

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

In re:

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Case No. 20-30608 (LMJ)

Chapter 11

**EX PARTE MOTION TO WITHDRAW AS COUNSEL AND TO REMOVE COUNSEL
FROM THE CM/ECF ELECTRONIC NOTIFICATION SERVICE**

Pursuant to Rule 2091-1(d)(3) of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina, the Official Committee of Asbestos Personal Injury Claimants (the “Committee”) hereby moves to withdraw David Neier as counsel for the Committee in the above-captioned case and its related adversary proceedings and to remove David Neier from any applicable notice and service lists, including the Court’s CM/ECF electronic notification list.

Winston & Strawn LLP (“Winston”) remains as counsel of record for the Committee through the continued appearance of, among others, Carrie V. Hardman and Cristina I. Calvar, notwithstanding the requested withdrawal of David Neier from this case. Accordingly, as the Committee continues to be represented by counsel of record from Winston, David Neier’s withdrawal will not result in delay of discovery, hearings, or any trials or other proceedings in the above-captioned case or any related adversary proceedings.

The instant Motion is filed in the interest of clarity and to ensure the record respecting the Committee’s representation is clear. The Committee asserts that no party will be prejudiced by the requested relief.

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



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WHEREFORE, the Committee respectfully requests entry of an order, substantially in the form attached hereto as **Exhibit A**, (1) permitting the withdrawal of David Neier; (2) removing David Neier from CM/ECF electronic notification service; and (3) granting such other and further relief as is just and proper.

Dated: August 18, 2025

Respectfully submitted,

WINSTON & STRAWN LLP

/s/ Carrie V. Hardman

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EXHIBIT A

Proposed Order

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

In re:

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

**ORDER GRANTING *EX PARTE* MOTION TO WITHDRAW AS COUNSEL AND TO
REMOVE COUNSEL FROM CM/ECF ELECTRONIC NOTIFICATION SERVICE**

The Court having reviewed the *Ex Parte Motion to Withdraw as Counsel and to Remove Counsel from CM/ECF Electronic Notification Service* (“Motion”), to withdraw David Neier as counsel for the Official Committee of Asbestos Personal Injury Claimants, the Court having reviewed the record in this case and for good cause shown, and the Court having determined that the relief requested in the Motion is appropriate:

IT IS HEREBY ORDERED that the Motion is GRANTED.

IT IS FURTHER ORDERED that the withdrawal of David Neier is hereby approved pursuant to Local Bankruptcy Rule 2091-1(d)(3), and David Neier is discharged from any further responsibility of representation of the Committee.

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.

IT IS FURTHER ORDERED that the Bankruptcy Court Clerk shall cause David Neier (dneier@winston.com) to be removed from the CM/ECF Electronic Notification Service for the above-captioned case, along with all related adversary proceedings.

This order has been signed electronically. The Judge's signature and Court's seal appear at the top of this Order.	United States Bankruptcy Court
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