

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)

EX PARTE MOTION FOR ORDER SHORTENING NOTICE

The Official Committee of Asbestos Personal Injury Claimants (the “Committee”) of Aldrich Pump LLC, *et al.*, (the “Debtors”) hereby files this Ex Parte Motion for Order Shortening Notice (this “Motion to Shorten Notice”) requesting, pursuant to Local Bankruptcy Rule 9006-1, shortened notice of the *Motion to Amend the Second Amended Case Management Order for Estimation of Asbestos Claims* (the “Expert Report Confidentiality Motion”). In support of this Motion to Shorten Notice, the Committee respectfully states as follows:

1. Contemporaneously herewith, the Committee filed the Expert Report Confidentiality Motion which seeks to enhance the confidentiality protections governing the Initial Expert Reports.² Specifically, the Expert Report Confidentiality Motion seeks entry of an order (a) limiting the use of the Initial Estimation Reports to the estimation proceeding in this case; and (b) restricting access to and production of the Initial Expert Reports to the parties to the estimation proceeding.

¹ The Debtors are the following entities (the last four digits of the Debtors’ 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.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Expert Report Confidentiality Motion.



2. As set forth in greater detail in the Expert Report Confidentiality Motion, the Debtors, the FCR, and the Committee have communicated regarding the treatment and disclosure of the Initial Expert Reports following their exchange on September 15, 2025. These communications identified a disagreement among the Parties: notwithstanding the Court's comments regarding the non-filing of the Initial Expert Reports, the communications indicated to the Committee that the FCR intended to imminently file the Initial Expert Reports for the Court's review and that the Debtors intended to share the reports with other entities that were requesting the reports from the Debtors.

3. A hearing date in these jointly administered chapter 11 cases is scheduled for October 23, 2025. Accordingly, the Committee is requesting that the required notice period for the Expert Report Confidentiality Motion be shortened so that it may be heard on October 23, 2025.

4. This motion is timely in that it has been filed as soon as possible following the identification of the remaining disagreement.

5. The Debtors and the FCR—the only parties affected by the Expert Report Confidentiality Motion—have consented to the Committee's request to shorten notice. Additionally, all parties to these proceedings shall receive notice via ECF of the Expert Report Confidentiality Motion and this Motion to Shorten Notice on October 10, 2025, immediately upon its filing.

6. Given the consent of the Debtors and the FCR, and the broad notice provided to other parties and their right to respond in advance of the hearing on October 23, the Committee submits that shortened notice is sufficient and justified under the circumstances, and no party will be prejudiced by such shortened notice in relation to the Expert Report Confidentiality Motion.

WHEREFORE, the Committee respectfully requests the Court enter an Order, in the form attached hereto as **Exhibit A**, granting the relief requested in this Motion to Shorten Notice and granting such further relief as the Court deems just and proper.

Dated: October 10, 2025
Charlotte, North Carolina

HAMILTON STEPHENS STEELE
+ MARTIN, PLLC

/s/ Robert A. Cox, Jr.

Glenn C. Thompson (Bar No. 37221)
Robert A. Cox, Jr. (Bar No. 21998)
525 North Tryon Street, Suite 1400
Charlotte, North Carolina 28202
Telephone: (704) 344-1117
Facsimile: (704) 344-1483
Email: gthompson@lawhssm.com
rcox@lawhssm.com

*Local Counsel for the Official Committee of
Asbestos Personal Injury Claimants*

Natalie D. Ramsey (admitted *pro hac vice*)
Davis Lee Wright (admitted *pro hac vice*)
ROBINSON & COLE LLP
1201 N. Market Street, Suite 1406
Wilmington, Delaware 19801
Tel: (302) 516-1700
Fax: (302) 516-1699
Email: nramsey@rc.com
dwright@rc.com

Kevin C. Maclay (admitted *pro hac vice*)
Todd E. Phillips (admitted *pro hac vice*)
James P. Wehner (admitted *pro hac vice*)
CAPLIN & DRYSDALE, CHARTERED
1200 New Hampshire Avenue NW, 8th Floor
Washington, District of Columbia 20036
Tel.: (202) 862-5000
Fax: (202) 429-3301
Email: kmaclay@capdale.com
jwehner@capdale.com
tphillips@capdale.com

Co-Counsel to the Official Committee of Asbestos Personal Injury Claimants

Exhibit A

**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)

EX PARTE ORDER SHORTENING NOTICE ON MOTION

This Court has considered the Ex Parte Motion for Order Shortening Notice (this “Motion to Shorten Notice”) regarding the *Motion to Amend the Second Amended Case Management Order for Estimation of Asbestos Claims* (the “Expert Report Confidentiality Motion”). After due deliberation and sufficient cause appearing therefore, it is hereby:

¹ The Debtors are the following entities (the last four digits of the Debtors’ 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.

ORDERED, that the notice period for the Expert Confidentiality Motion is hereby reduced pursuant to Bankruptcy Rule 9006; and it is further

ORDERED, that a hearing on the Expert Confidentiality Motion will be held on **October 23, 2025 at 9:30 a.m., or as soon as possible thereafter** before the Honorable Lena M. James at the United States Bankruptcy Court, Courtroom 2B, 401 W. Trade Street, Charlotte, NC 28202; and it is further

ORDERED, that the deadline to file any written response to the Expert Confidentiality Motion shall be **October 16, 2025**; and it is further

ORDERED, that this Court shall retain jurisdiction over any and all issues arising from or related to the implementation and interpretation of this Order.

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