

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

DECLARATION OF ORDINARY COURSE PROFESSIONAL

FOLEY & LARDNER LLP

The undersigned hereby declares, under penalty of perjury, as follows:

1. I am a member, partner, or similar representative of the following firm

(the "Firm"), which maintains offices at the address and phone number listed below:

Firm: FOLEY & LARDNER LLP
777 East Wisconsin Avenue
Milwaukee, WI 53202

2. This Declaration is submitted in connection with an order of the

United States Bankruptcy Court for the Western District of North Carolina authorizing Aldrich Pump LLC and Murray Boiler LLC (together, the "Debtors") to retain certain professionals in the ordinary course of business during the pendency of the Debtors' chapter 11 cases [Dkt. 170] (the "Order"). Following the date that the Debtors' chapter 11 cases were commenced (the "Petition Date"), the Debtors have requested that the Firm provide professional services (or continue to provide such services) to the Debtors, and the Firm has agreed to provide such services.

Accordingly, the Firm is filing this Declaration pursuant to the Order.

¹ The Debtors are the following entities (the last four digits of their respecti in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). Street, Davidson, North Carolina 28036.



3. The Firm, through me, and other members, partners, associates, or employees of the Firm, has provided, or plans to provide, the following services to the Debtors from and after the Petition Date: Collection and review of historical resolved claim file information potentially responsive to discovery requests served on the Debtors, and performing other services as requested and required during the pendency of the Debtors' chapter 11 cases.

4. To the best of my knowledge, information, and belief, formed after due inquiry, the Firm does not represent or hold an interest adverse to the Debtors or their estates with respect to the matter(s) on which the Firm is to be retained and employed.

5. The Firm is owed \$49,527.20 on account of services rendered and expenses incurred prior to the Petition Date in connection with the Firm's employment by the Debtors.

6. The Firm further states that it has not shared, has not agreed to share, nor will agree to share, any compensation received in connection with these chapter 11 cases with any party or person, although such compensation may be shared with any member or partner of, or any person employed by, the Firm.

7. If, at any time during its employment by the Debtors, the Firm discovers any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

Dated: July 7th, 2025

/s/ Eric G. Pearson

Eric G. Pearson (WI Bar No. 1064367)

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