

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

In re

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

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

**FIFTEENTH INTERIM APPLICATION OF K&L GATES LLP FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
FOR REIMBURSEMENT OF EXPENSES AS  
SPECIAL INSURANCE COUNSEL TO THE DEBTORS  
FOR THE PERIOD FROM FEBRUARY 1, 2025 THROUGH MAY 31, 2025**

Name of Applicant:	<b>K&amp;L Gates LLP</b>
Authorized to Provide Professional Services to:	The above-captioned Debtors and Debtors in Possession
Date of Order Approving Retention:	June 19, 2020 (as of the Petition Date), and amended on August 18, 2020
Petition Date:	June 18, 2020
Period for which compensation and reimbursement are sought:	February 1, 2025 through May 31, 2025
Amount of Compensation sought as actual, reasonable and necessary:	\$88,892.55
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$38.99
Total Compensation Approved by Interim Fee Order to Date:	\$3,350,635.18
Total Expenses Approved by Interim Fee Order to Date:	\$8,199.73

<sup>1</sup> The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.



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Total Allowed Compensation Paid to Date: \$3,350,635.18

Total Allowed Expenses Paid to Date: \$8,199.73

Compensation Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed: \$24,568.12

Expenses Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed: \$0.00

This is a(n):  X  interim   final application

Prior Monthly Fee Statements Submitted:

Date Submitted	Month Covered	Fees	Expenses
March 31, 2025	February 2025	\$13,153.05	\$0.00
April 30, 2025	March 2025	\$14,144.85	\$0.00
May 30, 2025	April 2025	\$30,195.90	\$0.00
June 30, 2025	May 2025	\$31,398.75	\$38.99

To date, K&L Gates LLP has not received any objections to any prior monthly fee statements, provided that the objection deadline relating to the *Fifty-Ninth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period from May 1, 2025 Through May 31, 2025* has not yet passed.

**SUMMARY OF HOURS AND COMPENSATION**

<b>Name</b>	<b>Position - Bar Year</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
D. F. McGONIGLE	PARTNER (1988)	\$1,200.00	67.5	\$81,000.00
J. C. SAFAR	PARTNER (1997)	\$1,075.00	5.3	\$5,697.50
M. WESTBROOK	PARTNER (1996)	\$875.00	1.0	\$875.00
E. STEELE	PARTNER (2014)	\$765.00	4.6	\$3,519.00
E. D. FLEURY	COUNSEL (2015)	\$700.00	9.1	\$6,370.00
J. BORTMES	E-DAT SR. ATTY	\$380.00	1.5	\$570.00
M. URICK	PARALEGAL	\$450.00	0.2	\$90.00
S. CARROLL	E-DAT ANLST II	\$270.00	2.4	\$648.00
<b>TOTAL</b>			<b>91.6</b>	<b>\$98,769.50</b>
<b>TOTAL w/ 10% DISC</b>				<b>\$88,892.55</b>

**COMPENSATION BY PROJECT CATEGORY**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Aldrich Asbestos Insurance Advice	33.5	\$31,660.20
Aldrich Chapter 11 Retention & Compensation	6.1	\$5,452.65
Murray Asbestos Insurance Advice	47.9	\$48,017.25
Murray Chapter 11 Retention and Compensation	4.1	\$3,762.45
<b>TOTAL</b>	<b>91.6</b>	<b>\$88,892.55</b>

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Delivery and Courier Service	Federal Express	\$38.99
<b>TOTAL</b>		<b>\$38.99</b>

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**FIFTEENTH INTERIM APPLICATION OF K&L GATES LLP FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND FOR  
REIMBURSEMENT OF EXPENSES AS  
SPECIAL INSURANCE COUNSEL TO THE DEBTORS FOR  
THE PERIOD FROM FEBRUARY 1, 2025 THROUGH MAY 31, 2025**

K&L Gates LLP, special insurance counsel to the above-captioned debtors and debtors in possession (the "Debtors"), makes its fifteenth interim application for allowance of compensation of \$88,892.55 and reimbursement of expenses of \$38.99 for the period from February 1, 2025 through May 31, 2025 (the "Compensation Period") in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals*, dated July 15, 2020 [Dkt. 171] (the "Interim Compensation Order").

In support of this Application, K&L Gates LLP respectfully represents as follows:

**Overview**

1. K&L Gates LLP attorneys and paraprofessionals expended a total of 91.6 hours during the Compensation Period for which compensation is requested.
2. During the Compensation Period, K&L Gates LLP did not receive any payments or promises of payment from any source other than the Debtors for services rendered

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<sup>1</sup> The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. No agreement or understanding exists between K&L Gates LLP or any third person for the sharing of compensation, except as allowed by section 504(b) of the Bankruptcy Code and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") with respect to the sharing of compensation between and among partners of K&L Gates LLP.

3. Pursuant to the Interim Compensation Order, included with this Application is: (a) a schedule identifying all K&L Gates LLP professionals and paraprofessionals who have performed services in these chapter 11 cases during the Compensation Period, the capacities in which each individual is employed by K&L Gates LLP, the hourly billing rate charged by K&L Gates LLP for the services performed by each such individual, the aggregate number of hours expended in this case during the Compensation Period for each professional and paraprofessional, the total fees billed therefor, and the year in which each professional was first licensed to practice law; (b) a summary of services by billing category for services rendered by K&L Gates LLP during the Compensation Period; and (c) a schedule summarizing, by category, the actual and necessary disbursements that K&L Gates LLP incurred during the Compensation Period in connection with the performance of professional services for the Debtors and for which it seeks reimbursement.

4. Attached hereto collectively as part of Exhibit A are K&L Gates LLP's itemized monthly time records for professionals and paraprofessionals performing services for the Debtors during the Compensation Period and K&L Gates LLP's itemized records detailing any expenses incurred on behalf of the Debtors during the Compensation Period.

5. This Application complies with sections 330 and 331 of title 11 of the United States Code (the "Bankruptcy Code"), the Bankruptcy Rules, the Interim

Compensation Order, the *Guidelines for Compensation and Expense Reimbursement of Professionals* issued by this Court (the "Compensation Guidelines"), and the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the "Local Rules").

### **Background**

6. On June 18, 2020 (the "Petition Date"), the Debtors commenced their reorganization cases (the "Chapter 11 Cases") by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. These Chapter 11 Cases have been consolidated for procedural purposes only and are being administered jointly.

7. On June 18, 2020, the Debtors filed the *Ex Parte Application of the Debtors for an Order Authorizing Them to Retain and Employ K&L Gates LLP as Special Insurance Counsel as of the Petition Date* [Dkt. 25] (the "Retention Application"), by which the Debtors sought authority to retain and employ K&L Gates LLP as special insurance counsel in the Chapter 11 Cases. On June 19, 2020, the Court entered an order [Dkt. 75] (the "Original Retention Order") authorizing the retention of K&L Gates LLP as the Debtors' special insurance counsel as of the Petition Date.

8. On July 7, 2020, the Court entered an order [Dkt. 147] appointing the official committee of asbestos personal injury claimants (the "Asbestos Committee") in these Chapter 11 Cases.

9. On July 8, 2020, and August 17, 2020, K&L Gates LLP filed its first and second supplemental declarations, respectively, providing additional disclosures related to its role in representation of the predecessor of one of the Debtors and the pre-petition restructuring involving the Debtors [Dkt. 149 and 256]. In addition, the Debtors and the Asbestos Committee agreed on an amendment to the Original Retention Order to reserve certain rights of the Asbestos



Committee. On August 18, 2020, the Court entered the amended retention order agreed upon by the Debtors and the Asbestos Committee [Dkt. 263] (the "K&L Gates Retention Order"), which superseded the Original Retention Order.

10. On November 9, 2020, K&L Gates LLP filed the *First Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 18, 2020 Through September 30, 2020* [Dkt. 425] (the "First Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 18, 2020 through September 30, 2020, in accordance with the Interim Compensation Order.

11. On November 25, 2020, K&L Gates LLP filed its third supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 440].

12. On December 2, 2020, the Court entered an order [Dkt. 453] (the "First Interim Approval Order") granting the First Interim Application.

13. On March 12, 2021, K&L Gates LLP filed the *Second Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2020 Through January 31, 2021* [Dkt. 623] (the "Second Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2020 through January 31, 2021, in accordance with the Interim Compensation Order.

14. On April 5, 2021, the Court entered an order [Dkt. 664] (the "Second Interim Approval Order") granting the Second Interim Application.

15. On July 9, 2021, K&L Gates LLP filed the *Third Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2021 Through May 31, 2021* [Dkt. 768] (the "Third Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2021 through May 31, 2021, in accordance with the Interim Compensation Order.

16. On July 28, 2021, the Court entered an order [Dkt. 791] (the "Third Interim Approval Order") granting the Third Interim Application.

17. On September 30, 2021, K&L Gates LLP filed its fourth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 836].

18. On November 9, 2021, K&L Gates LLP filed its *Fourth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2021 Through September 30, 2021* [Dkt. 878] (the "Fourth Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2021 through September 30, 2021, in accordance with the Interim Compensation Order.

19. On December 8, 2021, the Court entered an order [Dkt. 933] (the "Fourth Interim Approval Order") granting the Fourth Interim Application.

20. On March 11, 2022, K&L Gates LLP filed its *Fifth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2021 Through January 31, 2022* [Dkt. 1039] (the “Fifth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2021 through January 31, 2022, in accordance with the Interim Compensation Order.

21. On April 6, 2022, the Court entered an order [Dkt. 1110] (the “Fifth Interim Approval Order”) granting the Fifth Interim Application.

22. On May 19, 2022, K&L Gates LLP filed its fifth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1181].

23. On June 22, 2022, K&L Gates LLP filed its sixth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1218].

24. On July 11, 2022, K&L Gates LLP filed its *Sixth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2022 Through May 31, 2022* [Dkt. 1267] (the “Sixth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2022 through May 31, 2022, in accordance with the Interim Compensation Order.

25. On July 29, 2022, the Court entered an order [Dkt. 1296] (the “Sixth Interim Approval Order”) granting the Sixth Interim Application.

26. On November 9, 2022, K&L Gates LLP filed its *Seventh Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2022 Through September 30, 2022* [Dkt. 1404] (the “Seventh Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2022 through September 30, 2022, in accordance with the Interim Compensation Order.

27. On December 14, 2022, the Court entered an order [Dkt. 1472] (the “Seventh Interim Approval Order”) granting the Seventh Interim Application.

28. On March 9, 2023, K&L Gates LLP filed its seventh supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1637].

29. On March 13, 2023, K&L Gates LLP filed its *Eighth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2022 Through January 31, 2023* [Dkt. 1644] (the “Eighth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2022 through January 31, 2023, in accordance with the Interim Compensation Order.

30. On March 31, 2023, the Court entered an order [Dkt. 1693] (the “Eighth Interim Approval Order”) granting the Eighth Interim Application.

31. On April 28, 2023, K&L Gates LLP filed its eighth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1727].

32. On July 10, 2023, K&L Gates LLP filed its *Ninth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2023 Through May 31, 2023* [Dkt. 1853] (the “Ninth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2023 through May 31, 2023, in accordance with the Interim Compensation Order.

33. On August 28, 2023, the Court entered an order [Dkt. 1933] (the “Ninth Interim Approval Order”) granting the Ninth Interim Application.

34. On October 10, 2023, K&L Gates LLP filed its ninth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1969].

35. On November 9, 2023, K&L Gates LLP filed its *Tenth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2023 Through September 30, 2023* [Dkt. 1998] (the “Tenth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2023 through September 30, 2023, in accordance with the Interim Compensation Order.

36. On November 29, 2023, the Court entered an order [Dkt. 2022] (the “Tenth Interim Approval Order”) granting the Tenth Interim Application.

37. On March 11, 2024, K&L Gates LLP filed its *Eleventh Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2023 Through January 31, 2024* [Dkt. 2132] (the “Eleventh Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2023 through January 31, 2024, in accordance with the Interim Compensation Order.

38. On March 29, 2024, the Court entered an order [Dkt. 2163] (the “Eleventh Interim Approval Order”) granting the Eleventh Interim Application.

39. On July 10, 2024, K&L Gates LLP filed its *Twelfth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2024 Through May 31, 2024* [Dkt. 2294] (the “Twelfth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2024 through May 31, 2024, in accordance with the Interim Compensation Order.

40. On July 29, 2024, the Court entered an order [Dkt. 2327] (the “Twelfth Interim Approval Order”) granting the Twelfth Interim Application.

41. On October 25, 2024, K&L Gates LLP filed its tenth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 2396].

42. On November 12, 2024, K&L Gates LLP filed its *Thirteenth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from*

*June 1, 2024 Through September 30, 2024* [Dkt. 2425] (the “Thirteenth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2024 through September 30, 2024, in accordance with the Interim Compensation Order.

43. On December 9, 2024, the Court entered an order [Dkt. 2465] (the “Thirteenth Interim Approval Order”) granting the Thirteenth Interim Application.

44. On December 17, 2024, K&L Gates LLP filed its eleventh supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 2492].

45. On March 12, 2025, K&L Gates LLP filed its *Amended Fourteenth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2024 Through January 31, 2025* [Dkt. 2573] (the “Fourteenth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2024 through January 31, 2025, in accordance with the Interim Compensation Order.

46. On April 2, 2025, the Court entered an order [Dkt. 2625] (the “Fourteenth Interim Approval Order”) granting the Fourteenth Interim Application.

47. On June 2, 2025, K&L Gates LLP filed its twelfth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 2681].

48. On June 26, 2025, K&L Gates LLP filed its thirteenth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 2691].

### **Jurisdiction**

49. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for this matter is proper in this district pursuant to 28 U.S.C. § 1409.

### **Summary of Services**

50. The professional services performed by K&L Gates LLP were necessary and appropriate to the administration of the Debtors' Chapter 11 Cases, as described in detail below and in Exhibit A. These services were in the best interests of the Debtors and other parties in interest. The compensation requested is commensurate with the complexity and nature of the issues and tasks involved.

51. All of the services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Debtors, and not on behalf of any other entity.

### **Prior Monthly Fee Statements**

52. Pursuant to the Interim Compensation Order, K&L Gates LLP has submitted the following monthly fee statements (collectively, the “Prior Monthly Fee Statements”) to the Debtors for the four months comprising the Compensation Period, each of which is incorporated herein by reference in its entirety:<sup>2</sup>

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<sup>2</sup> Copies of the Prior Monthly Fee Statements are attached hereto collectively as Exhibit A.



Date Submitted	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
March 31, 2025	February 1-28, 2025	\$13,153.05	\$0.00	\$11,837.75	\$1,315.30
April 30, 2025	March 1-31, 2025	\$14,144.85	\$0.00	\$12,730.37	\$1,414.48
May 30, 2025	April 1-30, 2025	\$30,195.90	\$0.00	\$0.00	\$30,195.90
June 30, 2025	May 1-31, 2025	\$31,398.75	\$38.99	N/A	\$31,437.74

53. In total, K&L Gates LLP has submitted the Prior Monthly Fee Statements during the Compensation Period for total fees of \$88,892.55 and total expenses of \$38.99. As of the date of this Application, no party has objected to any of K&L Gates LLP's Prior Monthly Fee Statements.<sup>3</sup>

#### **Compensation by Project Category**

The following is a summary of the activities performed by K&L Gates LLP professionals and paraprofessionals during the Compensation Period, organized by project billing category.<sup>4</sup>

54. **Asbestos Insurance Advice (Combined for Both Debtors) — 81.4 hours — \$79,677.45**

During the Compensation Period, K&L Gates LLP professionals and paraprofessionals counseled and represented the Debtors on insurance coverage issues,

<sup>3</sup> The objection deadline relating to the *Fifty-Ninth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period from May 1, 2025 Through May 31, 2025* has not yet passed.

<sup>4</sup> The summary set forth below is qualified in its entirety by reference to the time and services detail attached to each Prior Monthly Fee Statement. Project billing categories for which no time was charged during the Compensation Period are not listed below.

particularly in relation to the Debtors' asbestos liabilities. The work performed by K&L Gates LLP included the following activities, among others:

- a) Analyzing and reporting on information relating to the Debtors' historical insurance coverage and related agreements, including working with the Debtors' insurance consultants, and generating work product related thereto;
- b) Assisting the Debtors in connection with insurer insolvency claim analysis and submission;
- c) Assisting the Debtors in addressing requests for insurance-related information from various interested parties in relation to the Chapter 11 Cases;
- d) Reporting to and interacting with the Debtors' insurers in connection with matters relating to the Chapter 11 Cases;
- e) Assisting the Debtors in addressing discovery issues in connection with matters relating to the Chapter 11 Cases;
- f) Participating in strategy and update conferences with the Debtors, general bankruptcy counsel, and special asbestos counsel in relation to the forgoing; and
- g) Attending hearings in connection with the Chapter 11 Cases.

**55. Chapter 11 Retention & Compensation (Combined for Both Debtors)**

**— 10.2 hours — \$9,215.10**

During the Compensation Period, K&L Gates LLP professionals and paraprofessionals devoted limited time to (a) reviewing and revising the January 2025, February 2025, March 2025 and April 2025 invoices for privilege, to preserve client confidentiality, and to ensure compliance with the Local Rules, (b) drafting, revising and submitting the Fifty-Fifth, Fifty-Sixth, Fifty-Seventh and Fifty-Eighth Monthly Fee Statements, (c) drafting, revising and submitting the Fourteenth Interim Application and the Fourteenth Interim Approval Order, and (d) drafting and submitting the twelfth supplemental declaration. K&L Gates LLP intends to seek compensation in connection with reviewing and revising the May 2025 invoices, drafting,

revising and submitting the Fifty-Ninth Monthly Fee Statement, drafting and submitting the thirteenth supplemental declaration, and preparing this Application at a later date.

**Expenses Incurred by K&L Gates LLP**

56. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by professionals employed in a chapter 11 case. Accordingly, K&L Gates LLP seeks reimbursement for expenses ("Expenses") incurred in rendering services to the Debtors during the Compensation Period in the amount of \$38.99. Itemized records detailing the Expenses incurred during the Compensation Period are attached to the Prior Monthly Fee Statements.

**Retainer Disclosure**

57. Prior to the Petition Date, the Debtors paid K&L Gates LLP retainer amounts totaling \$605,000 for professional services and expenses (together, the "Retainer"). Prior to the commencement of the Chapter 11 Cases, \$324,451.40 of the Retainer was applied to actual and estimated fees and expenses incurred prior to June 18, 2020. As of the Petition Date, the Retainer balance was \$280,922.03, subject to reconciliation of prepetition fees and expenses. Following K&L Gates LLP's final reconciliation of its prepetition fees and expenses in connection with the First Interim Application, at the time of entry of the First Interim Approval Order, the Retainer balance was \$30,484.16.

58. Following the entry of the First Interim Approval Order by the Court, and consistent with paragraph 2(f) of the Interim Compensation Order, the remaining Retainer balance has been applied to payments sought in connection with the First Interim Application (collectively, the "Interim Amounts"). Specifically, K&L Gates LLP applied \$30,484.16 of the Retainer balance to the Interim Amount sought in connection with the September 2020 Monthly Fee Statement. Following the application of this amount, the remaining Retainer balance now is

\$0.00. Accordingly, K&L Gates LLP did not apply any Retainer amounts to the Prior Monthly Fee Statements that are the subject of this Application.

### **Conclusion**

59. The fees and expenses requested herein by K&L Gates LLP are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable nonbankruptcy cases in a competitive national legal market and should be approved on an interim basis pursuant to sections 330 and 331 of the Bankruptcy Code, the Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules.

### **Notice**

60. This Application has been served in accordance with the Interim Compensation Order on the Notice Parties, as defined therein. In accordance with the Interim Compensation Order, a notice of opportunity for hearing on this Application in accordance with Local Rule 9013-1(e)(7) has been served on the Notice Parties and all parties that have filed a notice of appearance with the Clerk of this Court and requested such notice. K&L Gates LLP submits that, in light of the nature of the relief requested, no other or further notice need be provided.

### **No Prior Request**

61. No prior request for the relief sought in this Application has been made to this or any other court.

WHEREFORE, K&L Gates LLP respectfully requests that, pursuant to sections 330 and 331 of the Bankruptcy Code, the Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules, the Court (a) enter an order substantially in the form attached

hereto as Exhibit B granting the relief requested herein and (b) grant such other and further relief to K&L Gates LLP as the Court may deem just and proper.

Dated: July 10, 2025  
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle  
David McGonigle  
K&L Gates LLP  
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(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR  
DEBTORS AND DEBTORS IN POSSESSION

**EXHIBIT A**

**Prior Monthly Fee Statements**

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re

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

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

**FIFTY-SIXTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS 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"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Fifty-Sixth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From February 1, 2025 Through February 28, 2025* (the "Monthly Fee Statement").

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period February 1, 2025 through February 28, 2025 (the "Statement Period").

<sup>1</sup>

The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

**Total Fees and Expenses for the Statement Period**

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$13,153.05
Total Expenses	\$0.00
<b>TOTAL</b>	<b>\$13,153.05</b>

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$11,837.74 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

**Billing Adjustments**

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$399.00 in fees will not be charged to the Debtors.

**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, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 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, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., [feeapplications@ncwba.uscourts.gov](mailto: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., [pamoa@mccarter.com](mailto:pamoa@mccarter.com)), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., [abartell@mccarter.com](mailto:abartell@mccarter.com) and Phillip S. Pavlick, Esq., [ppavlick@mccarter.com](mailto:ppavlick@mccarter.com)), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., [gmascitti@mccarter.com](mailto:gmascitti@mccarter.com)) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., [scordes@burtcordeslaw.com](mailto:scordes@burtcordeslaw.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., [namsey@rc.com](mailto:namsey@rc.com) and Davis Lee Wright, Esq., [dwright@rc.com](mailto:dwright@rc.com)), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., [kmaclay@capdale.com](mailto:kmaclay@capdale.com), James P. Wehner, Esq., [jwehner@capdale.com](mailto:jwehner@capdale.com) and Todd E. Phillips, Esq., [tphillips@capdale.com](mailto:tphillips@capdale.com)) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., [gthompson@lawhssm.com](mailto:gthompson@lawhssm.com)), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., [jgrier@grierlaw.com](mailto:jgrier@grierlaw.com), A. Cotton Wright, Esq., [cwright@grierlaw.com](mailto:cwright@grierlaw.com)), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., [jguy@orrick.com](mailto:jguy@orrick.com), Debra L. Felder, Esq., [dfelder@orrick.com](mailto:dfelder@orrick.com)).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the

affected Retained Professional, and upon the other Notice Parties no later than April 14, 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 K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested 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 K&L Gates LLP at a later date.

Dated: March 31, 2025  
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR  
DEBTORS AND DEBTORS IN POSSESSION

**EXHIBIT A**

**Invoices**

**K&L GATES**

K&L GATES LLP  
K&L GATES CENTER  
210 SIXTH AVENUE  
PITTSBURGH, PA 15222-2613  
T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018

Aldrich Pump LLC  
Allan Tananbaum, Esquire  
800-E Beatty Street  
Davidson, North Carolina 28036

Invoice Date: March 1, 2025  
Invoice Number: 100149145  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY****Total USD \$****Asbestos Insurance Advice (00001)**

Fees	6,800.00	
10% Discount	(680.00)	
<b>Total Amount Due This Matter</b>		<b>\$ 6,120.00</b>

**Chapter 11 Retention and Compensation (00002)**

Fees	1,812.00	
10% Discount	(181.20)	
<b>Total Amount Due This Matter</b>		<b>\$ 1,630.80</b>

**CURRENT INVOICE DUE - All Matters****\$ 7,750.80****EBILLED INVOICE**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Aldrich Pump LLC

Invoice Date:

March 1, 2025

Invoice Number:

100149145

K&amp;L Ref. Number:

0246802

**Asbestos Insurance Advice - (00001)****\$6,120.00****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
05-FEB-25	Dave McGonigle	0.10	L120	Communications with B. Erens regarding status and planning (0.1)	120.00
06-FEB-25	Dave McGonigle	0.10	L120	Privilege and confidentiality review of Stout invoices (0.1)	120.00
07-FEB-25	Dave McGonigle	0.60	L120	Participate in works-in-process call with Debtors and Affiliates (0.5) (0.9/2); communications with insurer representative regarding status (0.1)	720.00
07-FEB-25	Joe Safar	0.50	L120	Attend works-in-process call (0.5) (0.9/2)	537.50
10-FEB-25	Dave McGonigle	0.10	L120	Emails with M. Evert and J. Miller regarding status and planning (0.1)	120.00
13-FEB-25	Dave McGonigle	0.10	L120	Conference with insurer representative regarding status (0.1)	120.00
14-FEB-25	Dave McGonigle	1.10	L120	Conference with insurer representative regarding status and planning (0.1) (0.2/2); attention to insurer update call planning and course of dealings (0.1) (0.2/2); participate in works-in-process call (0.3) (0.6/2); attention to insurer contact updates (0.4) (0.8/2); email to insurers regarding update call (0.1); conference with insurer representative regarding status (0.1)	1,320.00
14-FEB-25	Joe Safar	0.30	L120	Attend works-in-process call (0.3) (0.6/2)	322.50
17-FEB-25	Dave McGonigle	0.10	L120	Emails with J. Miller regarding proposed 502(d) Order status (0.1)	120.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

March 1, 2025

Invoice Number:

100149145

K&amp;L Ref. Number:

0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
18-FEB-25	Dave McGonigle	0.20	L120	Attention to information request from party in interest regarding insurance receipts (0.1) (0.2/2); emails with A. Tananbaum regarding information request (0.1)	240.00
24-FEB-25	Dave McGonigle	1.20	L120	Communications with team regarding planning for insurer update call (0.1) (0.2/2); prepare for insurer update call (0.4) (0.7/2); conference with J. Safar regarding status and planning (0.1) (0.2/2); conference with B. Erens and M. Evert regarding status and planning (0.3) (0.6/2); conference with insurer representative regarding status (0.1); report to J. Safar regarding status and planning (0.1); email to A. Tananbaum regarding status (0.1)	1,440.00
24-FEB-25	Joe Safar	0.10	L120	Confer with D. McGonigle regarding status and strategy (0.1) (0.2/2)	107.50
24-FEB-25	Jennifer Bortmes	0.20	L120	Confer with D. Osipovich regarding C. Maisano request for electronic document collection export (0.1) (0.2/2); coordinate with C. McBoyle regarding analyst assistance with email collection export requests (0.1) (0.2/2)	76.00
25-FEB-25	Dave McGonigle	0.40	L120	Participate in insurer update call (0.2) (0.3/2); follow-up conference with B. Erens (0.1); email and conference with J. Safar regarding update call (0.1)	480.00
25-FEB-25	Joe Safar	0.30	L120	Attend insurer update call (0.2) (0.3/2); prepare for insurer update call (0.1) (0.2/2)	322.50
26-FEB-25	Shawn Carroll	1.20	L120	Prepare and export requested e-Discovery and metadata per request of J. Bortmes (1.2) (2.4/2)	324.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

March 1, 2025

Invoice Number:

100149145

K&amp;L Ref. Number:

0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
26-FEB-25	Jennifer Bortmes	0.30	L120	Coordinate with litigation support team and case team regarding counsel request for export of email collections at the request of D. Osipovich (0.3) (0.6/2)	114.00
27-FEB-25	Dave McGonigle	0.10	L120	Emails from C. Maisano, D. Osipovich and team regarding discovery matters (0.1) (0.2/2)	120.00
27-FEB-25	Jennifer Bortmes	0.20	L120	Coordinate with S. Carroll and C. Maisano regarding transfer of email data (0.2) (0.3/2)	76.00
		<u>7.20</u>			<u>\$6,800.00</u>

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Dave McGonigle	4.10	1,200.00	4,920.00
Joe Safar	1.20	1,075.00	1,290.00
<b>e-DAT Anlst II</b>			
Shawn Carroll	1.20	270.00	324.00
<b>e-DAT Sr Atty</b>			
Jennifer Bortmes	<u>0.70</u>	380.00	<u>266.00</u>
	<b>7.20</b>		<b>\$6,800.00</b>

**TASK SUMMARY**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	<u>7.20</u>	<u>6,800.00</u>
<b>Total Fees</b>		<b>7.20</b>	<b>\$6,800.00</b>

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

March 1, 2025

Invoice Number:

100149145

K&amp;L Ref. Number:

0246802

**Chapter 11 Retention and Compensation - (00002)****\$1,630.80****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
20-FEB-25	Dave McGonigle	0.30	B160	Attention to draft monthly billing statement (0.3) (0.6/2)	360.00
24-FEB-25	Dave McGonigle	0.50	B160	Revise draft monthly fee statement (0.4) (0.8/2); emails with E. Steele regarding billing procedures (0.1)	600.00
26-FEB-25	Emily Steele	0.50	B160	Draft fifty-fifth monthly fee statement (January 2025) (0.1) (0.2/2); analyze January 2025 invoices for confidentiality and privilege (0.1); begin drafting fourteenth interim fee application (Oct. '24 - Jan. '25) (0.3) (0.6/2)	382.50
27-FEB-25	Dave McGonigle	0.20	B160	Emails with E. Steele regarding interim application (0.1); review and approve monthly fee statement (0.1) (0.2/2)	240.00
27-FEB-25	Emily Steele	0.30	B160	Analyze and advise regarding information needed for fourteenth interim fee application (0.2) (0.4/2); finalize and circulate January 2025 monthly fee statement (0.1) (0.2/2)	229.50
		<u>1.80</u>			<u>\$1,812.00</u>

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Emily Steele	0.80	765.00	612.00
Dave McGonigle	<u>1.00</u>	<u>1,200.00</u>	<u>1,200.00</u>
	<b>1.80</b>		<b>\$1,812.00</b>

EBILLED INVOICE



Aldrich Pump LLC

Invoice Date:

March 1, 2025

Invoice Number:

100149145

K&amp;L Ref. Number:

0246802

**TASK SUMMARY**

<b><u>Task Code</u></b>	<b><u>Description</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
B160	Fee/Employment Applications	1.80	1,812.00
<b>Total Fees</b>		<b>1.80</b>	<b>\$1,812.00</b>

EBILLED INVOICE

**K&L GATES**

K&L GATES LLP  
K&L GATES CENTER  
210 SIXTH AVENUE  
PITTSBURGH, PA 15222-2613  
T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018

Murray Boiler LLC  
Allan Tananbaum, Esquire  
800-E Beaty Street  
Davidson, NC 28036

Invoice Date: March 1, 2025  
Invoice Number: 100149146  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY****Total USD \$****Asbestos Insurance Advice (00001)**

Fees	4,507.00	
10% Discount	(450.70)	
<b>Total Amount Due This Matter</b>		<b>\$ 4,056.30</b>

**Chapter 11 Retention and Compensation (00002)**

Fees	1,495.50	
10% Discount	(149.55)	
<b>Total Amount Due This Matter</b>		<b>\$ 1,345.95</b>

**CURRENT INVOICE DUE - All Matters****\$ 5,402.25****EBILLED INVOICE**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Murray Boiler LLC

Invoice Date:

March 1, 2025

Invoice Number:

100149146

K&amp;L Ref. Number:

0246801

**Asbestos Insurance Advice - (00001)****\$4,056.30****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
07-FEB-25	Dave McGonigle	0.40	L120	Participate in works-in-process call with Debtors and Affiliates (0.4) (0.9/2)	480.00
07-FEB-25	Joe Safar	0.40	L120	Attend works-in-process call (0.4) (0.9/2)	430.00
14-FEB-25	Dave McGonigle	0.90	L120	Conference with insurer representative regarding status and planning (0.1) (0.2/2); attention to insurer update call planning and course of dealings (0.1) (0.2/2); participate in works-in-process call (0.3) (0.6/2); attention to insurer contact updates (0.4) (0.8/2)	1,080.00
14-FEB-25	Joe Safar	0.30	L120	Attend works-in-process call (0.3) (0.6/2)	322.50
18-FEB-25	Dave McGonigle	0.10	L120	Attention to information request from party in interest regarding insurance receipts (0.1) (0.2/2)	120.00
24-FEB-25	Dave McGonigle	0.80	L120	Communications with team regarding planning for insurer update call (0.1) (0.2/2); prepare for insurer update call (0.3) (0.7/2); conference with J. Safar regarding status and planning (0.1) (0.2/2); conference with B. Erens and M. Evert regarding status and planning (0.3) (0.6/2)	960.00
24-FEB-25	Joe Safar	0.10	L120	Confer with D. McGonigle regarding status and strategy (0.1) (0.2/2)	107.50
24-FEB-25	Jennifer Bortmes	0.20	L120	Confer with D. Osipovich regarding C. Maisano request for electronic document collection export (0.1) (0.2/2); coordinate with C. McBoyle regarding analyst assistance with email collection export requests (0.1) (0.2/2)	76.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

March 1, 2025

Invoice Number:

100149146

K&amp;L Ref. Number:

0246801

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
25-FEB-25	Dave McGonigle	0.10	L 120	Participate in insurer update call (0.1) (0.3/2)	120.00
25-FEB-25	Joe Safar	0.20	L 120	Attend insurer update call (0.1) (0.3/2); prepare for insurer update call (0.1) (0.2/2)	215.00
26-FEB-25	Shawn Carroll	1.20	L 120	Prepare and export requested e-Discovery and metadata per request of J. Bortmes (1.2) (2.4/2)	324.00
26-FEB-25	Jennifer Bortmes	0.30	L 120	Coordinate with litigation support team and case team regarding counsel request for export of email collections at the request of D. Osipovich (0.3) (0.6/2)	114.00
27-FEB-25	Dave McGonigle	0.10	L 120	Emails from C. Maisano, D. Osipovich and team regarding discovery matters (0.1) (0.2/2)	120.00
27-FEB-25	Jennifer Bortmes	0.10	L 120	Coordinate with S. Carroll and C. Maisano regarding transfer of email data (0.1) (0.3/2)	38.00
		<u>5.20</u>			<u>\$4,507.00</u>

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Dave McGonigle	2.40	1,200.00	2,880.00
Joe Safar	1.00	1,075.00	1,075.00
<b>e-DAT Anlst II</b>			
Shawn Carroll	1.20	270.00	324.00
<b>e-DAT Sr Atty</b>			
Jennifer Bortmes	0.60	380.00	228.00
	<u>5.20</u>		<u>\$4,507.00</u>

**TASK SUMMARY**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	5.20	4,507.00
<b>Total Fees</b>		<u>5.20</u>	<u>\$4,507.00</u>

Murray Boiler LLC

Invoice Date:

March 1, 2025

Invoice Number:

100149146

K&amp;L Ref. Number:

0246801

**Chapter 11 Retention and Compensation - (00002)****\$1,345.95****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
20-FEB-25	Dave McGonigle	0.30	B160	Attention to draft monthly billing statement (0.3) (0.6/2)	360.00
24-FEB-25	Dave McGonigle	0.40	B160	Revise draft monthly fee statement (0.4) (0.8/2)	480.00
26-FEB-25	Emily Steele	0.40	B160	Draft fifty-fifth monthly fee statement (January 2025) (0.1) (0.2/2); begin drafting fourteenth interim fee application (Oct. '24 - Jan. '25) (0.3) (0.6/2)	306.00
27-FEB-25	Dave McGonigle	0.10	B160	Review and approve monthly fee statement (0.1) (0.2/2)	120.00
27-FEB-25	Emily Steele	0.30	B160	Analyze and advise regarding information needed for fourteenth interim fee application (0.2) (0.4/2); finalize and circulate January 2025 monthly fee statement (0.1) (0.2/2)	229.50
		<u>1.50</u>			<u>\$1,495.50</u>

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Emily Steele	0.70	765.00	535.50
Dave McGonigle	0.80	1,200.00	960.00
	<u>1.50</u>		<u>\$1,495.50</u>

**TASK SUMMARY**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	1.50	1,495.50
<b>Total Fees</b>		<u>1.50</u>	<u>\$1,495.50</u>

EBILLED INVOICE

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re

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

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

**FIFTY-SEVENTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED  
BY K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS  
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"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Fifty-Seventh Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From March 1, 2025 Through March 31, 2025* (the "Monthly Fee Statement").

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period March 1, 2025 through March 31, 2025 (the "Statement Period").

<sup>1</sup>

The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

**Total Fees and Expenses for the Statement Period**

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$14,144.85
Total Expenses	\$0.00
<b>TOTAL</b>	<b>\$14,144.85</b>

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$12,730.36 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

**Billing Adjustments**

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$135.00 in fees will not be charged to the Debtors.

**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, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 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, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., [feeapplications@ncwba.uscourts.gov](mailto: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., [pamoa@mccarter.com](mailto:pamoa@mccarter.com)), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., [abartell@mccarter.com](mailto:abartell@mccarter.com) and Phillip S. Pavlick, Esq., [ppavlick@mccarter.com](mailto:ppavlick@mccarter.com)), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., [gmascitti@mccarter.com](mailto:gmascitti@mccarter.com)) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., [scordes@burtcordeslaw.com](mailto:scordes@burtcordeslaw.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., [namsey@rc.com](mailto:namsey@rc.com) and Davis Lee Wright, Esq., [dwright@rc.com](mailto:dwright@rc.com)), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., [kmaclay@capdale.com](mailto:kmaclay@capdale.com), James P. Wehner, Esq., [jwehner@capdale.com](mailto:jwehner@capdale.com) and Todd E. Phillips, Esq., [tphillips@capdale.com](mailto:tphillips@capdale.com)) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., [gthompson@lawhssm.com](mailto:gthompson@lawhssm.com)), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., [jgrier@grierlaw.com](mailto:jgrier@grierlaw.com), A. Cotton Wright, Esq., [cwright@grierlaw.com](mailto:cwright@grierlaw.com)), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., [jguy@orrick.com](mailto:jguy@orrick.com), Debra L. Felder, Esq., [dfelder@orrick.com](mailto:dfelder@orrick.com)).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the



affected Retained Professional, and upon the other Notice Parties no later than May 14, 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 K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested 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 K&L Gates LLP at a later date.

Dated: April 30, 2025  
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR  
DEBTORS AND DEBTORS IN POSSESSION

**EXHIBIT A**

**Invoices**

**K&L GATES**

K&amp;L GATES CENTER

210 SIXTH AVENUE

PITTSBURGH, PA 15222-2613

T +1 412 355 6500 F +1 412 355 6501 klgates.com

Tax ID No. 25 0921018

Aldrich Pump LLC  
Allan Tananbaum, Esquire  
800-E Beatty Street  
Davidson, North Carolina 28036

Invoice Date: April 1, 2025  
Invoice Number: 100160744  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY****Total USD \$****Asbestos Insurance Advice (00001)**

Fees	6,672.50	
10% Discount	(667.25)	
<b>Total Amount Due This Matter</b>		<b>\$ 6,005.25</b>

**Chapter 11 Retention and Compensation (00002)**

Fees	1,965.00	
10% Discount	(196.50)	
<b>Total Amount Due This Matter</b>		<b>\$ 1,768.50</b>

**CURRENT INVOICE DUE - All Matters****\$ 7,773.75****EBILLED INVOICE**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Aldrich Pump LLC

Invoice Date:

April 1, 2025

Invoice Number:

100160744

K&amp;L Ref. Number:

0246802

**Asbestos Insurance Advice - (00001)****\$6,005.25****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
07-MAR-25	Dave McGonigle	0.30	L120	Participate in works-in-process call with Debtors and Affiliates (0.3) (0.6/2)	360.00
07-MAR-25	Joe Safar	0.30	L120	Attend works-in-process call (0.3) (0.6/2)	322.50
10-MAR-25	Dave McGonigle	0.10	L120	Review Stout invoices for privilege and confidentiality (0.1)	120.00
14-MAR-25	Dave McGonigle	0.30	L120	Participate in works-in-process call (0.3) (0.5/2)	360.00
14-MAR-25	Joe Safar	0.30	L120	Attend works-in-process call (0.3) (0.5/2)	322.50
17-MAR-25	Dave McGonigle	0.20	L120	Communications with team regarding insurer information request (0.1) (0.2/2); respond to insurer information request (0.1)	240.00
18-MAR-25	Dave McGonigle	0.10	L120	Emails with M. Urick regarding counsel lists and review correspondence regarding Court notices of defective filing (0.1)	120.00
18-MAR-25	Joe Safar	0.20	L120	Review insurance work product (0.2) (0.3/2)	215.00
18-MAR-25	Mark Urick	0.20	L120	Update Service and counsel lists (0.2)	90.00
19-MAR-25	Dave McGonigle	0.20	L120	Respond to insurance information request from representative of party in interest (0.1) (0.2/2); emails with M. Evert and team regarding status and planning (0.1) (0.2/2)	240.00
20-MAR-25	Dave McGonigle	0.10	L120	Email to insurer representative regarding status and planning (0.1)	120.00
21-MAR-25	Dave McGonigle	1.00	L120	Participate in works-in-process call with Debtors and Affiliates (0.2) (0.4/2); review and analysis of CMO moving papers and responses (0.8) (1.6/2)	1,200.00
21-MAR-25	Joe Safar	0.20	L120	Attend works-in-process call (0.2) (0.4/2)	215.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

April 1, 2025

Invoice Number:

100160744

K&amp;L Ref. Number:

0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
24-MAR-25	Dave McGonigle	0.50	L120	Conference with insurer representative regarding status and upcoming hearing (0.1) (0.2/2); email to team regarding upcoming hearing and status (0.1) (0.2/2); address A. Tananbaum inquiry regarding insurer insolvency (0.2) (0.4/2); review reply in support of CMO motion (0.1) (0.2/2)	600.00
25-MAR-25	Dave McGonigle	0.10	L120	Conference with A. Tananbaum regarding insurer insolvency matters (0.1) (0.2/2)	120.00
27-MAR-25	Dave McGonigle	1.40	L120	Telephonic participation in motion hearing (1.0) (2.0/2); emails with A. Tananbaum regarding hearing (0.1); emails with Debtors' counsel regarding recent developments (0.2) (0.3/2); conference with J. Safar regarding status (0.1)	1,680.00
27-MAR-25	Joe Safar	0.10	L120	Conference with D. McGonigle regarding status (0.1)	107.50
28-MAR-25	Dave McGonigle	0.10	L120	Communications with B. Erens and M. Evert regarding status (0.1) (0.2/2)	120.00
31-MAR-25	Dave McGonigle	0.10	L120	Emails with team and insurer representative regarding recent developments and planning (0.1) (0.2/2)	120.00
		<b>5.80</b>			<b>\$6,672.50</b>

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Dave McGonigle	4.50	1,200.00	5,400.00
Joe Safar	1.10	1,075.00	1,182.50
<b>Paralegal</b>			
Mark Urick	0.20	450.00	90.00
	<b>5.80</b>		<b>\$6,672.50</b>

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

April 1, 2025

Invoice Number:

100160744

K&amp;L Ref. Number:

0246802

**TASK SUMMARY**

<b><u>Task Code</u></b>	<b><u>Description</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
L120	Analysis/Strategy	5.80	6,672.50
<b>Total Fees</b>		<b>5.80</b>	<b>\$6,672.50</b>

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

April 1, 2025

Invoice Number:

100160744

K&amp;L Ref. Number:

0246802

**Chapter 11 Retention and Compensation - (00002)****\$1,768.50****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
04-MAR-25	Emily Steele	0.20	B160	Further revise fourteenth interim fee application (0.2) (0.3/2)	153.00
10-MAR-25	Dave McGonigle	0.20	B160	Review and approve interim fee application (0.2) (0.3/2)	240.00
11-MAR-25	Emily Steele	0.20	B160	Finalize fourteenth interim fee application and circulate same for filing (0.2) (0.3/2)	153.00
12-MAR-25	Emily Steele	0.10	B160	Draft amended fourteenth interim fee application (0.1) (0.2/2)	76.50
13-MAR-25	Dave McGonigle	0.10	B160	Emails with E. Steele regarding PFD corruption and court filing issues (0.1)	120.00
27-MAR-25	Dave McGonigle	0.30	B160	Prepare monthly fee statement (0.3) (0.6/2)	360.00
28-MAR-25	Dave McGonigle	0.30	B160	Attention to billing matters and timekeeper approvals (0.3) (0.6/2)	360.00
28-MAR-25	Emily Steele	0.10	B160	Begin drafting fifty sixth monthly fee statement (February 2025) (0.1)	76.50
30-MAR-25	Emily Steele	0.10	B160	Analyze February invoices for confidentiality and privilege concerns (0.1)	76.50
31-MAR-25	Dave McGonigle	0.10	B160	Review and comment on draft monthly fee statement (0.1) (0.2/2)	120.00
31-MAR-25	Emily Steele	0.30	B160	Draft and finalize monthly fee statement (February 2025) and correspondence regarding same (0.2) (0.4/2); draft proposed order granting fourteenth interim fee application (0.1) (0.2/2)	229.50
		<b>2.00</b>			<b>\$1,965.00</b>

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

April 1, 2025

Invoice Number:

100160744

K&amp;L Ref. Number:

0246802

**TIMEKEEPER SUMMARY**

	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
<b>Partner</b>			
Emily Steele	1.00	765.00	765.00
Dave McGonigle	1.00	1,200.00	1,200.00
	<u>2.00</u>		<u>\$1,965.00</u>

**TASK SUMMARY**

<b><u>Task Code</u></b>	<b><u>Description</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
B160	Fee/Employment Applications	2.00	1,965.00
<b>Total Fees</b>		<u>2.00</u>	<u>\$1,965.00</u>

EBILLED INVOICE



**K&L GATES**

K&amp;L GATES CENTER

210 SIXTH AVENUE

PITTSBURGH, PA 15222-2613

T +1 412 355 6500 F +1 412 355 6501 klgates.com

Tax ID No. 25 0921018

Murray Boiler LLC  
Allan Tananbaum, Esquire  
800-E Beaty Street  
Davidson, NC 28036

Invoice Date: April 1, 2025  
Invoice Number: 100160743  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY****Total USD \$****Asbestos Insurance Advice (00001)**

Fees	5,660.00	
10% Discount	(566.00)	
<b>Total Amount Due This Matter</b>		<b>\$ 5,094.00</b>

**Chapter 11 Retention and Compensation (00002)**

Fees	1,419.00	
10% Discount	(141.90)	
<b>Total Amount Due This Matter</b>		<b>\$ 1,277.10</b>

**CURRENT INVOICE DUE - All Matters****\$ 6,371.10**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.**EBILLED INVOICE**

Murray Boiler LLC

Invoice Date:

April 1, 2025

Invoice Number:

100160743

K&amp;L Ref. Number:

0246801

**Asbestos Insurance Advice - (00001)****\$5,094.00****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
07-MAR-25	Dave McGonigle	0.30	L120	Participate in works-in-process call with Debtors and Affiliates (0.3) (0.6/2)	360.00
07-MAR-25	Joe Safar	0.30	L120	Attend works-in-process call (0.3) (0.6/2)	322.50
14-MAR-25	Dave McGonigle	0.20	L120	Participate in works-in-process call (0.2) (0.5/2)	240.00
14-MAR-25	Joe Safar	0.20	L120	Attend works-in-process call (0.2) (0.5/2)	215.00
17-MAR-25	Dave McGonigle	0.10	L120	Communications with team regarding insurer information request (0.1) (0.2/2)	120.00
18-MAR-25	Joe Safar	0.10	L120	Review insurance work product (0.1) (0.3/2)	107.50
19-MAR-25	Dave McGonigle	0.20	L120	Respond to insurance information request from representative of party in interest (0.1) (0.2/2); emails with M. Evert and team regarding status and planning (0.1) (0.2/2)	240.00
21-MAR-25	Dave McGonigle	1.00	L120	Participate in works-in-process call with Debtors and Affiliates (0.2) (0.4/2); review and analysis of CMO moving papers and responses (0.8) (1.6/2)	1,200.00
21-MAR-25	Joe Safar	0.20	L120	Attend works-in-process call (0.2) (0.4/2)	215.00
24-MAR-25	Dave McGonigle	0.50	L120	Conference with insurer representative regarding status and upcoming hearing (0.1) (0.2/2); email to team regarding upcoming hearing and status (0.1) (0.2/2); address A. Tananbaum inquiry regarding insurer insolvency (0.2) (0.4/2); review reply in support of CMO motion (0.1) (0.2/2)	600.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

April 1, 2025

Invoice Number:

100160743

K&amp;L Ref. Number:

0246801

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
25-MAR-25	Dave McGonigle	0.40	L120	Analysis of Stout work product regarding insurer insolvencies (0.2); conference with D. Ramljak regarding Stout insolvent insurer analysis (0.1); conference with A. Tananabaum regarding insurer insolvency matters (0.1) (0.2/2)	480.00
27-MAR-25	Dave McGonigle	1.10	L120	Telephonic participation in motion hearing (1.0) (2.0/2); emails with Debtors' counsel regarding recent developments (0.1) (0.3/2)	1,320.00
28-MAR-25	Dave McGonigle	0.10	L120	Communications with B. Erens and M. Evert regarding status (0.1) (0.2/2)	120.00
31-MAR-25	Dave McGonigle	0.10	L120	Emails with team and insurer representative regarding recent developments and planning (0.1) (0.2/2)	120.00
		<u>4.80</u>			<u>\$5,660.00</u>

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Dave McGonigle	4.00	1,200.00	4,800.00
Joe Safar	0.80	1,075.00	860.00
	<u>4.80</u>		<u>\$5,660.00</u>

TASK SUMMARY

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	4.80	5,660.00
<b>Total Fees</b>		<u>4.80</u>	<u>\$5,660.00</u>

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

April 1, 2025

Invoice Number:

100160743

K&amp;L Ref. Number:

0246801

**Chapter 11 Retention and Compensation - (00002)****\$1,277.10****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
04-MAR-25	Emily Steele	0.10	B160	Further revise fourteenth interim fee application (0.1) (0.3/2)	76.50
10-MAR-25	Dave McGonigle	0.10	B160	Review and approve interim fee application (0.1) (0.3/2)	120.00
11-MAR-25	Emily Steele	0.10	B160	Finalize fourteenth interim fee application and circulate same for filing (0.1) (0.3/2)	76.50
12-MAR-25	Emily Steele	0.10	B160	Draft amended fourteenth interim fee application (0.1) (0.2/2)	76.50
27-MAR-25	Dave McGonigle	0.30	B160	Prepare monthly fee statement (0.3) (0.6/2)	360.00
28-MAR-25	Dave McGonigle	0.30	B160	Attention to billing matters and timekeeper approvals (0.3) (0.6/2)	360.00
31-MAR-25	Dave McGonigle	0.10	B160	Review and comment on draft monthly fee statement (0.1) (0.2/2)	120.00
31-MAR-25	Emily Steele	0.30	B160	Draft and finalize monthly fee statement (February 2025) and correspondence regarding same (0.2) (0.4/2); draft proposed order granting fourteenth interim fee application (0.1) (0.2/2)	229.50
		<u>1.40</u>			<u>\$1,419.00</u>

**TIMEKEEPER SUMMARY**

<u>Partner</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Emily Steele	0.60	765.00	459.00
Dave McGonigle	0.80	1,200.00	960.00
	<u>1.40</u>		<u>\$1,419.00</u>

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

April 1, 2025

Invoice Number:

100160743

K&amp;L Ref. Number:

0246801

**TASK SUMMARY**

<b><u>Task Code</u></b>	<b><u>Description</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
B160	Fee/Employment Applications	1.40	1,419.00
<b>Total Fees</b>		<b>1.40</b>	<b>\$1,419.00</b>

EBILLED INVOICE

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re

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

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

**FIFTY-EIGHTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS 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"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Fifty-Eighth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From April 1, 2025 Through April 30, 2025* (the "Monthly Fee Statement").

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period April 1, 2025 through April 30, 2025 (the "Statement Period").

<sup>1</sup>

The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

**Total Fees and Expenses for the Statement Period**

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$30,195.90
Total Expenses	\$0.00
<b>TOTAL</b>	<b>\$30,195.90</b>

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$27,176.31 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

**Billing Adjustments**

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$120.00 in fees will not be charged to the Debtors.

**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, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmillerr@rcdlaw.net); (c) the office of the United States Bankruptcy

Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., [feeapplications@ncwba.uscourts.gov](mailto: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., [pamoa@mccarter.com](mailto:pamoa@mccarter.com)), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., [abartell@mccarter.com](mailto:abartell@mccarter.com) and Phillip S. Pavlick, Esq., [ppavlick@mccarter.com](mailto:ppavlick@mccarter.com)), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., [gmascitti@mccarter.com](mailto:gmascitti@mccarter.com)) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., [scordes@burtcordeslaw.com](mailto:scordes@burtcordeslaw.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., [namsey@rc.com](mailto:namsey@rc.com) and Davis Lee Wright, Esq., [dwright@rc.com](mailto:dwright@rc.com)), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., [kmaclay@capdale.com](mailto:kmaclay@capdale.com), James P. Wehner, Esq., [jwehner@capdale.com](mailto:jwehner@capdale.com) and Todd E. Phillips, Esq., [tphillips@capdale.com](mailto:tphillips@capdale.com)) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., [gthompson@lawhssm.com](mailto:gthompson@lawhssm.com)), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., [jgrier@grierlaw.com](mailto:jgrier@grierlaw.com), A. Cotton Wright, Esq., [cwright@grierlaw.com](mailto:cwright@grierlaw.com)), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., [jguy@orrick.com](mailto:jguy@orrick.com), Debra L. Felder, Esq., [dfelder@orrick.com](mailto:dfelder@orrick.com)).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the



affected Retained Professional, and upon the other Notice Parties no later than June 13, 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 K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested 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 K&L Gates LLP at a later date.

Dated: May 30, 2025  
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR  
DEBTORS AND DEBTORS IN POSSESSION

**EXHIBIT A**

**Invoices**

**K&L GATES****K&L GATES LLP**  
K&L GATES CENTER  
210 SIXTH AVENUE  
PITTSBURGH, PA 15222-2613T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018Aldrich Pump LLC  
Allan Tananbaum, Esquire  
800-E Beatty Street  
Davidson, North Carolina 28036Invoice Date: May 1, 2025  
Invoice Number: 100172773  
K&L Gates Contact: Dave McGonigle**INVOICE SUMMARY****Total USD \$****Asbestos Insurance Advice (00001)**

Fees	8,827.50	
10% Discount	(882.75)	
<b>Total Amount Due This Matter</b>		<b>\$ 7,944.75</b>

**Chapter 11 Retention and Compensation (00002)**

Fees	1,069.50	
10% Discount	(106.95)	
<b>Total Amount Due This Matter</b>		<b>\$ 962.55</b>

**CURRENT INVOICE DUE - All Matters****\$ 8,907.30****EBILLED INVOICE**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,  
500 First Ave 92  
Pittsburgh, PA 15219Beneficiary: K&L Gates LLP  
Acct No.: 1077692783Routing/ABA: 043000096  
Swift Code: PNCCUS33Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Aldrich Pump LLC

Invoice Date:

May 1, 2025

Invoice Number:

100172773

K&amp;L Ref. Number:

0246802

**Asbestos Insurance Advice - (00001)****\$7,944.75****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
01-APR-25	Dave McGonigle	0.60	L120	Communications with C. Maisano regarding estimation discovery matters (0.2) (0.3/2); analysis of estimation discovery issues (0.1) (0.2/2); conference with J. Safar regarding estimation discovery matters (0.1) (0.2/2); email to M. Westbrook regarding estimation discovery matters (0.2) (0.4/2)	720.00
01-APR-25	Joe Safar	0.10	L120	Confer with D. McGonigle regarding status (0.1) (0.2/2)	107.50
02-APR-25	Dave McGonigle	0.20	L120	Conference with J. Safar regarding estimation discovery matters (0.1); emails with M. Westbrook regarding estimation discovery matters (0.1)	240.00
02-APR-25	Joe Safar	0.10	L120	Confer and e-mail with D. McGonigle regarding estimation discovery issues (0.1) (0.2/2)	107.50
04-APR-25	Dave McGonigle	0.20	L120	Communications with M. Westbrook regarding estimation discovery matters (0.1); review recent orders (0.1)	240.00
08-APR-25	Dave McGonigle	0.60	L120	Analysis of estimation discovery issues (0.1) (0.2/2); conference with M. Westbrook regarding estimation discovery strategy issues (0.4) (0.8/2); review Stout invoices for confidentiality and privilege (0.1)	720.00
08-APR-25	Margaret Westbrook	1.00	L120	Review estimation discovery strategy (1.0)	875.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

May 1, 2025

Invoice Number:

100172773

K&amp;L Ref. Number:

0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
14-APR-25	Dave McGonigle	1.20	L120	Review Court correspondence regarding status conference (0.1); research regarding trust question raised by Jones Day (0.3) (0.6/2); attention to insurance related issues and trust discovery questions (0.4) (0.7/2); communications with C. Maisano regarding discovery matters (0.2) (0.4/2); emails with A. Pruitt regarding discovery related background inquiry (0.2) (0.3/2)	1,440.00
15-APR-25	Dave McGonigle	0.30	L120	Telephonic attendance at status conference regarding estimation (0.3) (0.6/2)	360.00
17-APR-25	Dave McGonigle	0.70	L120	Conference with M. Evert, C. Maisano and M. Cody regarding estimation discovery issues (0.2) (0.3/2); research regarding discovery matters (0.1); communications with insurer counsel in relation to discovery matters (0.1) (0.2/2); review estimation CMO (0.1); conference with insurer counsel and C. Maisano regarding discovery matters (0.2) (0.3/2)	840.00
18-APR-25	Joe Safar	0.10	L120	Confer with D. McGonigle regarding insolvent insurer issue (0.1)	107.50
22-APR-25	Dave McGonigle	1.10	L120	Review and analysis of recent report regarding insolvent insurer estate (0.9); emails with IRC colleagues regarding insolvent estate (0.2)	1,320.00
23-APR-25	Dave McGonigle	0.20	L120	Conference with policyholder-side counsel regarding potential insurer insolvency claim initiative (0.2)	240.00
24-APR-25	Dave McGonigle	0.20	L120	Communications with C. Maisano and team regarding estimation discovery matters (0.2) (0.3/2)	240.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

May 1, 2025

Invoice Number:

100172773

K&amp;L Ref. Number:

0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
25-APR-25	Dave McGonigle	0.40	L120	Participate in works-in-process call with Debtors and Affiliates (0.3) (0.5/2); conference with J. Safar regarding status (0.1) (0.2/2)	480.00
25-APR-25	Joe Safar	0.40	L120	Attend works-in-process call (0.3) (0.5/2); confer with D. McGonigle regarding follow-up (0.1) (0.2/2)	430.00
30-APR-25	Dave McGonigle	0.30	L120	Conference with A. Tanbanbaum regarding status and planning (0.3) (0.5/2)	360.00
		<u>7.70</u>			<u>\$8,827.50</u>

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Margaret Westbrook	1.00	875.00	875.00
Dave McGonigle	6.00	1,200.00	7,200.00
Joe Safar	0.70	1,075.00	752.50
	<u>7.70</u>		<u>\$8,827.50</u>

**TASK SUMMARY**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	7.70	8,827.50
<b>Total Fees</b>		<u>7.70</u>	<u>\$8,827.50</u>

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

May 1, 2025

Invoice Number:

100172773

K&amp;L Ref. Number:

0246802

**Chapter 11 Retention and Compensation - (00002)****\$962.55****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
18-APR-25	Dave McGonigle	0.10	B160	Attention to billing and payment reconciliation (0.1) (0.2/2)	120.00
22-APR-25	Dave McGonigle	0.40	B160	Reconcile fee receipts (0.3) (0.5/2); email to Jones Day regarding fee reconciliation (0.1) (0.2/2)	480.00
24-APR-25	Dave McGonigle	0.10	B160	Attention to monthly fee statement (0.1) (0.2/2)	120.00
28-APR-25	Emily Steele	0.20	B160	Analyze March 2025 invoices for confidentiality and privilege (0.1); draft monthly fee statement for March 2025 (0.1) (0.2/2)	153.00
29-APR-25	Dave McGonigle	0.10	B160	Review and approve monthly fee statement (0.1)	120.00
29-APR-25	Emily Steele	0.10	B160	Finalize and circulate monthly fee statement for March 2025 (0.1)	76.50
		<u>1.00</u>			<u>\$1,069.50</u>

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Emily Steele	0.30	765.00	229.50
Dave McGonigle	<u>0.70</u>	<u>1,200.00</u>	<u>840.00</u>
	<u>1.00</u>		<u>\$1,069.50</u>

**TASK SUMMARY**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	<u>1.00</u>	<u>1,069.50</u>
<b>Total Fees</b>		<b>1.00</b>	<b>\$1,069.50</b>

EBILLED INVOICE

**K&L GATES**

K&L GATES LLP  
K&L GATES CENTER  
210 SIXTH AVENUE  
PITTSBURGH, PA 15222-2613  
T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018

Murray Boiler LLC  
Allan Tananbaum, Esquire  
800-E Beaty Street  
Davidson, NC 28036

Invoice Date: May 1, 2025  
Invoice Number: 100172768  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY****Total USD \$****Asbestos Insurance Advice (00001)**

Fees	22,977.50	
10% Discount	(2,297.75)	
<b>Total Amount Due This Matter</b>		<b>\$ 20,679.75</b>

**Chapter 11 Retention and Compensation (00002)**

Fees	676.50	
10% Discount	(67.65)	
<b>Total Amount Due This Matter</b>		<b>\$ 608.85</b>

**CURRENT INVOICE DUE - All Matters****\$ 21,288.60****EBILLED INVOICE**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.



Murray Boiler LLC

Invoice Date: May 1, 2025  
 Invoice Number: 100172768  
 K&L Ref. Number: 0246801

**Asbestos Insurance Advice - (00001)**

**\$20,679.75**

**Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
01-APR-25	Dave McGonigle	0.50	L120	Communications with C. Maisano regarding estimation discovery matters (0.1) (0.3/2); analysis of estimation discovery issues (0.1) (0.2/2); conference with J. Safar regarding estimation discovery matters (0.1) (0.2/2); email to M. Westbrook regarding estimation discovery matters (0.2) (0.4/2)	600.00
01-APR-25	Joe Safar	0.10	L120	Confer with D. McGonigle regarding status (0.1) (0.2/2)	107.50
02-APR-25	Joe Safar	0.10	L120	Confer and e-mail with D. McGonigle regarding estimation discovery issues (0.1) (0.2/2)	107.50
08-APR-25	Dave McGonigle	0.60	L120	Analysis of estimation discovery issues (0.1) (0.2/2); conference with M. Westbrook regarding estimation discovery strategy issues (0.4) (0.8/2); conference with D. Ramjlak regarding insurance insolvency matters (0.1)	720.00
14-APR-25	Dave McGonigle	2.10	L120	Research regarding trust question raised by Jones Day (0.3) (0.6/2); attention to insurance related issues and trust discovery questions (0.3) (0.7/2); communications with C. Maisano regarding discovery matters (0.2) (0.4/2); emails with A. Pruitt regarding discovery related background inquiry (0.1) (0.3/2); draft materials for insolvent claim submission (1.2)	2,520.00
15-APR-25	Dave McGonigle	0.30	L120	Telephonic attendance at status conference regarding estimation (0.3) (0.6/2)	360.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

May 1, 2025

Invoice Number:

100172768

K&amp;L Ref. Number:

0246801

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
17-APR-25	Dave McGonigle	1.30	L120	Prepare insurance work product (0.6); conference with J. Safar regarding insurer insolvency matters (0.1); research regarding insolvency matters (0.3); conference with M. Evert, C. Maisano and M. Cody regarding estimation discovery issues (0.1) (0.3/2); communications with insurer counsel in relation to discovery matters (0.1) (0.2/2); conference with insurer counsel and C. Maisano regarding discovery matters (0.1) (0.3/2)	1,560.00
21-APR-25	Dave McGonigle	5.80	L120	Research and analysis regarding insurer insolvency status and claim procedures (3.1); revise draft claim submission and supplement (2.3); emails with D. Ramljak and M. Uddin regarding insurer insolvency matters (0.4)	6,960.00
22-APR-25	Dave McGonigle	0.40	L120	Conference with M. Uddin regarding insolvent insurer matters and status (0.4)	480.00
23-APR-25	Dave McGonigle	0.20	L120	Follow-up research regarding insolvent insurer claim status (0.2)	240.00
24-APR-25	Dave McGonigle	1.60	L120	Develop supporting materials for insolvency claim (0.4); communications with D. Ramljak regarding insolvency claim (0.4); revise claim material (0.7); communications with C. Maisano and team regarding estimation discovery matters (0.1) (0.3/2)	1,920.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

May 1, 2025

Invoice Number:

100172768

K&amp;L Ref. Number:

0246801

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
25-APR-25	Dave McGonigle	1.10	L120	Conference with D. Ramljak regarding insolvent insurer claim (0.1); revise draft proof of claim materials (0.2); attention to data reconciliation for proof of claim (0.5); participate in works-in-process call with Debtors and Affiliates (0.2) (0.5/2); conference with J. Safar regarding status (0.1) (0.2/2)	1,320.00
25-APR-25	Joe Safar	0.30	L120	Attend works-in-process call (0.2) (0.5/2); confer with D. McGonigle regarding follow-up (0.1) (0.2/2)	322.50
29-APR-25	Dave McGonigle	4.10	L120	Revise insurer claim submission (3.0); email to A. Tananbaum regarding insurer claim submission and approach (0.7); emails with D. Ramljak of Stout regarding claim submission (0.2); attention to insurer representative inquiry (0.2)	4,920.00
30-APR-25	Dave McGonigle	0.70	L120	Communications with M. Uddin regarding insurer inquiries (0.5); conference with A. Tanbanbaum regarding status and planning (0.2) (0.5/2)	840.00
		<u>19.20</u>			<u>\$22,977.50</u>

**TIMEKEEPER SUMMARY**

<u>Partner</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Dave McGonigle	18.70	1,200.00	22,440.00
Joe Safar	<u>0.50</u>	<u>1,075.00</u>	<u>537.50</u>
	<b>19.20</b>		<b>\$22,977.50</b>

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

May 1, 2025

Invoice Number:

100172768

K&amp;L Ref. Number:

0246801

**TASK SUMMARY**

<b><u>Task Code</u></b>	<b><u>Description</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
L120	Analysis/Strategy	19.20	22,977.50
<b>Total Fees</b>		<b>19.20</b>	<b>\$22,977.50</b>

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

May 1, 2025

Invoice Number:

100172768

K&amp;L Ref. Number:

0246801

**Chapter 11 Retention and Compensation - (00002)****\$608.85****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
18-APR-25	Dave McGonigle	0.10	B160	Attention to billing and payment reconciliation (0.1) (0.2/2)	120.00
22-APR-25	Dave McGonigle	0.30	B160	Reconcile fee receipts (0.2) (0.5/2); email to Jones Day regarding fee reconciliation (0.1) (0.2/2)	360.00
24-APR-25	Dave McGonigle	0.10	B160	Attention to monthly fee statement (0.1) (0.2/2)	120.00
28-APR-25	Emily Steele	0.10	B160	Draft monthly fee statement for March 2025 (0.1) (0.2/2)	76.50
		<u>0.60</u>			<u>\$676.50</u>

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Emily Steele	0.10	765.00	76.50
Dave McGonigle	<u>0.50</u>	<u>1,200.00</u>	<u>600.00</u>
	<b>0.60</b>		<b>\$676.50</b>

**TASK SUMMARY**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	<u>0.60</u>	<u>676.50</u>
<b>Total Fees</b>		<b>0.60</b>	<b>\$676.50</b>

EBILLED INVOICE

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

In re

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

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

**FIFTY-NINTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS 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"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Fifty-Ninth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From May 1, 2025 Through May 31, 2025* (the "Monthly Fee Statement").

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period May 1, 2025 through May 31, 2025 (the "Statement Period").

<sup>1</sup>

The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

**Total Fees and Expenses for the Statement Period**

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$31,398.75
Total Expenses	\$38.99
<b>TOTAL</b>	<b>\$31,437.74</b>

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$28,297.86 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

**Billing Adjustments**

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$480.00 in fees will not be charged to the Debtors.

**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, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 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, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., [feeapplications@ncwba.uscourts.gov](mailto: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., [pamoa@mccarter.com](mailto:pamoa@mccarter.com)), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., [abartell@mccarter.com](mailto:abartell@mccarter.com) and Phillip S. Pavlick, Esq., [ppavlick@mccarter.com](mailto:ppavlick@mccarter.com)), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., [gmascitti@mccarter.com](mailto:gmascitti@mccarter.com)) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., [scordes@burtcordeslaw.com](mailto:scordes@burtcordeslaw.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., [namsey@rc.com](mailto:namsey@rc.com) and Davis Lee Wright, Esq., [dwright@rc.com](mailto:dwright@rc.com)), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., [kmaclay@capdale.com](mailto:kmaclay@capdale.com), James P. Wehner, Esq., [jwehner@capdale.com](mailto:jwehner@capdale.com) and Todd E. Phillips, Esq., [tphillips@capdale.com](mailto:tphillips@capdale.com)) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., [gthompson@lawhssm.com](mailto:gthompson@lawhssm.com)), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., [jgrier@grierlaw.com](mailto:jgrier@grierlaw.com), A. Cotton Wright, Esq., [cwright@grierlaw.com](mailto:cwright@grierlaw.com)), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., [jguy@orrick.com](mailto:jguy@orrick.com), Debra L. Felder, Esq., [dfelder@orrick.com](mailto:dfelder@orrick.com)).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the



affected Retained Professional, and upon the other Notice Parties no later than July 14, 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 K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested 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 K&L Gates LLP at a later date.

Dated: June 30, 2025  
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR  
DEBTORS AND DEBTORS IN POSSESSION

**EXHIBIT A**

**Invoices**

**K&L GATES**

K&L GATES LLP  
K&L GATES CENTER  
210 SIXTH AVENUE  
PITTSBURGH, PA 15222-2613  
T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018

Aldrich Pump LLC  
Allan Tananbaum, Esquire  
800-E Beatty Street  
Davidson, North Carolina 28036

Invoice Date: June 1, 2025  
Invoice Number: 100185407  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY****Total USD \$****Asbestos Insurance Advice (00001)**

Fees	12,878.00	
10% Discount	(1,287.80)	
<b>Total Amount Due This Matter</b>		<b>\$ 11,590.20</b>

**Chapter 11 Retention and Compensation (00002)**

Fees	1,212.00	
10% Discount	(121.20)	
<b>Total Amount Due This Matter</b>		<b>\$ 1,090.80</b>

**CURRENT INVOICE DUE - All Matters****\$ 12,681.00****EBILLED INVOICE**

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Due and Payable upon ReceiptMail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Aldrich Pump LLC

Invoice Date:

June 1, 2025

Invoice Number:

100185407

K&amp;L Ref. Number:

0246802

**Asbestos Insurance Advice - (00001)****\$11,590.20****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
01-MAY-25	Dave McGonigle	0.50	L120	Review recent filings (0.3) (0.6/2); conference with D. Aceto regarding status and planning (0.1) (0.2/2); conference with A. Tananbaum regarding status (0.1)	600.00
02-MAY-25	Dave McGonigle	0.60	L120	Telephone conference with insurer representative regarding status and planning (0.3) (0.6/3); communication with team regarding status and communications with insurer representatives (0.3) (0.6/2)	720.00
02-MAY-25	Jennifer Bortmes	0.10	L120	Confer with D. McGonigle regarding client data files (0.1) (0.2/2)	38.00
03-MAY-25	Dave McGonigle	0.50	L120	Emails with A. Tananbaum regarding status and planning (0.1); review draft work product regarding status and planning (0.4) (0.8/2)	600.00
04-MAY-25	Dave McGonigle	1.00	L120	Email to A. Tananbaum regarding draft strategy and planning work product (1.0) (2.0/2)	1,200.00
05-MAY-25	Dave McGonigle	0.90	L120	Conference with A. Tanbanabaum, B. Erens, and M. Evert regarding status and planning (0.4) (0.7/2); conference with insurer representative regarding status (0.1); prepare for conference with A. Tananbaum (0.1) (0.2/2); conference with A. Tananbaum regarding status and strategy issues (0.3) (0.5/2)	1,080.00
08-MAY-25	Dave McGonigle	0.40	L120	Monitor Bestwall oral argument (0.4) (0.7/2)	480.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

June 1, 2025

Invoice Number:

100185407

K&amp;L Ref. Number:

0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
12-MAY-25	Dave McGonigle	1.80	L120	Review and analysis of settlement agreements in connection with insurance claim matters (0.6) (1.2/2); conferences with E. Fleury regarding historical policy agreement research and data collections (0.6) (1.1/2); attention to insurer inquiry regarding status (0.6)	2,160.00
12-MAY-25	Erin Fleury	1.70	L120	Conference calls with D. McGonigle discussing insurance-related questions (0.6) (1.1/2); review certain settlement agreements, policies, and prior work product to address inquiries regarding insurance-related questions (1.1) (2.2/2)	1,190.00
13-MAY-25	Dave McGonigle	0.50	L120	Review communications regarding insolvent insurer status (0.3) (0.5/2); emails with J. Miller regarding insurer updates (0.2) (0.4/2)	600.00
15-MAY-25	Dave McGonigle	0.10	L120	Analysis of policyholder work product regarding insolvent insurer estate (0.1) (0.2/2)	120.00
19-MAY-25	Dave McGonigle	0.20	L120	Emails with insurer representatives regarding contact updates (0.1) (0.2/2); conference with A. Tananbaum regarding status and planning (0.1) (0.2/2)	240.00
19-MAY-25	Erin Fleury	0.50	L120	Conference call with M. Urick regarding insurance-related work (0.2) (0.3/2); review documents to assist D. McGonigle regarding insurance-related bankruptcy work (0.3) (0.5/2)	350.00

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

June 1, 2025

Invoice Number:

100185407

K&amp;L Ref. Number:

0246802

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
20-MAY-25	Dave McGonigle	0.70	L120	Emails with M. Urich regarding counsel matrix updates (0.2) (0.3/2); communications with E. Fleury regarding historical settlement agreement work product and matrices (0.4) (0.8/2); communication with M. Uddin regarding insurance matters (0.1)	840.00
20-MAY-25	Erin Fleury	2.30	L120	Review agreements and other documents to assist in responding to inquiries from D. McGonigle regarding insurance-related matters (1.9) (3.8/2); conference call with D. McGonigle regarding insurance-related bankruptcy work (0.4) (0.7/2)	1,610.00
21-MAY-25	Erin Fleury	0.30	L120	Review documents to assist in responding to inquiries from D. McGonigle regarding insurance-related matters (0.3) (0.5/2)	210.00
26-MAY-25	Dave McGonigle	0.10	L120	Emails with Jones Day team regarding document production (0.1) (0.2/2)	120.00
27-MAY-25	Dave McGonigle	0.10	L120	Emails with C. Maisano and M. Hirst regarding estimation discovery matters (0.1) (0.2/2)	120.00
28-MAY-25	Dave McGonigle	0.40	L120	Review Stout invoices for privilege and confidentiality (0.1); review Stout insurance work product (0.2) (0.4/2); conference with D. Ramljak regarding Stout insurance work product (0.1)	480.00
30-MAY-25	Dave McGonigle	0.10	L120	Review and analysis of recent counsel (attorneys fees) submissions (0.1)	120.00
		<b>12.80</b>			<b>\$12,878.00</b>

**EBILLED INVOICE**

Aldrich Pump LLC

Invoice Date:

June 1, 2025

Invoice Number:

100185407

K&amp;L Ref. Number:

0246802

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Dave McGonigle	7.90	1,200.00	9,480.00
<b>Counsel</b>			
Erin Fleury	4.80	700.00	3,360.00
<b>e-DAT Sr Atty</b>			
Jennifer Bortmes	0.10	380.00	38.00
	<u>12.80</u>		<u>\$12,878.00</u>

**TASK SUMMARY**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	12.80	12,878.00
<b>Total Fees</b>		<u>12.80</u>	<u>\$12,878.00</u>

EBILLED INVOICE

Aldrich Pump LLC

Invoice Date:

June 1, 2025

Invoice Number:

100185407

K&amp;L Ref. Number:

0246802

**Chapter 11 Retention and Compensation - (00002)****\$1,090.80****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
16-MAY-25	Emily Steele	0.20	B160	Analyze and advise regarding new client representation and related disclosure matters (0.2) (0.3/2)	153.00
19-MAY-25	Dave McGonigle	0.20	B160	Prepare monthly fee statements (0.2) (0.3/2)	240.00
27-MAY-25	Dave McGonigle	0.10	B160	Review and comment on draft monthly fee statement (0.1) (0.2/2)	120.00
27-MAY-25	Emily Steele	0.40	B160	Analyze April 2025 invoices for compliance with bankruptcy rules and privilege issues (0.1); draft fifty-eighth monthly fee statement (April 2025) (0.1); attention to matters relating to new client representation and related disclosures to bankruptcy court (0.2) (0.3/2)	306.00
30-MAY-25	Dave McGonigle	0.20	B160	Attention to supplemental declaration in support of retention application (0.1); review and approve monthly fee statement (0.1) (0.2/2)	240.00
30-MAY-25	Emily Steele	0.20	B160	Finalize and circulate monthly fee statement for April 2025 (0.1) (0.2/2); revise twelfth supplemental declaration and correspond with debtors' counsel regarding same (0.1)	153.00
		<b>1.30</b>			<b>\$1,212.00</b>

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Emily Steele	0.80	765.00	612.00
Dave McGonigle	0.50	1,200.00	600.00
	<b>1.30</b>		<b>\$1,212.00</b>

EBILLED INVOICE



Aldrich Pump LLC

Invoice Date:

June 1, 2025

Invoice Number:

100185407

K&amp;L Ref. Number:

0246802

**TASK SUMMARY**

<b><u>Task Code</u></b>	<b><u>Description</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
B160	Fee/Employment Applications	1.30	1,212.00
	<b>Total Fees</b>	<b>1.30</b>	<b>\$1,212.00</b>

EBILLED INVOICE

**K&L GATES****K&L GATES LLP**  
K&L GATES CENTER  
210 SIXTH AVENUE

PITTSBURGH, PA 15222-2613

T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018Murray Boiler LLC  
Allan Tananbaum, Esquire  
800-E Beaty Street  
Davidson, NC 28036Invoice Date:  
Invoice Number:  
K&L Gates Contact:June 1, 2025  
100185406  
Dave McGonigle**INVOICE SUMMARY****Total USD \$****Asbestos Insurance Advice (00001)**Fees 20,208.00  
10% Discount (2,020.80)  
Disbursements and Other Charges 38.99**Total Amount Due This Matter****\$ 18,226.19****Chapter 11 Retention and Compensation (00002)**Fees 589.50  
10% Discount (58.95)**Total Amount Due This Matter****\$ 530.55****CURRENT INVOICE DUE - All Matters****\$ 18,756.74****EBILLED INVOICE**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,  
500 First Ave 92  
Pittsburgh, PA 15219Beneficiary: K&L Gates LLP  
Acct No.: 1077692783Routing/ABA: 043000096  
Swift Code: PNCCUS33Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Murray Boiler LLC

Invoice Date:

June 1, 2025

Invoice Number:

100185406

K&amp;L Ref. Number:

0246801

**Asbestos Insurance Advice - (00001)****\$18,226.19****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
01-MAY-25	Dave McGonigle	1.70	L120	Correspondence with A. Tananbaum regarding insolvency claim (0.1); prepare for insolvency claim submission (0.3); emails with A. Tananbaum, B. Erens and M. Evert regarding insolvency claim submission (0.9); review recent filings (0.3) (0.6/2); conference with D. Aceto regarding status and planning (0.1) (0.2/2)	2,040.00
02-MAY-25	Dave McGonigle	2.60	L120	Edit draft insurance claim document (0.6); communications with D. Ramljak regarding insurance claim materials (0.3); review and prepare for submission insurance claim supplemental materials (0.9); emails with A. Tananbaum regarding draft insurance claim (0.2); telephone conference with insurer representative regarding status and planning (0.3) (0.6/3); communication with team regarding status and communications with insurer representatives (0.3) (0.6/2)	3,120.00
02-MAY-25	Jennifer Bortmes	0.10	L120	Confer with D. McGonigle regarding client data files (0.1) (0.2/2)	38.00
03-MAY-25	Dave McGonigle	0.40	L120	Review draft work product regarding status and planning (0.4) (0.8/2)	480.00
04-MAY-25	Dave McGonigle	1.00	L120	Email to A. Tananbaum regarding draft strategy and planning work product (1.0) (2.0/2)	1,200.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date: June 1, 2025  
 Invoice Number: 100185406  
 K&L Ref. Number: 0246801

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
05-MAY-25	Dave McGonigle	2.90	L120	Finalize and submit proof of claim materials (2.1); communications with Stout team regarding claim submission (0.2); conference with A. Tanbanabaum, B. Erens, and M. Evert regarding status and planning (0.3) (0.7/2); prepare for conference with A. Tananbaum (0.1) (0.2/2); conference with A. Tananbaum regarding status and strategy issues (0.2) (0.5/2)	3,480.00
06-MAY-25	Dave McGonigle	0.70	L120	Telephone conference with insurer representatives regarding status and planning (0.3); communications with M. Uddin regarding status (0.1); email to A. Tananbaum regarding insolvency claim submission and status (0.3)	840.00
07-MAY-25	Dave McGonigle	0.40	L120	Attention to insolvency claims files (0.2); email to A. Tananbaum regarding report on insolvency claim status (0.2)	480.00
08-MAY-25	Dave McGonigle	0.30	L120	Monitor Bestwall oral argument (0.3) (0.7/2)	360.00
09-MAY-25	Dave McGonigle	0.10	L120	Conference with M. Cody regarding insolvency claim status (0.1)	120.00
12-MAY-25	Dave McGonigle	1.30	L120	Review and analysis of settlement agreements in connection with insurance claim matters (0.6) (1.2/2); conferences with E. Fluery regarding historical policy agreement research and data collections (0.5) (1.1/2); emails to A. Tananbaum, B. Erens and M. Cody regarding insolvent insurer claim status (0.2)	1,560.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

June 1, 2025

Invoice Number:

100185406

K&amp;L Ref. Number:

0246801

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
12-MAY-25	Erin Fleury	1.60	L120	Conference calls with D. McGonigle discussing insurance-related questions (0.5) (1.1/2); review certain settlement agreements, policies, and prior work product to address inquiries regarding insurance-related questions (1.1) (2.2/2)	1,120.00
13-MAY-25	Dave McGonigle	0.40	L120	Review communications regarding insolvent insurer status (0.2) (0.5/2); emails with J. Miller regarding insurer updates (0.2) (0.4/2)	480.00
15-MAY-25	Dave McGonigle	1.40	L120	Analysis of insurer settlement agreement in connection with insurer inquiry (1.3); analysis of policyholder work product regarding insolvent insurer estate (0.1) (0.2/2)	1,680.00
19-MAY-25	Dave McGonigle	0.20	L120	Emails with insurer representatives regarding contact updates (0.1) (0.2/2); conference with A. Tananbaum regarding status and planning (0.1) (0.2/2)	240.00
19-MAY-25	Erin Fleury	0.30	L120	Conference call with M. Urlick regarding insurance-related work (0.1) (0.3/2); review documents to assist D. McGonigle regarding insurance-related bankruptcy work (0.2) (0.5/2)	210.00
20-MAY-25	Dave McGonigle	0.50	L120	Emails with M. Urich regarding counsel matrix updates (0.1) (0.3/2); communications with E. Fleury regarding historical settlement agreement work product and matrices (0.4) (0.8/2)	600.00

EBILLED INVOICE

Murray Boiler LLC

Invoice Date:

June 1, 2025

Invoice Number:

100185406

K&amp;L Ref. Number:

0246801

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
20-MAY-25	Erin Fleury	2.20	L120	Review agreements and other documents to assist in responding to inquiries from D. McGonigle regarding insurance-related matters (1.9) (3.8/2); conference call with D. McGonigle regarding insurance-related bankruptcy work (0.3) (0.7/2)	1,540.00
21-MAY-25	Erin Fleury	0.20	L120	Review documents to assist in responding to inquiries from D. McGonigle regarding insurance-related matters (0.2) (0.5/2)	140.00
26-MAY-25	Dave McGonigle	0.10	L120	Emails with Jones Day team regarding document production (0.1) (0.2/2)	120.00
27-MAY-25	Dave McGonigle	0.10	L120	Emails with C. Maisano and M. Hirst regarding estimation discovery matters (0.1) (0.2/2)	120.00
28-MAY-25	Dave McGonigle	0.20	L120	Review Stout insurance work product (0.2) (0.4/2)	240.00
		<u>18.70</u>			<u>\$20,208.00</u>

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Dave McGonigle	14.30	1,200.00	17,160.00
<b>Counsel</b>			
Erin Fleury	4.30	700.00	3,010.00
<b>e-DAT Sr Atty</b>			
Jennifer Bortmes	0.10	380.00	38.00
	<u>18.70</u>		<u>\$20,208.00</u>

**TASK SUMMARY**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120	Analysis/Strategy	18.70	20,208.00
<b>Total Fees</b>		<b>18.70</b>	<b>\$20,208.00</b>

Murray Boiler LLC

Invoice Date:

June 1, 2025

Invoice Number:

100185406

K&L Ref. Number:

0246801

**Description**

**Amount**

Delivery and Courier Service

38.99

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**\$38.99**

**EBILLED INVOICE**

Murray Boiler LLC

Invoice Date:

June 1, 2025

Invoice Number:

100185406

K&amp;L Ref. Number:

0246801

**Chapter 11 Retention and Compensation - (00002)****\$530.55****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Task</u>	<u>Description</u>	<u>Amount</u>
16-MAY-25	Emily Steele	0.10	B160	Analyze and advise regarding new client representation and related disclosure matters (0.1) (0.3/2)	76.50
19-MAY-25	Dave McGonigle	0.10	B160	Prepare monthly fee statements (0.1) (0.3/2)	120.00
27-MAY-25	Dave McGonigle	0.10	B160	Review and comment on draft monthly fee statement (0.1) (0.2/2)	120.00
27-MAY-25	Emily Steele	0.10	B160	Attention to matters relating to new client representation and related disclosures to bankruptcy court (0.1) (0.3/2)	76.50
30-MAY-25	Dave McGonigle	0.10	B160	Review and approve monthly fee statement (0.1) (0.2/2)	120.00
30-MAY-25	Emily Steele	0.10	B160	Finalize and circulate monthly fee statement for April 2025 (0.1) (0.2/2)	76.50
		<u>0.60</u>			<u>\$589.50</u>

**TIMEKEEPER SUMMARY**

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partner</b>			
Emily Steele	0.30	765.00	229.50
Dave McGonigle	0.30	1,200.00	360.00
	<u>0.60</u>		<u>\$589.50</u>

**TASK SUMMARY**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	0.60	589.50
<b>Total Fees</b>		<b>0.60</b>	<b>\$589.50</b>

EBILLED INVOICE



**EXHIBIT B**

**Proposed Order**

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

In re

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

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

**ORDER GRANTING THE FIFTEENTH INTERIM APPLICATION OF K&L GATES  
LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES  
AS SPECIAL INSURANCE COUNSEL TO THE DEBTORS  
FOR THE PERIOD FROM FEBRUARY 1, 2025 THROUGH MAY 31, 2025 [DKT. \_\_]**

This matter coming before the Court on the *Fifteenth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period From February 1, 2025 Through May 31, 2025* [Dkt. \_\_] (the "Interim Fee Application")<sup>2</sup> filed by K&L Gates

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<sup>1</sup> The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Interim Fee Application.

LLP as special insurance counsel to the above-captioned debtors and debtor in possession (the "Debtors"); the Court having reviewed the Interim Fee Application; the Court having found that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (iii) notice of the Interim Fee Application and the notice of an opportunity for hearing were served upon the parties required by Local Rule 2002-1(g) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the "Interim Compensation Order") and no other or further notice is required, (iv) the compensation requested in the Interim Fee Application is reasonable and for actual and necessary services rendered by K&L Gates LLP on behalf of the Debtors during the period from February 1, 2025 through May 31, 2025 (the "Compensation Period"), (v) the expenses for which reimbursement is sought in the Interim Fee Application are actual and necessary expenses incurred by K&L Gates LLP during the Compensation Period on behalf of the Debtors, and (vi) the Interim Fee Application fully complies with the Interim Compensation Order, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Compensation Guidelines; and the Court having determined that the legal and factual bases set forth in the Interim Fee Application establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Interim Fee Application is GRANTED.
2. K&L Gates LLP is awarded, on an interim basis, compensation for professional services rendered during the Compensation Period in the amount of \$88,892.55 and reimbursement for actual and necessary expenses incurred by K&L Gates LLP during the Compensation Period in the amount of \$38.99.

3. The Debtors are authorized and directed to pay promptly to K&L Gates LLP the amount of fees and expenses approved by this Order, to the extent that such amounts have not previously been paid by the Debtors.

4. The Debtors and K&L Gates LLP are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

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

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

United States Bankruptcy Court