

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

In re:

Chapter 11

ALDRICH PUMP LLC, *et al.*,¹

Case No. 20-30608 (LMJ)

Debtors.

Jointly Administered

**SUMMARY OF FIFTEENTH INTERIM APPLICATION OF ORRICK, HERRINGTON
& SUTCLIFFE LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND 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:	Orrick, Herrington & Sutcliffe LLP
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Order Approving Retention:	October 15, 2020, effective as of August 21, 2020 (Doc. No. 394)
Period for which compensation and reimbursement is sought:	February 1, 2025 – May 31, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$579,845.50
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$7,174.90
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$587,020.40

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.



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**UNITED STATES BANKRUPTCY COURT
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In re:

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ALDRICH PUMP LLC, *et al.*,¹

Case No. 20-30608 (LMJ)

Debtors.

Jointly Administered

**FIFTEENTH INTERIM APPLICATION OF ORRICK, HERRINGTON &
SUTCLIFFE LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND 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**

Orrick, Herrington & Sutcliffe LLP (“Orrick”), counsel to Joseph W. Grier, III, the Court-appointed future claimants’ representative in these cases (the “FCR”), hereby brings its fifteenth interim application for allowance of compensation of \$579,845.50 and reimbursement of expenses of \$7,174.90 for the period of February 1, 2025 through May 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

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.

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 October 15, 2020, the Court entered an order authorizing the FCR to retain Orrick as his counsel in this Chapter 11 Case, effective as of August 21, 2020. (Doc. No. 394).

5. 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

6. Pursuant to the Fee Procedures Order, Orrick 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 Orrick has received on the same.

Date of Monthly Fee Statement	Description	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
3/7/2025	Fifty-Fourth Monthly	2/1/2025 – 2/28/2025	\$131,369.50	\$1,925.82	\$120,158.37	\$13,136.95
4/20/2025	Fifty-Fifth Monthly	3/1/2025 – 3/31/2025	\$234,422.50	\$2,762.57	\$213,742.82	\$23,442.25
5/16/2025	Fifty-Sixth Monthly	4/1/2025 – 4/30/2025	\$113,215.50	\$2,046.82	\$103,940.77	\$11,321.55
6/12/2025	Fifty-Seventh Monthly	5/1/2025 – 5/31/2025	\$100,838.00	\$439.69	\$0.00	\$101,277.69
Total:			\$579,845.50	\$7,174.90	\$437,841.96	\$149,178.44

7. In total, Orrick has submitted fee statements during the Interim Period for total fees of \$579,845.50 and total expenses of \$7,174.90. As of the date of this Application, no party has objected to the fee statements circulated by Orrick.

SUMMARY OF SERVICES RENDERED

8. Attached hereto as **Exhibits A-1 through A-4** are Orrick's monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by Orrick during the Interim Period. In summary, during the Interim Period, Orrick expended a total of 508.30 hours rendering necessary services in this Chapter 11 Case and incurred total fees of \$579,845.50 and \$7,174.90 in expenses.

9. As counsel to the FCR, Orrick provided a variety of services in connection with the Chapter 11 Case as set forth in the summary description below and in detail in **Exhibits A-1 through A-4**.

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

11. Orrick 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. **Insurance – 0.20 hours, \$298.00.** During the Interim Period, counsel for the FCR corresponded with the FCR’s insurance counsel regarding the Home Insurance settlement.

B. **Litigation – 464.80 hours, \$525,944.00.** During the Interim Period, counsel for the FCR reviewed dockets and pleadings from other asbestos cases, corresponded internally regarding the Bestwall appeal, reviewed and revised a directory of counsel, listened to court hearings in the Red River talc bankruptcy case and reviewed and summarized pleadings and hearings regarding the same. Counsel for the FCR also participated in telephone conferences with Debtors’ counsel, strategized regarding next steps, and reviewed and responded to the Debtors’ motion to amend the estimation case management order. In addition, counsel for the FCR prepared materials for the March omnibus hearing, attended hearings in these Cases in March and April, and listened to the Fourth Circuit hearing in Bestwall.

C. **Orrick Retention – 0.20 hours, \$298.00.** During the Interim Period, counsel for the FCR prepared a draft supplemental declaration.

D. **FCR and Other Professionals’ Retention – 23.70 hours, \$31,999.50.** During the Interim Period, counsel for the FCR considered issues regarding estimation experts and prepared pleadings seeking Bankruptcy Court approval regarding the same.

E. **Orrick Compensation – 4.80 hours, \$6,252.00.** During the Interim Period, counsel for the FCR prepared and circulated Orrick’s invoices and monthly fee statements. Counsel for the FCR also prepared and finalized its interim fee application for the period October 1, 2024 through January 31, 2025.

F. FCR and Other Professionals' Compensation – 7.60 hours, \$9,839.00.

During the Interim Period, counsel for the FCR reviewed and/or prepared monthly fee statements for Anderson Kill, Ankura, TetraRho, the FCR, and the FCR's counsel at Grier Wright Martinez PA, reviewed interim fee applications regarding the same, and corresponded with the Bankruptcy Administrator regarding Ankura's monthly invoices.

G. Non-Working Travel – 7.00 hours, \$5,215.00. During the Interim Period, counsel for the FCR traveled to and from Charlotte, North Carolina for omnibus hearings in these Cases. Pursuant to the Interim Compensation Order, Orrick's time for non-working travel is billed at 50% of the professional's normal hourly rate. Accordingly, Orrick's fees for non-working travel during the Interim Period have been reduced by \$5,215.00 to reflect a 50% reduction of the professional's normal hourly rate.

12. **Exhibit B** provides a summary of Orrick's time by the project categories recommended by the Guidelines for Compensation and Reimbursement of Professionals referenced in Rule 2016-1 of this Court's Local Rules of Practice and Procedure.

13. **Exhibit C** reflects a summary by category of the expenses that Orrick incurred during the Interim Period, which totaled \$7,174.90.

14. **Exhibit D** provides information as to Orrick's professionals, including years of practice, position, billing rates, and the total number of hours billed during the Interim Period. Orrick maintains that its billing rates for the Interim Period, which reflect its customary hourly rates for 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 Orrick has rendered.

15. **Exhibit E** is a summary of Orrick's prior interim applications for compensation in this Chapter 11 Case.

DISBURSEMENTS

16. Orrick 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.

17. Orrick requests reimbursement for its actual and necessary expenses incurred during the Interim Period in the amount of \$7,174.90. A detailed breakdown of such expenses were included in Orrick's invoices (attached hereto as **Exhibits A-1 through A-4**) and those expenses are summarized in **Exhibit C**. Orrick's expenses during the Interim Period were necessary and reasonable under the circumstances of this Chapter 11 Case.

NOTICE

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

NO PRIOR REQUEST

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

CONCLUSION

20. Based on the foregoing, Orrick makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred in connection with representing the FCR.

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

1) Allowing interim compensation to Orrick in the amount of \$579,845.50 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 \$7,174.90 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay Orrick the amount of \$587,020.40, which is equal to 100% of Orrick's requested compensation for the Interim Period and 100% of Orrick's requested expense reimbursement for the Interim Period, less all previous payments made to Orrick pursuant to the Fee Procedures Order; and

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

Dated: July 9, 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, 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-1

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

)	
In re:)	Chapter 11
)	
ALDRICH PUMP LLC, <i>et al.</i> , ¹)	Case No. 20-30608 (LMJ)
)	
Debtors.)	(Jointly Administered)
)	

**FIFTY-FOURTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM FEBRUARY 1, 2025 THROUGH FEBRUARY 28, 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 Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Fourth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from February 1, 2025 through February 28, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period February 1, 2025 through February 28, 2025 (the “Fee Statement Period”).

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: February 1, 2025 – February 28, 2025	
Total Fees:	\$131,369.50
Total Expenses:	\$1,925.82
TOTAL:	\$133,295.32

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$120,158.37 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’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., pamo@mcarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mcarter.com and Phillip S. Pavlick, Esq., ppavlick@mcarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mcarter.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 Orrick, no later than March 21, 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 Orrick 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 Orrick.

This is the 7th day of March 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



Grier, Joseph W. III.
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

March 7, 2025
Client No. 24998
Invoice No. 2258821

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through February 28, 2025 in connection
with the matters described on the attached pages:

\$ 131,369.50

DISBURSEMENTS as per attached pages:

1,925.82

TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):

\$ 133,295.32

Matter(s): 24998/2013, 2014, 2018, 2019, 2021
ASB-12739487

DUE UPON RECEIPT

The following is for information only:

Previous Balance not included in this invoice:

\$105,258.48

If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,
please reference your **INVOICE** and **CLIENT** numbers on your remittance.
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2258821*

**ELECTRONIC FUNDS
TRANSFERS:**

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S
Account Number: 4123701088
*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2258821
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice: 2258821*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



Grier, Joseph W. III.
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

March 7, 2025
Client No. 24998
Invoice No. 2258821

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through February 28, 2025 in Connection With:

Matter: 2013 - Aldrich Pump - Insurance
Matter: ASB-12739487

02/07/25	J. Guy	Emails to/from M. Garbowski regarding Home Insurance settlement.	0.20	298.00
		Total Hours	0.20	
		Total For Services	\$	298.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jonathan P. Guy	0.20	1,490.00	298.00
Total All Timekeepers	0.20	\$1,490.00	\$298.00
Total For This Matter			\$298.00



Grier, Joseph W. III. - 24998
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March 7, 2025
Invoice No. 2258821

For Legal Services Rendered Through February 28, 2025 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation

Matter: ASB-12739487

02/01/25	J. Guy	Review dockets of multiple asbestos bankruptcy cases (collected over separate occasions).	1.50	2,235.00
02/03/25	D. Carnie	Confer with J. Guy, J. Grier and C. Wright regarding notice of related cases and scheduled hearing for Bestwall appeal.	0.30	261.00
02/03/25	J. Guy	Emails from D. Carnie and C. Wright regarding Bestwall appeal and notice of related cases.	0.30	447.00
02/04/25	D. Carnie	File notice of related cases in Bestwall appeal and confer with J. Guy regarding same.	0.70	609.00
02/04/25	M. Rosenberg	Review dockets.	1.20	1,500.00
02/04/25	J. Guy	Emails to/from D. Carnie regarding Bestwall appeal (.2); strategize regarding next steps (.4).	0.60	894.00
02/05/25	J. Guy	Emails to/from D. Carnie regarding 4th Circuit notices.	0.20	298.00
02/06/25	M. Rosenberg	Confer with D. Carnie regarding incoming alerts.	0.30	375.00
02/07/25	D. Carnie	Revise and proof chart of counsel in Aldrich case.	3.90	3,393.00
02/07/25	D. Carnie	Circulate pleadings from Red River Talc case to Orrick team and confer with J. Guy regarding same.	0.30	261.00
02/07/25	J. Guy	Review Red River Talc filings regarding claims process and plan (.8); emails to/from D. Carnie regarding same (various occasions) (.3); emails to/from D. Carnie regarding list of professionals for court (.2).	1.30	1,937.00
02/08/25	D. Carnie	Revise chart of counsel in Aldrich case and recirculate to Orrick team and C. Wright.	0.20	174.00
02/08/25	J. Guy	Review and comment on list of professionals for court (.3); attention to Red River Talc plan and confirmation issues and review docket (.5).	0.80	1,192.00
02/10/25	D. Carnie	Revise directory of counsel and circulate to ACC and Debtors.	1.00	870.00
02/10/25	D. Carnie	Review pleadings in Red River Talc case.	1.00	870.00



Grier, Joseph W. III. - 24998
page 3

March 7, 2025
Invoice No. 2258821

02/10/25	J. Guy	Review dockets of multiple asbestos bankruptcy cases (collected over separate occasions).	1.50	2,235.00
02/11/25	D. Carnie	Confer with J. Guy regarding Red River Talc and Garlock (.4); review Red River Talc docket and confer with team regarding confirmation brief in same (.4); review and analyze pleadings in Aldrich and related cases, and circulate calendar invites for upcoming dates (1.7).	2.50	2,175.00
02/12/25	D. Carnie	Listen to status conference in Red River Talc case, and summarize same for J. Guy (.7); review pleadings in Red River Talc case (1.0).	1.70	1,479.00
02/13/25	J. Guy	Emails to/from D. Carnie regarding Red River Talc confirmation hearing.	0.20	298.00
02/14/25	D. Carnie	Review pleadings in Red River Talc case.	0.50	435.00
02/14/25	D. Carnie	Confer internally and with Debtor and ACC counsel regarding directory in case to be circulated to chambers.	1.40	1,218.00
02/14/25	M. Rosenberg	Confer with D. Carnie regarding Red River Talc trial and updating counsel list.	0.30	375.00
02/14/25	J. Guy	Review chart of counsel to be provided to the court (.2); multiple emails to/from D. Carnie and various ACC counsel regarding chart seeking agreement on same (.4).	0.60	894.00
02/15/25	D. Carnie	Review pleadings in Red River Talc case.	3.50	3,045.00
02/16/25	D. Carnie	Review pleadings in Red River Talc case and draft memo for team.	5.60	4,872.00
02/17/25	D. Carnie	Review chart of counsel and confer with M. Rosenberg.	0.70	609.00
02/17/25	D. Carnie	Draft memorandum on Red River Talc case for team.	7.80	6,786.00
02/17/25	M. Rosenberg	Confer with D. Carnie regarding J&J trial and directory.	0.40	500.00
02/17/25	J. Guy	Review dockets of multiple asbestos bankruptcy cases, including Aldrich (separate occasions) (1.5); various emails to/from D. Carnie regarding counsel list (.3).	1.80	2,682.00
02/17/25	J. Guy	Review correspondence from J. Miller, Debtors' counsel, regarding 502(d) order.	0.20	298.00
02/18/25	D. Carnie	Draft memorandum summarizing main issues on trial in Red River Talc case and circulate to Orrick team, C. Wright and J. Grier (5.0); listen to Red River Talc trial (8.1).	13.10	11,397.00



Grier, Joseph W. III. - 24998
page 4

March 7, 2025
Invoice No. 2258821

02/18/25	M. Rosenberg	Listen to portions of opening day of J&J confirmation trial.	3.20	4,000.00
02/19/25	D. Carnie	Listen to Red River Talc trial.	8.10	7,047.00
02/20/25	D. Carnie	Listen to Red River Talc trial.	8.00	6,960.00
02/20/25	D. Carnie	Draft email summarizing Red River Talc trial progress.	0.20	174.00
02/20/25	M. Rosenberg	Listen to portion of Red River Talc confirmation trial.	1.20	1,500.00
02/21/25	D. Carnie	Listen to Red River Talc trial and summarize for J. Grier, C. Cotten, J. Guy, D. Felder and M. Rosenberg.	8.40	7,308.00
02/21/25	J. Guy	Review and analyze detailed summary of Red River Talc proceedings prepared by D. Carnie.	0.80	1,192.00
02/22/25	D. Carnie	Review Aldrich, Bestwall and related dockets for notable filings.	0.30	261.00
02/23/25	D. Carnie	Review trial exhibits for Red River Talc trial.	0.30	261.00
02/24/25	D. Carnie	Listen to Red River Talc trial.	7.90	6,873.00
02/24/25	J. Guy	Analysis of liability estimates in Garlock and application to Aldrich (.6); emails to/from FCR and C. Wright regarding liability estimates (.1).	0.70	1,043.00
02/25/25	D. Carnie	Listen to Red River Talc trial.	8.00	6,960.00
02/25/25	M. Rosenberg	Listen to FCR and other testimony in Red River Talc trial.	2.50	3,125.00
02/26/25	D. Carnie	Listen to Red River Talc trial.	7.30	6,351.00
02/26/25	D. Carnie	Draft update to client regarding progress of trial.	1.60	1,392.00
02/26/25	J. Guy	Review dockets of multiple asbestos dockets (separate occasions).	1.50	2,235.00
02/27/25	D. Carnie	Listen to Red River Talc trial (5.4); correspond with J. Guy regarding same (.5).	5.90	5,133.00
02/27/25	D. Carnie	Correspond with M. Rosenberg regarding directory.	0.10	87.00
02/27/25	M. Rosenberg	Review and revise D. Carnie summary (.5); listen to additional testimony in Red River Talc trial (.7).	1.20	1,500.00
02/27/25	J. Guy	Emails to/from D. Carnie regarding Red River Talc trial (.2); strategize regarding next steps in Aldrich (.7).	0.90	1,341.00
02/28/25	D. Carnie	Listen to Red River Talc trial.	9.40	8,178.00
Total Hours			132.90	
Total For Services			\$	127,535.00



Grier, Joseph W. III. - 24998
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March 7, 2025
Invoice No. 2258821

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Dan Carnie	109.70	870.00	95,439.00
Jonathan P. Guy	12.90	1,490.00	19,221.00
Mike Rosenberg	10.30	1,250.00	12,875.00
Total All Timekeepers	132.90	\$959.63	\$127,535.00

Disbursements

Hotel	547.66	
Other Business Meals	12.98	
Parking Expense	35.00	
Taxi Expense	38.62	
Travel Expense, Air Fare	1,291.56	
Total Disbursements		\$1,925.82

Total For This Matter **\$129,460.82**



Grier, Joseph W. III. - 24998
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March 7, 2025
Invoice No. 2258821

For Legal Services Rendered Through February 28, 2025 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation
Matter: ASB-12739487

02/03/25	J. Guy	Review Orrick's January invoice.	0.30	447.00
02/05/25	J. Guy	Emails to/from D. Felder regarding Orrick invoices for January 2025.	0.20	298.00
02/11/25	D. Felder	Review and revise January 2025 invoice, prepare monthly fee statement and email to notice parties.	0.50	632.50
Total Hours			1.00	
Total For Services			\$	1,377.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.50	1,265.00	632.50
Jonathan P. Guy	0.50	1,490.00	745.00
Total All Timekeepers	1.00	\$1,377.50	\$1,377.50

Total For This Matter **\$1,377.50**



Grier, Joseph W. III. - 24998
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March 7, 2025
Invoice No. 2258821

For Legal Services Rendered Through February 28, 2025 in Connection With:

Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation

Matter: ASB-12739487

02/03/25	D. Felder	Review TetraRho's January 2025 invoice and prepare monthly fee statement regarding same.	0.30	379.50
02/19/25	J. Guy	Review proposed compensation procedures order, emails to/from Bankruptcy Administrator, Debtors, FCR team regarding same.	0.40	596.00
02/24/25	D. Felder	Review January 2025 monthly fee statements and invoices for J. Grier and Grier, Wright, Martinez.	0.30	379.50
02/25/25	D. Felder	Prepare Ankura's monthly fee statements for October 2024 and January 2025.	0.40	506.00
02/27/25	J. Guy	Emails to/from Bankruptcy Administrator and Ankura regarding Ankura invoices in Aldrich.	0.20	298.00
Total Hours			1.60	
Total For Services			\$	2,159.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	1.00	1,265.00	1,265.00
Jonathan P. Guy	0.60	1,490.00	894.00
Total All Timekeepers	1.60	\$1,349.38	\$2,159.00

Total For This Matter \$2,159.00

*** COMBINED TOTALS ***

Total Hours	135.70	
Total Fees, all Matters		\$131,369.50
Total Disbursements, all Matters		\$1,925.82
Total Amount Due		\$133,295.32

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> , ¹)	Case No. 20-30608 (LMJ)
)	
Debtors.)	(Jointly Administered)
)	

**FIFTY-FIFTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM MARCH 1, 2025 THROUGH MARCH 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 Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Fifth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from March 1, 2025 through March 31, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Orrick's invoice for the period March 1, 2025 through March 31, 2025 (the "Fee Statement Period").

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: March 1, 2025 – March 31, 2025	
Total Fees:	\$234,422.50 ²
Total Expenses:	\$2,762.57
TOTAL:	\$237,185.07

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$213,742.82 from the Debtors for the Fee Statement Period (the "Interim Amount"), representing (a) 90% of Orrick's fees and (b) 100% of its incurred expenses.

Billing Adjustments

4. Pursuant to the Interim Compensation Order, Orrick's time for non-working travel will be billed at 50% of the professional's normal hourly rate. Accordingly, Orrick's fees for non-working travel during this Fee Statement Period have been reduced by \$5,215.00 to reflect a 50% reduction of the professional's normal hourly rate.

Notice and Objection Procedures

5. 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

² Orrick's fees were reduced by \$5,215.00 for non-working travel.

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., pamoamccarter.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, 31st 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).

6. 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 Orrick, no later than May 5, 2025 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

7. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay Orrick 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.

8. 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 Orrick.

This is the 20th day of April 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



Grier, Joseph W. III.
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

April 7, 2025
Client No. 24998
Invoice No. 2266142

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through March 31, 2025 in connection
with the matters described on the attached pages:

Nonworking travel reduced by 50%:

SUBTOTAL:

DISBURSEMENTS as per attached pages:

TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):

\$	239,637.50
	<i>(5,215.00)</i>
\$	<u>234,422.50</u>
	<u>2,762.57</u>
\$	<u>237,185.07</u>

Matter(s): 24998/2014, 2019, 2021, 2022
ASB-12739487

DUE UPON RECEIPT

The following is for information only:

Previous Balance not included in this invoice:

\$176,149.02 If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,
please reference your **INVOICE** and **CLIENT** numbers on your remittance.
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2266142*

**ELECTRONIC FUNDS
TRANSFERS:**

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S
Account Number: 4123701088
*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2266142
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice:
2266142*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



Grier, Joseph W. III.
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

April 7, 2025
Client No. 24998
Invoice No. 2266142

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through March 31, 2025 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation
Matter: ASB-12739487

03/02/25	D. Carnie	Draft update regarding Red River Talc for client.	3.00	2,610.00
03/03/25	D. Carnie	Draft updates to client regarding Aldrich, Red River Talc and related cases.	3.40	2,958.00
03/03/25	D. Carnie	Confer with counsel for Semian and other individual claimants regarding updates.	0.90	783.00
03/03/25	J. Guy	Telephone conference with B. Erens regarding case status (.3); review dockets of various pending asbestos bankruptcy cases with issues pertinent to Aldrich (separate occasions) (1.5); emails to/from Orrick team, Bankruptcy Administrator, and J. Miller regarding compensation procedures order and status of same (.4); due diligence regarding treatment of futures in Red River Talc bankruptcy (.4); emails to/from D. Carnie regarding responding to various requests from other parties to changes to counsel directory (.2); strategize regarding next steps (.7).	3.50	5,215.00
03/04/25	D. Carnie	Review dockets for related cases and draft client update.	2.60	2,262.00
03/04/25	J. Guy	Strategize regarding potential resolution of case (separate occasions) (.3); due diligence on confirmed asbestos cases (.8).	1.10	1,639.00
03/05/25	D. Carnie	Confer with J. Guy regarding Red River Talc trust and future claims representative.	0.20	174.00
03/05/25	J. Guy	Emails to/from M. Cody regarding motion to extend removal deadline.	0.20	298.00



Grier, Joseph W. III. - 24998
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April 7, 2025
Invoice No. 2266142

03/06/25	D. Carnie	Telephone conference with Debtors' counsel regarding estimation (.5); confer with M. Rosenberg regarding plan releases (.2); review precedent plans and confer with J. Guy regarding specified provisions therein (.7); circulate pleadings in Aldrich case (.1).	1.50	1,305.00
03/06/25	M. Rosenberg	Telephone conference with Debtors' counsel regarding estimation (.5); confer with D. Carnie regarding same (.3); evaluate Debtors' motion to amend CMO (.8); review survey of opt-out plan mechanisms (.6).	2.20	2,750.00
03/06/25	J. Guy	Telephone conference with the FCR, Orrick, and Debtors' counsel and representatives regarding potential Debtor filing on claim estimates and next steps (.6); prepare for telephone conference and strategize regarding case (.4); review and analyze motion to amend CMO (.7).	1.70	2,533.00
03/07/25	D. Carnie	Review docket of Aldrich and related cases and draft update to client regarding same.	0.60	522.00
03/10/25	D. Carnie	Confer with J. Guy and M. Rosenberg regarding case status and next steps.	0.30	261.00
03/11/25	D. Carnie	Review Aldrich and related dockets for notable filings.	0.30	261.00
03/12/25	D. Carnie	Review Aldrich and related dockets for notable filings (.5); confer with J. Guy regarding next steps (.1).	0.60	522.00
03/12/25	M. Rosenberg	Review docket activity.	0.30	375.00
03/13/25	D. Carnie	Telephone conference with claimant counsel regarding confirmation issues.	1.50	1,305.00
03/13/25	D. Carnie	Review pleadings and circulate (.5); review slides regarding Garlock trust and circulate (.3).	0.80	696.00
03/13/25	J. Guy	Telephone conference with the FCR and others regarding confirmation issues (separate occasions) (.7); prepare for conference (.5); due diligence on potential voting issues for plan confirmation (.8); strategize regarding next steps (.9).	2.90	4,321.00
03/14/25	J. Guy	Emails to/from C. Wright, D. Carnie, Bankruptcy Administrator, and the Court regarding final counsel directory (separate occasions).	0.30	447.00



Grier, Joseph W. III. - 24998
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April 7, 2025
Invoice No. 2266142

03/17/25	D. Carnie	Circulate fee applications for FTI, motions to employ for FTI and LAS, and expert report from Garlock to team (.4); review fee applications and confer with J. Guy regarding same (.4); coordinate ordering transcripts for purposes of drafting response (.4); review transcript and draft email with same to J. Guy (.6); review notes from Red River trial (.2); confer with J. Guy regarding Red River case (.2); review proofs of claim in Aldrich case (.4); review docket for Aldrich and related cases for update to client (4.4).	7.00	6,090.00
03/17/25	J. Guy	Draft and revise response to Debtors' Motion to Amend CMO (6.0); various emails to/from D. Carnie and Orrick team regarding same (.8).	6.80	10,132.00
03/18/25	D. Carnie	Confer with J. Guy regarding next steps (.2); confer with M. Rosenberg regarding same (.2); review docket for Aldrich and related cases for update to client (4.4).	4.80	4,176.00
03/18/25	D. Carnie	Revise draft response from J. Guy to Case Management Order motion by Debtors.	8.00	6,960.00
03/18/25	M. Rosenberg	Review and revise response in support of Debtors' motion to amend CMO.	5.50	6,875.00
03/18/25	M. Rosenberg	Evaluate Bestwall docket activity.	0.50	625.00
03/18/25	J. Guy	Prepare FCR response to Debtors' Motion to Amend CMO (7.0); review background materials and prior filings (2.0); telephone conference with B. Erens regarding upcoming hearing and related matters (.2).	9.20	13,708.00
03/19/25	D. Carnie	Review docket for Aldrich and related cases for update to client, and draft update for client (2.8); circulate pleadings to J. Guy (.5); confer with D. Felder regarding tracker charts (.2).	3.50	3,045.00
03/19/25	D. Carnie	Revise updated draft response to CMO motion by Debtors.	6.80	5,916.00
03/19/25	M. Rosenberg	Continue to revise responsive brief and obtain relevant citations.	4.60	5,750.00
03/19/25	J. Guy	Review filings from pending asbestos bankruptcy cases and appellate dockets (1.5); various emails to/from M. Rosenberg and D. Carnie regarding FCR Response to Debtors' Motion to Amend CMO (.8); finalize Response (2.8).	5.10	7,599.00



Grier, Joseph W. III. - 24998
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April 7, 2025
Invoice No. 2266142

03/20/25	D. Carnie	Revise draft response to Case Management Order motion by Debtors.	8.70	7,569.00
03/20/25	M. Rosenberg	Finalize response in support of Debtor's motion (2.6); listen to portion of Bestwall hearing (1.2).	3.80	4,750.00
03/20/25	J. Guy	Emails to/from C. Wright, FCR, M. Rosenberg, D. Felder, and D. Carnie regarding FCR Response (.8); finalize Response (3.6); review pleadings and case support (2.8); strategize regarding next steps First Review Bestwall filings for 3/20 hearing (.3); attend same by telephone (.5).	8.00	11,920.00
03/21/25	D. Carnie	Confer with J. Guy regarding next steps and circulate pleadings from related cases.	1.60	1,392.00
03/21/25	D. Carnie	Draft analysis of ACC's Bestwall amicus brief to circulate internally.	1.70	1,479.00
03/21/25	M. Rosenberg	Evaluate relevant filings in Paddock.	0.70	875.00
03/21/25	J. Guy	Telephone conference with B. Erens (separate occasions) regarding 3/27 hearing (.6); numerous emails to/from Orrick team regarding preparing for 3/27 hearing (1.2); prepare for hearing (6.0).	7.80	11,622.00
03/23/25	D. Carnie	Draft summary of legal issues in Bestwall for upcoming hearing.	0.90	783.00
03/24/25	D. Carnie	Confer with J. Guy regarding presentation for hearing (.2); confer with team regarding presentation for hearing (.1); confer with Veritext on transcript in connection with draft presentation (.1); draft presentation (2).	2.40	2,088.00
03/24/25	D. Carnie	Continue drafting summary of legal issues in Bestwall for upcoming hearing.	7.00	6,090.00
03/24/25	J. Guy	Prepare slides for 3/27 hearing (2.5); due diligence in advance of hearing (2.0); emails regarding same to/from M. Rosenberg and D. Carnie (.2).	4.70	7,003.00
03/25/25	D. Carnie	Draft email to client regarding pleadings for upcoming hearing.	2.70	2,349.00
03/25/25	D. Carnie	Draft presentation for upcoming hearing regarding case management order in estimation proceeding.	9.70	8,439.00
03/25/25	M. Rosenberg	Evaluate initial set of slides prepared by D. Carnie for upcoming hearing.	1.30	1,625.00



Grier, Joseph W. III. - 24998
page 5

April 7, 2025
Invoice No. 2266142

03/25/25	J. Guy	Telephone conference with Jones Day litigators regarding 3/27 hearing (.5); continued preparation of slides for hearing (2.0); numerous emails to/from Orrick team regarding same (1.2); review motion for late-filed claim, emails regarding same to FCR and others (.7); review Debtors' Reply on CMO motion (.8); analyze issues presented for argument at 3/27 hearing (2.7).	7.90	11,771.00
03/26/25	D. Carnie	Draft presentation for hearing.	4.50	3,915.00
03/26/25	D. Carnie	Confer with client regarding pleadings for upcoming hearing.	0.50	435.00
03/26/25	M. Rosenberg	Review and revise slides in preparation for hearing.	2.40	3,000.00
03/26/25	J. Guy	Telephone conference with D. Carnie regarding slides for 3/27 hearing (separate occasions) (.5); review slides and prepare for hearing (4.5); working travel to Charlotte (3.0).	8.00	11,920.00
03/27/25	D. Carnie	Review pleadings in related cases.	1.60	1,392.00
03/27/25	D. Carnie	Listen and take notes during hearing, review notes and confer with M. Rosenberg regarding same.	1.90	1,653.00
03/27/25	M. Rosenberg	Listen to Aldrich hearing.	2.20	2,750.00
03/27/25	J. Guy	Prepare for hearing (1.5); attend hearing and various contemporaneous meetings with parties (3.5); attend meeting with FCR and Debtors (.8); various emails to/from FCR and attention to mediation status (.6).	6.40	9,536.00
03/28/25	D. Carnie	Confer with M. Rosenberg regarding next steps.	0.50	435.00
03/28/25	J. Guy	Review various asbestos dockets (collected over separate occasions) (1.5); emails to/from FCR regarding mediation status, attention to same (.6).	2.10	3,129.00
03/31/25	D. Carnie	Review Aldrich and related dockets (.5); circulate Red River decision (.2).	0.70	609.00
Total Hours			189.40	
Total For Services			\$	220,642.00



Grier, Joseph W. III. - 24998
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April 7, 2025
Invoice No. 2266142

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Dan Carnie	90.20	870.00	78,474.00
Jonathan P. Guy	75.70	1,490.00	112,793.00
Mike Rosenberg	23.50	1,250.00	29,375.00
Total All Timekeepers	189.40	\$1,164.95	\$220,642.00

Disbursements

Hotel	1,577.16	
Out of Town Business Meals	22.00	
Taxi Expense	185.36	
Travel Expense, Air Fare	978.05	
Total Disbursements		\$2,762.57

Total For This Matter **\$223,404.57**



Grier, Joseph W. III. - 24998
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April 7, 2025
Invoice No. 2266142

For Legal Services Rendered Through March 31, 2025 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation
Matter: ASB-12739487

03/07/25	D. Felder	Prepare Orrick's interim fee application for the period October 1, 2024 through January 31, 2025.	1.00	1,265.00
03/07/25	D. Felder	Review and revise Orrick's February 2025 invoice.	0.40	506.00
03/11/25	D. Felder	Finalize Orrick's interim fee application and exhibits for October 1, 2024 through January 31, 2025.	0.60	759.00
		Total Hours	2.00	
		Total For Services	\$	2,530.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	2.00	1,265.00	2,530.00
Total All Timekeepers	2.00	\$1,265.00	\$2,530.00
Total For This Matter			\$2,530.00



Grier, Joseph W. III. - 24998
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April 7, 2025
Invoice No. 2266142

For Legal Services Rendered Through March 31, 2025 in Connection With:

Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation
Matter: ASB-12739487

03/03/25	D. Felder	Review TetraRho's February invoice and prepare monthly fee statement.	0.50	632.50
03/03/25	J. Guy	Various emails to/from Ankura, C. Wright, and Orrick team regarding collection of Excel files for Bankruptcy Administrator (separate occasions).	0.40	596.00
03/07/25	D. Felder	Prepare and finalize TetraRho's and Ankura's interim fee application for the period October 1, 2024 through January 31, 2025.	0.80	1,012.00
03/11/25	D. Felder	Revise and finalize interim fee applications for Ankura and TetraRho for the period October 1, 2024 through January 31, 2025 (1.0); review and provide comments on GWM and J. Grier's interim fee application (.3).	1.30	1,644.50
03/17/25	D. Felder	Review Ankura's February monthly fee statement and prepare monthly fee statement.	0.30	379.50
03/19/25	D. Felder	Review monthly fee statements and interim fee applications for court-appointed professionals in Bestwall, DBMP, and Aldrich and update summaries regarding same.	1.40	1,771.00
Total Hours			4.70	
Total For Services			\$	6,035.50

Timekeeper Summary	Hours	Rate	Amount
Debra L. Felder	4.30	1,265.00	5,439.50
Jonathan P. Guy	0.40	1,490.00	596.00
Total All Timekeepers	4.70	\$1,284.15	\$6,035.50

Total For This Matter **\$6,035.50**



Grier, Joseph W. III. - 24998
page 9

April 7, 2025
Invoice No. 2266142

For Legal Services Rendered Through March 31, 2025 in Connection With:

Matter: 2022 - Aldrich Pump - Non Working Travel
Matter: ASB-12739487

03/26/25	J. Guy	Travel from DC to Charlotte.	3.50	5,215.00
03/27/25	J. Guy	Travel from Charlotte to DC.	3.50	5,215.00
Total Hours			7.00	
Total For Services			\$	10,430.00
<i>Nonworking travel reduced by 50%</i>			\$	<i>(5,215.00)</i>
Total For Services			\$	5,215.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jonathan P. Guy	7.00	1,490.00	10,430.00
Total All Timekeepers	7.00	\$1,490.00	\$10,430.00

Total For This Matter **\$5,215.00**

*** * * COMBINED TOTALS * * ***

Total Hours	203.10	
Total Fees, all Matters		\$234,422.50
Total Disbursements, all Matters		\$2,762.57
Total Amount Due		\$237,185.07

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> , ¹)	Case No. 20-30608 (LMJ)
)	
Debtors.)	(Jointly Administered)
)	

**FIFTY-SIXTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM APRIL 1, 2025 THROUGH APRIL 30, 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 Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Sixth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from April 1, 2025 through April 30, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period April 1, 2025 through April 30, 2025 (the “Fee Statement Period”).

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: April 1, 2025 – April 30, 2025	
Total Fees:	\$113,215.50
Total Expenses:	\$2,046.82
TOTAL:	\$115,262.32

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$103,940.77 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’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., pamo@mcarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mcarter.com and Phillip S. Pavlick, Esq., ppavlick@mcarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mcarter.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 Orrick, no later than May 30, 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 Orrick 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 Orrick.

This is the 16th day of May 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



Grier, Joseph W. III.
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

May 12, 2025
Client No. 24998
Invoice No. 2274132

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through April 30, 2025 in connection with the matters described on the attached pages:	\$	113,215.50
DISBURSEMENTS as per attached pages:		2,046.82
TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):	\$	<u>115,262.32</u>

Matter(s): 24998/2014, 2019, 2021
ASB-12739487

DUE UPON RECEIPT

The following is for information only:
Previous Balance not included in this invoice:
\$287,700.02 If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,
please reference your **INVOICE** and **CLIENT** numbers on your remittance.
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2274132*

**ELECTRONIC FUNDS
TRANSFERS:**

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S
Account Number: 4123701088

*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2274132
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice:
2274132*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



Grier, Joseph W. III.
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

May 12, 2025
Client No. 24998
Invoice No. 2274132

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through April 30, 2025 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation

Matter: ASB-12739487

04/01/25	D. Carnie	Review Aldrich docket and confer with C. Wright regarding transcript from hearing (.2); draft update regarding Aldrich and related cases for client and circulate internally (.7).	0.90	783.00
04/01/25	J. Guy	Review and analyze J&J River Talc decision (1.8); strategize regarding impact of same (.4).	2.20	3,278.00
04/02/25	D. Carnie	Confer with J. Guy regarding related cases (.3); confer with C. Wright regarding transcript from hearing (.1); confer with team regarding telephone conference with opposing counsel (.1); draft update on related cases (1.0); draft chart regarding related cases (4.4).	5.90	5,133.00
04/02/25	J. Guy	Telephone conference with B. Erens regarding case status (.2); due diligence on plan confirmation options (separate occasions) (1.8); review asbestos bankruptcy dockets (collected over separate occasions) (1.5); emails to/from C. Wright regarding 3/27 transcript (.1); review of same (.7).	4.30	6,407.00
04/03/25	D. Carnie	Telephone conference with Debtors' counsel regarding next steps and CMO.	0.60	522.00
04/03/25	M. Rosenberg	Evaluate ACC's CMO edits and additional correspondence regarding CMO.	1.20	1,500.00



Grier, Joseph W. III. - 24998
page 2

May 12, 2025
Invoice No. 2274132

04/03/25	J. Guy	Conference with FCR and Debtors regarding next steps and CMO (.6); prepare for same (.3); review various emails to/from Debtors and FCR team regarding CMO language (.7); prepare response for Court (.3).	1.90	2,831.00
04/04/25	M. Rosenberg	Evaluate Garlock estimation expert reports and post-trial brief (1.6); draft proposed FCR position statement on CMOs (1.1).	2.70	3,375.00
04/06/25	D. Carnie	Review correspondence with M. Rosenberg and J. Guy regarding email to court.	0.20	174.00
04/06/25	M. Rosenberg	Continue review of Garlock estimation record (1.2); revise CMO position (1.1).	2.30	2,875.00
04/06/25	J. Guy	Emails to/from M. Rosenberg and D. Carnie regarding FCR insert on pending CMO questions (.2); prepare insert and analyze related issues (2.7).	2.90	4,321.00
04/07/25	D. Carnie	Confer with J. Guy and M. Rosenberg regarding email to court (.5); review pleadings and revise email to court (2.4).	2.90	2,523.00
04/07/25	M. Rosenberg	Review and revise FCR submission in support of Debtors' version of CMO.	1.60	2,000.00
04/07/25	J. Guy	Emails and telephone conference to/from FCR, Debtors and ACC regarding submission to Court on pending CMO issues (separate occasions) (.8); review, revise and prepare FCR submission (3.0); analyze issues related to CMO (2.0); strategize regarding next steps (.8).	6.60	9,834.00
04/08/25	D. Carnie	Review pleadings in Aldrich and DBMP.	0.20	174.00
04/09/25	D. Carnie	Summarize pleadings in related case and confer with M. Rosenberg regarding summary (1.7); circulate same (.1).	1.80	1,566.00
04/09/25	M. Rosenberg	Review and revise D. Carnie e-mail regarding DBMP hearing.	0.30	375.00
04/10/25	D. Carnie	Attend hearing in DBMP and prepare summary for client.	3.00	2,610.00
04/10/25	J. Guy	Attend DBMP conference, via telephone (3.3); review Aldrich and other asbestos bankruptcy dockets (separate occasions) (1.8).	5.10	7,599.00
04/11/25	D. Carnie	Circulate invite for telephonic hearing next week.	0.10	87.00
04/15/25	D. Carnie	Listen to hearing regarding proposed CMO.	0.50	435.00
04/15/25	M. Rosenberg	Listen to hearing regarding proposed CMO.	0.60	750.00



Grier, Joseph W. III. - 24998
page 3

May 12, 2025
Invoice No. 2274132

04/15/25	J. Guy	Attend court conference via telephone to hear ruling on CMO motion (.5); prepare for court conference (.7); follow-up discussions with FCR and Debtors' regarding same (separate occasions) (.3); strategize regarding next steps (.7); expert due diligence (.5).	2.70	4,023.00
04/16/25	D. Carnie	Due diligence on expert issues.	1.10	957.00
04/16/25	J. Guy	Telephone conference with FCR and Orrick team regarding expert witness due diligence (1.0); review NC and other pending asbestos bankruptcy dockets (1.5).	2.50	3,725.00
04/17/25	D. Carnie	Review pleadings in Aldrich and related cases.	0.80	696.00
04/23/25	D. Carnie	Analyze and confer with team regarding filings in related cases.	3.10	2,697.00
04/23/25	J. Guy	Telephone conference with B. Erens regarding case status (.3); review filings made by Mandlebrot Law firm and response to same (.8); emails to/from FCR and Orrick team regarding Mandlebrot law firm letter (.3); due diligence on claims made by Mandlebrot law firm (.7).	2.10	3,129.00
04/24/25	D. Carnie	Analyze and confer with team regarding filings in related cases.	1.50	1,305.00
04/24/25	M. Rosenberg	Confer with J. Guy regarding next steps.	0.30	375.00
04/24/25	J. Guy	Telephone conference with M. Rosenberg regarding staffing and next steps (.3); review asbestos bankruptcy dockets (1.5); review Discovery Referee report in DBMP (1.5); analyze impact of River Talc ruling and next steps (.8); strategize regarding plan confirmation (2.0).	6.10	9,089.00
04/25/25	D. Carnie	Analyze referee report from DBMP and confer with team regarding same and regarding upcoming Bestwall appeal.	3.50	3,045.00
04/28/25	D. Carnie	Draft summary of DBMP referee report.	0.40	348.00
04/28/25	J. Guy	Due diligence on expert issues.	0.40	596.00
04/29/25	D. Carnie	Draft summary of DBMP referee report for team.	1.60	1,392.00
04/29/25	D. Carnie	Revise common interest document regarding amici briefs in preparation for Bestwall appeal hearing.	1.20	1,044.00
04/29/25	D. Felder	Review pleadings in Imerys regarding FCR issues.	0.60	759.00



Grier, Joseph W. III. - 24998
page 4

May 12, 2025
Invoice No. 2274132

04/29/25	J. Guy	Review historical filings in Imerys, due diligence on halt of chapter 11 confirmation trial (1.8); review 4th Circuit Kaiser decision and due diligence concerning claims treatment (2.3); emails to/from Orrick team regarding Bestwall appeal and strategize regarding same (1.2).	5.30	7,897.00
04/30/25	D. Carnie	Draft update to client and confer with M. Rosenberg regarding same (2.5); attend diligence telephone conference (1.0).	3.50	3,045.00
04/30/25	M. Rosenberg	Telephone conference with FCR team regarding experts (.6); revise DBMP summary (.7); evaluate and revise oral argument points (1.2); compile sample expert applications (.8).	3.30	4,125.00
04/30/25	J. Guy	Further due diligence on experts.	0.80	1,192.00
04/30/25	J. Guy	Review asbestos dockets, Aldrich, DBMP, Bestwall, Red River, Imerys and others and analyze impact on Aldrich cases (collected over separate occasions).	2.00	2,980.00
Total Hours			90.60	
Total For Services			\$	111,571.00

Timekeeper Summary	Hours	Rate	Amount
Dan Carnie	32.80	870.00	28,536.00
Debra L. Felder	0.60	1,265.00	759.00
Jonathan P. Guy	44.90	1,490.00	66,901.00
Mike Rosenberg	12.30	1,250.00	15,375.00
Total All Timekeepers	90.60	\$1,231.47	\$111,571.00



Grier, Joseph W. III. - 24998
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May 12, 2025
Invoice No. 2274132

Disbursements

Court Photocopy/Document Retrieval Fee	59.40	
Hotel	371.11	
Other Business Meals	168.71	
Out of Town Business Meals	54.92	
Parking Expense	70.00	
Public Access to Court Electronic Records	460.50	
Taxi Expense	48.25	
Travel Expense, Air Fare	813.93	
Total Disbursements		\$2,046.82

Total For This Matter	\$113,617.82
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Grier, Joseph W. III. - 24998
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May 12, 2025
Invoice No. 2274132

For Legal Services Rendered Through April 30, 2025 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation

Matter: ASB-12739487

04/07/25	D. Felder	Review and revise Orrick's March invoice and prepare monthly fee statement regarding same.	0.70	885.50
04/20/25	D. Felder	Prepare and circulate Orrick's March 2025 monthly fee statement.	0.20	253.00
		Total Hours	0.90	
		Total For Services	\$	1,138.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.90	1,265.00	1,138.50
Total All Timekeepers	0.90	\$1,265.00	\$1,138.50

Total For This Matter **\$1,138.50**



Grier, Joseph W. III. - 24998
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May 12, 2025
Invoice No. 2274132

For Legal Services Rendered Through April 30, 2025 in Connection With:

Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation
Matter: ASB-12739487

04/01/25	D. Felder	Review TetraRho's March invoice and prepare monthly fee statement regarding same.	0.40	506.00
		Total Hours	0.40	
		Total For Services	\$	506.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.40	1,265.00	506.00
Total All Timekeepers	0.40	\$1,265.00	\$506.00
Total For This Matter			\$506.00

* * * **COMBINED TOTALS** * * *

Total Hours	91.90	
Total Fees, all Matters		\$113,215.50
Total Disbursements, all Matters		\$2,046.82
Total Amount Due		\$115,262.32

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> , ¹)	Case No. 20-30608 (LMJ)
)	
Debtors.)	(Jointly Administered)
)	

**FIFTY-SEVENTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM MAY 1, 2025 THROUGH MAY 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 Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Seventh Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from May 1, 2025 through May 31, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

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

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: May 1, 2025 – May 31, 2025	
Total Fees:	\$100,838.00
Total Expenses:	\$439.69
TOTAL:	\$101,277.69

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$91,193.89 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’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., pamoamccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartellmccarter.com and Phillip S. Pavlick, Esq., ppavlickmccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascittimccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., stacycordes-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., nramseyrc.com and Davis Lee Wright, Esq., dwrightrc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclaycapdale.com, James P. Wehner, Esq., jwehnercapdale.com, and Todd E. Phillips, Esq., tphillipscapdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompsonlawhssm.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, cwrightgrierlaw.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 Orrick, no later than June 26, 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 Orrick 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 Orrick.

This is the 12th day of June 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



Grier, Joseph W. III.
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

June 10, 2025
Client No. 24998
Invoice No. 2282232

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through May 31, 2025 in connection with the matters described on the attached pages:	\$	100,838.00
DISBURSEMENTS as per attached pages:		439.69
TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):	\$	<u>101,277.69</u>

Matter(s): 24998/2014, 2018, 2019, 2020, 2021
ASB-12739487

DUE UPON RECEIPT

The following is for information only:
Previous Balance not included in this invoice:
\$151,290.22 If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,
please reference your **INVOICE** and **CLIENT** numbers on your remittance.
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2282232*

**ELECTRONIC FUNDS
TRANSFERS:**

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S
Account Number: 4123701088
*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2282232
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice:
2282232*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



Grier, Joseph W. III.
521 E. Morehead St., Suite 440
Charlotte, NC 28202
Attn: Joseph W. Grier, III.

June 10, 2025
Client No. 24998
Invoice No. 2282232

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through May 31, 2025 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation
Matter: ASB-12739487

05/01/25	A. Summer	Review docket and search for transcript for D. Carnie.	0.50	250.00
05/01/25	D. Carnie	Confer with Orrick team regarding diligence telephone conference regarding next steps.	1.90	1,653.00
05/01/25	M. Rosenberg	Listen to DBMP hearing.	0.50	625.00
05/01/25	J. Guy	Attend DBMP status conference by phone (.5); review email from Orrick team regarding same (.1); emails to/from FCR and others regarding plan structure (.3); strategize regarding plan issues (.8); strategy telephone conference with FCR and Orrick team (.7); follow up telephone conference with FCR (.7).	3.10	4,619.00
05/02/25	J. Guy	Review dockets of pending asbestos/talc bankruptcy cases.	1.80	2,682.00
05/07/25	D. Carnie	Confer with Orrick team regarding Bestwall hearing in Fourth Circuit.	0.10	87.00
05/07/25	J. Guy	Travel to Richmond for 4th circuit while working on appellate issues (3.0); review appellate arguments (2.0); strategize regarding opportunities for plan confirmation (.8).	5.80	8,642.00
05/08/25	M. Rosenberg	Listen to Fourth Circuit oral argument.	1.00	1,250.00
05/08/25	J. Guy	Attend oral argument at 4th Circuit (.8); travel to DC while working on strategy issues (3.8); telephone conference with FCR regarding oral argument (.3).	4.90	7,301.00



Grier, Joseph W. III. - 24998
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June 10, 2025
Invoice No. 2282232

05/09/25	D. Carnie	Take notes during Bestwall Hearing (telephonic).	4.00	3,480.00
05/09/25	M. Rosenberg	Listen to hearing in Bestwall.	2.70	3,375.00
05/09/25	J. Guy	Attend Bestwall hearing on motion for protective order by telephone.	5.00	7,450.00
05/12/25	D. Carnie	Confer with team regarding diligence for estimation.	0.10	87.00
05/12/25	M. Rosenberg	Review outgoing correspondence by D. Carnie.	0.30	375.00
05/12/25	J. Guy	Review dockets of pending asbestos/talc bankruptcy cases (separate occasions).	1.30	1,937.00
05/13/25	D. Carnie	Request transcript for Fourth Circuit argument (.2); review and confer with client regarding third case management order for estimation in Bestwall (.6); review dockets and calendar dates for omnibus hearings (.2).	1.00	870.00
05/13/25	J. Guy	Claims expert due diligence.	0.80	1,192.00
05/14/25	J. Guy	Claims expert due diligence (2.8); emails and telephone conference to/from FCR regarding same (.4).	3.20	4,768.00
05/15/25	D. Carnie	Confer with M. Rosenberg regarding diligence for estimation.	0.20	174.00
05/15/25	M. Rosenberg	Confer with D. Carnie.	0.20	250.00
05/19/25	J. Guy	Further claims expert due diligence (.8); review dockets of pending asbestos/talc bankruptcy cases (separate occasions) (1.5).	2.30	3,427.00
05/20/25	D. Carnie	Review dockets for Revlon case and circulate documents to Orrick team.	1.60	1,392.00
05/23/25	J. Stephens	Communications regarding production and transfer and organize document production files.	0.60	144.00
05/23/25	D. Carnie	Attend diligence telephone conference regarding estimation (1.0); confer with Orrick team regarding same (.3).	1.30	1,131.00
05/23/25	J. Guy	Finalize claims expert review and due diligence.	1.80	2,682.00
05/27/25	D. Carnie	Confer with M. Rosenberg regarding estimation diligence.	0.10	87.00
05/28/25	D. Carnie	Review and revise documents for estimation diligence.	3.60	3,132.00



Grier, Joseph W. III. - 24998
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Invoice No. 2282232

05/29/25	M. Rosenberg	Assess recent docket activity.	0.60	750.00
05/31/25	J. Guy	Review Aldrich and other asbestos bankruptcy dockets.	1.60	2,384.00
Total Hours			51.90	
Total For Services			\$	66,196.00

Timekeeper Summary	Hours	Rate	Amount
Dan Carnie	13.90	870.00	12,093.00
Jonathan P. Guy	31.60	1,490.00	47,084.00
Mike Rosenberg	5.30	1,250.00	6,625.00
John G. Stephens	0.60	240.00	144.00
Amy R. Summer	0.50	500.00	250.00
Total All Timekeepers	51.90	\$1,275.45	\$66,196.00

Disbursements

Hotel	221.28	
Out of Town Business Meals	115.85	
Parking Expense	50.00	
Public Access to Court Electronic Records	2.50	
Taxi Expense	50.06	
Total Disbursements		\$439.69

Total For This Matter **\$66,635.69**



Grier, Joseph W. III. - 24998
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June 10, 2025
Invoice No. 2282232

For Legal Services Rendered Through May 31, 2025 in Connection With:

Matter: 2018 - Aldrich Pump - Orrick Retention
Matter: ASB-12739487

05/12/25	J. Guy	Review Eighth supplemental declaration.	0.20	298.00
		Total Hours	0.20	
		Total For Services	\$	298.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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Jonathan P. Guy	0.20	1,490.00	298.00
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Total All Timekeepers	0.20	\$1,490.00	\$298.00
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Total For This Matter			\$298.00
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Grier, Joseph W. III. - 24998
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June 10, 2025
Invoice No. 2282232

For Legal Services Rendered Through May 31, 2025 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation
Matter: ASB-12739487

05/12/25	D. Felder	Review and revise Orrick's April 2025 invoice.	0.30	379.50
05/15/25	D. Felder	Prepare Orrick's monthly fee statement for April 2025 and circulate to notice parties.	0.30	379.50
05/27/25	J. Guy	Attention to Orrick May 2025 billables.	0.30	447.00
		Total Hours	0.90	
		Total For Services	\$	1,206.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.60	1,265.00	759.00
Jonathan P. Guy	0.30	1,490.00	447.00
Total All Timekeepers	0.90	\$1,340.00	\$1,206.00

Total For This Matter **\$1,206.00**



Grier, Joseph W. III. - 24998
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June 10, 2025
Invoice No. 2282232

For Legal Services Rendered Through May 31, 2025 in Connection With:

Matter: 2020 - Aldrich Pump - FCR and Other Professionals Retention
Matter: ASB-12739487

05/01/25	M. Rosenberg	Discuss declaration and engagement letter with prospective expert (.4); draft portions of declaration (2.2); revise engagement letter (1.0); prepare and revise ancillary materials (1.8).	5.40	6,750.00
05/01/25	D. Felder	Email correspondence with J. Guy and M. Rosenberg regarding next steps for estimation expert (.5); review materials and email same to M. Rosenberg (.5); telephone conference with M. Rosenberg and expert regarding next steps (.5).	1.50	1,897.50
05/01/25	J. Guy	Due diligence on testifying expert and application for same (.5); telephone conference with C. Wright regarding expert (separate occasions) (.2); attention to expert application and numerous emails and telephone conferences with FCR team regarding same (2.7).	3.40	5,066.00
05/02/25	M. Rosenberg	Consult with possible expert (.3); correspond with local counsel regarding same (.2); continue to prepare declaration, engagement letter, and revise application (4.1).	4.60	5,750.00
05/02/25	J. Guy	Work on expert application and related issues.	2.70	4,023.00
05/05/25	M. Rosenberg	Conduct follow-up review of proposed expert's materials and exchange correspondence.	1.40	1,750.00
05/05/25	J. Guy	Due diligence on potential testifying experts.	1.80	2,682.00
05/09/25	J. Guy	Due diligence on experts.	0.70	1,043.00
05/28/25	J. Guy	Review expert application and emails to/from Orrick/FCR teams.	0.80	1,192.00



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June 10, 2025
Invoice No. 2282232

05/29/25	M. Rosenberg	Evaluate draft engagement letter and coordinate revisions with D. Carnie.	1.00	1,250.00
05/31/25	J. Guy	Review and revise expert application.	0.40	596.00
Total Hours			23.70	
Total For Services			\$	31,999.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	1.50	1,265.00	1,897.50
Jonathan P. Guy	9.80	1,490.00	14,602.00
Mike Rosenberg	12.40	1,250.00	15,500.00
Total All Timekeepers	23.70	\$1,350.19	\$31,999.50

Total For This Matter **\$31,999.50**



Grier, Joseph W. III. - 24998
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June 10, 2025
Invoice No. 2282232

For Legal Services Rendered Through May 31, 2025 in Connection With:

Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation
Matter: ASB-12739487

05/05/25	D. Felder	Review Anderson Kill's monthly fee statement and invoice for April and email to A. Pelton regarding same (.2); update TetraRho's April monthly fee statement and email to notice parties (.3).	0.50	632.50
05/29/25	D. Felder	Review April 2025 monthly fee statements and invoices for FCR and Grier Wright Martinez and emails with B. Franklin regarding same.	0.40	506.00
		Total Hours	0.90	
		Total For Services	\$	1,138.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.90	1,265.00	1,138.50
Total All Timekeepers	0.90	\$1,265.00	\$1,138.50

Total For This Matter **\$1,138.50**

*** * * COMBINED TOTALS * * ***

Total Hours	77.60	
Total Fees, all Matters		\$100,838.00
Total Disbursements, all Matters		\$439.69
Total Amount Due		\$101,277.69

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

February 1, 2025 through May 31, 2025

Project Category	Matter Number	Total Hours for the Interim Period (2/1/2025 - 5/31/2025)	Total Hours from the Petition Date (6/18/2020- 5/31/2025)	Total Fees for the Interim Period (2/1/2025-5/31/2025)	Total Fees from the Petition Date (6/18/2020- 5/31/2025)
Case Administration	2012	0.00	3.10	\$0.00	\$3,878.00
Insurance	2013	0.20	38.00	\$298.00	\$40,700.00
Litigation	2014	464.8	3,570.60	\$525,944.00	\$3,705,431.50
Adversary Proceeding Litigation	2015	0.00	467.20	\$0.00	\$450,032.50
Plan & Disclosure Statement	2016	0.00	204.30	\$0.00	\$213,988.00
Due Diligence	2017	0.00	82.00	\$0.00	\$89,511.50
Orrick Retention	2018	0.20	56.50	\$298.00	\$47,868.00
Orrick Compensation	2019	4.80	112.18	\$6,252.00	\$114,429.50
FCR and Other Professionals - Retention	2020	23.70	91.40	\$31,999.50	\$99,471.50
FCR and Other Professionals - Compensation	2021	7.60	154.30	\$9,839.00	\$158,798.00
Non-Working Travel	2022	7.0	146.40	\$5,215.00	\$89,860.00
TOTAL:		508.30	\$4,925.98	\$579,845.50	\$5,013,968.50

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

February 1, 2025 through May 31, 2025

Expense Category	Total Expenses for the Interim Period (2/1/2025-5/31/2025)	Total Expenses from the Petition Date (6/18/2020-5/31/2025)
Deposition Transcripts	\$0.00	\$548.70
Document Reproduction (@ .20/page)	\$0.00	\$506.20
Document Retrieval Fee	\$59.40	\$59.40
Express Delivery	\$0.00	\$36.88
Hotel	\$2,717.21	\$11,311.80
Lexis Research	\$0.00	\$1,552.00
Out of Town Business Meals / Other Business Meals	\$374.46	\$1,693.51
Outside Services – Data Processing of Debtors and Non-Debtors Document Productions	\$0.00	\$2,033.60
PACER Charges	\$463.00	\$7,967.50
Parking Expense	\$155.00	\$1,060.46
Taxi Expense	\$322.29	\$1,457.87
Travel Expense, Air Fare (coach fare)	\$3,083.54	\$13,628.74
Travel Expense, Mileage	\$0.00	\$544.04
Westlaw Research	\$0.00	\$23,681.00
Word Processing	\$0.00	\$768.90
TOTAL:	\$7,174.90	\$66,850.60

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

February 1, 2025 through May 31, 2025

Name of Professional	Position - Bar Year	2025 Hourly Billing Rate	Total Hours Billed (2/1/2025- 5/31/2025)	Total Compensation (2/1/2025- 5/31/2025)
Jonathan P. Guy	Senior Counsel - 1996	\$1,490	188.00	\$274,027.50
Debra L. Felder	Senior Associate - 2002	\$1,265	8.80	\$11,132.00
Michael Rosenberg	Senior Associate - 2013	\$1,250	63.80	\$79,750.00
Daniel Carnie	Associate – 2023	\$870	246.60	\$214,542.00
John G. Stephens	Project Support Specialist	\$240	0.60	\$144.00
Amy R. Summer	Research Specialist	\$500	0.50	\$250.00
TOTAL:			508.30	\$579,845.50

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 st Interim	11/9/2020; Dkt. No. 423	8/21/2020-9/30/2020	\$46,289.00	\$0.00	Dkt. No. 459; 12/3/2020
2 nd Interim	3/11/2021; Dkt. No. 617	10/1/2020-1/31/2021	\$488,022.50	\$5,033.60	Dkt. No. 661; 4/2/2021
3 rd Interim	7/9/2021; Dkt. No. 762	2/1/2021-5/31/2021	\$630,867.00	\$6,609.60	Dkt. No. 795; 8/2/2021
4 th Interim	10/29/2021; Dkt. No. 863	6/1/2021-9/30/2021	\$240,028.50	\$1,488.88	Dkt. No. 928; 12/8/2021
5 th Interim	3/1/2022; Dkt. Nos. 1008	10/1/2021-1/31/2022	\$251,136.00	\$1,506.62	Dkt. No. 1065; 3/23/2022
6 th Interim	7/11/2022; Dkt. No. 1262	2/1/2022-6/31/2022	\$299,435.00	\$3,405.87	Dkt. No. 1311; 8/3/2022
7 th Interim	11/7/2022; Dkt. No. 1388	1/1/2022-9/30/2022	\$289,310.50	\$5,524.85	Dkt. No. 1458; 12/7/2022
8 th Interim	3/8/2023; Dkt. No. 1631	10/1/2022-1/31/2023	\$212,252.50	\$4,182.20	Dkt. No. 1827; 6/21/2023
9 th Interim	8/3/2023; Dkt. No. 1902	2/1/2023-5/31/2023	\$368,257.00	\$3,956.38	Dkt. No. 1902; 8/2/2023
10 th Interim	11/7/2023; Dkt. No. 1990	6/1/2023-9/30/2023	\$295,603.00	\$5,181.57	Dkt. No. 2026; 11/30/2023
11 th Interim	3/15/2024; Dkt. No. 2146	10/1/2023-1/31/2024	\$115,605.00	\$730.90	Dkt. No. 2193; 4/11/2024
12 th Interim	7/11/2024; Dkt. No. 2300	2/1/2024-5/31/2024	\$563,076.50	\$19,282.50	Dkt. No. 2339; 8/2/2024
13 th Interim	11/13/2024; Dkt. No. 2442	6/1/2024-9/30/2024	\$201,324.00	\$684.90	Dkt. No. 2481; 12/12/2024
14 th Interim	3/13/2025; Dkt. No. 2587	10/1/2024-1/31/2025	\$432,916.50	\$2,354.83	Dkt. No. 2637; 4/4/2025
TOTAL:			\$4,434,123.00	\$59,942.70	