

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

In re

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

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

**DECLARATION OF CARRIE V. HARDMAN IN FURTHER SUPPORT OF THE *EX PARTE* APPLICATION OF THE OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS FOR AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF WINSTON & STRAWN, LLP AS SPECIAL LITIGATION AND INTERNATIONAL COUNSEL, EFFECTIVE AS OF JULY 6, 2020**

I, Carrie V. Hardman, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am a partner of the law firm Winston & Strawn LLP (“Winston”) and am authorized to execute this declaration on behalf of Winston. I am a member in good standing of the Bar of the State of New York, and I have been admitted to practice in New York. There are no disciplinary proceedings pending against me.

2. On August 4, 2020, the Official Committee of Asbestos Personal Injury Claimants (the “Committee”) filed with this Court the *Ex Parte Application of the Official Committee of Asbestos Personal Injury Claimants for an Order Authorizing the Retention and Employment of Winston & Strawn, LLP as Special Litigation and International Counsel, Effective as of July 6, 2020* [Docket No. 212] (the “Application”).<sup>2</sup>

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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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Application.



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3. Attached as Exhibit B to the Application was the *Declaration of David Neier* (the “Original Declaration”).

4. On August 24, 2020, the Court entered the *Amended Ex Parte Order Authorizing the Retention and Employment of Winston & Strawn LLP as Special Litigation Counsel, Effective as of July 6, 2020* [Docket No. 279].

5. I submit this supplemental declaration (the “Supplemental Declaration”) in further connection with the Application and Original Declaration in order to provide additional disclosures in accordance with Bankruptcy Rule 2014(a). Except as otherwise indicated in this Supplemental Disclosure, all facts stated in this Supplemental Disclosure are based on my personal knowledge, information learned from my review of relevant documents, and information supplied to me by Winston’s partners or employees. If called upon to testify, I would testify on that basis.

6. None of the additional representations or disclosures described herein are materially adverse to the interests of the Debtors, their estates, non-debtor defendants, or any class of creditors.

### **Specific Disclosures**

7. Winston has a large and diversified legal practice that encompasses the representation of many commercial enterprises. Winston maintains a regularly updated conflicts check system to ensure compliance with applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, and applicable standards of professional ethics.

8. A review of Winston’s conflict check system conducted in advance of the start date for Winston’s 2025 summer associates indicated that a summer associate in Winston’s Charlotte, North Carolina office, Laila Robinson, interned for the Honorable Laura T. Beyer, United States

Bankruptcy Judge for the Western District of North Carolina in the summer of 2023. I do not believe the relationship creates a conflict of interest.

9. Laila Robinson will not provide services to the Committee in connection with these chapter 11 cases and is screened from these cases. Specifically, Winston has established an ethical screen (the “Ethical Wall”) separating Laila Robinson from attorneys representing the Committee. The Ethical Wall prevents employees on one side of the screen from accessing any and all client-related files and information that is maintained across the screen. Winston attorneys are further prohibited from discussing, disclosing, or otherwise communicating with Laila Robinson on any matter related to the above-captioned cases.

10. If any additional material relevant facts or relationships are discovered or arise, Winston will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a)

11. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 18, 2025

By: /s/ Carrie V. Hardman  
Carrie V. Hardman