

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

In re:

CASE NO. 20-30608

ALDRICH PUMP LLC, *et al.*,¹

CHAPTER 11

Debtors.

Jointly Administered

**SUMMARY OF FIFTEENTH INTERIM APPLICATION FOR COMPENSATION OF
GRIER WRIGHT MARTINEZ, PA FOR SERVICES RENDERED TO AND FOR
REIMBURSEMENT OF EXPENSES AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM FEBRUARY 1, 2025 THROUGH MAY 31, 2025**

Name of Applicant:	Grier Wright Martinez, PA
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Appointment:	October 14, 2020
Period for which compensation and reimbursement is sought:	February 1, 2025 through May 31, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$7,585.50
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$4.30
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$7,589.80

This is a(n) x interim final application.

¹ 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.



**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
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In re:

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

CASE NO. 20-30608

CHAPTER 11

Jointly Administered

**FIFTEENTH INTERIM APPLICATION FOR COMPENSATION OF GRIER WRIGHT
MARTINEZ, PA FOR SERVICES RENDERED TO AND FOR REIMBURSEMENT OF
EXPENSES AS COUNSEL TO JOSEPH W. GRIER, III,
THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM FEBRUARY 1, 2025 THROUGH MAY 31, 2025**

Grier Wright Martinez, PA (“GWM”), counsel to Joseph W. Grier, III, the Future Claimants’ Representative in this case (the “FCR”), through counsel, hereby brings its fifteenth interim application for allowance of compensation of \$7,585.50 and reimbursement of expenses of \$4.30 for the period of February 1, 2025 through May 31, 2025 (the “Compensation Period”) in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Doc. No. 171) (the “Fee Procedure Order”), and in support, respectfully represents as follows:

BACKGROUND

1. On June 18, 2020 (the “Petition Date”), the Debtors commenced their bankruptcy cases (together, the “Chapter 11 Case”) by filing a voluntary petition 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 authorized to continue to

¹ 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.

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 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. On October 15, 2020, the Court entered Orders authorizing the FCR to retain Orrick, Herrington & Sutcliffe, LLP (“Orrick”) and Grier Wright Martinez, PA (“GWM”) to represent him in this case. (Doc. Nos. 393 & 394).

4. Pursuant to the Fee Procedure Order, professionals may request monthly compensation and reimbursement. 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 Procedure 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

5. Pursuant to the Fee Procedure Order, GWM has submitted fee statements to the Debtors for the Interim Period. Copies of the relevant invoices are attached as **Exhibit A**. Summarized below are the requested professional fees and expenses and payments that GWM has received on the same.

Date of Request	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
3/28/2025	2/1/2025-2/28/2025	\$1,680.00	\$0.00	\$1,512.00	\$168.00
4/25/2025	3/1/2025-3/31/2025	\$4,366.50	\$0.00	\$3,929.85	\$436.65
5/29/2025	4/1/2025-4/30/2025	\$510.00	\$4.30	\$514.30 ²	\$0.00
6/26/2025	1/1/2025-1/31/2025	\$1,029.00	\$0.00	\$288.98 ³	\$740.02

6. In total, GWM has submitted fee statements during the Interim Period for total fees of \$7,585.50 and total expenses of \$4.30. As of the date of this Application, no party has objected to the fee statements circulated by GWM.

SUMMARY OF SERVICES RENDERED

7. Attached here as **Exhibit A** are GWM's monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by GWM during the Interim Period. In summary, GWM expended a total of 19.9 hours rendering necessary services in this Chapter 11 proceeding during the Interim Period. GWM's fees total \$7,585.50 for the Interim Period.

8. As attorneys for the FCR, GWM has provided a variety of services in the Debtors' bankruptcy case as set forth in the summary description below and in detail in **Exhibit A**.

9. GWM believes that the services the firm has provided to the FCR in the context of the Debtors' bankruptcy case during the Interim Period were necessary and beneficial to the administration of this case. GWM further believes that its services were performed within a

² On May 21, 2025, Grier Wright Martinez, PA received an overpayment of \$803.28. Having consulted with debtor's counsel, we are holding this amount to apply to future fees and expenses. GWM has credited \$514.30 for April's fees and expenses.

³ After crediting \$514.30 to April fees and expenses, GWM had an overpayment of \$288.98. GWM credited \$288.98 to May fees and expenses leaving a balance due of \$740.02.

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

10. GWM 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. **Case Administration and Business Operations** – 2.6 hours, \$1,365.00. During the Interim Period, GWM kept the FCR and his professionals abreast of case issues and reviewed and responded to emails from attorneys for the parties.

B. **Professional Retention/Fee Issues** – 4.3 hours, \$1,753.50. GWM reviewed and signed off on fee requests for the FCR's professionals, corresponded with Debtors' counsel regarding fee issues and overpayment, and worked on application to employ expert.

C. **Court Hearings** – 6.4 hours, \$2,100.00. GWM attended a hearing on case management order.

D. **Fee Application Preparation** – 3.8 hours, \$955.50. GWM prepared applications for compensation for the FCR and GWM.

E. **Asbestos Matters** – 0.1 hours, \$52.50. GWM reviewed email regarding Bestwall appeal.

F. **Litigation and Adversary Proceedings** – 2.7 hours, \$1,359.00. Reviewed, edited, and filed FCR's response to motion to amend case management order.

11. In **Exhibit B**, GWM has categorized the firm's time by project categories recommended by the Guidelines for Compensation and Expense Reimbursement of Professionals referenced in Rule 2016-1 of this Court's Local Rules of Practice and Procedure (the "Local Rules").

12. **Exhibit C** reflects a summary by category of the expenses that GWM incurred during the Interim Period, which totaled \$4.30.

13. **Exhibit D** provides information as to GWM's professionals, including years of practice, billing rates, and the total number of hours billed during the Interim Period. GWM maintains that its billing rates for the Interim Period should be deemed reasonable for purposes of this Court's determination of the "reasonableness" of the fees for the services that GWM has rendered.

14. Attached as **Exhibit E** is a summary of GWM's prior applications for compensation in this case.

DISBURSEMENTS

15. GWM 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, transcription charges, and the like.

16. GWM requests reimbursement for the firm's actual and necessary expenses incurred during the Interim Period in the amount of \$4.30. A detailed breakdown of such expenses is provided in GWM's invoices included in **Exhibit A**, and those expenses are summarized in **Exhibit C**. GWM's expenses during the Interim Period were necessary and reasonable under the circumstances of this case.

NOTICE

17. 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 entered in this case. GWM submits that, given the nature of the relief requested, no other or further notice need be provided.

NO PRIOR REQUEST

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

CONCLUSION

19. Based on the foregoing, GWM makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred representing the Court-appointed FCR.

WHEREFORE, Grier Wright Martinez, PA respectfully requests that the Court enter an Order:

1) Allowing interim compensation to GWM in the amount of \$7,585.50 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 \$4.30 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay GWM the amount of \$7,589.80, which is equal to 100% of GWM's requested compensation for the Interim Period and 100% of GWM's

requested expense reimbursement for the Interim Period, less all previous payments made to GWM pursuant to the Fee Procedure Order; and

3) Granting such further relief as is just and proper.

This is the 9th of July, 2025.

/s/ A. Cotten Wright
A. Cotten Wright (State Bar No. 28162)
Grier Wright Martinez, PA
521 E Morehead Street, Suite 440
Charlotte, NC 28202
704-332-0207
cwright@grierlaw.com
*Attorneys for Joseph W. Grier, III,
Future Claimants' Representative*

EXHIBIT A



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1360
Date: 03/28/2025
Due On: 04/14/2025

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
02/03/2025	Professional Retention/Fee Issues: Reviewed and signed off on TetraRho fee request for January.	ACW	0.10	\$525.00	\$52.50
02/03/2025	Asbestos Matters: Reviewed email from D.Carnie regarding request in Bestwall appeal for all parties to disclose related cases and sent response.	ACW	0.10	\$525.00	\$52.50
02/06/2025	Professional Retention/Fee Issues: Reviewed and signed off on Anderson Kill's fee requests for January.	ACW	0.10	\$525.00	\$52.50
02/07/2025	Case Administration and Business Operations: Reviewed email from D.Carnie re: photographic guide to counsel in Aldrich case and response from J.Guy.	ACW	0.10	\$525.00	\$52.50
02/10/2025	Professional Retention/Fee Issues: Reviewed Orrick's fee request for January 2025 and signed off on same.	ACW	0.10	\$525.00	\$52.50
02/10/2025	Case Administration and Business Operations: Sent corrections for photographic guide to D.Carnie.	ACW	0.20	\$525.00	\$105.00
02/10/2025	Case Administration and Business Operations: Reviewed email from D.Carnie to other attorneys	ACW	0.10	\$525.00	\$52.50

	in the case providing them with a copy of the photo guide.				
02/13/2025	Professional Retention/Fee Issues: Reviewed Anderson Kill's application for compensation and signed off on same.	ACW	0.20	\$525.00	\$105.00
02/14/2025	Case Administration and Business Operations: Reviewed email from D.Carnie circulating updated photo guide.	ACW	0.10	\$525.00	\$52.50
02/17/2025	Case Administration and Business Operations: Reviewed email from J.Miller requesting comments on 502(d) order.	ACW	0.10	\$525.00	\$52.50
02/18/2025	Professional Retention/Fee Issues: Reviewed email from A.Pelton re: Anderson Kill fee request.	ACW	0.10	\$525.00	\$52.50
02/18/2025	Case Administration and Business Operations: Reviewed email from J.Miller to chambers attaching agreed-to 502(d) order.	ACW	0.10	\$525.00	\$52.50
02/18/2025	Case Administration and Business Operations: Reviewed email from J.Miller re: possible cancelation of February 27 hearing.	ACW	0.10	\$525.00	\$52.50
02/19/2025	Professional Retention/Fee Issues: Reviewed email from D.Felder re: status of applications for compensation for Orrick, Ankura, and TetraRho.	ACW	0.10	\$525.00	\$52.50
02/19/2025	Case Administration and Business Operations: Reviewed email from S.Abel re: proposed amendment to the order on compensation; drafted and sent response relative to information for FCR's professionals; reviewed multiple responses related to amendment.	ACW	0.40	\$525.00	\$210.00
02/20/2025	Case Administration and Business Operations: Reviewed email from J.Miller to chambers re: possible cancelation of February hearing; reviewed response from chambers.	ACW	0.10	\$525.00	\$52.50
02/20/2025	Case Administration and Business Operations: Reviewed email from J.Miller re: requested edits to amendment to compensation order.	ACW	0.10	\$525.00	\$52.50
02/24/2025	Case Administration and Business Operations: Reviewed multiple emails from D.Wright, C.Hardman, T.Phillips, and J.Guy re: photo guide.	ACW	0.40	\$525.00	\$210.00
02/25/2025	Professional Retention/Fee Issues: Reviewed and edited fee requests for FCR and GWM.	ACW	0.30	\$525.00	\$157.50
02/27/2025	Case Administration and Business Operations: Reviewed email from J.Guy following up on debtor's proposed edits to compensation order and response from J.Guy signing off on same.	ACW	0.10	\$525.00	\$52.50

02/27/2025	Professional Retention/Fee Issues: Reviewed emails from S.Abel re: request for spreadsheet of Ankura's invoices for November and December in this and other asbestos cases; reviewed responses from J.Guy.	ACW	0.20	\$525.00	\$105.00
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Quantity Subtotal 3.2

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	3.2	\$525.00	\$1,680.00
Quantity Total			3.2
Subtotal			\$1,680.00
Total			\$1,680.00
Payment (04/15/2025)			-\$1,512.00
Balance Owning			\$168.00

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1378	05/16/2025	\$4,366.50	\$3,929.85	\$436.65
1390	06/16/2025	\$514.30	\$463.30	\$51.00
1404	07/21/2025	\$1,029.00	\$0.00	\$1,029.00

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1360	04/14/2025	\$1,680.00	\$1,512.00	\$168.00
Outstanding Balance				\$1,684.65
Total Amount Outstanding				\$1,684.65

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1378
Date: 04/25/2025
Due On: 05/16/2025

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
03/03/2025	Fee Application Preparation: Draft application for compensation to Grier Wright Martinez, PA.	BLF	1.10	\$210.00	\$231.00
03/04/2025	Fee Application Preparation: Draft Application to Compensation to Joseph W. Grier, III, Future Claimants' Representative. Send application for JOE and GWM to ACW to review.	BLF	0.90	\$210.00	\$189.00
03/04/2025	Professional Retention/Fee Issues: Reviewed email from S.Abel to parties re: status of revised compensation procedures order.	ACW	0.10	\$525.00	\$52.50
03/06/2025	Case Administration and Business Operations: Brief review of debtors' motion to amend case management order.	ACW	0.20	\$525.00	\$105.00
03/07/2025	Professional Retention/Fee Issues: Reviewed and signed off on fee request for Anderson Kill for February.	ACW	0.10	\$525.00	\$52.50
03/07/2025	Professional Retention/Fee Issues: Reviewed fee statement for Orrick for February and approved same.	ACW	0.10	\$525.00	\$52.50
03/13/2025	Fee Application Preparation: Reviewed notice of opportunity for hearing on applications for	ACW	0.10	\$525.00	\$52.50

	compensation for the FCR's professionals.				
03/13/2025	Fee Application Preparation: Reviewed application for compensation for Ankura and signed off on same.	ACW	0.10	\$525.00	\$52.50
03/13/2025	Fee Application Preparation: Reviewed application for compensation for TetraRho and signed off on same.	ACW	0.10	\$525.00	\$52.50
03/13/2025	Fee Application Preparation: Reviewed application for compensation for Orrick and signed off on same.	ACW	0.10	\$525.00	\$52.50
03/13/2025	Fee Application Preparation: Drafted notice of opportunity for hearing on applications for compensation. Send to ACW for review.	BLF	0.30	\$210.00	\$63.00
03/13/2025	Fee Application Preparation: Prepare for filing applications for compensation for FCR's professionals. File and have served.	BLF	0.50	\$210.00	\$105.00
03/13/2025	Fee Application Preparation: Review emails from D. Felder re applications for compensation.	BLF	0.10	\$210.00	\$21.00
03/14/2025	Case Administration and Business Operations: Reviewed pictorial directory emailed by D.Carnie and sent response.	ACW	0.10	\$525.00	\$52.50
03/14/2025	Case Administration and Business Operations: Reviewed and responded to email from J.Guy re: circulation of pictorial directory and sent response.	ACW	0.10	\$525.00	\$52.50
03/14/2025	Case Administration and Business Operations: Drafted email to chambers attaching pictorial directory prepared by D.Carnie with copies to counsel who regularly appear in the case.	ACW	0.20	\$525.00	\$105.00
03/20/2025	Litigation and Adversary Proceedings: Reviewed email from M.Rosenberg and attached draft response to motion to amend CMO.	ACW	0.50	\$525.00	\$262.50
03/20/2025	Litigation and Adversary Proceedings: Prepared suggested edits to FCR's response to motion to amend CMO and forwarded same to Orrick.	ACW	1.20	\$525.00	\$630.00
03/20/2025	Litigation and Adversary Proceedings: Reviewed final version of FCR's response to motion to amend CMO and Exhibit A thereto and filed same. Requested BLF arrange for service.	ACW	0.70	\$525.00	\$367.50
03/27/2025	Court Hearings: Travel to/from and attend hearing on Debtor's motion for case management order.	BDR	5.50	\$330.00	\$1,815.00
Quantity Subtotal					12.1

Time Keeper	Quantity	Rate	Total
Benjamin Rhodes	5.5	\$330.00	\$1,815.00
A. Cotten Wright	3.7	\$525.00	\$1,942.50
Brittany L. Franklin	2.9	\$210.00	\$609.00
Quantity Total			12.1
Subtotal			\$4,366.50
Total			\$4,366.50
Payment (05/21/2025)			-\$3,929.85
Balance Owing			\$436.65

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1360	04/14/2025	\$1,680.00	\$1,512.00	\$168.00
1390	06/16/2025	\$514.30	\$463.30	\$51.00
1404	07/21/2025	\$1,029.00	\$0.00	\$1,029.00

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1378	05/16/2025	\$4,366.50	\$3,929.85	\$436.65
Outstanding Balance				\$1,684.65
Total Amount Outstanding				\$1,684.65

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1390
Date: 05/29/2025
Due On: 06/16/2025

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
04/14/2025	Professional Retention/Fee Issues: Review Orrick Monthly Fee Statement for D. Felder	BLF	0.20	\$210.00	\$42.00
04/14/2025	Court Hearings: Email chambers re telephonic hearing.	BLF	0.10	\$210.00	\$21.00
04/15/2025	Litigation and Adversary Proceedings: Review of positions of FCR, Debtors, and ACC prior to telephonic hearing on competing case management order proposals.	BDR	0.30	\$330.00	\$99.00
04/15/2025	Court Hearings: Telephonic hearing re: motion on case management order.	BDR	0.60	\$330.00	\$198.00
04/15/2025	Court Hearings: Conference with JWG and J. Guy after telephonic hearing re: motion on case management order.	BDR	0.20	\$330.00	\$66.00
04/24/2025	Professional Retention/Fee Issues: Draft monthly fee statements for GWM and FCR. Send to D. Felder.	BLF	0.40	\$210.00	\$84.00
Quantity Subtotal					1.8

Services Subtotal \$510.00

Expenses

Date	Notes	Quantity	Rate	Total
05/19/2025	Online Research - Pacer: Online Research - Pacer	1.00	\$4.30	\$4.30
Expenses Subtotal				\$4.30

Time Keeper	Quantity	Rate	Total
Benjamin Rhodes	1.1	\$330.00	\$363.00
Brittany L. Franklin	0.7	\$210.00	\$147.00
Quantity Total			1.8
Subtotal			\$514.30
Total			\$514.30
Payment (05/21/2025)			-\$463.30
Balance Owning			\$51.00

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1360	04/14/2025	\$1,680.00	\$1,512.00	\$168.00
1378	05/16/2025	\$4,366.50	\$3,929.85	\$436.65
1404	07/21/2025	\$1,029.00	\$0.00	\$1,029.00

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1390	06/16/2025	\$514.30	\$463.30	\$51.00
Outstanding Balance				\$1,684.65
Total Amount Outstanding				\$1,684.65

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1404
Date: 06/26/2025
Due On: 07/21/2025

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
05/01/2025	Case Administration and Business Operations: Took call from J.Guy re: questions regarding outstanding matters.	ACW	0.10	\$525.00	\$52.50
05/01/2025	Professional Retention/Fee Issues: Reviewed and responded to emails from J.Guy re: application to employ prospective expert.	ACW	0.10	\$525.00	\$52.50
05/01/2025	Professional Retention/Fee Issues: Draft application to employ prospective expert. Send to ACW to review.	BLF	0.60	\$210.00	\$126.00
05/02/2025	Professional Retention/Fee Issues: Reviewed draft application to employ prospective expert; edited draft application to employ; requested BLF draft notice of opportunity for hearing; emailed notice and draft application to Orrick team.	ACW	0.90	\$525.00	\$472.50
05/02/2025	Fee Application Preparation: Reviewed April fee request from TetraRho and signed off on same.	ACW	0.10	\$525.00	\$52.50
05/21/2025	Professional Retention/Fee Issues: Reviewed spreadsheet prepared by BLF re: overpayments of amounts due to the FCR and GWM; sent email to A.Johnson re: same.	ACW	0.20	\$525.00	\$105.00

05/21/2025	Professional Retention/Fee Issues: Review payments from debtors. Prepare spreadsheet of overpayments of amounts due to the FCR and GWM. Send to ACW for review.	BLF	0.40	\$210.00	\$84.00
05/29/2025	Fee Application Preparation: Prepare monthly fee statements for FCR and GWM for April 2025. Send to ACW for review. Make edits. Send to D. Felder.	BLF	0.40	\$210.00	\$84.00
Quantity Subtotal					2.8

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	1.4	\$525.00	\$735.00
Brittany L. Franklin	1.4	\$210.00	\$294.00
Quantity Total			2.8
Subtotal			\$1,029.00
Total			\$1,029.00

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1360	04/14/2025	\$1,680.00	\$1,512.00	\$168.00
1378	05/16/2025	\$4,366.50	\$3,929.85	\$436.65
1390	06/16/2025	\$514.30	\$463.30	\$51.00

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1404	07/21/2025	\$1,029.00	\$0.00	\$1,029.00
Outstanding Balance				\$1,684.65
Total Amount Outstanding				\$1,684.65

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

February 1, 2025 through May 31, 2025

Project Category	Total Hours for the Period	Total Hours from the Petition Date	Total Fees for the Period	Total Fees from the Petition Date
Case Administration & Business Operations	2.6	64.8	\$1,365.00	\$26,217.00
Court Hearings	6.4	81.9	\$2,100.00	\$32,680.50
Professional Retention / Fee Issues	4.3	29.95	\$1,753.50	\$12,476.75
Fee Application Preparation	3.8	97.1	\$955.50	\$15,109.50
Asbestos Matters	.10	38.0	\$52.50	\$15,997.50
Litigation	2.7	70.2	\$1,359.00	\$30,736.50
Plan & Disclosure Statement	0.0	0.20	\$0.00	\$80.00
Total	19.9	382.15	\$7,585.50	\$133,297.75

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

Expense Category	Total Expenses for the Interim Period	Total Expenses from the Petition Date
Court Fee – <i>Pro Hac Vice</i> Applications	\$0.00	\$2,331.00
Westlaw – Online Research	\$0.00	\$268.46
Pacer – Online Research	\$4.30	\$520.74
TOTAL	\$4.30	\$3,120.20

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

Name of Professional	Position – Bar Year	Hourly Billing Rate	Total Hours Billed	Total Compensation
A. Cotten Wright	Member- 2001	\$525	8.3	\$4,357.50
Benjamin Rhodes	Associate - 2024	\$330	6.6	\$2,178.00
Brittany L. Franklin	Paralegal	\$210	5.0	\$1,050.00
Summer Clerk	Summer Clerk	\$175	0.0	\$0.00

EXHIBIT E

SUMMARY OF PRIOR FEE APPLICATIONS

Document	Interim Fee Application Date and Doc. No.	Period Covered	Fees Requested/Allowed	Expenses Requested/Allowed	Order Approving Interim Application
1 st Interim	11/9/2020 Doc. No. 421	9/23/2020 – 9/30/2020	\$1,960.00	\$281.00	Doc. No. 460 12/3/2020
2 nd Interim	3/11/2021 Doc. No. 615	October 1, 2020 – January 31, 2021	\$21,926.25	\$355.00	Doc. No. 660 4/2/2021
3 rd Interim	7/9/2021 Doc. No. 763	February 1, 2021- May 31, 2021	\$17,825.00	\$915.78	Doc. No. 794 8/2/2021
4 th Interim	10/29/2021 Doc. No. 862	June 1, 2021 – September 30, 2021	\$14,200.00	\$96.32	Doc No. 927 12/8/2021
5 th Interim	03/01/2022 Doc. No. 1007	October 1, 2021 – January 31, 2022	\$6,542.50	\$44.00	Doc. No. 1064 03/23/2022
6 th Interim	07/11/2022 Doc. No. 1263	February 1, 2022- May 31, 2022	\$4,335.00	\$31.90	Doc. No. 1314 08/03/2022
7 th Interim	11/7/2022 Doc. No. 1389	June 1, 2022- September 30, 2022	\$4,797.50	\$37.30	Doc. No. 1456 12/7/2022
8 th Interim	3/8/2023 Doc. No. 1630	October 1, 2022 – January 31, 2023	\$4,017.50	\$8.70	Doc. No. 1826 6/21/2023
9 th Interim	7/12/23 Doc. No 1866	February 1, 2023 – May 31, 2023	\$5,915.00	\$309.30	Doc. No. 1904 8/2/2023

10 th Interim	11/7/2023 Doc. No. 1989	June 1, 2023 – September 30, 2023	\$10,110.00	\$29.10	Doc. No. 2025 11/30/2023
11 th Interim	3/15/2024 Doc. No. 2149	October 1, 2023 – January 31, 2024	\$6,438.00	\$39.00	Doc. No. 2195 04/11/2024
12 th Interim	7/11/2024 Doc. No. 2299	February 1, 2024- May 31, 2024	\$9,135.00	\$612.00	Doc. No. 2338 8/2/2024
13 th Interim	11/13/2024 Doc. No. 2441	June 1, 2024- September 30, 2024	\$5,014.00	\$612.20	Doc. No. 2480 12/12/2024
14 th Interim	3/13/2025 Doc. No. 2586	October 1, 2024- January 31, 2024	\$13,496.50	\$25.50	Doc. No. 2636 4/4/2025