

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

**In re:**

Chapter 11

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

Case No. 20-30608 (LMJ)

**Debtors.**

Jointly Administered

**SUMMARY OF THIRD INTERIM APPLICATION OF TETRARHO LLC FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES AS FINANCIAL ADVISOR TO  
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,  
FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

Name of Applicant:	TetraRho LLC
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Order Approving Retention:	April 5, 2024 (Dkt. No. 2187)
Period for which compensation and reimbursement is sought:	October 1, 2024 – January 31, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$12,540.00
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:	\$12,540.00

This is a(n)   x   interim        final application.

<sup>1</sup> The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.



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

**In re:**

Chapter 11

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

Case No. 20-30608 (LMJ)

**Debtors.**

Jointly Administered

**THIRD INTERIM APPLICATION OF TETRARHO LLC  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES AS FINANCIAL ADVISOR TO JOSEPH W.  
GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE, FOR THE PERIOD  
FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

TetraRho LLC (“Tetra”), financial advisor to Joseph W. Grier, III, the Court-appointed future claimants’ representative in these cases (the “FCR”), hereby brings its third interim application for allowance of compensation of \$12,540.00 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 (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

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<sup>1</sup> The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

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 December 3, 2020, the Court entered an order authorizing the FCR to retain Ankura Consulting Group, LLC (“Ankura”) as his asbestos claims consultant and financial advisor in this Chapter 11 Case, effective as of December 3, 2020 (Doc. No. 464) (the “Ankura Retention Order”). While the FCR’s asbestos claims consultant team continues to be employed by Ankura and retained in this Chapter 11 Case pursuant to the Ankura Retention Order, the FCR’s financial advisory team, led by Jason Solganick (“Mr. Solganick”), resigned from Ankura in October 2023 and formed Tetra. Mr. Solganick is the sole member and employee of Tetra.

5. On April 5, 2024, the Court entered an order authorizing the FCR to retain Tetra as his financial advisor in this Chapter 11 Case, effective as of April 5, 2024 (Doc. No. 2187) (the “Tetra Retention Order”). Ankura is continuing to provide asbestos claims consulting services to the FCR under the Ankura Retention Order and, pursuant to the Tetra Retention Order, Tetra will provide financial advisory services to the FCR.

6. 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**

7. Pursuant to the Fee Procedures Order, Tetra 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 Tetra has received on the same.

<b>Date of Monthly Fee Statement</b>	<b>Description</b>	<b>Period Covered</b>	<b>Requested Fees</b>	<b>Requested Expenses</b>	<b>Payment Received</b>	<b>Amount Outstanding</b>
11/5/24	Seventh Monthly	10/1/2024-10/31/2024	\$6,650.00	\$0.00	\$5,985.01	\$664.99
12/4/24	Eighth Monthly	11/1/2024-11/30/2024	\$2,280.00	\$0.00	\$2,052.01	\$227.99
1/4/25	Ninth Monthly	12/1/2024-12/31/2024	\$855.00	\$0.00	\$769.51	\$85.49
2/3/25	Tenth Monthly	1/1/2025-1/31/2025	\$2,755.00	\$0.00	\$0.00	\$2,755.00
<b>TOTAL:</b>			<b>\$12,540.00</b>	<b>\$0.00</b>	<b>\$8,806.53</b>	<b>\$3,733.47</b>

8. In total, Tetra has submitted fee statements during the Interim Period for total fees of \$12,540.00 and total expenses of \$0.00. As of the date of this Application, no party has objected to the fee statements circulated by Tetra.

### **SUMMARY OF SERVICES RENDERED**

9. Attached hereto as **Exhibits A-1 through A-4** are Tetra's monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by Tetra during the Interim Period. In summary, during the Interim Period, Tetra expended a total of

13.2 hours rendering necessary services in this Chapter 11 Case and incurred total fees of \$12,540.00 and \$0.00 in expenses.

10. As the financial advisor to the FCR, Tetra provided a variety of services in connection with the Chapter 11 Case set forth in the summary description below and in detail in **Exhibits A-1 through A-4**.

11. Tetra 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. Tetra further believes that its services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the tasks addressed.

12. Tetra 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. **Business Operations – 8.6 hours, \$8,170.00.** During the Interim Period, Mr. Solganick reviewed the Debtors' monthly operating reports and relevant news coverage and press releases relating to the Debtors' and Trane's financials. Mr. Solganick also listened to Trane's quarterly earnings calls and reviewed their investor presentations, financial results, and 10Q filing.
- b. **Litigation – 4.3 hours, \$4,085.00.** During the Interim Period, at the FCR's counsel's request, Mr. Solganick reviewed comparable bankruptcy cases for certain financial information.

- c. **Staffing Report/Fee Applications – 0.3 hours, \$285.00.** During the Interim Period, Mr. Solganick reviewed Tetra’s second interim fee application.
13. **Exhibit B** provides a summary of Tetra’s time by project category.
14. **Exhibit C** reflects a summary by category of the expenses that Tetra incurred during the Interim Period, which totaled \$0.00.
15. **Exhibit D** provides information as to Tetra’s professionals, including position, billing rates, and the total number of hours billed during the Interim Period. Tetra 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 Tetra has rendered.
16. **Exhibit E** is a summary of Tetra’s prior interim application for compensation in this Chapter 11 Case.

### **DISBURSEMENTS**

17. Tetra must incur certain expenses in the course of rendering services to the FCR. Those expenses may include items such as 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.

18. Tetra did not incur any expenses during the Interim Period.

### **NOTICE**

19. 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. Tetra submits that, in light of the nature of the relief requested, no other or further notice need be provided.

**NO PRIOR REQUEST**

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

**CONCLUSION**

21. Based on the foregoing, Tetra makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred in connection with rendering asbestos claims consultant services and financial advisory services to the FCR.

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

- 1) Allowing interim compensation to Tetra in the amount of \$12,540.00 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 \$0.00 as reasonable, actual and necessary;
- 2) Authorizing and directing the Debtors to pay Tetra the amount of \$12,540.00, which is equal to 100% of Tetra's requested compensation for the Interim Period and 100% of Tetra's requested expense reimbursement for the Interim Period, less all previous payments made to Tetra 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, NW

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> , <sup>1</sup>	)	Case No. 20-30608
	)	
Debtors.	)	(Jointly Administered)
	)	

**SEVENTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
TETRARHO LLC AS FINANCIAL ADVISOR 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 Authorizing Joseph W. Grier, III, the Future Claimants’ Representative, to Retain and Employ TetraRho LLC as Financial Advisor*, effective as of April 5, 2024 (Dkt. No. 2187), TetraRho LLC (“Tetra”), as financial advisor to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Seventh Monthly Statement of Fees and Expenses Incurred by TetraRho LLC as Financial Advisor to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from October 1, 2024 through October 31, 2024* (the “Monthly Fee Statement”).

**Itemization of Services Rendered and Expenses Incurred**

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

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<sup>1</sup> The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors’ address is 800-E Beaty Street, Davidson, North Carolina 28036.

**Total Fees and Expenses for the Fee Statement Period**

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

<b>Fee Statement Period: October 1, 2024 – October 31, 2024</b>	
Total Fees:	\$6,650.00
Total Expenses:	\$0.00
<b>TOTAL:</b>	<b>\$6,650.00</b>

3. Pursuant to the Interim Compensation Order, Tetra seeks payment of \$5,985.00 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Tetra’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.,

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, 31<sup>st</sup> 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).

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 Tetra, no later than November 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 Tetra 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 Tetra.

This is the 5<sup>th</sup> 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.

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Facsimile: (202) 339-8500

Email: jguy@orrick.com

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

# **Exhibit A**



TetraRho LLC  
1900 Half Moon Bay Drive  
Croton, NY 10520

Date	Invoice #	Due Date	FEIN #
11/01/2024	ALD 202410	11/30/2024	93-4281061

Jonathan Guy  
Orrick, Herrington & Sutcliffe LLP  
2100 Pennsylvania Ave., NW  
Washington, DC 20037

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

**Professional Services Rendered for the Month of October 2024 (Aldrich Pump FCR)**

<b>Total Invoice Amount:</b>	<b>\$6,650.00</b>
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Remittance Information:  
TetraRho LLC  
Jason Solganick  
1900 Half Moon Bay Drive  
Croton, NY 10520



Project: Aldrich Pump FCR  
 Invoice Date: 11/01/2024  
 Invoice #: ALD 202410  
 Professional Services Through: 10/31/2024

**Invoice Summary**

Professional Services: \$6,650.00  
 Total Amount Due: \$6,650.00

**Summary by Person:**

<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Jason Solganick	Managing Director	\$950.00	7.0	\$6,650.00
<b>Total</b>			<b>7.0</b>	<b>\$6,650.00</b>

**Time Detail:**

<u>Date</u>	<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>	<u>Category</u>
10/1/2024	Jason Solganick	Mng. Dir.	0.3	950.0	\$ 285.00	Review monthly operating reports (August 2024)	Business Operations
10/1/2024	Jason Solganick	Mng. Dir.	0.9	950.0	\$ 855.00	Review comparable bankruptcy cases at request of counsel	Litigation
10/2/2024	Jason Solganick	Mng. Dir.	1.4	950.0	\$ 1,330.00	Review comparable bankruptcy cases at request of counsel	Litigation
10/8/2024	Jason Solganick	Mng. Dir.	0.8	950.0	\$ 760.00	Review comparable bankruptcy cases at request of counsel	Litigation
10/10/2024	Jason Solganick	Mng. Dir.	0.5	950.0	\$ 475.00	Correspondence re: comparable bankruptcy cases	Litigation
10/16/2024	Jason Solganick	Mng. Dir.	0.7	950.0	\$ 665.00	Review status reports by various parties	Litigation
10/21/2024	Jason Solganick	Mng. Dir.	0.3	950.0	\$ 285.00	Review news updates for relevant coverage	Business Operations
10/29/2024	Jason Solganick	Mng. Dir.	0.2	950.0	\$ 190.00	Review case dockets	Business Operations
10/30/2024	Jason Solganick	Mng. Dir.	1.0	950.0	\$ 950.00	Listen to Trane 3Q2024 earnings call	Business Operations
10/30/2024	Jason Solganick	Mng. Dir.	0.6	950.0	\$ 570.00	Review Trane financial results presentation for 3Q2024	Business Operations
10/31/2024	Jason Solganick	Mng. Dir.	0.3	950.0	\$ 285.00	Review Trane 3Q2024 financial results news release	Business Operations
<b>Total:</b>			<b>7.0</b>		<b>\$ 6,650.00</b>		

**Outstanding Invoices:**

202404	5/01/24	\$3,410.50
202405	6/03/24	\$1,149.50
202406	7/02/24	\$161.50
202407	8/1/24	\$427.49
202408	9/3/24	\$266.00
202409	10/1/24	\$6,555.00



# **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> , <sup>1</sup>	)	Case No. 20-30608
	)	
Debtors.	)	(Jointly Administered)
	)	

**EIGHTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
TETRARHO LLC AS FINANCIAL ADVISOR 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 Authorizing Joseph W. Grier, III, the Future Claimants’ Representative, to Retain and Employ TetraRho LLC as Financial Advisor*, effective as of April 5, 2024 (Dkt. No. 2187), TetraRho LLC (“Tetra”), as financial advisor to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Eighth Monthly Statement of Fees and Expenses Incurred by TetraRho LLC as Financial Advisor to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from November 1, 2024 through November 30, 2024* (the “Monthly Fee Statement”).

**Itemization of Services Rendered and Expenses Incurred**

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

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<sup>1</sup> The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors’ address is 800-E Beaty Street, Davidson, North Carolina 28036.

**Total Fees and Expenses for the Fee Statement Period**

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

<b>Fee Statement Period: November 1, 2024 – November 30, 2024</b>	
Total Fees:	\$2,280.00
Total Expenses:	\$0.00
<b>TOTAL:</b>	<b>\$2,280.00</b>

3. Pursuant to the Interim Compensation Order, Tetra seeks payment of \$2,052.00 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Tetra’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.,

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, 31<sup>st</sup> 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).

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 Tetra, no later than December 18, 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 Tetra 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 Tetra.

This is the 4<sup>th</sup> 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.

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Email: jguy@orrick.com

dfelder@orrick.com

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

# **Exhibit A**



TetraRho LLC  
1900 Half Moon Bay Drive  
Croton, NY 10520

Date	Invoice #	Due Date	FEIN #
12/02/2024	ALD 202411	12/31/2024	93-4281061

Jonathan Guy  
Orrick, Herrington & Sutcliffe LLP  
2100 Pennsylvania Ave., NW  
Washington, DC 20037

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

**Professional Services Rendered for the Month of November 2024 (Aldrich Pump FCR)**

<b>Total Invoice Amount:</b>	<b>\$2,280.00</b>
------------------------------	-------------------

Remittance Information:  
TetraRho LLC  
Jason Solganick  
1900 Half Moon Bay Drive  
Croton, NY 10520



Project: Aldrich Pump FCR  
 Invoice Date: 12/02/2024  
 Invoice #: ALD 202411  
 Professional Services Through: 11/30/2024

**Invoice Summary**

Professional Services: \$2,280.00  
 Total Amount Due: \$2,280.00

**Summary by Person:**

<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Jason Solganick	Managing Director	\$950.00	2.4	\$2,280.00
<b>Total</b>			<b>2.4</b>	<b>\$2,280.00</b>

**Time Detail:**

<u>Date</u>	<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>	<u>Category</u>
11/1/2024	Jason Solganick	Mng. Dir.	0.8	950.0	\$ 760.00	Review Trane 10Q filing for 3Q2024	Business Operations
11/1/2024	Jason Solganick	Mng. Dir.	0.3	950.0	\$ 285.00	Review monthly operating reports (September 2024)	Business Operations
11/4/2024	Jason Solganick	Mng. Dir.	0.3	950.0	\$ 285.00	Review interim fee application	Staffing Report/ Fee Applications
11/8/2024	Jason Solganick	Mng. Dir.	0.2	950.0	\$ 190.00	Review case dockets	Business Operations
11/15/2024	Jason Solganick	Mng. Dir.	0.3	950.0	\$ 285.00	Review news updates for relevant coverage	Business Operations
11/21/2024	Jason Solganick	Mng. Dir.	0.2	950.0	\$ 190.00	Review case dockets	Business Operations
11/26/2024	Jason Solganick	Mng. Dir.	0.3	950.0	\$ 285.00	Review monthly operating reports (October 2024)	Business Operations
<b>Total:</b>			<b>2.4</b>		<b>\$ 2,280.00</b>		

**Outstanding Invoices:**

202406	7/02/24	\$161.50
202407	8/1/24	\$427.49
202408	9/3/24	\$266.00
202409	10/1/24	\$655.50
202410	11/1/24	\$6,650.00



# **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> , <sup>1</sup>	)	Case No. 20-30608
	)	
Debtors.	)	(Jointly Administered)
	)	

**NINTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
TETRARHO LLC AS FINANCIAL ADVISOR 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 Authorizing Joseph W. Grier, III, the Future Claimants’ Representative, to Retain and Employ TetraRho LLC as Financial Advisor*, effective as of April 5, 2024 (Dkt. No. 2187), TetraRho LLC (“Tetra”), as financial advisor to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Ninth Monthly Statement of Fees and Expenses Incurred by TetraRho LLC as Financial Advisor to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from December 1, 2024 through December 31, 2024* (the “Monthly Fee Statement”).

**Itemization of Services Rendered and Expenses Incurred**

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

---

<sup>1</sup> The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors’ address is 800-E Beaty Street, Davidson, North Carolina 28036.

**Total Fees and Expenses for the Fee Statement Period**

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

<b>Fee Statement Period: December 1, 2024 – December 31, 2024</b>	
Total Fees:	\$855.00
Total Expenses:	\$0.00
<b>TOTAL:</b>	<b>\$855.00</b>

3. Pursuant to the Interim Compensation Order, Tetra seeks payment of \$769.50 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Tetra’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.,

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, 31<sup>st</sup> 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).

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 Tetra, no later than January 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 Tetra 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 Tetra.

This is the 4<sup>th</sup> 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**



TetraRho LLC  
1900 Half Moon Bay Drive  
Croton, NY 10520

Date	Invoice #	Due Date	FEIN #
1/02/2025	ALD 202412	1/31/2025	93-4281061

Jonathan Guy  
Orrick, Herrington & Sutcliffe LLP  
2100 Pennsylvania Ave., NW  
Washington, DC 20037

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

**Professional Services Rendered for the Month of December 2024 (Aldrich Pump FCR)**

<b>Total Invoice Amount:</b>	<b>\$855.00</b>
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Remittance Information:  
TetraRho LLC  
Jason Solganick  
1900 Half Moon Bay Drive  
Croton, NY 10520



Project: Aldrich Pump FCR  
 Invoice Date: 1/02/2025  
 Invoice #: ALD 202412  
 Professional Services Through: 12/31/2024

**Invoice Summary**

Professional Services: \$855.00  
 Total Amount Due: \$855.00

**Summary by Person:**

<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Jason Solganick	Managing Director	\$950.00	<u>0.9</u>	<u>\$855.00</u>
<b>Total</b>			<b>0.9</b>	<b>\$855.00</b>

**Time Detail:**

<u>Date</u>	<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>	<u>Category</u>
12/5/2024	Jason Solganick	Mng. Dir.	0.2	950.0	\$ 190.00	Review case dockets	Business Operations
12/10/2024	Jason Solganick	Mng. Dir.	0.1	950.0	\$ 95.00	Review release re: share repurchase program	Business Operations
12/20/2024	Jason Solganick	Mng. Dir.	0.2	950.0	\$ 190.00	Review case dockets	Business Operations
12/20/2024	Jason Solganick	Mng. Dir.	0.2	950.0	\$ 190.00	Review news updates for relevant coverage	Business Operations
12/30/2024	Jason Solganick	Mng. Dir.	<u>0.2</u>	950.0	<u>\$ 190.00</u>	Review monthly operating reports (November 2024)	Business Operations
<b>Total:</b>			<b><u>0.9</u></b>		<b><u>855.0</u></b>		

**Outstanding Invoices:**

202410 11/1/24 \$664.99  
 202411 12/1/24 \$2,280.00



# **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> , <sup>1</sup>	)	Case No. 20-30608 (LMJ)
	)	
Debtors.	)	(Jointly Administered)
	)	

**TENTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
TETRARHO LLC AS FINANCIAL ADVISOR 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 Authorizing Joseph W. Grier, III, the Future Claimants’ Representative, to Retain and Employ TetraRho LLC as Financial Advisor*, effective as of April 5, 2024 (Dkt. No. 2187), TetraRho LLC (“Tetra”), as financial advisor to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Tenth Monthly Statement of Fees and Expenses Incurred by TetraRho LLC as Financial Advisor to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from January 1, 2025 through January 31, 2025* (the “Monthly Fee Statement”).

**Itemization of Services Rendered and Expenses Incurred**

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

---

<sup>1</sup> The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors’ address is 800-E Beaty Street, Davidson, North Carolina 28036.

**Total Fees and Expenses for the Fee Statement Period**

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

<b>Fee Statement Period: January 1, 2025 – January 31, 2025</b>	
Total Fees:	\$2,755.00
Total Expenses:	\$0.00
<b>TOTAL:</b>	<b>\$2,755.00</b>

3. Pursuant to the Interim Compensation Order, Tetra seeks payment of \$2,479.50 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Tetra’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.,

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, 31<sup>st</sup> 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).

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 Tetra, no later than February 17, 2025 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay Tetra 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 Tetra.

This is the 3<sup>rd</sup> 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**



TetraRho LLC  
1900 Half Moon Bay Drive  
Croton, NY 10520

Date	Invoice #	Due Date	FEIN #
2/02/2025	ALD 202501	2/28/2025	93-4281061

Jonathan Guy  
Orrick, Herrington & Sutcliffe LLP  
2100 Pennsylvania Ave., NW  
Washington, DC 20037

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

**Professional Services Rendered for the Month of January 2025 (Aldrich Pump FCR)**

<b>Total Invoice Amount:</b>	<b>\$2,755.00</b>
------------------------------	-------------------

Remittance Information:  
TetraRho LLC  
Jason Solganick  
1900 Half Moon Bay Drive  
Croton, NY 10520



Project: Aldrich Pump FCR  
 Invoice Date: 2/02/2025  
 Invoice #: ALD 202501  
 Professional Services Through: 1/31/2025

**Invoice Summary**

Professional Services: \$2,755.00  
 Total Amount Due: \$2,755.00

**Summary by Person:**

<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Jason Solganick	Managing Director	\$950.00	2.9	\$2,755.00
<b>Total</b>			<b>2.9</b>	<b>\$2,755.00</b>

**Time Detail:**

<u>Date</u>	<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>	<u>Category</u>
1/9/2025	Jason Solganick	Mng. Dir.	0.2	950.0	\$ 190.00	Review case dockets	Business Operations
1/16/2025	Jason Solganick	Mng. Dir.	0.2	950.0	\$ 190.00	Review news updates for relevant coverage	Business Operations
1/24/2025	Jason Solganick	Mng. Dir.	0.2	950.0	\$ 190.00	Review periodic report regarding value, operations and profitability	Business Operations
1/30/2025	Jason Solganick	Mng. Dir.	1.0	950.0	\$ 950.00	Listen to Trane 4Q2024 earnings call	Business Operations
1/31/2025	Jason Solganick	Mng. Dir.	0.2	950.0	\$ 190.00	Review monthly operating reports (December 2024)	Business Operations
1/31/2025	Jason Solganick	Mng. Dir.	0.7	950.0	\$ 665.00	Review Trane financial results presentation for 4Q2024	Business Operations
1/31/2025	Jason Solganick	Mng. Dir.	0.3	950.0	\$ 285.00	Review Trane 4Q2024 financial results news release	Business Operations
1/31/2025	Jason Solganick	Mng. Dir.	0.1	950.0	\$ 95.00	Review news updates for relevant coverage	Business Operations
<b>Total:</b>			<b>2.9</b>		<b>\$ 2,755.00</b>		

**Outstanding Invoices:**

202410 11/1/24 \$664.99  
 202411 12/1/24 \$227.99  
 202412 1/1/25 \$855.00



# EXHIBIT B

## CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

October 1, 2024 through January 31, 2025

Project Category	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)
Business Operations	8.6	58.2	\$8,170.00	\$55,290.00
Litigation	4.3	17.8	\$4,085.00	\$16,910.00
Staffing Report/Fee Applications	0.3	1.1	\$285.00	\$1,045.00
<b>TOTAL:</b>	<b>13.2</b>	<b>77.1</b>	<b>\$12,540.00</b>	<b>\$73,245.00</b>

# EXHIBIT C

**CUMULATIVE EXPENSE SUMMARY**

**October 1, 2024 through January 31, 2025**

Expense Category	Total Expenses for the Period	Total Expenses from the Petition Date
N/A	\$0.00	\$0.00

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

October 1, 2024 through January 31, 2025

Name of Professional	Position	2024 Hourly Billing Rate	Total Hours Billed	Total Compensation
Jason Solganick	Managing Director	\$950	13.2	\$12,540.00
Total:			13.2	\$12,540.00

# 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 <sup>st</sup> Interim	7/11/2024; Dkt. No. 2303	4/5/2024 – 5/31/2024	\$45,600.00	\$0.00	Dkt. No. 2342; 8/2/2024
2 <sup>nd</sup> Interim	11/13/2024; Dkt. No. 2445	6/1/2024 – 9/30/2024	\$15,105.00	\$0.00	Dkt. No. 2484; 12/12/2024