

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 20-30608

(Jointly Administrated)

**SUMMARY OF THIRTEENTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES OF GILBERT LLP, SPECIAL INSURANCE COUNSEL TO THE  
OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS,  
FOR THE PERIOD OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Official Committee of Asbestos Personal Injury Claimants
Date of retention:	Order entered December 22, 2020, effective as of November 24, 2020
Period for which compensation and reimbursement are sought:	October 1, 2024 through January 31, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$4,045.00
Amount of expenses sought as as actual, reasonable, and necessary:	\$0.00
Amount of compensation paid as actual, reasonable and necessary for applicable period:	\$3,640.51
Amount of expenses reimbursed as actual, reasonable and necessary for applicable period:	\$0.00

<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.



2030608250321000000000002

Total amount of unpaid fees and expenses  
sought for applicable period: \$404.49

This is an:   x   interim        final application

**MONTHLY FEE STATEMENTS**

Date Submitted	Period Covered	Fees Requested	Expenses Requested	Fees Paid (90%)	Expenses Paid (100%)
11/26/2024	10/01/2024–10/31/2024	\$4,045.00	\$0.00	\$3,640.51	\$0.00
	<b>Total</b>	<b>\$4,045.00</b>	<b>\$0.00</b>	<b>\$3,640.51</b>	<b>\$0.00</b>

**SUMMARY OF FEES BY PROFESSIONAL**

Name	Position	Bar Year	Hourly Rate	Hours Billed	Total Compensation
Heather Frazier	Partner	2009	\$925.00	0.4	\$370.00
Brandon Levey	Associate	2017	\$750.00	4.9	\$3,675.00
			<b>Total</b>	<b>5.3</b>	<b>\$4,045.00</b>

**SUMMARY OF FEES BY PROJECT CATEGORY**

Matter	Project Category	Hours	Fees
001	Insurance Analysis & Recovery	2.2	\$1,720.00
004	Hearings	3.1	\$2,325.00
	<b>Total</b>	<b>5.3</b>	<b>\$4,045.00</b>

**SUMMARY OF EXPENSES**

Expense	Total
N/A	\$0.00
<b>Total</b>	<b>\$0.00</b>

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

In re

ALDRICH PUMP LLC, *et al.*,

Debtors.<sup>2</sup>

Chapter 11

Case No. 20-30608

(Jointly Administrated)

**THIRTEENTH INTERIM APPLICATION FOR ALLOWANCE OF COMPENSATION  
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES OF  
GILBERT LLP, SPECIAL INSURANCE COUNSEL TO THE OFFICIAL  
COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS, FOR  
THE PERIOD OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

Gilbert, LLP (“Gilbert”), special insurance counsel to the Official Committee of Asbestos Personal Injury Claimants (the “Committee”) of Aldrich Pump LLC, *et al.*, (the “Debtors”), hereby submits its thirteenth interim fee application (the “Thirteenth Interim Application”) for allowance of compensation for professional services rendered and reimbursement of actual and necessary expenses incurred for the period October 1, 2024 through January 31, 2025 (the “Application Period”).

**JURISDICTION AND STATUTORY BASIS FOR RELIEF**

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1334 and 157. This Thirteenth Interim Application is made pursuant to 11 U.S.C. § 331.

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<sup>2</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.

## **BACKGROUND**

2. On June 18, 2020, (the “Petition Date”), the Debtors filed voluntary petitions for relief under Chapter 11 under Title 11 of the United States Code (the “Bankruptcy Code”).

3. The Debtors have continued to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. On June 30, 2020, the Office of the United States Bankruptcy Administrator (the “Bankruptcy Administrator”) filed its *Motion of the Bankruptcy Administrator to Appoint Official Committee of Asbestos Claimants* [Docket No. 126]. On July 7, 2020, the Court entered an order appointing the Committee pursuant to section 1102 of the Bankruptcy Code [Docket No. 147].

5. On July 15, 2020, the Court entered an *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “Interim Compensation Order”) [Docket No. 171].

6. On December 22, 2020, the Committee filed and served an *Ex Parte Application to Retain and Employ Gilbert LLP* (the “Retention Application”) as its special insurance counsel [Docket No. 483]. On December 22, 2020, the Court entered an order approving the Retention Application [Docket No. 484].

7. Pursuant to the Interim Compensation Order, professionals may request monthly compensation and reimbursement. Such requests are to be served on certain identified parties for review (the “Notice Parties”). 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.

8. Beginning with the period ending September 30, 2020, the Interim Compensation Order also requires each retained professional to file at four-month intervals an application for interim Court approval and allowance pursuant to section 331 of the Bankruptcy Code of 100% of the compensation for services and reimbursement of expenses for prior months not already included in a previous interim fee application.

**SERVICES TO BE PROVIDED**

9. As set forth in the *Declaration of Kami E. Quinn in Support of the Ex Parte Application of the Official Committee of Asbestos Personal Injury Claimants for an Order Authorizing it to Retain and Employ Gilbert, LLP as Special Insurance Counsel, Effective as of November 24, 2020* [Docket No. 483], Gilbert was engaged by the Committee to perform the following services:

- A. analyzing the Debtors' insurance policies and providing strategic advice as to the coverage potentially available to respond to asbestos claims;
- B. advising the Committee on steps to be taken to preserve insurance coverage and maximize insurance recoveries;
- C. attending meetings and negotiations with the Committee, representatives of the Debtors, their insurance carriers, and other parties-in-interest in these Chapter 11 Cases related to the preservation of insurance coverage;
- D. advising and representing the Committee with respect to insurance settlements executed prior to the commencement of these Chapter 11 Cases;
- E. advising and representing the Committee with respect to the use of insurance coverage and insurance proceeds in connection with a plan of reorganization;
- F. advising and representing the Committee with respect to other matters and pleadings that may be raised by insurers or that may impact insurance coverage;
- G. advising and representing the Committee in any dispute that may arise including, but not limited to, an adversary proceeding, arbitration, or mediation related to insurance coverage; and

- H. assisting the Committee with any other insurance-related matters arising in conjunction with the formulation of a plan of reorganization and funding of a trust for the payment of asbestos claims established under plan.

**MONTHLY FEE STATEMENTS DURING THE APPLICATION PERIOD**

10. In accordance with the Interim Compensation Order, Gilbert provided the Notice Parties with true and correct copies of the monthly fee statements as follows:

- For the period October 1, 2024 through October 31, 2024: fees in the amount of \$4,045.00 and no expenses (the “October Monthly Fee Statement”). A copy of the October Monthly Fee Statement is attached hereto as Exhibit B.

11. Gilbert submitted monthly fee statements during the Application Period of fees in the total amount of \$4,045.00 and no expenses. A chart summarizing the monthly statements submitted during this Application Period is included in the summary cover pages submitted with this Thirteenth Interim Application.

**SUMMARY OF SERVICES**

12. The professional services performed by Gilbert during the Application Period were necessary and appropriate to the administration of these Chapter 11 Cases. The services were in the best interest of the Committee, the Debtors, and creditors. The compensation requested is commensurate with the complexity and nature of the issues and tasks involved.

13. During the Application Period, Gilbert devoted 5.3 hours to the representation of the Committee in these Chapter 11 Cases. A summary of the services performed by Gilbert professionals and paraprofessionals during the Application Period by category is as follows:

**A. Insurance Analysis & Recovery (001):  
Hours: 2.2; Fees: \$1,720.00**

This category generally includes time spent by Gilbert related to analyzing insurance issues, policies and related documents, preparing an insurance presentation for co-counsel,

researching coverage-in-place agreements, conducting document review, analyzing discovery issues, and communicating with co-counsel.

**B. Hearings (004):  
Hours: 3.1; Fees: \$2,325.00**

This category includes time spent by Gilbert attending an omnibus hearing.

All of Gilbert's work reflected in the Thirteenth Interim Application was necessary, reasonable, and beneficial to the Committee and its constituency.

**EXPENSES INCURRED DURING THE APPLICATION PERIOD**

14. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by the professionals employed in a chapter 11 case. Gilbert seeks no reimbursement for actual expenses during the Application Period.

15. It is Gilbert's policy to bill clients for all other expenses incurred and disbursements in connection with representation of its clients. These costs include, but are not limited to, major photocopying charges, courier and overnight delivery charges, travel expenses (including mileage, parking, airfare, lodging, meals, and ground transportation), costs incurred related to litigation support systems, and filing fees. Gilbert's practice is to bill costs to its clients at the same rate at which they are billed and paid; Gilbert does not write up costs for a profit. Gilbert does not bill clients for overhead, telephone, facsimile or routine copying charges. Gilbert charges for these expenses in a manner and at rates consistent with charges made generally to the firm's other clients and the Local Rules.

16. Gilbert submits that the actual expenses incurred in providing professional services during the Application Period were necessary, reasonable and justified to serve the needs of the Committee in these Chapter 11 Cases. A summary of the expenses incurred is included on the summary pages submitted with this Thirteenth Interim Application.

**LEGAL BASIS FOR REQUESTED RELIEF**

17. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court's award of such compensation. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 1103 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered . . . and . . . reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1)(A) and (B).

18. Section 330 of the Bankruptcy Code also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded to . . . [a] professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3)(A)-(F).



20. The foregoing professional services performed by Gilbert were appropriate and necessary to the effective administration of these Chapter 11 Cases. The services were in the best interests of the Committee. Compensation for the foregoing services as requested is commensurate with the complexity, importance, and nature of the problems, as well as issues or tasks involved. The professional services were performed in an appropriately expeditious and efficient manner. In addition, Gilbert has made every effort to minimize its disbursements in this case. The actual expenses incurred in providing professional services were necessary, reasonable, and justified under the circumstances to serve the needs of the Committee.

21. In accordance with section 504 of the Bankruptcy Code and Fed. R. Bankr. P. 2016(a), no agreement or understanding exists between Gilbert and any other person for the sharing of compensation received or to be received for services rendered in or in connection with this case.

22. No agreement or understanding prohibited by 18 U.S.C. § 155 has been or will be made by Gilbert.

**COMPENSATION REQUESTED FOR THE APPLICATION PERIOD**

23. The services for which Gilbert seeks compensation in this Thirteenth Interim Application were, at the time rendered, necessary for, beneficial to, and in the best interests of, the Committee and the Debtors' estates. The services rendered by Gilbert were consistently performed in a timely manner commensurate with the complexity, importance, and nature of the issues involved. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Gilbert is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the

services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

#### **NO PRIOR REQUEST**

24. No prior request for the relief sought in this Thirteenth Interim Application has been made to this or any other court in connection with these Chapter 11 Cases apart from the delivery of the monthly fee statements.

#### **RESERVATION OF RIGHTS**

25. The Committee expressly reserves all rights with respect to challenging the validity, propriety, jurisdiction, and venue of these Chapter 11 Cases, including without limitation seeking to dismiss these Chapter 11 Cases pursuant 11 U.S.C. § 1112 and seeking to transfer these Chapter 11 Cases pursuant to 28 U.S.C. §§ 1406 and 1408 and 11 U.S.C. § 105.

#### **NOTICE**

26. Notice of this Thirteenth Interim Application has been provided in accordance with the Interim Compensation Order. Gilbert submits that no other or further notice need be provided.

#### **CONCLUSION**

WHEREFORE, Gilbert respectfully requests that the Court: (i) enter the order attached as Exhibit A granting the Thirteenth Interim Application and authorizing interim allowance of compensation in the amount of \$4,045.00 for professional services rendered on behalf of the Official Committee of Asbestos Personal Injury Claimants and reimbursement for actual and necessary expenses in the amount of \$0.00; (ii) direct payment by the Debtors of the foregoing

amounts less any amount already paid pursuant to the Interim Compensation Order; and

(iii) grant such other and further relief as the Court deems just and proper.

Dated: March 21, 2025  
Charlotte, North Carolina

HAMILTON STEPHENS STEELE  
+ MARTIN, PLLC

/s/ Glenn C. Thompson  
Glenn C. Thompson (Bar No. 37221)  
525 North Tryon Street, Suite 1400  
Charlotte, North Carolina 28202  
Telephone: (704) 344-1117  
Facsimile: (704) 344-1483  
gthompson@lawhssm.com

*Local Counsel for the Official Committee of  
Asbestos Personal Injury Claimants*

and

GILBERT LLP

/s/ Kami E. Quinn  
Kami E. Quinn (*Admitted pro hac vice*)  
700 Pennsylvania Avenue SE, Suite 400  
Washington, DC 20003  
Telephone: (202) 772-2336  
quinnk@gilbertlegal.com

*Special Insurance Counsel for the Official  
Committee of Asbestos Personal Injury Claimants*

**EXHIBIT A**

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

In re

ALDRICH PUMP LLC, *et al.*,

Debtors.<sup>3</sup>

Chapter 11

Case No. 20-30608

(Jointly Administrated)

**ORDER GRANTING THIRTEENTH INTERIM APPLICATION FOR ALLOWANCE  
OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES OF GILBERT LLP, SPECIAL INSURANCE COUNSEL TO THE  
OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS,  
FOR THE PERIOD OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

This matter coming before the Court on the *Thirteenth Interim Application for Allowance of Compensation for Services Rendered and Reimbursement of Expenses of Gilbert LLP, Special Insurance Counsel to the Official Committee of Asbestos Personal Injury Claimants, for the*

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<sup>3</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.

*Period October 1, 2024 through January 31, 2025* (the “Thirteenth Interim Application”)<sup>4</sup> filed by Gilbert LLP (“Gilbert”), special insurance counsel to the Official Committee of Asbestos Personal Injury Claimants (the “Committee”); the Court having reviewed the Thirteenth Interim Application; the Court having found that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); (c) notice of the Thirteenth Interim Application was sufficient pursuant to Local Rule 2002-1(g) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 171] (the “Interim Compensation Order”) and no other or further notice is required; (d) the compensation requested in the Thirteenth Interim Application is reasonable and for actual and necessary services rendered by Gilbert on behalf of the Committee during the period of October 1, 2024 through January 31, 2025 (the “Application Period”); (e) the expenses for which reimbursement is sought in the Thirteenth Interim Application are actual and necessary expenses incurred by Gilbert during the Application Period on behalf of the Committee; and (f) Thirteenth Interim Application fully complies with the Interim Compensation Order, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Guidelines; and the Court having determined that the legal and factual bases set forth in the Thirteenth Interim Application establish just cause for the relief granted herein:

1. The Thirteenth Interim Application is GRANTED.
2. Gilbert is awarded, on an interim basis, compensation for professional services rendered during the Application Period in the amount of \$4,045.00 and reimbursement for actual and necessary expenses incurred by Gilbert during the Application Period in the amount of \$0.00.

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<sup>4</sup> Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Thirteenth Interim Application.

3. The Debtors are authorized and directed to pay Gilbert promptly the fees and expenses approved in this Order to the extent such amounts have not been paid previously by the Debtors.

4. The Debtors and Gilbert are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

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

This Order has been signed electronically.  
The Judge's signature and court's seal appear  
at the top of the Order.

United States Bankruptcy Court

**EXHIBIT B**





700 Pennsylvania Avenue, SE  
Suite 400  
Washington, DC 20003  
O 202.772.2200  
F 202.772.3333  
[GilbertLegal.com](http://GilbertLegal.com)

APICC for Aldrich Pump LLC, et al.  
c/o Kevin Maclay, Esq.  
Caplin & Drysdale, Chartered  
One Thomas Circle NW, Suite 1100  
Washington, DC 20005

November 26, 2024  
Invoice Number: 11335906  
Client Number: 1626

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**FOR PROFESSIONAL SERVICES RENDERED through October 31, 2024**

**Re: APICC for Aldrich Pump LLC**

<b>Matter Description</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
Insurance Analysis & Recovery	1,720.00	.00	1,720.00
Hearings	2,325.00	.00	2,325.00
<b>Total</b>	<b>4,045.00</b>	<b>.00</b>	<b>4,045.00</b>
TOTAL FEES			\$ 4,045.00
TOTAL EXPENSES			<u>\$ .00</u>
<b>TOTAL FEES AND EXPENSES</b>			<b>\$ 4,045.00</b>

**FOR PROFESSIONAL SERVICES RENDERED through October 31, 2024**

**Insurance Analysis & Recovery**

<b>Date</b>	<b>Name</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
10/07/24	Levey, B.	Confer with Committee re upcoming filing and oral argument.	.90	675.00
10/07/24	Levey, B.	Draft memorandum re Committee meeting and next steps.	.40	300.00
10/09/24	Frazier, H.	Review draft status report.	.40	370.00
10/24/24	Levey, B.	Review status brief filed by ACC.	.50	375.00
<b>TOTAL CHARGEABLE HOURS</b>			<b>2.20</b>	
<b>TOTAL FEES</b>				<b>\$ 1,720.00</b>

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Frazier, H.	.40	925.00	370.00
Levey, B.	1.80	750.00	1,350.00
<b>TOTALS</b>	<b>2.20</b>		<b>\$ 1,720.00</b>
<b>TOTAL FEES AND EXPENSES FOR MATTER</b>			<b>\$ 1,720.00</b>

Invoice Number: 11335906  
November 26, 2024

**FOR PROFESSIONAL SERVICES RENDERED through October 31, 2024**

**Hearings**

<b>Date</b>	<b>Name</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
10/24/24	Levey, B.	Attend omnibus hearing.	3.10	2,325.00
<b>TOTAL CHARGEABLE HOURS</b>			<b>3.10</b>	
<b>TOTAL FEES</b>				<b>\$ 2,325.00</b>

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Levey, B.	3.10	750.00	2,325.00
<b>TOTALS</b>	<b>3.10</b>		<b>\$ 2,325.00</b>
<b>TOTAL FEES AND EXPENSES FOR MATTER</b>			<b>\$ 2,325.00</b>
<b>TOTAL FEES AND EXPENSES</b>			<b>\$ 4,045.00</b>

**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 Administrated)

**NOTICE OF FILING AND OPPORTUNITY FOR HEARING**

**(No Protest Notice – No Hearing Will be Held Unless a Request for Hearing is Filed)**

PLEASE TAKE NOTICE that the Official Committee of Asbestos Personal Injury Claimants (the “Committee”) filed the *Thirteenth Interim Application for Allowance of Compensation for Services Rendered and Reimbursement of Expenses of Gilbert LLP, Special Insurance Counsel to the Official Committee of Asbestos Personal Injury Claimants, for the Period October 1, 2024 Through January 31, 2025* (the “Application”).

If a copy of the Application is not included with this Notice, a copy may be viewed at the Court’s website, [www.ncwb.uscourts.gov](http://www.ncwb.uscourts.gov), under Debtor Aldrich Pump LLC’s name and case number; you may obtain a copy of the Application from the Debtors’ claims and noticing agent at [www.veritaglobal.net/aldrich](http://www.veritaglobal.net/aldrich); or you may request in writing a copy from the undersigned counsel to the Committee.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THESE BANKRUPTCY CASES. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)**

**IF YOU DO NOT WANT THE COURT TO GRANT THE RELIEF REQUESTED IN THE APPLICATION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE APPLICATION, THEN ON OR BEFORE APRIL 4, 2025 YOU MUST:**

1. File a formal, written response with the Bankruptcy Court at:

Clerk, United States Bankruptcy Court  
Charles Jonas Federal Building  
401 West Trade Street  
Charlotte, NC 28202

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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.

2. Serve a copy of your response on all parties in interest, including:

- a) U.S. Bankruptcy Administrator  
401 West Trade Street, Suite 2400  
Charlotte, NC 28202
- b) HAMILTON STEPHENS STEELE + MARTIN, PLLC  
Glenn C. Thompson  
525 North Tryon Street, Suite 1400  
Charlotte, NC 28202
- c) GILBERT LLP  
Kami E. Quinn  
700 Pennsylvania Avenue SE, Suite 400  
Washington, DC 20003

If you do not want the Court to grant the relief requested in the Application or if you want the Court to consider your views on the Application, then you or your attorney should attend the hearing on **April 24, 2025 at 9:30 a.m. (ET)** before the Honorable Lena M. James at the United States Bankruptcy Court, Charles Jonas Federal Building, Courtroom 2B, 401 West Trade Street, Charlotte, North Carolina 28202.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought and may enter an Order granting the relief requested. If no objections are timely filed and served, the court may rule on the Application without a hearing. No further notice of that hearing will be given.

Dated: March 21, 2025  
Charlotte, North Carolina

HAMILTON STEPHENS  
STEELE + MARTIN, PLLC

/s/ Glenn C. Thompson

Glenn C. Thompson (Bar No. 37221)  
525 North Tryon Street, Suite 1400  
Charlotte, North Carolina 28202  
Telephone: (704) 344-1117  
Facsimile: (704) 344-1483  
gthompson@lawhssm.com

*Counsel to the Official Committee of Asbestos  
Personal Injury Claimants*