

**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
	:	
Debtors.	:	(Jointly Administrated)
	:	

**THE NON-DEBTOR AFFILIATES' RESPONSE TO THE MOTION OF THE OFFICIAL
COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS TO SUBSTITUTE
COMMITTEE MEMBERS**

Trane Technologies Company LLC (“**New TTC**”) and Trane U.S. Inc. (“**New TUI**,” together with New TTC, the “**Non-Debtor Affiliates**”) submit this response to the *Motion of the Official Committee of Asbestos Personal Injury Claimants To Substitute Committee Members* dated August 7, 2025 [Dkt. 2769] (the “**Motion**” or “**Mot.**”) filed by the Official Committee of Asbestos Personal Injury Claimants (the “**Committee**”) and state as follows:

1. The Non-Debtor Affiliates join in the responses to the Motion submitted by the Debtors and Joseph W. Grier, III, the representative for future asbestos claimants in the above-captioned cases (the “**FCR**”). *See, Debtors’ Limited Response to Motion of the Official Committee of Asbestos Personal Injury Claimants To Substitute Committee Members* dated August 21, 2025 [Dkt. 2787] and *The Future Asbestos Claimants’ Representative’s Response to the ACC’s Motion To Substitute Committee Members* dated August 21, 2025 [Dkt. 2786].

2. The Non-Debtor Affiliates, the Debtors, and the FCR have each expressed concerns regarding the governance of the Committee and the incongruity between the interests of asbestos

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.



claimants and the actions of the Committee. The Fourth Circuit in the *Bestwall* bankruptcy proceeding has likewise recognized this incongruity on multiple occasions and questioned the tactics of the committee in that proceeding (a committee comprised of members represented by many of the same plaintiff firms that represent the former and proposed committee members here). *In re Bestwall LLC*, 71 F.4th 168, 184 (4th Cir. 2023) (“It is not clear why Claimant Representatives' counsel have relentlessly attempted to circumvent the bankruptcy proceeding, but we note that aspirational greater fees that could be awarded to the claimants' counsel in the state-court proceedings is not a valid reason to object to the processing of the claims in the bankruptcy proceeding.”); *In re Bestwall LLC*, 2025 WL 2177391, at *10 n.2 (4th Cir. Aug. 1, 2025) (Agee, J., concurring) (“That begs the question, as we previously noted in *In re Bestwall LLC*, as to whether the delay relates to valid claims or the desire for perceived higher attorneys’ fees should the claims be removed and be adjudicated outside of bankruptcy?”).

3. The Motion raises questions as to how the Committee has operated over multiple years with the loss of its members and is completely devoid of any explanation as to how the Committee made critical decisions in this case, including the decisions to refuse to negotiate with the Debtors and the FCR in connection their proposed plan and to expend the time and resources to prosecute pointless litigation to “recover assets” for the Debtors’ estates while simultaneously asserting the Debtors have more than sufficient resources to pay all of their liabilities in full. The Motion further fails to disclose what information, if any, was provided to non-members during this time and what role, if any, non-members had on the Committee during such time.

4. As a condition to obtaining the relief requested in the Motion, the Committee should disclose information regarding its governance and decision-making during the years preceding the Motion. The Non-Debtor Affiliates further request that any relief granted with

respect to the Motion be without prejudice to the Non-Debtor Affiliates' arguments that any communications and/or documents shared between the Committee and/or its counsel and non-members prior to their substitution are not subject to the attorney-client privilege or work product protection. The Non-Debtor Affiliates reserve their right to seek further relief regarding the governance and conduct of the Committee, its members, and their respective counsel, including, without limitation, the right to request the appointment of an independent committee member to ensure the Committee is properly governed by the Committee's members in accordance with any applicable by-laws and not by the plaintiff firms representing such members.

Dated: August 21, 2025

/s/ Bradley R. Kutrow

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