

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

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS,

Plaintiff,

v.

ALDRICH PUMP LLC, MURRAY
BOILER LLC, TRANE TECHNOLOGIES
COMPANY LLC, and TRANE U.S. INC.,

Defendants.

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS, on
behalf of the estates of Aldrich Pump LLC
and Murray Boiler LLC,

Plaintiff,

v.

INGERSOLL-RAND GLOBAL HOLDING
COMPANY LIMITED, TRANE
TECHNOLOGIES HOLDCO INC.,
TRANE TECHNOLOGIES COMPANY
LLC, TRANE INC., TUI HOLDINGS
INC., TRANE U.S. INC., and MURRAY
BOILER HOLDINGS LLC,

Defendants.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

Adv. Pro. No. 21-03029 (LMJ)

Adv. Pro. No. 22-03028 (LMJ)

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.



DEFENDANTS' EX PARTE MOTION FOR AUTHORITY TO SUBMIT DEFENDANTS' MOTION TO STAY ADVERSARY PROCEEDINGS IN EXCESS OF PAGE LIMITS

Aldrich Pump LLC (“Aldrich”) and Murray Boiler LLC (“Murray”), as debtors and debtors in possession (together, the “Debtors”), and Trane Technologies Company LLC and Trane U.S. Inc. (the “NDAs” and together with the Debtors, “Defendants”), by and through their undersigned counsel, file this *ex parte* motion (the “Motion”) requesting authority to file the *Defendants’ Motion to Stay Adversary Proceedings* (the “Stay Motion”) in excess of page limits mandated by Rules 7007-1 and 9013-2 of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the “Local Rules”)² and in support of the Motion, respectfully state as follows:

1. On October 18, 2021, the Committee³ initiated the Sub Con Proceeding and filed a motion, which the Court granted, for authority to investigate and commence certain causes of action related to the 2020 Corporate Restructuring. Eight months later, the Committee filed the Fraudulent Transfer Complaint and the Fiduciary Duty Complaint.

2. On January 10, 2023, the Court entered the Adversary Proceedings CMO for the three Adversary Proceedings, staying the Fiduciary Duty Proceeding in its entirety pending entry of final orders in the Fraudulent Transfer and the Sub Con Proceedings.

3. Since January 2023, the Adversary Proceedings have largely been dormant despite much activity in the Debtors’ base cases, including litigation and appeals involving dismissal motions and continued efforts to drive estimation forward.

² Local Rule 7007-1(a) provides that motions and briefs in adversary proceedings should be filed in accordance with Local Rule 9013-2. Local Rule 9013-2(a) states that briefs filed in contested matters should not exceed twenty-five (25) pages unless otherwise ordered by the Court.

³ Unless otherwise defined herein, capitalized terms shall have the definition given to them by the Stay Motion.

4. On August 7, 2025, Committee counsel sent correspondence proposing various amendments to the Adversary Proceedings CMO and notified Defendants' counsel that they intended to file a motion to modify the Adversary Proceedings CMO to accelerate many of the current deadlines. The Defendants indicated their disagreement with the Committee's proposed modifications and stated that the Adversary Proceedings should not be tried until after the estimation proceeding.

5. On October 2, 2025, the Committee filed its motion to modify the Adversary Proceedings CMO. The Defendants intend to file their Stay Motion contemporaneously with this Motion.

6. The Defendants respectfully request authority to exceed the page limits in their Stay Motion established by the Local Rules. The Defendants believe the relief requested by this Motion is justified due to the complex legal, procedural and factual history related to the Adversary Proceedings, including bringing the Court current to the happenings in the Adversary Proceedings and the Debtors' base cases from January 2023 through present, much of which occurred while Judge Whitley presided over the various cases.

7. The Defendants seek to compile the complex history in one pleading in order to avoid directing the Court to prior pleadings and requiring the Court to root through the various dockets and pleadings should the Defendants comply with the page limit and otherwise refer and incorporate prior pleadings on the various dockets. Instead, the Defendants believe authorization to exceed page limits will efficiently put the history before the Court and parties in one succinct pleading that is 38 pages, excluding signature blocks and exhibits, making the request one to exceed the Local Rules' page limits only by 13 pages.

8. Based on the above-described circumstances, the Defendants believe good cause exists to permit them to file the Stay Motion in excess of 25 pages.

CONCLUSION

WHEREFORE, the Defendants respectfully request that the Court (a) enter an order substantially in the form attached hereto as Exhibit A, granting the relief requested herein, and (b) grant such other and further relief to the Defendants as the Court may deem just and proper.

Dated: October 2, 2025
Charlotte, North Carolina

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Respectfully submitted,

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ATTORNEYS FOR DEBTORS AND
DEBTORS IN POSSESSION

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
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BOILER HOLDINGS LLC,

Defendants.

Adv. Pro. No. 22-03028 (LMJ)

EX PARTE ORDER GRANTING
DEFENDANTS AUTHORITY TO EXCEED MAXIMUM PAGE LIMIT

This matter came before the Court on the Defendants' *Ex Parte Motion for Authority to File the Defendants' Motion to Stay Adversary Proceedings* (the "Motion"). Based on the Motion, the Court finds and concludes that good cause exists to grant relief from the twenty-five (25) page limit imposed by Local Rules 7007-1 and 9013-2(a) to the extent that it applies to the *Motion to Stay Adversary Proceedings*. Accordingly, the Motion is **GRANTED** and the page limit as established by Local Rules 7007-1 and 9013-2(a) is hereby lifted with respect to the *Motion to Stay Adversary Proceedings* in excess of page limits as described in the Motion.

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