

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

In re

ALDRICH PUMP LLC, *et al.*,¹

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

Adv. Pro. No. 22-03028

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.



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

Plaintiff,

v.

TRANE TECHNOLOGIES PLC, INGERSOLL-
RAND GLOBAL HOLDING COMPANY
LIMITED, TRANE TECHNOLOGIES HOLDCO
INC., TRANE TECHNOLOGIES COMPANY
LLC, TRANE INC., TUI HOLDINGS INC.,
TRANE U.S. INC., MURRAY BOILER
HOLDINGS LLC, SARA BROWN, RICHARD
DAUDELIN, MARC DUFOUR, HEATHER
HOWLETT, CHRISTOPHER KUEHN,
MICHAEL LAMACH, RAY PITTARD, DAVID
REGNERY, AMY ROEDER, ALLAN
TANANBAUM, EVAN TURTZ, MANLIO
VALDES, and ROBERT ZAFARI

Defendants.

Adv. Pro. No. 22-03029

**THE FUTURE ASBESTOS CLAIMANTS' REPRESENTATIVE'S
OMNIBUS RESPONSE TO (I) DEBTORS' MOTION TO STAY
ADVERSARY PROCEEDINGS, AND (II) OFFICIAL COMMITTEE OF
ASBESTOS PERSONAL INJURY CLAIMANTS' MOTION
TO AMEND CASE MANAGEMENT ORDER**

Joseph W. Grier, III, the representative for future asbestos claimants in the above-captioned cases (the "FCR"), through counsel, hereby files this *Omnibus Response* to (i) the Debtors' *Motion to Stay Adversary Proceedings* (the "Motion to Stay") [Dkt. No. 169], and (ii) Official Committee of Asbestos Personal Injury Claimants' (the "ACC") *Motion to Amend Case Management Order* (the "Motion to Amend the CMO") [Dkt. No. 168].

The FCR respectfully submits that the Motion to Stay should be granted. The ACC's appeal to the District Court divested this Court of jurisdiction as to its challenge to two-step

bankruptcies in these cases.² For the same reason, the Motion to Amend the CMO should be denied.

Dated: October 16, 2025
Charlotte, North Carolina

Respectfully submitted,

/s/ A. Cotten Wright

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FUTURE CLAIMANTS' REPRESENTATIVE

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Motion to Stay, at 23-39. Curiously, as the FCR has noted many times, the ACC law firms are fully supportive of two-step bankruptcies in Delaware, as evidenced by their overwhelming support of the plan of reorganization in *In Re Paddock Enterprises, LLC*, Case No. 20-10228, (Bankr. D.Del.), that took that same path as Debtors to fully and fairly address their asbestos liabilities with a fully funded, section 524(g) trust. The one difference, which is not dispositive, is that *Paddock* relied on Delaware not Texas corporate law. Thus, in Delaware, the ACC law firms consider such bankruptcy filings to be jurisdictional, brought in good faith, and reflecting the best interests of claimants. In North Carolina, virtually the same firms take the opposite position. The ACC has not attempted, and indeed cannot, reconcile this contradictory approach.