

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

In re

ALDRICH PUMP LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 20-30608

(Jointly Administrated)

**SUMMARY OF FOURTEENTH INTERIM APPLICATION FOR ALLOWANCE OF
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES OF GILBERT LLP, SPECIAL INSURANCE COUNSEL TO THE
OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS,
FOR THE PERIOD FEBRUARY 1, 2025 THROUGH MAY 31, 2025**

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Official Committee of Asbestos Personal Injury Claimants
Date of retention:	Order entered December 22, 2020, effective as of November 24, 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:	\$292,319.50
Amount of expenses sought as as actual, reasonable, and necessary:	\$0.00
Amount of compensation paid as actual, reasonable and necessary for applicable period:	\$169,548.75
Amount of expenses reimbursed as actual, reasonable and necessary for applicable period:	\$0.00

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



203060825071400000000002

Total amount of unpaid fees and expenses
sought for applicable period: \$122,770.75

This is an: x interim final application

MONTHLY FEE STATEMENTS

Date Submitted	Period Covered	Fees Requested	Expenses Requested	Fees Paid (90%)	Expenses Paid (100%)
05/01/2025	03/01/2025 – 03/31/2025	\$188,387.50	\$0.00	\$169,548.75	\$0.00
05/28/2025	04/01/2025 – 04/30/2025	\$98,082.00	\$0.00	\$0.00	\$0.00
06/27/2025	05/01/2025 – 05/31/2025	\$5,850.00	\$0.00	\$0.00	\$0.00
	Total	\$292,319.50	\$0.00	\$169,548.75	\$0.00

SUMMARY OF FEES BY PROFESSIONAL

Name	Position	Bar Year	Hourly Rate	Hours Billed	Total Compensation
Kami Quinn	Partner	2000	\$1,650.00	5.7	\$9,405.00
Sonia Murphy	Partner	2002	\$1,150.00	10.2	\$11,730.00
Heather Frazier	Partner	2009	\$1,025.00	37.1	\$38,027.50
Beth Koehler	Of Counsel	1997	\$950.00	18.5	\$17,575.00
Brandon Levey	Associate	2017	\$825.00	58.9	\$48,592.50
John Girgenti	Associate	2002	\$500.00	125.4	\$62,700.00
Lisa Evans	E-Discovery Counsel	2011	\$540.00	43.7	\$23,598.00
Mandi Galloway	Senior Staff Attorney	2001	\$395.00	13.0	\$5,135.00
Marnie Glaebberman	Staff Attorney	2007	\$360.00	27.3	\$9,828.00
Tarsha Jones	Staff Attorney	2001	\$360.00	58.9	\$21,204.00
Janet Sanchez	Staff Attorney	2020	\$360.00	24.0	\$8,640.00
Sam Shirzadi	Director of Litigation Support Services	N/A	\$600.00	8.1	\$4,860.00
Blair Hubbard	Director of Analytics	N/A	\$600.00	18.5	\$11,100.00
Jacob Bullis	Litigation Support Analyst	N/A	\$515.00	14.7	\$7,570.50
Stephanie Seymour	Senior Paralegal Specialist	N/A	\$440.00	16.2	\$7,128.00
Nick Poz	Senior Paralegal	N/A	\$410.00	4.5	\$1,845.00
Sarah Ogrey	Paralegal	N/A	\$350.00	5.2	\$1,820.00
Tricia Hicks	Analyst	N/A	\$385.00	3.6	\$1,386.00
Mary Carter Hudgins	Bankruptcy Billing Specialist	N/A	\$350.00	0.5	\$175.00
			Total	494.0	\$292,319.50

SUMMARY OF FEES BY PROJECT CATEGORY

Matter	Project Category	Hours	Fees
001	Insurance Analysis & Recovery	478.4	\$276,207.00
002	Retention / Fee Applications	0.5	\$175.00
004	Hearings	4.5	\$4,447.50
006	Plan / Disclosure Statement	10.6	\$11,490.00
	Total	494.0	\$292,319.50

SUMMARY OF EXPENSES

Expense	Total
N/A	\$0.00
Total	\$0.00

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

In re

ALDRICH PUMP LLC, *et al.*,
Debtors.²

Chapter 11

Case No. 20-30608

(Jointly Administrated)

**FOURTEENTH INTERIM APPLICATION FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES OF
GILBERT LLP, SPECIAL INSURANCE COUNSEL TO THE OFFICIAL
COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS, FOR
THE PERIOD FEBRUARY 1, 2025 THROUGH MAY 31, 2025**

Gilbert, LLP (“Gilbert”), special insurance counsel to the Official Committee of Asbestos Personal Injury Claimants (the “Committee”) of Aldrich Pump LLC, *et al.*, (the “Debtors”), hereby submits its fourteenth interim fee application (the “Fourteenth Interim Application”) for allowance of compensation for professional services rendered and reimbursement of actual and necessary expenses incurred for the period February 1, 2025 through May 31, 2025 (the “Application Period”).

JURISDICTION AND STATUTORY BASIS FOR RELIEF

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1334 and 157. This Fourteenth Interim Application is made pursuant to 11 U.S.C. § 331.

² 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.

BACKGROUND

2. On June 18, 2020, (the “Petition Date”), the Debtors filed voluntary petitions for relief under Chapter 11 under Title 11 of the United States Code (the “Bankruptcy Code”).

3. The Debtors have continued to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. On June 30, 2020, the Office of the United States Bankruptcy Administrator (the “Bankruptcy Administrator”) filed its *Motion of the Bankruptcy Administrator to Appoint Official Committee of Asbestos Claimants* [Docket No. 126]. On July 7, 2020, the Court entered an order appointing the Committee pursuant to section 1102 of the Bankruptcy Code [Docket No. 147].

5. On July 15, 2020, the Court entered an *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “Interim Compensation Order”) [Docket No. 171].

6. On December 22, 2020, the Committee filed and served an *Ex Parte Application to Retain and Employ Gilbert LLP* (the “Retention Application”) as its special insurance counsel [Docket No. 483]. On December 22, 2020, the Court entered an order approving the Retention Application [Docket No. 484].

7. Pursuant to the Interim Compensation Order, professionals may request monthly compensation and reimbursement. Such requests are to be served on certain identified parties for review (the “Notice Parties”). If no objection to a professional’s request is received within fourteen (14) days of such request, the Debtors are authorized to pay 90% of the fees and 100% of the expenses requested.

8. Beginning with the period ending September 30, 2020, the Interim Compensation Order also requires each retained professional to file at four-month intervals an application for interim Court approval and allowance pursuant to section 331 of the Bankruptcy Code of 100% of the compensation for services and reimbursement of expenses for prior months not already included in a previous interim fee application.

SERVICES TO BE PROVIDED

9. As set forth in the *Declaration of Kami E. Quinn in Support of the Ex Parte Application of the Official Committee of Asbestos Personal Injury Claimants for an Order Authorizing it to Retain and Employ Gilbert, LLP as Special Insurance Counsel, Effective as of November 24, 2020* [Docket No. 483], Gilbert was engaged by the Committee to perform the following services:

- A. analyzing the Debtors' insurance policies and providing strategic advice as to the coverage potentially available to respond to asbestos claims;
- B. advising the Committee on steps to be taken to preserve insurance coverage and maximize insurance recoveries;
- C. attending meetings and negotiations with the Committee, representatives of the Debtors, their insurance carriers, and other parties-in-interest in these Chapter 11 Cases related to the preservation of insurance coverage;
- D. advising and representing the Committee with respect to insurance settlements executed prior to the commencement of these Chapter 11 Cases;
- E. advising and representing the Committee with respect to the use of insurance coverage and insurance proceeds in connection with a plan of reorganization;
- F. advising and representing the Committee with respect to other matters and pleadings that may be raised by insurers or that may impact insurance coverage;
- G. advising and representing the Committee in any dispute that may arise including, but not limited to, an adversary proceeding, arbitration, or mediation related to insurance coverage; and

- H. assisting the Committee with any other insurance-related matters arising in conjunction with the formulation of a plan of reorganization and funding of a trust for the payment of asbestos claims established under plan.

MONTHLY FEE STATEMENTS DURING THE APPLICATION PERIOD

10. In accordance with the Interim Compensation Order, Gilbert provided the Notice Parties with true and correct copies of the monthly fee statements as follows:

- For the period February 1, 2025 through February 28, 2025: Gilbert did not have any fees or expenses during the month of February.
- For the period March 1, 2025 through March 31, 2025: fees in the amount of \$188,387.50 and no expenses (the “March Monthly Fee Statement”). A copy of the March Monthly Fee Statement is attached hereto as Exhibit B.
- For the period April 1, 2025 through April 30, 2025: fees in the amount of \$98,082.00 and no expenses (the “April Monthly Fee Statement”). A copy of the April Monthly Fee Statement is attached hereto as Exhibit B.
- For the period May 1, 2025 through May 31, 2025: fees in the amount of \$5,850.00 and no expenses (the “May Monthly Fee Statement”). A copy of the May Monthly Fee Statement is attached hereto as Exhibit B.

11. Gilbert submitted monthly fee statements during the Application Period of fees in the total amount of \$292,319.50 and \$0.00 expenses. A chart summarizing the monthly statements submitted during this Application Period is included in the summary cover pages submitted with this Fourteenth Interim Application.

SUMMARY OF SERVICES

12. The professional services performed by Gilbert during the Application Period were necessary and appropriate to the administration of these Chapter 11 Cases. The services

were in the best interest of the Committee, the Debtors, and creditors. The compensation requested is commensurate with the complexity and nature of the issues and tasks involved.

13. During the Application Period, Gilbert devoted 494.0 hours to the representation of the Committee in these Chapter 11 Cases. A summary of the services performed by Gilbert professionals and paraprofessionals during the Application Period by category is as follows:

A. Insurance Analysis & Recovery (001):
Hours: 4.4; Fees: \$276,207.00

This category generally includes time spent by Gilbert related to analyzing insurance issues, policies and related documents, preparing an insurance presentation for co-counsel, researching coverage-in-place agreements, conducting document review, analyzing discovery issues, and communicating with co-counsel.

B. Retention / Fee Applications (002):
Hours: 0.5; Fees: \$175.00

This category includes time spent drafting an interim fee application.

C. Hearings (004):
Hours: 4.5; Fees: \$4,447.50

This category includes time spent by Gilbert attending an omnibus hearing and a status hearing.

D. Hearings (006):
Hours: 10.6; Fees: \$11,490.00

This category includes time spent analyzing plan-related issues.

All of Gilbert's work reflected in the Fourteenth Interim Application was necessary, reasonable, and beneficial to the Committee and its constituency.

EXPENSES INCURRED DURING THE APPLICATION PERIOD

14. Section 330 of the Bankruptcy Code authorizes “reimbursement for actual, necessary expenses” incurred by the professionals employed in a chapter 11 case. Gilbert seeks no reimbursement for actual expenses during the Application Period.

15. It is Gilbert’s policy to bill clients for all other expenses incurred and disbursements in connection with representation of its clients. These costs include, but are not limited to, major photocopying charges, courier and overnight delivery charges, travel expenses (including mileage, parking, airfare, lodging, meals, and ground transportation), costs incurred related to litigation support systems, and filing fees. Gilbert’s practice is to bill costs to its clients at the same rate at which they are billed and paid; Gilbert does not write up costs for a profit. Gilbert does not bill clients for overhead, telephone, facsimile or routine copying charges. Gilbert charges for these expenses in a manner and at rates consistent with charges made generally to the firm’s other clients and the Local Rules.

16. Gilbert submits that the actual expenses incurred in providing professional services during the Application Period were necessary, reasonable and justified to serve the needs of the Committee in these Chapter 11 Cases. A summary of the expenses incurred is included on the summary pages submitted with this Fourteenth Interim Application.

LEGAL BASIS FOR REQUESTED RELIEF

17. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court’s award of such compensation. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 1103 of the Bankruptcy

Code “reasonable compensation for actual, necessary services rendered . . . and . . . reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1)(A) and (B).

18. Section 330 of the Bankruptcy Code also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded to . . . [a] professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3)(A)-(F).

20. The foregoing professional services performed by Gilbert were appropriate and necessary to the effective administration of these Chapter 11 Cases. The services were in the best interests of the Committee. Compensation for the foregoing services as requested is commensurate with the complexity, importance, and nature of the problems, as well as issues or tasks involved. The professional services were performed in an appropriately expeditious and efficient manner. In addition, Gilbert has made every effort to minimize its disbursements in this

case. The actual expenses incurred in providing professional services were necessary, reasonable, and justified under the circumstances to serve the needs of the Committee.

21. In accordance with section 504 of the Bankruptcy Code and Fed. R. Bankr. P. 2016(a), no agreement or understanding exists between Gilbert and any other person for the sharing of compensation received or to be received for services rendered in or in connection with this case.

22. No agreement or understanding prohibited by 18 U.S.C. § 155 has been or will be made by Gilbert.

COMPENSATION REQUESTED FOR THE APPLICATION PERIOD

23. The services for which Gilbert seeks compensation in this Fourteenth Interim Application were, at the time rendered, necessary for, beneficial to, and in the best interests of, the Committee and the Debtors' estates. The services rendered by Gilbert were consistently performed in a timely manner commensurate with the complexity, importance, and nature of the issues involved. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Gilbert is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

NO PRIOR REQUEST

24. No prior request for the relief sought in this Fourteenth Interim Application has been made to this or any other court in connection with these Chapter 11 Cases apart from the delivery of the monthly fee statements.

RESERVATION OF RIGHTS

25. The Committee expressly reserves all rights with respect to challenging the validity, propriety, jurisdiction, and venue of these Chapter 11 Cases, including without limitation seeking to dismiss these Chapter 11 Cases pursuant 11 U.S.C. § 1112 and seeking to transfer these Chapter 11 Cases pursuant to 28 U.S.C. §§ 1406 and 1408 and 11 U.S.C. § 105.

NOTICE

26. Notice of this Fourteenth Interim Application has been provided in accordance with the Interim Compensation Order. Gilbert submits that no other or further notice need be provided.

CONCLUSION

WHEREFORE, Gilbert respectfully requests that the Court: (i) enter the order attached as Exhibit A granting the Fourteenth Interim Application and authorizing interim allowance of compensation in the amount of \$292,319.50 for professional services rendered on behalf of the Official Committee of Asbestos Personal Injury Claimants and reimbursement for actual and necessary expenses in the amount of \$0.00; (ii) direct payment by the Debtors of the foregoing

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amounts less any amount already paid pursuant to the Interim Compensation Order; and

(iii) grant such other and further relief as the Court deems just and proper.

Dated: July 14, 2025
Charlotte, North Carolina

HAMILTON STEPHENS STEELE
+ MARTIN, PLLC

/s/ Glenn C. Thompson
Glenn C. Thompson (Bar No. 37221)
525 North Tryon Street, Suite 1400
Charlotte, North Carolina 28202
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*Local Counsel for the Official Committee of
Asbestos Personal Injury Claimants*

and

GILBERT LLP

/s/ Kami E. Quinn
Kami E. Quinn (*Admitted pro hac vice*)
700 Pennsylvania Avenue SE, Suite 400
Washington, DC 20003
Telephone: (202) 772-2336
quinnk@gilbertlegal.com

*Special Insurance Counsel for the Official
Committee of Asbestos Personal Injury Claimants*

EXHIBIT A

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

In re

ALDRICH PUMP LLC, *et al.*,

Debtors.³

Chapter 11

Case No. 20-30608

(Jointly Administrated)

**ORDER GRANTING FOURTEENTH INTERIM APPLICATION FOR ALLOWANCE
OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES OF GILBERT LLP, SPECIAL INSURANCE COUNSEL TO THE
OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS,
FOR THE PERIOD FEBRUARY 1, 2025 THROUGH MAY 31, 2025**

This matter coming before the Court on the *Fourteenth Interim Application for Allowance of Compensation for Services Rendered and Reimbursement of Expenses of Gilbert LLP, Special Insurance Counsel to the Official Committee of Asbestos Personal Injury*

³ 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.

Claimants, for the Period February 1, 2025 through May 31, 2025 (the “Fourteenth Interim Application”)⁴ filed by Gilbert LLP (“Gilbert”), special insurance counsel to the Official Committee of Asbestos Personal Injury Claimants (the “Committee”); the Court having reviewed the Fourteenth Interim Application; the Court having found that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); (c) notice of the Fourteenth Interim Application was sufficient pursuant to Local Rule 2002-1(g) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 171] (the “Interim Compensation Order”) and no other or further notice is required; (d) the compensation requested in the Fourteenth Interim Application is reasonable and for actual and necessary services rendered by Gilbert on behalf of the Committee during the period of February 1, 2025 through May 31, 2025 (the “Application Period”); (e) the expenses for which reimbursement is sought in the Fourteenth Interim Application are actual and necessary expenses incurred by Gilbert during the Application Period on behalf of the Committee; and (f) Fourteenth Interim Application fully complies with the Interim Compensation Order, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Guidelines; and the Court having determined that the legal and factual bases set forth in the Fourteenth Interim Application establish just cause for the relief granted herein:

1. The Fourteenth Interim Application is GRANTED.
2. Gilbert is awarded, on an interim basis, compensation for professional services rendered during the Application Period in the amount of \$292,319.50 and reimbursement for actual and necessary expenses incurred by Gilbert during the Application Period in the amount of \$0.00.

⁴ Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Fourteenth Interim Application.

3. The Debtors are authorized and directed to pay Gilbert promptly the fees and expenses approved in this Order to the extent such amounts have not been paid previously by the Debtors.

4. The Debtors and Gilbert 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

EXHIBIT B



700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
O 202.772.2200
F 202.772.3333
GilbertLegal.com

APICC for Aldrich Pump LLC, et al.
c/o Kevin Maclay, Esq.
Caplin & Drysdale, Chartered
One Thomas Circle NW, Suite 1100
Washington, DC 20005

May 1, 2025
Invoice Number: 11337916
Client Number: 1626

FOR PROFESSIONAL SERVICES RENDERED through March 31, 2025

Re: APICC for Aldrich Pump LLC

Matter Description	Fees	Costs	Total
Insurance Analysis & Recovery	172,522.50	.00	172,522.50
Retention / Fee Application	175.00	.00	175.00
Hearings	4,200.00	.00	4,200.00
Plan / Disclosure Statement	11,490.00	.00	11,490.00
Total	188,387.50	.00	188,387.50

TOTAL FEES \$ 188,387.50

TOTAL EXPENSES \$.00

TOTAL FEES AND EXPENSES \$ 188,387.50

FOR PROFESSIONAL SERVICES RENDERED through March 31, 2025

Insurance Analysis & Recovery

Date	Name	Services	Hours	Amount
2/14/25	Quinn, K.	Confer with T. Phillips re status and open issues.	.30	495.00
3/12/25	Frazier, H.	Review Debtors' motion to amend the case management order re estimation.	.70	717.50
3/14/25	Seymour, S.	Research status of insurance issues.	.50	220.00
3/14/25	Frazier, H.	Confer with B. Levey re next steps in insurance recovery.	.60	615.00
3/14/25	Frazier, H.	Communicate with S. Murray re insurance-related issues and next steps.	.40	410.00
3/14/25	Frazier, H.	Review insurance policies and allocation issues re next steps for insurance recovery.	4.30	4,407.50
3/14/25	Levey, B.	Confer with H. Frazier re insurance-related issues.	.60	495.00
3/14/25	Levey, B.	Review key insurance-related materials.	.80	660.00
3/15/25	Levey, B.	Analyze Murray coverage-in-place agreements and related information to determine scope of missing information and next steps in analysis.	1.90	1,567.50
3/16/25	Murphy, S.	Review insurance-related documents.	2.00	2,300.00
3/17/25	Quinn, K.	Communicate with S. Murphy and H. Frazier re strategy.	.30	495.00
3/17/25	Girgenti, J.	Confer with team re case status and strategy,	.70	350.00
3/17/25	Girgenti, J.	Analyze data re Murray and Aldrich entities re defense issues.	3.80	1,900.00
3/17/25	Seymour, S.	Confer with team re status and strategy.	.70	308.00
3/17/25	Frazier, H.	Confer with team re insurance-related issues.	.70	717.50
3/17/25	Frazier, H.	Analyze preliminary conclusions re allocation and coverage-in-place rejection.	1.80	1,845.00
3/17/25	Frazier, H.	Draft memorandum re preliminary insurance issues for research.	.80	820.00
3/17/25	Levey, B.	Confer with team re status and next steps.	.70	577.50
3/17/25	Levey, B.	Review research re applicability and enforceability of coverage-in-place provisions.	1.40	1,155.00
3/17/25	Levey, B.	Communicate with S. Murphy re coverage-in-place research.	.20	165.00
3/17/25	Levey, B.	Review information re missing policies and agreements to request during discovery.	.70	577.50
3/17/25	Levey, B.	Draft summary of coding of defense provisions.	.70	577.50

Invoice Number: 11337916
May 1, 2025

Date	Name	Services	Hours	Amount
3/17/25	Ogrey, S.	Confer with case team re strategy.	.70	245.00
3/17/25	Hubbard, B.	Confer with team re status and strategy.	.70	420.00
3/17/25	Evans, L	Confer with team re case status and next steps.	.70	378.00
3/17/25	Evans, L	Analyze defense costs language in Murray and Aldrich policies.	2.60	1,404.00
3/17/25	Evans, L	Draft summary of defense costs language for Aldrich and Murray.	1.20	648.00
3/17/25	Evans, L	Analyze additional information needed for coverage analysis.	1.20	648.00
3/17/25	Murphy, S.	Research coverage-in-place agreements.	1.60	1,840.00
3/17/25	Murphy, S.	Confer with team re case status and strategy.	.70	805.00
3/18/25	Quinn, K.	Confer with team re defense analysis.	.50	825.00
3/18/25	Quinn, K.	Analyze coverage comparison analytics results.	1.60	2,640.00
3/18/25	Girgenti, J.	Confer with B. Hubbard, L. Evans and B. Levey re defense analysis of policies.	.80	400.00
3/18/25	Girgenti, J.	Analyze Aldrich coverage-in-place agreements re defense treatment and nullification issues.	4.80	2,400.00
3/18/25	Girgenti, J.	Analyze policies and policy data for Murray and Aldrich entities re defense issues.	3.60	1,800.00
3/18/25	Seymour, S.	Research missing policy and agreements.	1.20	528.00
3/18/25	Seymour, S.	Research coverage charts in preparation for client call.	.70	308.00
3/18/25	Sanchez, J.	Research assignment of contracts and ipso facto clauses in bankruptcy proceedings.	4.80	1,728.00
3/18/25	Sanchez, J.	Confer with team re analysis of defense language.	.50	180.00
3/18/25	Frazier, H.	Confer with S. Murphy re insurance issues and next steps.	.50	512.50
3/18/25	Frazier, H.	Confer with team re defense treatment and allocation analysis issues.	.50	512.50
3/18/25	Frazier, H.	Analyze applicable allocation law re Murray policies in four jurisdictions.	1.40	1,435.00
3/18/25	Frazier, H.	Review allocation analysis re potential rejection of coverage-in-place agreements and applicable state law methodology.	.80	820.00
3/18/25	Frazier, H.	Analyze insurance agreements and policies re potential strategic plan options.	1.30	1,332.50
3/18/25	Levey, B.	Confer with team re insurance status and strategy.	.50	412.50
3/18/25	Levey, B.	Communicate with J. Sanchez re research re coverage-in place applicability.	.20	165.00
3/18/25	Levey, B.	Confer with B. Hubbard, L. Evans and J. Girgenti re defense analysis of policies.	.80	660.00

Invoice Number: 11337916
May 1, 2025

Date	Name	Services	Hours	Amount
3/18/25	Levey, B.	Review coverage-in-place re implications for potential insurance recovery.	1.20	990.00
3/18/25	Levey, B.	Research jurisdictional issues governing policies and agreements.	.90	742.50
3/18/25	Levey, B.	Review underlying policies to analyze defense treatment.	.70	577.50
3/18/25	Levey, B.	Supplement research re coverage-in-place enforceability.	.40	330.00
3/18/25	Ogrey, S.	Review Aldrich and Murray coverage-in-place agreements re certain provisions.	2.20	770.00
3/18/25	Hubbard, B.	Confer with L. Evans, J. Girgenti and B. Levey re defense treatment analysis.	.80	480.00
3/18/25	Hubbard, B.	Confer with L. Evans re defense analysis.	.70	420.00
3/18/25	Hubbard, B.	Analyze Aldrich recovery in coverage-in-place agreements re Carter Wallace allocation.	5.40	3,240.00
3/18/25	Hicks, T.	Confer with L. Evans re incorporating in defense analysis into master insurance policy listing.	.50	192.50
3/18/25	Hicks, T.	Incorporate defense analysis into master insurance policy listing.	2.60	1,001.00
3/18/25	Evans, L	Confer with team re defense type analysis.	.50	270.00
3/18/25	Evans, L	Confer with B. Hubbard re defense analysis.	.70	378.00
3/18/25	Evans, L	Analyze certain Aldrich policies for defense costs language.	4.90	2,646.00
3/18/25	Evans, L	Communicate with B. Levey re defense costs analysis.	.30	162.00
3/18/25	Evans, L	Confer with B. Hubbard, B. Levey and J. Girgenti re defense analysis.	.80	432.00
3/18/25	Evans, L	Confer with T. Hicks re incorporating in defense analysis into master insurance policy listing.	.50	270.00
3/18/25	Murphy, S.	Confer with team re defense analysis.	.50	575.00
3/18/25	Murphy, S.	Confer with H. Frazier re insurance-related issues.	.50	575.00
3/19/25	Girgenti, J.	Analyze policies and policy data for Murray and Aldrich entities re asbestos issues.	2.60	1,300.00
3/19/25	Girgenti, J.	Analyze policies for nullification and exhaustion-related issues.	3.20	1,600.00
3/19/25	Girgenti, J.	Confer with team re insurance issues.	.50	250.00
3/19/25	Seymour, S.	Research insurer agreements and missing policy information.	3.20	1,408.00
3/19/25	Seymour, S.	Confer with team re status and strategy.	.50	220.00
3/19/25	Sanchez, J.	Confer with team re status and next steps.	.50	180.00
3/19/25	Frazier, H.	Confer with team re insurance-related issues and strategy.	.50	512.50

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Date	Name	Services	Hours	Amount
3/19/25	Frazier, H.	Confer with Caplin & Drysdale team re insurance issues and potential plan structure.	1.00	1,025.00
3/19/25	Frazier, H.	Draft outline re results of preliminary analysis and research re coverage and plan issues.	2.40	2,460.00
3/19/25	Frazier, H.	Analyze research re allocation, trigger, applicable state law, defense treatment, and coverage-in-place provisions.	2.30	2,357.50
3/19/25	Levey, B.	Confer with team re insurance issues.	.50	412.50
3/19/25	Levey, B.	Confer with Caplin & Drysdale team re insurance issues.	1.00	825.00
3/19/25	Levey, B.	Analyze data defense treatment in coverage-in-place agreements and policies.	1.60	1,320.00
3/19/25	Levey, B.	Review policies and coverage-in-place agreements re defense issue.	.90	742.50
3/19/25	Levey, B.	Draft summary of missing agreements.	.60	495.00
3/19/25	Levey, B.	Review background information re Debtors' liability.	.60	495.00
3/19/25	Levey, B.	Revise summary of treatment of defense costs in policies.	.70	577.50
3/19/25	Ogrey, S.	Confer with team re case updates.	.50	175.00
3/19/25	Hubbard, B.	Analyze remaining limits by jurisdiction.	.60	360.00
3/19/25	Hubbard, B.	Confer with T. Hicks re insurance allocation model methodologies.	.50	300.00
3/19/25	Hubbard, B.	Confer with team re case status and next steps.	.50	300.00
3/19/25	Hubbard, B.	Analyze defense treatment data and asbestos exclusion analysis.	2.70	1,620.00
3/19/25	Hicks, T.	Confer with B. Hubbard re insurance allocation model methodologies.	.50	192.50
3/19/25	Evans, L.	Analyze asbestos and asbestosis language in policies.	1.10	594.00
3/19/25	Murphy, S.	Confer with Caplin & Drysdale team re insurance issues.	1.00	1,150.00
3/19/25	Murphy, S.	Confer with team re case status and strategy.	.50	575.00
3/20/25	Quinn, K.	Confer with Caplin & Drysdale re insurance-related options.	.90	1,485.00
3/20/25	Quinn, K.	Review updated analytics re insurance valuation.	.60	990.00
3/20/25	Seymour, S.	Confer with B. Koehler, L. Evans, and B. Levey re defense costs.	.80	352.00
3/20/25	Seymour, S.	Review bankruptcy plans from similar cases in support of discussions with client re same.	1.10	484.00
3/20/25	Sanchez, J.	Research treatment of payment of expenses provision in policies and defense costs implications.	2.80	1,008.00

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Date	Name	Services	Hours	Amount
3/20/25	Frazier, H.	Confer with B. Koehler and B. Levey re current case posture, default judgment research, defense costs research, and policy analysis needed.	.90	922.50
3/20/25	Levey, B.	Confer with H. Frazier and B. Koehler re analysis of policy information.	.90	742.50
3/20/25	Levey, B.	Confer with B. Koehler, L. Evans, and S. Seymour re defense cost allocation.	.80	660.00
3/20/25	Levey, B.	Research default judgment issue.	.80	660.00
3/20/25	Levey, B.	Analyze information re Debtors' liability and Murray coverage programs.	.50	412.50
3/20/25	Ogrey, S.	Research Hon. Lena James decisions.	1.30	455.00
3/20/25	Koehler, B.	Confer with H. Frazier and B. Levey re case status, default judgment research, defense costs research, and policy analysis needed.	.90	855.00
3/20/25	Koehler, B.	Confer with L. Evans, S. Seymour and B. Levey re defense costs.	.80	760.00
3/20/25	Evans, L	Confer with B. Koehler, S. Seymour and B. Levey re additional defense costs analysis.	.80	432.00
3/20/25	Evans, L	Analyze defense costs language to prepare exemplar set for analysis and review.	3.40	1,836.00
3/21/25	Seymour, S.	Review exemplar defense language policies.	1.40	616.00
3/21/25	Seymour, S.	Confer with e-discovery team re policy evidence review.	.50	220.00
3/21/25	Seymour, S.	Confer with B. Levey, B. Koehler, L. Evans and J. Sanchez re defense costs analysis.	.40	176.00
3/21/25	Sanchez, J.	Research implications of denial of coverage and default judgments.	2.40	864.00
3/21/25	Sanchez, J.	Confer with B. Levey, B. Koehler, L. Evans and S. Seymour re defense costs analysis.	.40	144.00
3/21/25	Frazier, H.	Analyze legal implications of defense language of polices.	.80	820.00
3/21/25	Frazier, H.	Analyze impact of insurance settlement agreements re potential state law allocation and rejection of contracts.	1.20	1,230.00
3/21/25	Levey, B.	Confer with B. Koehler, S. Shirzadi, L. Evans, S. Seymour, and S. Ogrey re policy review.	.50	412.50
3/21/25	Levey, B.	Confer with B. Koehler, S. Seymour, J. Sanchez, L. Evans re defense treatment.	.40	330.00
3/21/25	Levey, B.	Review pertinent policy provisions re defense treatment.	.60	495.00
3/21/25	Ogrey, S.	Confer with B. Levey, S. Seymour, B. Kohler, L. Evans, and S. Shirzadi re policy evidence review.	.50	175.00

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Date	Name	Services	Hours	Amount
3/21/25	Shirzadi, S.	Confer with team re policy review documents.	.50	300.00
3/21/25	Koehler, B.	Confer with B. Levey, J. Sanchez, L. Evans and S. Seymour re defense costs analysis.	.40	380.00
3/21/25	Koehler, B.	Confer with team re policy evidence analysis.	.50	475.00
3/21/25	Koehler, B.	Draft memorandum re Aldrich insurance policies and materials re unique defense costs provisions.	3.70	3,515.00
3/21/25	Evans, L	Prepare examples of defense costs language for policy review.	.90	486.00
3/21/25	Evans, L	Confer with S. Shirzadi, S. Seymour, S. Ogrey and B. Levey re policy review.	.50	270.00
3/21/25	Evans, L	Confer with B. Koehler, J. Sanchez, B. Levey and S. Seymour re additional defense costs language.	.40	216.00
3/21/25	Evans, L	Analyze policies re defense costs language.	.90	486.00
3/24/25	Seymour, S.	Revise master policy index with defense treatment re settlement agreements.	2.50	1,100.00
3/24/25	Levey, B.	Review attachments to coverage-in-place listing policy information.	.90	742.50
3/24/25	Levey, B.	Second-level review of policies re accuracy of coverage-in-place listings.	.40	330.00
3/25/25	Seymour, S.	Continue revising master policy index with defense treatment from settlement agreements.	1.10	484.00
3/25/25	Frazier, H.	Analyze defense treatment coding.	.30	307.50
3/25/25	Levey, B.	Confer with B. Koehler re defense cost review.	.50	412.50
3/25/25	Levey, B.	Review policy information spreadsheet.	.60	495.00
3/25/25	Levey, B.	Review summary of policy language re defense.	.20	165.00
3/25/25	Levey, B.	Draft summary of background information re Debtors' liability streams.	.50	412.50
3/25/25	Shirzadi, S.	Confer with J. Bullis re data loads for Aldrich and Murray.	.50	300.00
3/25/25	Koehler, B.	Confer with B. Levey re defense cost review.	.50	475.00
3/25/25	Koehler, B.	Communicate with H. Frazier re defense costs review.	.10	95.00
3/25/25	Bullis, J.	Confer with S. Shirzadi re data loads for Aldrich and Murray.	.50	257.50
3/25/25	Evans, L	Analyze Murray and Aldrich coverage-in-place classifications and defense-related fields for policy analysis.	2.70	1,458.00
3/25/25	Evans, L	Draft process for analysis of additional provisions re defense costs.	1.30	702.00
3/26/25	Seymour, S.	Confer with team re defense costs and insurance coverage issues.	1.10	484.00

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Date	Name	Services	Hours	Amount
3/26/25	Sanchez, J.	Confer with B. Levey re research re implications of default judgment to insurance policies in bankruptcy context.	.30	108.00
3/26/25	Sanchez, J.	Confer with team re protocol for policy review.	1.10	396.00
3/26/25	Sanchez, J.	Research treatment of certain policy language in policies under New York and New Jersey law.	1.70	612.00
3/26/25	Levey, B.	Confer with team re policy review issues.	1.10	907.50
3/26/25	Levey, B.	Confer with J. Sanchez re research re implications of default judgment to insurance policies in bankruptcy context.	.30	247.50
3/26/25	Levey, B.	Revise policy review spreadsheet.	.80	660.00
3/26/25	Levey, B.	Revise protocol for policy review.	.30	247.50
3/26/25	Levey, B.	Research implications of default judgment in bankruptcy context.	.60	495.00
3/26/25	Hubbard, B.	Confer with team re defense analysis.	1.10	660.00
3/26/25	Hubbard, B.	Confer with L. Evans re policy review process.	1.70	1,020.00
3/26/25	Koehler, B.	Confer with team re Aldrich policy analysis.	1.10	1,045.00
3/26/25	Bullis, J.	Build custom load file and load data into policy review database.	5.70	2,935.50
3/26/25	Evans, L	Confer with B. Hubbard re policy review process.	1.70	918.00
3/26/25	Evans, L	Confer with team re defense analysis.	1.10	594.00
3/26/25	Evans, L	Continue analyzing Murray insurance programs re defense costs analysis.	1.80	972.00
3/27/25	Girgenti, J.	Confer with policy review team re defense language review.	.50	250.00
3/27/25	Girgenti, J.	Analyze defense participation provisions for Kewanee Boiler and American Standard program (1977-1985).	5.20	2,600.00
3/27/25	Glaebberman, M.	Begin analyzing defense language in Murray Northbrook Insurance Co. policies in Batch 5.	1.50	540.00
3/27/25	Glaebberman, M.	Confer with policy review team re defense language review.	.50	180.00
3/27/25	Jones, T.	Confer with policy review team re defense language review.	.50	180.00
3/27/25	Jones, T.	Analyze defense participation provisions for Employer's Mutual (1958-1962).	1.40	504.00
3/27/25	Sanchez, J.	Research duty to defend language and defense costs treatment in certain policies.	2.40	864.00
3/27/25	Levey, B.	Confer with policy review team re defense language review.	.50	412.50
3/27/25	Levey, B.	Communicate with S. Seymour re policy review issues.	.20	165.00

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Date	Name	Services	Hours	Amount
3/27/25	Levey, B.	Continue revising protocol for policy review.	.30	247.50
3/27/25	Levey, B.	Second-level policy review.	1.10	907.50
3/27/25	Evans, L	Analyze Murray policies re American Standard re defense cost handling.	2.90	1,566.00
3/27/25	Evans, L	Review protocol for defense costs analysis.	.50	270.00
3/27/25	Evans, L	Confer with policy review team re defense language review.	.50	270.00
3/27/25	Galloway, M.	Analyze defense participation provisions for Chubb (1974-1977).	6.20	2,449.00
3/28/25	Girgenti, J.	Confer with B. Koehler and B. Levey re review of defense language.	.50	250.00
3/28/25	Girgenti, J.	Analyze defense participation provisions for American Standard program (1977-1985), WABCO program (1964-1969), and Trane program (1969-1983).	6.90	3,450.00
3/28/25	Glaebberman, M.	Continue analyzing defense language in Murray policies (Northbrook, INA, Continental) in Batch 5.	7.80	2,808.00
3/28/25	Jones, T.	Continue analyzing defense participation provisions for INA, Interstate Fire, London Market and Northwest National (1964-1970).	7.80	2,808.00
3/28/25	Sanchez, J.	Research certain policy language treatment and implications of defense costs.	3.30	1,188.00
3/28/25	Frazier, H.	Analyze key language re various defense provisions in relevant policies.	.80	820.00
3/28/25	Levey, B.	Confer with B. Koehler and J. Girgenti re policy review issues.	.50	412.50
3/28/25	Levey, B.	Confer with N. Poz re review of defense provisions in Murray historical policies.	.30	247.50
3/28/25	Levey, B.	Communicate with B. Hubbard re quality control analysis of policy review.	.50	412.50
3/28/25	Levey, B.	Continue revising protocol for policy review.	.80	660.00
3/28/25	Levey, B.	Quality control analysis of policy review for defense provisions.	.70	577.50
3/28/25	Levey, B.	Analyze policy review coding re follow-form analysis.	.80	660.00
3/28/25	Hubbard, B.	Review status of defense analysis and flag policies for next level review.	1.20	720.00
3/28/25	Poz, N.	Confer with B. Levey re policy review.	.30	123.00
3/28/25	Poz, N.	Analyze defense participation provisions for WABCO coverage program for 13 policies (1955-1959).	2.50	1,025.00

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Date	Name	Services	Hours	Amount
3/28/25	Shirzadi, S.	Prepare export of Aldrich documents identified as secondary evidence.	1.80	1,080.00
3/28/25	Koehler, B.	Confer with J. Girgenti and B. Levey re Aldrich coverage analysis.	.50	475.00
3/28/25	Koehler, B.	Communicate with team re defense costs language in Aldrich policies.	.30	285.00
3/28/25	Bullis, J.	Generate custom relational field to link policy evidence to primary policy and create custom load file into policy review database.	2.30	1,184.50
3/28/25	Evans, L	Analyze WABCO insurance program for Murray policies re defense cost treatment.	2.40	1,296.00
3/28/25	Evans, L	Review London policy defense treatment analysis.	.30	162.00
3/28/25	Evans, L	Analyze American Standard AIG policies re defense type language and category.	2.70	1,458.00
3/28/25	Galloway, M.	Analyze defense participation provisions for AIG (1976-1978).	6.80	2,686.00
3/29/25	Levey, B.	Second-level policy review re defense costs.	.60	495.00
3/30/25	Glaebberman, M.	Continue analyzing defense language in Murray policies (Northbrook, INA, Continental) in Batch 5.	1.30	468.00
3/30/25	Jones, T.	Continue analyzing defense participation provisions for Associated International (1982-1983).	1.20	432.00
3/30/25	Levey, B.	Second-level policy review re defense costs and follow-form provisions.	1.30	1,072.50
3/30/25	Levey, B.	Research policy language re defense costs.	.50	412.50
3/30/25	Koehler, B.	Review policy language re defense costs.	.10	95.00
3/31/25	Quinn, K.	Communicate with B. Levey re hearing.	.30	495.00
3/31/25	Girgenti, J.	Analyze defense participation provisions for Trane (1969-1983).	1.40	700.00
3/31/25	Glaebberman, M.	Continue analyzing defense language in Murray policies (Northbrook, INA, Continental) in Batch 5.	3.60	1,296.00
3/31/25	Jones, T.	Continue analyzing defense participation provisions for Meade Reinsurance (1983-1985).	1.30	468.00
3/31/25	Frazier, H.	Communicate with team re policy review and coding issues.	.30	307.50
3/31/25	Levey, B.	Communicate with team re omnibus hearing.	.60	495.00
3/31/25	Levey, B.	Review language re defense responsibility.	.30	247.50
3/31/25	Levey, B.	Continue second-level policy review re defense and follow-form analysis.	.50	412.50
3/31/25	Hubbard, B.	Draft listing of fields to import into Relativity based on policy analysis.	.80	480.00

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Date	Name	Services	Hours	Amount
3/31/25	Poz, N.	Analyze defense participation provisions for WABCO coverage program for 8 policies (1958-1960).	1.70	697.00
3/31/25	Shirzadi, S.	Confer with J. Bullis re data, updated field list, and update of policy evidence relational field for Aldrich data.	1.90	1,140.00
3/31/25	Bullis, J.	Export Policy evidence records, OCR, and export text files to be loaded into review database.	.50	257.50
3/31/25	Bullis, J.	Confer with S. Shirzadi re data, updated field list, and update of policy evidence relational field for Aldrich data.	1.90	978.50
3/31/25	Bullis, J.	Create field mapping for Aldrich data to be loaded to review database.	1.10	566.50
3/31/25	Evans, L	Analyze Allianz and Berkshire Hathaway policies for Murray re handling of defense costs.	2.20	1,188.00
TOTAL CHARGEABLE HOURS			280.80	
TOTAL FEES				\$ 172,522.50

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Quinn, K.	4.50	1,650.00	7,425.00
Girgenti, J.	34.50	500.00	17,250.00
Glaebberman, M.	14.70	360.00	5,292.00
Seymour, S.	15.70	440.00	6,908.00
Jones, T.	12.20	360.00	4,392.00
Sanchez, J.	20.20	360.00	7,272.00
Frazier, H.	24.30	1,025.00	24,907.50
Levey, B.	37.80	825.00	31,185.00
Ogrey, S.	5.20	350.00	1,820.00
Hubbard, B.	16.70	600.00	10,020.00
Poz, N.	4.50	410.00	1,845.00
Hicks, T.	3.60	385.00	1,386.00
Shirzadi, S.	4.70	600.00	2,820.00
Koehler, B.	8.90	950.00	8,455.00
Bullis, J.	12.00	515.00	6,180.00
Evans, L	41.50	540.00	22,410.00
Galloway, M.	13.00	395.00	5,135.00
Murphy, S.	6.80	1,150.00	7,820.00
TOTALS	280.80		\$ 172,522.50
TOTAL FEES AND EXPENSES FOR MATTER			\$ 172,522.50

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FOR PROFESSIONAL SERVICES RENDERED through March 31, 2025

Retention / Fee Application

Date	Name	Services	Hours	Amount
3/10/25	Hudgins, M.C.	Draft thirteenth interim fee application.	.50	175.00
TOTAL CHARGEABLE HOURS			.50	
TOTAL FEES				\$ 175.00

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Hudgins, M.C.	.50	350.00	175.00
TOTALS	.50		\$ 175.00
TOTAL FEES AND EXPENSES FOR MATTER			\$ 175.00

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FOR PROFESSIONAL SERVICES RENDERED through March 31, 2025

Hearings

Date	Name	Services	Hours	Amount
3/27/25	Frazier, H.	Attend omnibus hearing.	1.40	1,435.00
3/27/25	Levey, B.	Attend omnibus hearing.	1.40	1,155.00
3/27/25	Murphy, S.	Attend omnibus hearing.	1.40	1,610.00
TOTAL CHARGEABLE HOURS			4.20	
TOTAL FEES				\$ 4,200.00

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Frazier, H.	1.40	1,025.00	1,435.00
Levey, B.	1.40	825.00	1,155.00
Murphy, S.	1.40	1,150.00	1,610.00
TOTALS	4.20		\$ 4,200.00
TOTAL FEES AND EXPENSES FOR MATTER			\$ 4,200.00

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FOR PROFESSIONAL SERVICES RENDERED through March 31, 2025

Plan / Disclosure Statement

Date	Name	Services	Hours	Amount
3/11/25	Frazier, H.	Review plan-related insurance issues.	.80	820.00
3/14/25	Quinn, K.	Confer with Caplin & Drysdale team re plan strategy.	.60	990.00
3/14/25	Frazier, H.	Confer with Caplin & Drysdale team re next steps in plan process.	.60	615.00
3/18/25	Murphy, S.	Review plan-related documents.	2.00	2,300.00
3/19/25	Frazier, H.	Review plan provisions and Debtors' proposed plan re insurance transfer.	.80	820.00
3/20/25	Frazier, H.	Analyze next steps re plan process.	.40	410.00
3/20/25	Frazier, H.	Analyze pass through plan structure and insurance issues re same.	2.50	2,562.50
3/24/25	Frazier, H.	Analyze potential plan structure re insurance implications.	1.80	1,845.00
3/25/25	Frazier, H.	Continue analyzing potential plan structure re insurance implications.	1.10	1,127.50
TOTAL CHARGEABLE HOURS			10.60	
TOTAL FEES				\$ 11,490.00

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Quinn, K.	.60	1,650.00	990.00
Frazier, H.	8.00	1,025.00	8,200.00
Murphy, S.	2.00	1,150.00	2,300.00
TOTALS	10.60		\$ 11,490.00
TOTAL FEES AND EXPENSES FOR MATTER			\$ 11,490.00
TOTAL FEES AND EXPENSES			\$ 188,387.50



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APICC for Aldrich Pump LLC, et al.
c/o Kevin Maclay, Esq.
Caplin & Drysdale, Chartered
One Thomas Circle NW, Suite 1100
Washington, DC 20005

May 30, 2025
Invoice Number: 11338398
Client Number: 1626

FOR PROFESSIONAL SERVICES RENDERED through April 30, 2025

Re: APICC for Aldrich Pump LLC

Matter Description	Fees	Costs	Total
Insurance Analysis & Recovery	97,834.50	.00	97,834.50
Hearings	247.50	.00	247.50
Total	98,082.00	.00	98,082.00

TOTAL FEES \$ 98,082.00

TOTAL EXPENSES \$.00

TOTAL FEES AND EXPENSES \$ 98,082.00

FOR PROFESSIONAL SERVICES RENDERED through April 30, 2025**Insurance Analysis & Recovery**

Date	Name	Services	Hours	Amount
4/01/25	Girgenti, J.	Analyze defense participation provisions for American Standard and Trane programs (1966-1985).	7.80	3,900.00
4/01/25	Glaebberman, M.	Continue analyzing defense language in Murray policies (Century, Prudential) in Batch 5.	4.50	1,620.00
4/01/25	Jones, T.	Continue analyzing defense participation provisions for American Reinsurance (1976-1979), National Casualty (1983-1985), Manhattan Fire (1976-1977), and Republic Insurance (1983-1985).	7.70	2,772.00
4/01/25	Levey, B.	Review policies for defense and follow-form language.	.60	495.00
4/01/25	Levey, B.	Review coding of policies to ensure consistency.	.50	412.50
4/01/25	Bullis, J.	Overlay document text for primary and policy evidence records and update dtSearch index.	.40	206.00
4/01/25	Bullis, J.	Overlay metadata and coding from master spreadsheet to Relativity database for primary policies.	1.20	618.00
4/02/25	Girgenti, J.	Second-level review of defense participation provisions for American Standard and Trane programs.	1.60	800.00
4/02/25	Girgenti, J.	Confer with B. Levey, B. Hubbard, J. Sanchez, L. Evans, T. Jones, and M. Glaebberman re policy review.	1.00	500.00
4/02/25	Girgenti, J.	Follow-form analysis of consent and defense participation provisions for American Standard and Trane in 1980s.	4.90	2,450.00
4/02/25	Glaebberman, M.	Confer with B. Levey, B. Hubbard, J. Sanchez, L. Evans, T. Jones, and J. Girgenti re policy review.	1.00	360.00
4/02/25	Glaebberman, M.	Continue analyzing defense language in Murray policies (Century, Prudential) in Batch 5.	4.70	1,692.00
4/02/25	Jones, T.	Confer with B. Levey, B. Hubbard, J. Sanchez, L. Evans, M. Glaebberman, and J. Girgenti re policy review.	1.00	360.00
4/02/25	Jones, T.	Continue analyzing defense participation provisions for Aetna Casualty (1983-1986), Zurich (1983-1986) and London Market (1981-1986).	6.40	2,304.00
4/02/25	Sanchez, J.	Confer with B. Levey, B. Hubbard, T. Jones, L. Evans, M. Glaebberman, and J. Girgenti re policy review.	1.00	360.00

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May 30, 2025

Date	Name	Services	Hours	Amount
4/02/25	Levey, B.	Confer with J. Sanchez, B. Hubbard, T. Jones, L. Evans, M. Glaebberman, and J. Girgenti re policy review.	1.00	825.00
4/02/25	Levey, B.	Confer with B. Hubbard re defense analysis and coding provisions.	.30	247.50
4/02/25	Levey, B.	Draft memorandum re status of policy review and next steps.	.90	742.50
4/02/25	Levey, B.	Continue researching defense provisions in insurance policies.	.90	742.50
4/02/25	Levey, B.	Analyze consent and cooperation provisions in policies for second-level review.	.60	495.00
4/02/25	Hubbard, B.	Confer with B. Levey re defense analysis and coding provisions.	.30	180.00
4/02/25	Hubbard, B.	Confer with J. Sanchez, B. Levey, T. Jones, L. Evans, M. Glaebberman, and J. Girgenti re policy review.	1.00	600.00
4/02/25	Hubbard, B.	Revise draft defense analysis.	.50	300.00
4/02/25	Evans, L	Confer with J. Sanchez, B. Levey, T. Jones, B. Hubbard, M. Glaebberman, and J. Girgenti re policy review.	1.00	540.00
4/03/25	Girgenti, J.	Follow-form analysis of consent and defense participation provisions for American Standard and Trane programs in 1970s and 1980s.	5.20	2,600.00
4/03/25	Jones, T.	Continue analyzing defense participation provisions for Hudson (1981-1982), Gibraltar Casualty (1983-1984), Employers Mutual Casualty (1978-1985), and London Market (1960-1963).	6.10	2,196.00
4/03/25	Frazier, H.	Communicate with B. Levey re policy review and research.	.20	205.00
4/03/25	Frazier, H.	Confer with T. Phillips re status and strategy.	.10	102.50
4/03/25	Levey, B.	Revise policy review protocol.	.40	330.00
4/03/25	Levey, B.	Review revisions to review spreadsheet and policy coding categories.	.40	330.00
4/03/25	Levey, B.	Review batching of Aldrich policies for defense policy review.	.30	247.50
4/03/25	Levey, B.	Second-level review of Murray policies and follow-form analysis.	.60	495.00
4/03/25	Evans, L	Review Murray policy analysis status and next steps.	.20	108.00
4/03/25	Evans, L	Revise policy listing to streamline defense type payment analysis.	.60	324.00
4/04/25	Girgenti, J.	Confer with B. Levey and L. Evans re Aldrich policy review.	.40	200.00

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Date	Name	Services	Hours	Amount
4/04/25	Girgenti, J.	Second-level review of defense participation provisions for American Standard and Trane programs.	.70	350.00
4/04/25	Girgenti, J.	Follow-form analysis of consent and defense participation provisions for American Standard and Trane programs in 1960s and 1970s.	4.90	2,450.00
4/04/25	Glaebberman, M.	Analyze defense language in Aldrich policies (Aetna) in Batch 2.	2.40	864.00
4/04/25	Sanchez, J.	Analyze incurred jointly and mutual consent language in St. Paul policies.	2.80	1,008.00
4/04/25	Levey, B.	Confer with J. Girgenti and L. Evans re review of Aldrich policies.	.40	330.00
4/04/25	Levey, B.	Finalize protocol policy review.	.40	330.00
4/04/25	Levey, B.	Confer with B. Koehler re status of research and policy review.	.40	330.00
4/04/25	Levey, B.	Review Aetna policy re consent issue.	.40	330.00
4/04/25	Koehler, B.	Confer with B. Levey re insurance coverage analysis.	.40	380.00
4/04/25	Evans, L.	Confer with B. Levey and J. Girgenti re Aldrich defense type language review.	.40	216.00
4/07/25	Girgenti, J.	Continue follow-form analysis of consent and defense participation provisions for American Standard and Trane programs in 1960s and 1970s.	2.60	1,300.00
4/07/25	Girgenti, J.	Analyze defense participation provisions for Ingersoll Rand program (Batches 3 and 10).	5.30	2,650.00
4/07/25	Jones, T.	Continue analyzing defense participation provisions for General Reinsurance Corporation (1954-1961), Employers' Liability Assurance (1961-1966) and Fireman's Fund (1969-1976).	7.20	2,592.00
4/07/25	Levey, B.	Second-level review of Aldrich policies for defense and follow-form treatment.	1.60	1,320.00
4/08/25	Girgenti, J.	Analyze defense participation provisions for Ingersoll Rand program (Batches 10 and 11).	6.20	3,100.00
4/08/25	Jones, T.	Continue analyzing defense participation provisions for Fireman's Fund (1976-1983), Riunione Adriatica di Sicurta (1979-1981), American Insurance (1979-1985) and Geico (1982-1984).	7.20	2,592.00
4/08/25	Levey, B.	Communicate with J. Girgenti re policy coding.	.30	247.50
4/08/25	Levey, B.	Review ACC update re meet-and-confer process.	.30	247.50
4/08/25	Levey, B.	Revise Murray policy spreadsheet re status of second-level and follow-form review.	.60	495.00
4/09/25	Quinn, K.	Review estimation pleadings.	.60	990.00

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Date	Name	Services	Hours	Amount
4/09/25	Girgenti, J.	Analyze defense participation provisions for Ingersoll Rand program (Batch 8).	5.10	2,550.00
4/09/25	Frazier, H.	Review N. Ramsey correspondence re open issues.	.30	307.50
4/09/25	Levey, B.	Analyze background materials re Debtor liability streams.	.50	412.50
4/09/25	Levey, B.	Review research re consent provisions in insurance policies.	.30	247.50
4/10/25	Girgenti, J.	Analyze defense participation provisions for Ingersoll Rand program (Batches 7 and 8).	6.40	3,200.00
4/10/25	Seymour, S.	Confer with J. Bullis and S. Shirzadi re Murray policy identification.	.50	220.00
4/10/25	Levey, B.	Review status of coding of Aldrich policies.	.60	495.00
4/10/25	Shirzadi, S.	Confer with J. Bullis and S. Seymour re identification of Murray policies.	.50	300.00
4/10/25	Bullis, J.	Confer with S. Shirzadi and S. Seymour re identification of Murray policies.	.50	257.50
4/11/25	Girgenti, J.	Analyze defense participation provisions for Ingersoll Rand program (Batches 6 and 7).	6.20	3,100.00
4/11/25	Levey, B.	Review policies for follow-form and consent language treatment.	1.30	1,072.50
4/12/25	Jones, T.	Continue analyzing defense participation provisions for Federal Insurance (1976-1985).	1.00	360.00
4/14/25	Girgenti, J.	Analyze defense participation provisions for unreviewed policies in Ingersoll Rand program.	6.80	3,400.00
4/14/25	Jones, T.	Continue analyzing defense participation provisions for Bermuda Fire (1980-1982), American Excess (1982-1984), Central National (1971-1983) and Insurance Company of North America (1966-1972).	8.30	2,988.00
4/14/25	Shirzadi, S.	Prepare Murray documents for loading and update information database for creation of relational fields	2.30	1,380.00
4/14/25	Shirzadi, S.	Confer with J. Bullis re sync of Murray policy data load and Murray metadata master spreadsheet in Relativity review database.	.60	360.00
4/14/25	Bullis, J.	Confer with S. Shirzadi re sync of Murray policy data load and Murray metadata master spreadsheet in Relativity review database.	.60	309.00
4/15/25	Girgenti, J.	Analyze defense participation provisions for policies following form to Northbrook and London policies in Ingersoll Rand program.	7.30	3,650.00
4/15/25	Jones, T.	Continue analyzing defense participation provisions for Insurance Company of North America (1966-1973).	1.80	648.00

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Date	Name	Services	Hours	Amount
4/16/25	Girgenti, J.	Analyze defense participation provisions for policies following form to London, Home and Travelers policies in Ingersoll Rand program.	6.80	3,400.00
4/16/25	Levey, B.	Review policies for follow-form and defense language.	1.10	907.50
4/16/25	Levey, B.	Second-level review of coding of defense and follow-form provisions.	.50	412.50
4/17/25	Girgenti, J.	Analyze defense participation provisions for policies following form to Central National and Insurance Company of North America policies in Ingersoll Rand program.	4.60	2,300.00
4/17/25	Girgenti, J.	Analyze defense participation provisions for remaining follow-form policies in Murray program.	2.70	1,350.00
4/17/25	Frazier, H.	Review Court ruling on estimation issues.	.30	307.50
4/17/25	Frazier, H.	Confer with parties re Hartford objection.	.20	205.00
4/17/25	Frazier, H.	Confer with insurer counsel re witness lists and order.	.30	307.50
4/17/25	Levey, B.	Second-level policy review of defense and consent language.	1.30	1,072.50
4/18/25	Girgenti, J.	Analyze defense participation provisions for remaining follow-form policies in Murray and Ingersoll Rand programs.	4.40	2,200.00
4/18/25	Levey, B.	Review research re insurance consent provisions.	.40	330.00
4/21/25	Levey, B.	Draft summary of outstanding research re pass through provision issue.	.30	247.50
4/24/25	Levey, B.	Confer with B. Koehler re defense provision language research.	.20	165.00
4/24/25	Levey, B.	Review research re defense cost language.	.50	412.50
4/24/25	Koehler, B.	Confer with B. Levey re defense provision language research.	.20	190.00
4/24/25	Koehler, B.	Begin analyzing treatment of option to defend/proportion language under applicable law.	1.10	1,045.00
4/25/25	Koehler, B.	Continue analyzing defense cost language.	1.30	1,235.00
4/30/25	Frazier, H.	Review recent orders and communications with Committee re insurance strategy and next steps.	1.30	1,332.50
4/30/25	Koehler, B.	Draft memorandum re defense costs consent and proportion language.	2.50	2,375.00
TOTAL CHARGEABLE HOURS			191.30	
TOTAL FEES				\$ 97,834.50

Invoice Number: 11338398
May 30, 2025

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Quinn, K.	.60	1,650.00	990.00
Girgenti, J.	90.90	500.00	45,450.00
Glaebberman, M.	12.60	360.00	4,536.00
Seymour, S.	.50	440.00	220.00
Jones, T.	46.70	360.00	16,812.00
Sanchez, J.	3.80	360.00	1,368.00
Frazier, H.	2.70	1,025.00	2,767.50
Levey, B.	17.90	825.00	14,767.50
Hubbard, B.	1.80	600.00	1,080.00
Shirzadi, S.	3.40	600.00	2,040.00
Koehler, B.	5.50	950.00	5,225.00
Bullis, J.	2.70	515.00	1,390.50
Evans, L	2.20	540.00	1,188.00
TOTALS	191.30		\$ 97,834.50
TOTAL FEES AND EXPENSES FOR MATTER			\$ 97,834.50

Invoice Number: 11338398
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FOR PROFESSIONAL SERVICES RENDERED through April 30, 2025

Hearings

Date	Name	Services	Hours	Amount
4/15/25	Levey, B.	Attend portion of status hearing.	.30	247.50
TOTAL CHARGEABLE HOURS			.30	
TOTAL FEES				\$ 247.50

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Levey, B.	.30	825.00	247.50
TOTALS	.30		\$ 247.50
TOTAL FEES AND EXPENSES FOR MATTER			\$ 247.50
TOTAL FEES AND EXPENSES			\$ 98,082.00

GILBERT LLP

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APICC for Aldrich Pump LLC, et al.
c/o Kevin Maclay, Esq.
Caplin & Drysdale, Chartered
One Thomas Circle NW, Suite 1100
Washington, DC 20005

June 27, 2025
Invoice Number: 11338647
Client Number: 1626

FOR PROFESSIONAL SERVICES RENDERED through May 31, 2025

Re: APICC for Aldrich Pump LLC

Matter Description	Fees	Costs	Total
Insurance Analysis & Recovery	5,850.00	.00	5,850.00
Total	5,850.00	.00	5,850.00
TOTAL FEES			\$ 5,850.00
TOTAL EXPENSES			<u>\$.00</u>
TOTAL FEES AND EXPENSES			\$ 5,850.00

FOR PROFESSIONAL SERVICES RENDERED through May 31, 2025

Insurance Analysis & Recovery

Date	Name	Services	Hours	Amount
5/02/25	Koehler, B.	Analyze various defense costs and loss provisions in Aldrich policies.	2.30	2,185.00
5/06/25	Levey, B.	Review list of unexhausted policies to determine applicability for liquidation bar date.	.40	330.00
5/07/25	Frazier, H.	Analyze issues re Arrowood proof of claim.	.40	410.00
5/07/25	Levey, B.	Review policy potentially relevant to Arrowood liquidation.	.40	330.00
5/07/25	Koehler, B.	Draft memorandum re treatment of defense costs language in Aldrich policies.	1.80	1,710.00
5/08/25	Frazier, H.	Communicate with Debtors and B. Levey re Arrowood insolvency issues.	.20	205.00
5/08/25	Levey, B.	Draft summary of potential recovery from Arrowood.	.20	165.00
5/08/25	Levey, B.	Research details and exhaustion of policy at issue re Arrowood liquidation issues.	.50	412.50
5/09/25	Frazier, H.	Confer with Debtors' counsel re Arrowood insolvency submission.	.10	102.50
TOTAL CHARGEABLE HOURS			6.30	
TOTAL FEES				\$ 5,850.00

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Frazier, H.	.70	1,025.00	717.50
Levey, B.	1.50	825.00	1,237.50
Koehler, B.	4.10	950.00	3,895.00
TOTALS	6.30		\$ 5,850.00
TOTAL FEES AND EXPENSES FOR MATTER			\$ 5,850.00
TOTAL FEES AND EXPENSES			\$ 5,850.00

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

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

NOTICE OF FILING AND OPPORTUNITY FOR HEARING

(No Protest Notice – No Hearing Will be Held Unless a Request for Hearing is Filed)

PLEASE TAKE NOTICE that the Official Committee of Asbestos Personal Injury Claimants (the “Committee”) filed the *Fourteenth Interim Application for Allowance of Compensation for Services Rendered and Reimbursement of Expenses of Gilbert LLP, Special Insurance Counsel to the Official Committee of Asbestos Personal Injury Claimants, for the Period February 1, 2025 Through May 31, 2025* (the “Application”).

If a copy of the Application is not included with this Notice, a copy may be viewed at the Court’s website, www.ncwb.uscourts.gov, under Debtor Aldrich Pump LLC’s name and case number; you may obtain a copy of the Application from the Debtors’ claims and noticing agent at www.veritaglobal.net/aldrich; or you may request in writing a copy from the undersigned counsel to the Committee.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THESE BANKRUPTCY CASES. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)

IF YOU DO NOT WANT THE COURT TO GRANT THE RELIEF REQUESTED IN THE APPLICATION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE APPLICATION, THEN ON OR BEFORE JULY 28, 2025 YOU MUST:

1. File a formal, written response with the Bankruptcy Court at:

Clerk, United States Bankruptcy Court
Charles Jonas Federal Building
401 West Trade Street
Charlotte, NC 28202

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

2. Serve a copy of your response on all parties in interest, including:

- a) U.S. Bankruptcy Administrator
401 West Trade Street, Suite 2400
Charlotte, NC 28202
- b) HAMILTON STEPHENS STEELE + MARTIN, PLLC
Glenn C. Thompson
525 North Tryon Street, Suite 1400
Charlotte, NC 28202
- c) GILBERT LLP
Kami E. Quinn
700 Pennsylvania Avenue SE, Suite 400
Washington, DC 20003

If you do not want the Court to grant the relief requested in the Application or if you want the Court to consider your views on the Application, then you or your attorney should attend the hearing on **August 28, 2025 at 9:30 a.m. (ET)** before the Honorable Lena M. James at the United States Bankruptcy Court, Charles Jonas Federal Building, Courtroom 2B, 401 West Trade Street, Charlotte, North Carolina 28202.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought and may enter an Order granting the relief requested. If no objections are timely filed and served, the court may rule on the Application without a hearing. No further notice of that hearing will be given.

Dated: July 14, 2025
Charlotte, North Carolina

HAMILTON STEPHENS
STEELE + MARTIN, PLLC

/s/ Glenn C. Thompson

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525 North Tryon Street, Suite 1400
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Facsimile: (704) 344-1483
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*Counsel to the Official Committee of Asbestos
Personal Injury Claimants*