE, FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025

Name of Applicant:	Anderson Kill P.C.
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Order Approving Retention:	December 23, 2020 (Docket No. 486)
Period for which compensation and reimbursement is sought:	October 1, 2024 – January 31, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$10,545.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$10,545.00

This	is	a(r	1)	X	interim	final	application.

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 FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

Debtors.	Jointly Administered
ALDRICH PUMP LLC, et al.,1	Case No. 20-30608
In re:	Chapter 11

THIRTEENTH INTERIM APPLICATION OF ANDERSON KILL P.C. FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL INSURANCE COUNSEL TO JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE, FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025

Anderson Kill P.C. ("Anderson"), Special Insurance Counsel to Joseph W. Grier, III, the Court-appointed future claimants' representative in these cases (the "FCR"), hereby brings its thirteenth interim application for allowance of compensation of \$10,545.00 and reimbursement of expenses of \$0.00 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 (Docket. 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 (Docket. No. 114). The Debtors are authorized to continue to manage their property and operate their businesses as debtors-in-

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.

possession pursuant to §§ 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 December 23, 2020, the Court entered an order authorizing the FCR to retain Anderson as his special insurance counsel in this Chapter 11 Case (Docket No. 486).
- 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, Anderson 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 through A-3**.² Summarized below are the requested professional fees, expenses and payments that Anderson has received on the same.

No fee application was submitted for December 2024.

Date of	Description	Period	Requested	Requested	Payment	Amount
Monthly Fee Statement		Covered	Fees	Expenses	Received	Outstanding
11/04/24	Forty-Fifth Monthly	10/01/2024- 10/31/2024	\$7,869.00	\$0.00	\$7,082.10	\$786.90
12/04/24	Forty-Sixth Monthly	11/01/2024- 11/30/2024	\$1,367.00	\$0.00	\$1,230.30	\$136.70
02/06/25	Forty-Seventh Monthly	12/01/2024- 01/31/2025	\$1,309.00	\$0.00	\$0.00	\$1,309.00
		TOTAL:	\$10,545.00	\$0.00	\$8,312.40	\$2,232.60
OVERPAYMENT Received on 01/16/2025:						\$7,082.12
LESS Outstanding Balance:						-\$2,232.60
TOTAL Amount Outstanding:						\$0.00
	·	·	UNAPI	PLIED CREDIT	Γ Remaining:	\$4,849.52 ³

7. In total, Anderson has submitted fee statements during the Interim Period for total fees of \$10,545.00 and total expenses of \$0.00. As of the date of this Application, no party has objected to the fee statements circulated by Anderson.

SUMMARY OF SERVICES RENDERED

- 8. Attached hereto as **Exhibits A-1 through A-3** are Anderson's monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by Anderson during the Interim Period. In summary, during the Interim Period, Anderson expended a total of 13.10 hours rendering necessary services in this Chapter 11 Case and incurred total fees of \$10,545.00 and \$0.00 in expenses.
- 9. As special insurance counsel to the FCR, Anderson provided a variety of insurance-related services to the FCR in connection with the Chapter 11 Case as set forth in the summary description below and in detail in **Exhibits A-1 through A-3**.
- 10. Anderson 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. Anderson further believes that its services were performed within a reasonable amount

³ On 01/16/2025, Anderson Kill received a second payment of \$7,082.12, for invoice #323295. We are currently holding this and applying it to fees and expenses as they are incurred.

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of time commensurate with the complexity, importance, and nature of the tasks addressed.

- 11. Anderson 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. **B120 Asset Analysis and Recovery 5.80 hours, \$7,830.00.** During the Interim Period, Anderson professionals Anderson professionals prepared for, and participated in Court hearings.
- B. **B160 Fee/Employment Applications 7.30 hours, \$2,715.00.** During the Interim Period, Anderson professionals prepared and circulated their invoices and monthly fee statements for October 2024, November 2024 and January 2025, and prepared the interim fee application for the prior period.
- 12. **Exhibit B** provides a summary of Anderson'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 Anderson incurred during the Interim Period, which totaled \$0.00.
- 14. **Exhibit D** provides information as to Anderson's professionals, including years of practice, position, billing rates, and the total number of hours billed during the Interim Period. Anderson maintains that its billing rates for the Interim Period, which reflect its customary hourly rates for the years 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 Anderson has rendered.

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

DISBURSEMENTS

- 16. Anderson 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, professional service charges, transcription charges, and the like.
- 17. Anderson requests reimbursement for its actual and necessary expenses incurred during the Interim Period in the amount of \$0.00. A detailed breakdown of such expenses were included in Anderson's invoices (attached hereto as **Exhibits A-1 through A-3**) and those expenses are summarized in **Exhibit C**. Anderson'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. Anderson submits that, in light of the nature of the relief requested, no other or further notice need be provided.

NO PRIOR REQUEST

19. Anderson has not made a prior request for the relief sought in this Application to

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this or any other Court.

CONCLUSION

20. Based on the foregoing, Anderson 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 as special insurance counsel in the Chapter 11

Case.

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

Allowing interim compensation to Anderson in the amount of \$10,545.00 as 1)

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 \$0.00 as reasonable, actual and necessary;

Authorizing and directing the Debtors to pay Anderson the amount of \$10,545.00, 2)

which is equal to 100% of Anderson's requested compensation for the Interim Period and 100%

of Anderson's requested expense reimbursement for the Interim Period, less all previous payments

made to Anderson 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

7

-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 Case 20-30608 Doc 2588 Filed 03/13/25 Entered 03/13/25 15:14:18 Desc Main Document Page 9 of 45

EXHIBIT A-1

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UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

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

FORTY-FIFTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY ANDERSON KILL P.C. AS SPECIAL INSURANCE 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 (Docket 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 Anderson Kill P.C. as Special Insurance Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of December 23, 2020 (Docket No. 486) (the "Anderson Retention Order"), Anderson Kill P.C. ("Anderson"), as Special Insurance Counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the "Future Claimants' Representative), submits its Forty-Fifth Monthly Statement of Fees and Expenses Incurred by Anderson Kill PC as Special Insurance 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").

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 Anderson'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 Anderson during the Fee Statement Period are as follows:

Fee Statement Period: October 1, 2024 – October 31, 2024			
Total Fees:	\$7,869.00		
Total Expenses:	\$0.00		
TOTAL:	\$7,869.00		

3. Pursuant to the Interim Compensation Order, Anderson seeks payment of \$7,082.10 from the Debtors for the Fee Statement Period (the "Interim Amount"), representing (a) 90% of Anderson'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

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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., 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 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., scordes@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 Anderson, no later than November 18, 2024 (the "Objection Deadline"). Any Objection must set

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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 Anderson 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 Anderson.

This is the 4th day of November 2024.

ANDERSON KILL P.C.

/s/ Robert M. Horkovich

Robert M. Horkovich (admitted pro hac vice) 1251 Avenue of the Americas New York, NY 10020-1182 Telephone: (212) 278-1000

Facsimile: (212) 278-1733

E-mail: rhorkovich@andersonkill.com

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

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Exhibit A

Anderson Kill P.C.

1251 Avenue of the Americas, New York, NY 10020 (212) 278-1000 EIN:13-2743351

E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq. Grier Wright Martinez PA 521 E. Morehead Street, Suite 440 Charlotte, NC 28202

Invoice No. 323295

Invoice Date: November 4, 2024 Client Matter ID: 106539.10997 Billing Attorney: Robert M Horkovich

Joseph W. Grier, III, Esq.

Aldrich Pump-FCR

Professional Services: \$7,869.00

Costs: \$0.00

Total Current Invoice: \$7,869.00

Outstanding Balance from Prior Invoices (see listing): \$1,844.31

Total Amount: \$9,713.31

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Anderson Kill P.C.

1251 Avenue of the Americas, New York, NY 10020

EIN:13-2743351 (212) 278-1000 E-Mail: Accounting@andersonkill.com

November 4, 2024 Invoice No. 323295

MATTER: Aldrich Pump-FCR

INVOICE LIST

INVOICE	DATE	INVOICE TOTAL
320462	03/04/24	\$890.59
320708	04/04/24	\$92.49
321021	05/03/24	\$438.49
321387	06/06/24	\$100.80
321793	07/05/24	\$125.80
322270	08/07/24	\$136.94
322545	09/13/24	\$59.20
	OUTSTANDING BALANCE FROM PRIOR INVOICES	\$1,844.31

Anderson Kill P.C.

1251 Avenue of the Americas, New York, NY 10020

(212) 278-1000 EIN:13-2743351 E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq. Grier Wright Martinez PA 521 E. Morehead Street, Suite 440 Charlotte, NC 28202

Billing Attorney Robert M Horkovich

Invoice No. 323295

Invoice Date November 4, 2024

Client Matter #: 106539.10997 Joseph W. Grier, III, Esq. RE: Aldrich Pump-FCR

FOR PROFESSIONAL SERVICES RENDERED THROUGH October 31, 2024

Date	Professional	Hours	Task	Activity	Narrative	Amount
10/11/24	AHP	1.20	B160	A103	Begin drafting 12th interim fee application.	444.00
10/22/24	RMH	0.40	B120	A107	Communicate with court and co-counsel re hearing.	540.00
10/22/24	RMH	0.10	B120	A104	Review agenda.	135.00
10/24/24	RMH	5.00	B120	A109	Hearing before judge re case history.	6,750.00

Total Fees: \$7,869.00

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	RATE	AMOUNT
Robert M Horkovich	5.50	1,350.00	7,425.00
Arline H Pelton	1.20	370.00	444.00
	6.70		\$7,869,00

SUMMARY OF SERVICES BY ACTIVITY

	HOURS	RATE	AMOUNT
ACTIVITY CODE B120 ASSET ANALYSIS AND RECOVERY			
Horkovich, Robert M	5.50	1,350.00	\$7,425.00
	5.50		\$7,425.00
ACTIVITY CODE B160 FEE/EMPLOYMENT APPLICATIONS			
Pelton, Arline H	1.20	370.00	\$444.00
	1.20		\$444.00

TOTAL CURRENT BILLING: \$7,869.00

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Anderson Kill P.C.

1251 Avenue of the Americas, New York, NY 10020

(212) 278-1000 EIN:13-2743351 E-Mail: Accounting@andersonkill.com

Joseph W. Grier, III, Esq. Grier Wright Martinez PA 521 E. Morehead Street, Suite 440 Charlotte, NC 28202

Chanolle, NC 20202

November 4, 2024

MATTER: Aldrich Pump-FCR

REMITTANCE COPY

Professional Services \$7,869.00

106539, 10997

323295

Costs: \$0.00

Total Current Invoice: \$7,869.00

Outstanding Amount From Prior Invoices: \$1,844.31

MATTER:

INVOICE:

TOTAL AMOUNT DUE: \$9,713.31

PLEASE SEND YOUR REMITTANCE TO US AT:

OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

Anderson Kill P.C. 1251 Avenue of the Americas New York, NY 10020 BANK: WELLS FARGO BANK, N.A. ABA NUMBER FOR WIRES: 121000248 ABA NUMBER FOR ACHS: 026012881 CREDIT TO: ANDERSON KILL P.C. OPERATING ACCOUNT

ACCOUNT NUMBER: 2000037634722

KINDLY INDICATE:

CLIENT NUMBER: 106539 INVOICE NUMBER: 323295

YOUR FIRM NAME: Joseph W. Grier, III, Esq.

THIS INVOICE IS PAYABLE UPON RECEIPT

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

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EXHIBIT A-2

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UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

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

FORTY-SIXTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY ANDERSON KILL P.C. AS SPECIAL INSURANCE 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 (Docket 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 Anderson Kill P.C. as Special Insurance Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of December 23, 2020 (Docket No. 486) (the "Anderson Retention Order"), Anderson Kill P.C. ("Anderson"), as Special Insurance Counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the "Future Claimants' Representative), submits its Forty-Sixth Monthly Statement of Fees and Expenses Incurred by Anderson Kill PC as Special Insurance 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").

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 Anderson'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 Anderson during the Fee Statement Period are as follows:

Fee Statement Period: November 1, 2024	- November 30, 2024
Total Fees:	\$1,367.00
Total Expenses:	\$0.00
TOTAL:	\$1,367.00

3. Pursuant to the Interim Compensation Order, Anderson seeks payment of \$1,230.30 from the Debtors for the Fee Statement Period (the "<u>Interim Amount</u>"), representing (a) 90% of Anderson'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

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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., 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 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., scordes@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 Anderson, no later than December 18, 2024 (the "Objection Deadline"). Any Objection must set

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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 Anderson 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

This is the 4th day of December 2024.

Anderson.

ANDERSON KILL P.C.

/s/ Robert M. Horkovich

Robert M. Horkovich (admitted pro hac vice) 1251 Avenue of the Americas New York, NY 10020-1182 Telephone: (212) 278-1000

Facsimile: (212) 278-1733

E-mail: rhorkovich@andersonkill.com

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

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Exhibit A

Anderson Kill P.C.

1251 Avenue of the Americas, New York, NY 10020 (212) 278-1000 EIN:13-2743351

E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq. Grier Wright Martinez PA 521 E. Morehead Street, Suite 440 Charlotte, NC 28202

Invoice No. 323648

Invoice Date: December 3, 2024
Client Matter ID: 106539.10997
Billing Attorney: Robert M Horkovich

Joseph W. Grier, III, Esq.

Aldrich Pump-FCR

Professional Services: \$1,367.00

Costs: \$0.00

Total Current Invoice: \$1,367.00

Outstanding Balance from Prior Invoices (see listing): \$8,866.91

Total Amount: \$10,233.91

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Anderson Kill P.C.

1251 Avenue of the Americas, New York, NY 10020

(212) 278-1000 EIN:13-2743351 E-Mail: Accounting@andersonkill.com

December 3, 2024 Invoice No. 323648

MATTER: Aldrich Pump-FCR

INVOICE LIST

INVOICE	DATE	INVOICE TOTAL
320462	03/04/24	\$675.97
321793	07/05/24	\$125.80
322270	08/07/24	\$136.94
322545	09/13/24	\$59.20
323295	11/04/24	\$7,869.00

OUTSTANDING BALANCE FROM PRIOR INVOICES: \$8,866.91

Anderson Kill P.C.

1251 Avenue of the Americas, New York, NY 10020

(212) 278-1000 EIN:13-2743351 E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq. Grier Wright Martinez PA 521 E. Morehead Street, Suite 440 Charlotte, NC 28202

Billing Attorney Robert M Horkovich

Invoice No. 323648

Invoice Date December 3, 2024

Client Matter #: 106539.10997 Joseph W. Grier, III, Esq. RE: Aldrich Pump-FCR

FOR PROFESSIONAL SERVICES RENDERED THROUGH November 30, 2024

Date	Professional	Hours	Task	Activity	Narrative	Amount
11/01/24	AHP	0.40	B160	A103	Revise 12th interim fee application.	148.00
11/04/24	AHP	0.90	B160	A103	Draft 45th monthly fee application for 1st and 2nd reviews.	333.00
11/12/24	AHP	0.30	B160	A103	Revise 12th interim fee application for 3rd review and filing.	111.00
11/15/24	AHP	0.40	B160	A103	Update monitoring chart.	148.00
11/15/24	RMH	0.30	B120	A106	Report on Home estate payments to Aldrich.	405.00
11/20/24	AHP	0.60	B160	A103	Draft 46th monthly fee application.	222.00

Total Fees: \$1,367.00

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	RATE	AMOUNT
Robert M Horkovich	0.30	1,350.00	405.00
Arline H Pelton	2.60	370.00	962.00
	2.90		\$1,367.00

SUMMARY OF SERVICES BY ACTIVITY

	HOURS	RATE	AMOUNT
ACTIVITY CODE B120 ASSET ANALYSIS AND RECOVERY Horkovich, Robert M	0.30	1,350.00	\$405.00 \$405.00
ACTIVITY CODE B160 FEE/EMPLOYMENT APPLICATIONS Pelton, Arline H	2.60 2.60	370.00	\$962.00 \$962.00

TOTAL CURRENT BILLING: \$1,367.00

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Anderson Kill P.C.

1251 Avenue of the Americas, New York, NY 10020

(212) 278-1000 EIN:13-2743351 E-Mail: Accounting@andersonkill.com

Joseph W. Grier, III, Esq. Grier Wright Martinez PA 521 E. Morehead Street, Suite 440

Charlotte, NC 28202

December 3, 2024

MATTER: Aldrich Pump-FCR

REMITTANCE COPY

Professional Services \$1,367.00

106539, 10997

323648

Costs: \$0.00

Total Current Invoice: \$1,367.00

Outstanding Amount From Prior Invoices: \$8,866.91

MATTER:

INVOICE:

TOTAL AMOUNT DUE: \$10,233.91

PLEASE SEND YOUR REMITTANCE TO US AT: OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

Anderson Kill P.C. 1251 Avenue of the Americas New York, NY 10020 BANK: WELLS FARGO BANK, N.A. ABA NUMBER FOR WIRES: 121000248 ABA NUMBER FOR ACHS: 026012881 CREDIT TO: ANDERSON KILL P.C. OPERATING ACCOUNT

ACCOUNT NUMBER: 2000037634722

KINDLY INDICATE:

CLIENT NUMBER: 106539 INVOICE NUMBER: 323648

YOUR FIRM NAME: Joseph W. Grier, III, Esq.

THIS INVOICE IS PAYABLE UPON RECEIPT

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

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EXHIBIT A-3

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UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

In re:)	Chapter 11
ALDRICH PUMP LLC, et al.,1)	Case No. 20-30608
Dei	btors.)	(Jointly Administered)

FORTY-SEVENTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY ANDERSON KILL P.C. AS SPECIAL INSURANCE COUNSEL TO JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE, FOR THE PERIOD FROM DECEMBER 1, 2024 THROUGH JANUARY 31, 2025²

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals (Docket 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 Anderson Kill P.C. as Special Insurance Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of December 23, 2020 (Docket No. 486) (the "Anderson Retention Order"), Anderson Kill P.C. ("Anderson"), as Special Insurance Counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the "Future Claimants' Representative), submits its Forty-Seventh Monthly Statement of Fees and Expenses Incurred by Anderson Kill PC as Special Insurance Counsel to Joseph W. Grier, III, the Future Claimants' Representative, for the Period from December 1, 2024 through January 31, 2025 (the

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.

Anderson Kill did not previously submit a monthly application for December 1-31, 2024, as the only time was for fee applications.

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"Monthly Fee Statement").

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Anderson's invoice for the period December 1, 2024 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 Anderson during the Fee Statement Period are as follows:

Fee Statement Period: December 1, 2024 – January 31, 2025				
Total Fees:	\$1,309.00			
Total Expenses:	\$0.00			
TOTAL:	\$1,309.00			
OVERPAYMENT Received 1/16/2025: ³	\$7,082.12			
LESS Current Invoice:	-\$1,309.00			
TOTAL DUE:	\$0.00			

3. Pursuant to the Interim Compensation Order, Anderson seeks payment of \$1,178.10 from the Debtors for the Fee Statement Period (the "Interim Amount"), representing (a) 90% of Anderson'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

On 01/16/2025, Anderson Kill received a <u>second</u> payment of \$7,082.12, for invoice #323295. We are currently holding this and applying it to fees and expenses as they are incurred.

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(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., 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 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., scordes@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

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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

Anderson, no later than February 20, 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 Anderson 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

Anderson.

This is the 6th day of February 2025.

ANDERSON KILL P.C.

/s/ Robert M. Horkovich

Robert M. Horkovich (admitted pro hac vice)

7 Times Square

15th Floor

New York, NY 10036

Telephone: (212) 278-1000

Facsimile: (212) 278-1733

E-mail: rhorkovich@andersonkill.com

Special Insurance Counsel for

Joseph W. Grier, III

Future Claimants' Representative

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Exhibit A

Anderson Kill P.C.

7 Times Square, New York, NY 10036 (212) 278-1000 EIN:13-2743351 E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq. Grier Wright Martinez PA 521 E. Morehead Street, Suite 440 Charlotte, NC 28202

Invoice No. 324427

Invoice Date: February 6, 2025 Client Matter ID: 106539.10997 Billing Attorney: Robert M Horkovich

Joseph W. Grier, III, Esq.

Aldrich Pump-FCR

Professional Services: \$1,309.00

Costs: \$0.00

Total Current Invoice: \$1,309.00

Outstanding Balance from Prior Invoices (see listing): \$923.60

OVERPAYMENT Received on 01/16/2025: \$7,082.12

LESS Current Invoice: -\$1,390.00

LESS Outstanding Balance: -\$923.60

Total Amount Due: \$0.00

UNAPPLIED CREDIT Remaining: \$4,849.52

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Anderson Kill P.C.

7 Times Square, New York, NY 10036 (212) 278-1000 EIN:13-2743351 E-Mail: Accounting@andersonkill.com

February 6, 2025 Invoice No. 324427

MATTER: Aldrich Pump-FCR

INVOICE LIST

INVOICE	DATE	INVOICE TOTAL
323295	11/04/24	\$786.90
323648	12/04/24	\$136.70

OUTSTANDING BALANCE FROM PRIOR INVOICES \$923.60

Anderson Kill P.C.

7 Times Square, New York, NY 10036 (212) 278-1000 EIN:13-2743351 E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq. Grier Wright Martinez PA 521 E. Morehead Street, Suite 440 Charlotte, NC 28202

Client Matter #: 106539.10997 Joseph W. Grier, III, Esq. RE: Aldrich Pump-FCR Billing Attorney Robert M Horkovich

Invoice No. 324427

Invoice Date February 6, 2025

FOR PROFESSIONAL SERVICES RENDERED THROUGH January 31, 2025

Date	Professional	Hours	Task	Activity	Narrative	Amount
12/03/24	AHP	0.80	B160	A103	Finalize draft of 46th monthly fee application for 1st review.	296.00
12/04/24	AHP	0.40	B160	A103	Prepare 46th monthly fee application for submission.	148.00
12/06/24	AHP	0.60	B160	A103	Draft notice of change of address.	222.00
12/09/24	AHP	0.40	B160	A103	Re-draft and circulate change of address.	148.00
12/17/24	AHP	0.60	B160	A103	Revise monitoring chart.	222.00
01/06/25	AHP	0.70	B160	A103	Draft 47th monthly fee application.	273.00

Total Fees: \$1,309.00

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	RATE	AMOUNT
Arline H Pelton	2.80	370.00	1,036.00
Arline H Pelton	0.70	390.00	273.00
	3.50		1,309.00

SUMMARY OF SERVICES BY ACTIVITY

	HOURS	RATE	AMOUNT
ACTIVITY CODE B160 FEE/EMPLOYMENT APPLICATIONS Pelton. Arline H	3.50	374.00	\$1.309.00
Pelion, Anne n	3.50	3/4.00	φ1,309.00
	3.50		\$1,309.00

TOTAL CURRENT BILLING: \$1,309.00

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Anderson Kill P.C.

7 Times Square, New York, NY 10036 (212) 278-1000 EIN:13-2743351 E-Mail: Accounting@andersonkill.com

Grier, Joseph W., III, Esq. Grier Wright Martinez PA 521 E. Morehead Street, Suite 440 Charlotte, NC 28202

February 6, 2025

MATTER: Aldrich Pump-FCR

REMITTANCE COPY

Professional Services \$1,309.00

106539, 10997

324427

Costs: \$0.00

Total Current Invoice: \$1,309.00

Outstanding Amount From Prior Invoices: \$923.60

MATTER:

INVOICE:

OVERPAYMENT Received on 01/16/2025: \$7,082.12

LESS Current Invoice: -\$1,390.00

LESS Outstanding Balance: -\$923.60

Total Amount Due: \$0.00

UNAPPLIED CREDIT Remaining: \$4,849.52

PLEASE SEND YOUR REMITTANCE TO US AT: OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

Anderson Kill P.C. 7 Times Square New York, NY 10036 BANK: WELLS FARGO BANK, N.A. ABA NUMBER FOR WIRES: 121000248 ABA NUMBER FOR ACHS: 026012881 CREDIT TO: ANDERSON KILL P.C.

OPERATING ACCOUNT

ACCOUNT NUMBER: 2000037634722

KINDLY INDICATE:

CLIENT NUMBER: 106539 INVOICE NUMBER: 324427

YOUR FIRM NAME: Joseph W. Grier, III, Esq.

THIS INVOICE IS PAYABLE UPON RECEIPT

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

October 1, 2024 through January 31, 2025

Project Category ¹	Matter Number	Total Hours for	Total Hours	Total Fees for the	Total Fees from the
		the Interim	from the Petition	Interim Period	Petition Date
		Period	Date	Periou	
Asset Analysis and Recovery	B120/A2	5.80	1,269.80	\$7,830.00	\$1,041,647.50
(formerly Insurance)					
Case Administration	B110/A3	0.00	0.30	\$0.00	\$324.00
(formerly Due Diligence)					
Fee/Employment	B160/A8	7.30	162.80	\$2,715.00	\$54,071.95
Applications (formerly					
Anderson Compensation)					
	TOTAL:	13.10	1,432.60	\$10,545.00	\$1,095,719.45

Due to the case beginning e-billing, the prior categories of Insurance, Due Diligence and Anderson Compensation are hereinafter blended to now be: B120 Asset Analysis and Recovery, B110 Case Administration, and B160 Fee/Employment Applications.

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

October 1, 2024 through January 31, 2025

Expense Category	Total	Total
	Expenses	Expenses
	for the	from the
	Period	Petition Date
Professional Services (Database Hosting Fees)	\$0.00	\$3,698.51
Transcripts & Depositions	\$0.00	\$59.40
Library & Legal Research (Westlaw)	\$0.00	\$40.30
TOTAL:	\$0.00	\$3,798.21

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	Total Compensation
Robert M. Horkovich	Managing Shareholder - 1980	\$1,245	\$1,465	5.80	\$7,830.00
Arline Pelton	Senior Legal Assistant	\$370	\$390	7.30	\$2,715.00
		TOTAL:		13.10	\$10,545.00

EXHIBIT E

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

December 23, 2020 through September 30, 2024

Document	Application Date Docket No.	Period Covered	Fees Requested/ Allowed	Expenses Requested /Allowed	Order Approving Interim Application
1 st Interim	03/11/2021;	12/23/2020 -	\$47, 974.50	\$0.00	Docket No. 662;
and T	Docket No. 619	01/31/2021	Φ425 025 00	#000 # 0	04/02/2021
2 nd Interim	07/09/2021;	02/01/2021-	\$425,925.00	\$900.50	Docket No. 798,
	Docket No. 764	05/31/2021			08/02/2021
3 rd Interim	10/29/2021;	06/01/20201-	\$208,062.00	\$526.01	Docket No. 929;
	Docket No. 864	09/30/2021			12/08/2021
4 th Interim	03/01/2022;	10/01/2021-	\$107,343.50	\$513.05	Docket No. 1062;
	Docket No. 1009	01/31/2022			03/23/2022
5 th Interim	07/11/22;	02/01/2022-	\$52,985.50	\$513.02	Docket No. 1315;
	Docket No. 1261	05/31/2022			08/03/2022
6 th Interim	11/08/2022;	06/01/2022-	\$27,530.13	\$178.15	Docket No. 1460;
	Docket No. 1396	09/30/2022			12/07/2022
7 th Interim	03/08/2023;	10/01/2022-	\$42,205.50	\$613.61	Docket No. 1825;
	Docket No. 1632	01/31/2023			06/21/2023
8 th Interim	07/12/2023;	02/01/2023-	\$75,463.50	\$199.56	Docket No. 1901;
	Docket No. 1868	05/31/2023			08/02/2023
9 th Interim	11/07/2023;	06/01/2023-	\$74,596.60	\$305.49	Docket No. 2027;
	Docket No. 1991	09/30/2023			11/30/2027
10 th Interim	03/15/2024;	10/01-2023-	\$11,433.50	\$49.08	Docket No. 2191;
	Docket No. 2143	01/31/2024			04/11/2024
11 th Interim	07/11/2024;	02/01/2024-	\$8,464.00	\$0.00	Docket No. 2340;
	Docket No. 2301	05/31/2024			08/02/2024
12 th Interim	11/13/2024;	06/01/2024-	\$3,218.95	\$0.00	Docket No. 2482;
	Docket No. 2443	09/30/2024			12/12/2024