

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

Jointly Administered

MOTION FOR PRO HAC VICE ADMISSION FOR MICHAEL ROSENBERG

A. Cotten Wright, hereby moves the Court for entry of an Order pursuant to Local Bankruptcy Rule 2090-2 for the admission *pro hac vice* of Michael Rosenberg for the purpose of representing Joseph W. Grier, III, the Court-appointed representative for future asbestos claimants against the above-captioned Debtors (the “FCR”), in the above-referenced chapter 11 bankruptcy cases, and in support thereof, respectfully shows the Court as follows:

1. The undersigned is a member of the bar of this Court in good standing and is of counsel of the firm of Grier Wright Martinez, PA located at 521 E. Morehead Street, Suite 440, Charlotte, NC 28202.

2. Michael Rosenberg (“Mr. Rosenberg”) seeks to appear *pro hac vice* on behalf of the FCR in these chapter 11 cases and any related adversary proceedings. Mr. Rosenberg is an attorney of the law firm of Orrick, Herrington & Sutcliffe LLP (“Orrick”) and maintains an office at the firm's Chicago location at 353 North Clark Street, Chicago, IL 60654. Mr. Rosenberg’s telephone number is 312-924-9833 and his email address is mrosenberg@orrick.com.

3. Orrick is employed as bankruptcy counsel to the FCR in these chapter 11 cases pursuant to an Order entered on October 15, 2020 (Doc. No. 394).

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.



4. Mr. Rosenberg is admitted to practice before and remains in good standing with the State Bars of Illinois and New York.

5. Mr. Rosenberg is familiar with the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure, has been made aware of the Local Rules of Bankruptcy Procedure published by this Court, and understands that he will be subject to the disciplinary jurisdiction of this Court.

6. The attorneys at Grier Wright Martinez PA, including the undersigned, will serve as co-counsel in these jointly administered cases and any related adversary proceedings, and attend all hearings with the proposed admittee unless otherwise permitted by the Court.

7. A Declaration of Mr. Rosenberg in support of this application is attached.

8. The \$300.00 fee for *pro hac vice* admission will be tendered upon the filing of this application.

WHEREFORE, the undersigned respectfully prays that the Court will enter an Order admitting Michael Rosenberg *pro hac vice* in these matters.

This 23rd day of July 2025.

/s/ A. Cotten Wright
A. Cotten Wright (State Bar No. 28162)
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Charlotte, NC 28202
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IN RE:

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Chapter 11

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**DECLARATION OF MICHAEL ROSENBERG IN SUPPORT OF
APPLICATION FOR ADMISSION *PRO HAC VICE***

Michael Rosenberg declares as follows:

1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP (“Orrick”).

My contact information is as follows:

Orrick, Herrington & Sutcliffe LLP
353 N. Clark St., Ste. 3600
Chicago, IL 60654
Telephone: 312-924-9833
Email: mrosenberg@orrick.com

2. Orrick is employed as bankruptcy counsel to Joseph W. Grier, III, the Court-appointed legal representative for future asbestos claimants (the “FCR”), pursuant to an Order entered by this Court on October 15, 2020 (Doc. No. 394). I am a member in good standing of the State Bar of California

3. I am generally familiar with the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure, I have been made aware of the Local Rules of Bankruptcy Procedure published by this Court, and I understand that I will be subject to the disciplinary jurisdiction of this Court.

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.

4. I have never been disbarred, suspended, or denied admission to practice. I have never had a *pro hac vice* admission revoked or admission in any other bar revoked. No disciplinary proceeding has been initiated against me and no investigation is currently pending.

5. I am not a member of the North Carolina bar and I do not maintain any law office in North Carolina.

6. I understand that my admission *pro hac vice* is for these chapter 11 cases and any related adversary proceedings only and does not constitute formal admission to the bar of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 23rd day of July 2025.

/s/ Michael Rosenberg
Michael Rosenberg