

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re:

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

Debtor.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

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SUPPLEMENT TO  
MAUNE RAICHLE HARTLEY FRENCH & MUDD LLC'S OBJECTION TO THE  
DEBTORS' MOTION TO AMEND CASE MANAGEMENT  
ORDER FOR ESTIMATION OF ASBESTOS CLAIMS

All mesothelioma claimants represented by Maune Raichle Hartley French & Mudd LLC ("MRHFM"), through its undersigned counsel, hereby supplement *Maune Raichle Hartley French & Mudd LLC's Objection To The Debtors' Motion To Amend Case Management Order For Estimation Of Asbestos Claims* [Dkt. 2596] with the Declaration of Robert Semian, attached as Exhibit A.

Dated: March 24, 2025.      Respectfully submitted,

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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.



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**WALDREP WALL BABCOCK & BAILEY PLLC**

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**MAUNE RAICHLE HARTLEY FRENCH &  
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*Counsel to Various Claimants Holding Mesothelioma  
Claims*

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I am, and at all times hereafter mentioned was, more than 18 years of age and that on this day I caused a copy of the foregoing **SUPPLEMENT TO MAUNE RAICHLE HARTLEY FRENCH & MUDD LLC'S OBJECTION TO THE DEBTORS' MOTION TO AMEND CASE MANAGEMENT ORDER FOR ESTIMATION OF ASBESTOS CLAIMS** to be served via this Court's CM/ECF system on those parties registered to receive electronic notices for this case.

Dated: March 24, 2025.

/s/ Thomas W. Waldrep, Jr. \_\_\_\_\_

Thomas W. Waldrep Jr. (NC State Bar No. 11135)

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*Counsel to Various Claimants Holding  
Mesothelioma Claims*

**Exhibit A**

- ## DECLARATION OF ROBERT SEMIAN

9. I object to this bankruptcy. I object to the Debtors' proposed plan, which does not permit me to pursue all state law damages available to me against Trane and the Debtors before a jury.
10. I do not agree to compromise my constitutional right to have a jury trial and to collect my full, jury determined damages. I do not agree to negotiate while my rights are stranded in the bankruptcy court by the automatic stay, which has been wrongfully invoked by these wealthy, profitable and non-distressed companies.
11. Estimation will have no impact on my decision to try my case before a jury or settle with Trane and the Debtors because they can pay all claims—including mine—in full outside of bankruptcy.
12. I object to anyone else, including the Official Committee of Asbestos Claimants, mediating my claims against Trane and the Debtors on my behalf. I will only negotiate my claims individually with Trane and the Debtors.

I declare under penalty of perjury that the foregoing is true and correct.

Robert Semian  
Robert Semian

MARCH-19-2025  
Dated