

**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

CHAPTER 11

Jointly Administered

**SUMMARY OF SIXTEENTH INTERIM APPLICATION FOR COMPENSATION FOR
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM JUNE 1, 2025 THROUGH SEPTEMBER 30, 2025**

Name of Applicant:	Joseph W. Grier, III, Future Claimants' Representative
Date of Appointment:	October 14, 2020
Period for which compensation and reimbursement is sought:	June 1, 2025 through September 30, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$47,080.00
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$35.63
Total amount of compensation and expense reimbursement sought as actual, reasonable, and necessary:	\$47,115.63

This is a(n) x interim final application.

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.



**UNITED STATES BANKRUPTCY COURT
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CHAPTER 11

Jointly Administered

**SIXTEENTH INTERIM APPLICATION OF JOSEPH W. GRIER, III, FUTURE
CLAIMANTS' REPRESENTATIVE, FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES FOR THE
PERIOD OF JUNE 1, 2025 THROUGH SEPTEMBER 30, 2025**

Joseph W. Grier, III, the Future Claimants' Representative in this case (the "FCR"), through counsel, hereby brings his sixteenth interim application (this "Application") for allowance of compensation of \$47,080.00 and reimbursement of expenses of \$35.63 for the period of June 1, 2025 through September 30, 2025 (the "Interim Period") in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Doc. No. 171) (the "Fee Procedure Order"), and in support, respectfully represents as follows:

BACKGROUND

1. On June 18, 2020 (the "Petition Date"), the Debtors commenced their bankruptcy cases (together, the "Chapter 11 Case") by filing a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code. On June 25, 2020, the Court entered an Order directing that the Debtors' cases be jointly administered (Doc. No. 114). The Debtors are authorized to continue to

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.

manage their property and operate their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On July 7, 2020, the Court entered its *Order Appointing the Official Committee of Asbestos Personal Injury Claimants* (Doc. No. 147), appointing a committee (the “ACC”) to represent personal injury claimants in this case.

3. On October 14, 2020, the Court entered its *Order Appointing Joseph W. Grier, III as Legal Representative for Future Asbestos Claimants* (Doc. No. 389), appointing the FCR. On October 15, 2020, the Court entered Orders authorizing the FCR to retain Orrick, Herrington & Sutcliffe, LLP (“Orrick”) and Grier Wright Martinez, PA (“GWM”) to represent him in this case. (Doc. Nos. 393 & 394).

4. Pursuant to the Fee Procedure Order, professionals may request monthly compensation and reimbursement. Such requests are to be served on certain identified interested parties for review. If no objection to a professional’s request is received within fourteen (14) days of such request, the Debtors are authorized to pay 90% of the fees and 100% of the expenses requested. The Fee Procedure Order also requires each retained professional to file, approximately every four months, an application for interim Court approval and allowance pursuant to section 331 of the Bankruptcy Code of 100% of the compensation and reimbursement of expenses for the prior four-month period.

COMPENSATION RECEIVED DURING THE INTERIM PERIOD

5. Pursuant to the Fee Procedure Order, the FCR has submitted fee statements to the Debtors for the Interim Period. Copies of the relevant invoices are attached as **Exhibit A**. Summarized below are the requested professional fees and expenses and payments that the FCR has received on the same.

Date of Request	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
7/24/2025	6/1/2025-6/30/2025	\$1,672.00	\$0.00	\$1,504.80	\$167.20
9/03/2025	7/1/2025-7/31/2025	\$11,000.00	\$0.00	\$9,900.00	\$1,100.00
10/15/2025	8/1/2025-8/31/2025	\$13,464.00	\$16.00	\$2,953.64 ²	\$10,526.36
10/22/2025	9/1/2025-9/30/2025	\$20,944.00	\$19.63	\$0.00	\$20,963.63

6. In total, the FCR has submitted fee statements during the Interim Period for total fees of \$47,080.00 and total expenses of \$35.63. As of the date of this Application, no party has objected to the fee statements circulated by the FCR.

SUMMARY OF SERVICES RENDERED

7. Attached here as **Exhibit A** are the FCR's monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by the FCR during the Interim Period. In summary, the FCR expended a total of 53.5 hours rendering necessary services in this Chapter 11 proceeding during the Interim Period. The FCR's fees total \$47,080.00 for the Interim Period.

8. As the representative of future claimants in this case, the FCR has provided a variety of services in the Debtors' bankruptcy case as set forth in the summary description below and in detail in **Exhibit A**.

9. The FCR believes that the services he has provided to the Debtors' bankruptcy estate on behalf of future claimants during the Interim Period were necessary and beneficial to the administration of this case. The FCR further believes that his services were performed within a

² On October 28, 2025, Grier Wright Martinez, PA received an overpayment of \$2,953.64. GWM has credited \$2,953.64 for August's fees and expenses.

reasonable amount of time commensurate with the complexity, importance, and nature of the tasks addressed.

10. The FCR has attempted to assign his time entries to the categories that best relate to those services. The following is a summary of the activities performed by the FCR during the Interim Period, organized by project billing category:

A. **Case Administration and Business Operations** – 2.6 hours, \$2,288.00. During the Interim Period, the FCR reviewed and responded to emails regarding case updates and issues.

B. **Asbestos Matters** – 5.4 hours, \$4,752.00. The FCR reviewed orders and briefs filed in other asbestos cases and observed hearings in other pending asbestos cases.

C. **Court Hearings** – 8.4 hours, \$7,392.00. The FCR reviewed pleadings in preparation for hearings in the Debtors' case and attended hearings.

D. **Litigation and Adversary Proceedings** – 35.3 hours, \$31,064.00. The FCR reviewed pleadings filed by the parties and authorized appropriate responses.

E. **Professional Retention/Fee Issues** – 1.6 hours, \$1,408.00. The FCR conducted due diligence relative to engaging an expert to provide testimony and authorized an application to employ an expert.

F. **Plan and Disclosure Statement** – 0.2 hours, \$176.00. The FCR reviewed an amendment to a Plan support agreement and executed the same.

11. In **Exhibit B**, the FCR has categorized his time by project categories recommended by the Guidelines for Compensation and Expense Reimbursement of Professionals referenced in Rule 2016-1 of this Court's Local Rules of Practice and Procedure (the "Local Rules").

12. **Exhibit C** reflects a summary by category of the expenses that the FCR incurred during the Interim Period, which totaled \$35.63.

13. **Exhibit D** provides information as to the FCR's position, years of practice, billing rate, and the total number of hours billed during the Interim Period. The FCR maintains that his billing rate for the Interim Period should be deemed reasonable for purposes of this Court's determination of the "reasonableness" of the fees for the services that he has rendered.

14. Attached as **Exhibit E** is a summary of the FCR's prior applications for compensation in this case.

DISBURSEMENTS

15. The FCR must incur certain expenses in order to perform his duties and responsibilities. Those expenses may include items such as court fees, copying charges, regular and express mail charges, special or hand delivery charges, photocopying charges, travel expenses, expenses for working meals, computerized research charges, transcription charges, and the like.

16. The FCR requests reimbursement for his actual and necessary expenses incurred during the Interim Period in the amount of \$35.63. A detailed breakdown of such expenses is provided in the FCR's invoices included in **Exhibit A**, and those expenses are summarized in **Exhibit C**. The FCR's expenses during the Interim Period were necessary and reasonable under the circumstances of this case.

NOTICE

17. Notice of this Application has been provided to: (a) the office of the United States Bankruptcy Administrator for the Western District of North Carolina; (b) counsel for the Debtors; (c) counsel for the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.; (d) counsel to the ACC; and (e) the other parties on the Service List established by the Case Management Order entered in this case. The FCR submits that, given the nature of the relief requested, no other or further notice need be provided.

NO PRIOR REQUEST

18. The FCR has not made a prior request for the relief sought in this Application to this or any other Court.

CONCLUSION

19. Based on the foregoing, the FCR makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred in performance of his duties and responsibilities as the Court-appointed FCR.

WHEREFORE, the Future Claimants' Representative respectfully requests that the Court enter an Order:

1) Allowing interim compensation to the FCR in the amount of \$47,080.00 as reasonable, actual, and necessary for professional services rendered by it on behalf of the FCR during the Interim Period and interim reimbursement of expenses incurred during the Interim Period of \$35.63 as reasonable, actual, and necessary;

2) Authorizing and directing the Debtors to pay the FCR the amount of \$47,115.63, which is equal to 100% of GWM's requested compensation for the Interim Period and 100% of GWM's requested expense reimbursement for the Interim Period, less all previous payments made

to GWM pursuant to the Fee Procedure Order; and

- 3) Granting such further relief as is just and proper.

This is the 13th day of November, 2025.

/s/ A. Cotten Wright

A. Cotten Wright (State Bar No. 28162)

Grier Wright Martinez, PA

521 E Morehead Street, Suite 440

Charlotte, NC 28202

704-332-0207; cwright@grierlaw.com

Attorneys for Joseph W. Grier, III,

Future Claimants' Representative

EXHIBIT A



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1421
Date: 07/24/2025
Due On: 08/18/2025

Aldrich Pump, LLC

20-10102/Aldrich Pump, LLC

Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
06/11/2025	Professional Retention/Fee Issues: Review declaration of potential expert and related emails.	JWG	0.30	\$880.00	\$264.00
06/17/2025	Case Administration and Business Operations: Review emails to/from J. Guy re tort system opt out.	JWG	0.30	\$880.00	\$264.00
06/18/2025	Case Administration and Business Operations: Review and respond to communication from J. Guy.	JWG	0.30	\$880.00	\$264.00
06/18/2025	Case Administration and Business Operations: Conference D. McKnight, P. Hinton & A. Gunn of Brattle Group and Orrick attorneys re expectations and tasks.	JWG	0.80	\$880.00	\$704.00
06/24/2025	Case Administration and Business Operations: Review emails to/from J. Guy re opt out to tort system.	JWG	0.20	\$880.00	\$176.00
Quantity Subtotal					1.9

Time Keeper	Quantity	Rate	Total
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Joseph W. Grier, III	1.9	\$880.00	\$1,672.00
Quantity Total			1.9
Subtotal			\$1,672.00
Total			\$1,672.00
Payment (08/26/2025)			-\$1,504.80
Balance Owing			\$167.20

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1439	09/24/2025	\$11,000.00	\$9,900.00	\$1,100.00
1444	11/03/2025	\$13,480.00	\$2,953.46	\$10,526.54
1477	11/12/2025	\$20,963.63	\$0.00	\$20,963.63

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1421	08/18/2025	\$1,672.00	\$1,504.80	\$167.20
Outstanding Balance				\$32,757.37
Total Amount Outstanding				\$32,757.37

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1439
Date: 09/03/2025
Due On: 09/24/2025

Aldrich Pump, LLC

20-10102/Aldrich Pump, LLC

Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
07/07/2025	Litigation and Adversary Proceedings: Attend via Teams conference expert due diligence meeting.	JWG	2.50	\$880.00	\$2,200.00
07/08/2025	PLAN & DISCLOSURE STATEMENT: Review and sign amendment to plan support agreement.	JWG	0.20	\$880.00	\$176.00
07/09/2025	Professional Retention/Fee Issues: Zoom meeting with Battle Group re expert report.	JWG	0.90	\$880.00	\$792.00
07/11/2025	Professional Retention/Fee Issues: Review McKnight supplemental declaration.	JWG	0.10	\$880.00	\$88.00
07/14/2025	Litigation and Adversary Proceedings: Phone call J. Guy re response to objection to retention of Battle Group.	JWG	0.20	\$880.00	\$176.00
07/14/2025	Litigation and Adversary Proceedings: Review debtor's proposed Objection to ACC Motion to Reconsider Brattle.	JWG	0.10	\$880.00	\$88.00
07/14/2025	Litigation and Adversary Proceedings: Review draft FCR Objection to ACC Motion to Reconsider	JWG	0.30	\$880.00	\$264.00
07/16/2025	Litigation and Adversary Proceedings: Review pleadings related to objection by ACC to FCR's retention of Battle Group.	JWG	1.50	\$880.00	\$1,320.00

07/16/2025	Litigation and Adversary Proceedings: Phone call J. Guy re upcoming hearing on reconsideration of order approving retention of Battle Group.	JWG	0.80	\$880.00	\$704.00
07/16/2025	Litigation and Adversary Proceedings: Review material in anticipation of hearing on motion to reconsider order authorizing retention of Battle Group.	JWG	0.30	\$880.00	\$264.00
07/21/2025	Litigation and Adversary Proceedings: Review email chain and phone call with J. Guy re ACC objection to Brattle Retention.	JWG	0.20	\$880.00	\$176.00
07/24/2025	Court Hearings: Attend hearing on ACC motion to reconsider order approving retention of Brattle Group.	JWG	2.50	\$880.00	\$2,200.00
07/25/2025	Professional Retention/Fee Issues: Review and respond to email from J. Guy re issues related to compensation.	JWG	0.30	\$880.00	\$264.00
07/29/2025	Asbestos Matters: Review email from J. Guy re filings in Whittaker case.	JWG	0.30	\$880.00	\$264.00
07/30/2025	Case Administration and Business Operations: Review and respond to email from J. Guy re case issue.	JWG	0.40	\$880.00	\$352.00
07/30/2025	Case Administration and Business Operations: Conference C. Wright re substitution of ACC committee members.	JWG	0.30	\$880.00	\$264.00
07/31/2025	Litigation and Adversary Proceedings: Review Order Denying Official Committee of Asbestos Personal Injury Claimants Motion To Reconsider.	JWG	0.10	\$880.00	\$88.00
07/31/2025	Litigation and Adversary Proceedings: Zoom conference with Brattle Group re expert report.	JWG	1.50	\$880.00	\$1,320.00
Quantity Subtotal					12.5

Time Keeper	Quantity	Rate	Total
Joseph W. Grier, III	12.5	\$880.00	\$11,000.00

Quantity Total	12.5
Subtotal	\$11,000.00
Total	\$11,000.00
Payment (08/26/2025)	-\$507.06
Payment (09/17/2025)	-\$2,446.40
Payment (10/28/2025)	-\$6,946.54

Balance Owing \$1,100.00

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1421	08/18/2025	\$1,672.00	\$1,504.80	\$167.20
1444	11/03/2025	\$13,480.00	\$2,953.46	\$10,526.54
1477	11/12/2025	\$20,963.63	\$0.00	\$20,963.63

Current Statement

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1439	09/24/2025	\$11,000.00	\$9,900.00	\$1,100.00
Outstanding Balance				\$32,757.37
Total Amount Outstanding				\$32,757.37

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Our tax ID is 56-1643255



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
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www.grierlaw.com

STATEMENT

Statement # 1444
Date: 10/01/2025
Due On: 11/03/2025

Aldrich Pump, LLC

20-10102/Aldrich Pump, LLC

Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
08/01/2025	Asbestos Matters: Review 4th Cir opinion in Bestwall LLC v. The Official Committee of Asbestos Claimants	JWG	0.50	\$880.00	\$440.00
08/01/2025	Asbestos Matters: Phone call J. Guy re 4th Circuit Bestwall decision on constitutionality of bankruptcy by a solvent entity.	JWG	0.20	\$880.00	\$176.00
08/07/2025	Litigation and Adversary Proceedings: Review order for telephonic conference in District Court appeal of Bankruptcy Court's denial of motions to dismiss.	JWG	0.20	\$880.00	\$176.00
08/12/2025	Litigation and Adversary Proceedings: Teams meeting re expert reports and motion to approve re-constituted committee.	JWG	2.60	\$880.00	\$2,288.00
08/12/2025	Litigation and Adversary Proceedings: Phone call J. Guy re ACC motion to substitute committee members.	JWG	0.40	\$880.00	\$352.00
08/13/2025	Court Hearings: Attend status hearing on Semian	JWG	0.40	\$880.00	\$352.00

	and ACC District Court appeal.				
08/18/2025	Litigation and Adversary Proceedings: Review order from District Court Judge Volk and telephone call J. Guy re same.	JWG	0.40	\$880.00	\$352.00
08/18/2025	Litigation and Adversary Proceedings: Review pleadings in District Court appeal (motions to dismiss).	JWG	0.40	\$880.00	\$352.00
08/20/2025	Litigation and Adversary Proceedings: Review draft response to ACC motion to substitute committee members.	JWG	0.60	\$880.00	\$528.00
08/21/2025	Litigation and Adversary Proceedings: Review draft Aldrich Limited Response to ACC motion to substitute committee members.	JWG	0.30	\$880.00	\$264.00
08/21/2025	Litigation and Adversary Proceedings: Review draft FCR response to ACC motion to substitute committee members.	JWG	0.30	\$880.00	\$264.00
08/21/2025	Litigation and Adversary Proceedings: Review Amended Trust Discovery Order	JWG	0.10	\$880.00	\$88.00
08/21/2025	Litigation and Adversary Proceedings: Additional review of FCR response to ACC motion to substitute committee members and discuss with C. Wright.	JWG	0.40	\$880.00	\$352.00
08/22/2025	Litigation and Adversary Proceedings: Review Non-Debtor Affiliates response to ACC motion to substitute committee members.	JWG	0.10	\$880.00	\$88.00
08/25/2025	Litigation and Adversary Proceedings: Teams meeting re ACC discovery issues.	JWG	0.70	\$880.00	\$616.00
08/25/2025	Litigation and Adversary Proceedings: Review email from J. Guy and respond re hearing on ACC motion to substitute committee members.	JWG	0.30	\$880.00	\$264.00
08/26/2025	Litigation and Adversary Proceedings: Conversation J. Guy re hearing this Thursday on ACC motion to substitute committee members.	JWG	0.40	\$880.00	\$352.00
08/27/2025	Litigation and Adversary Proceedings: Review pleadings in preparation for hearing on ACC motion to substitute committee members.	JWG	1.50	\$880.00	\$1,320.00
08/28/2025	Court Hearings: Pre-hearing meeting with debtors re hearing. Attend hearing on ACC motion to substitute committee members. Post hearing meeting with debtors re case issues.	JWG	5.50	\$880.00	\$4,840.00
Quantity Subtotal				15.3	
Services Subtotal					\$13,464.00

Expenses

Date	Notes	Quantity	Rate	Total
08/28/2025	Parking: Parking for Hearing August 28, 2025	1.00	\$16.00	\$16.00
Expenses Subtotal				\$16.00

Time Keeper	Quantity	Rate	Total
Joseph W. Grier, III	15.3	\$880.00	\$13,464.00
Quantity Total			15.3
Subtotal			\$13,480.00
Total			\$13,480.00
Payment (10/28/2025)			-\$2,953.46
Balance Owing			\$10,526.54

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1421	08/18/2025	\$1,672.00	\$1,504.80	\$167.20
1439	09/24/2025	\$11,000.00	\$9,900.00	\$1,100.00
1477	11/12/2025	\$20,963.63	\$0.00	\$20,963.63

Current Statement

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Outstanding Balance				\$32,757.37
Total Amount Outstanding				\$32,757.37

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255



ATTORNEYS AT LAW

Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1477
Date: 10/22/2025
Due On: 11/12/2025

Aldrich Pump, LLC

20-10102/Aldrich Pump, LLC

Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
09/02/2025	Litigation and Adversary Proceedings: Review outline of Battle Group expert report in preparation for conference with Paul Hinton and David McKnight.	JWG	0.50	\$880.00	\$440.00
09/02/2025	Litigation and Adversary Proceedings: Conference Brattle Group re its estimation report.	JWG	1.00	\$880.00	\$880.00
09/03/2025	Litigation and Adversary Proceedings: Review correspondence from J. Guy	JWG	0.20	\$880.00	\$176.00
09/03/2025	Litigation and Adversary Proceedings: Review email from J. Guy	JWG	0.10	\$880.00	\$88.00
09/04/2025	Asbestos Matters: Review email from J. Guy and attached memo re possible further appeal of recent Bestwall 4th Cir. decision.	JWG	0.20	\$880.00	\$176.00
09/09/2025	Litigation and Adversary Proceedings: Review email from McCarter & English re discovery responses.	JWG	0.20	\$880.00	\$176.00
09/10/2025	Litigation and Adversary Proceedings: Review	JWG	0.10	\$880.00	\$88.00

	comments from J. Miller re proposed order on ACC motion				
09/10/2025	Litigation and Adversary Proceedings: Review draft expert report from Brattle Group and call with J. Guy re same.	JWG	2.00	\$880.00	\$1,760.00
09/10/2025	Litigation and Adversary Proceedings: Conference Brattle Group re expert report.	JWG	0.50	\$880.00	\$440.00
09/10/2025	Litigation and Adversary Proceedings: Conference debtors, Bates White and Brattle Group re expert reports.	JWG	2.00	\$880.00	\$1,760.00
09/11/2025	Litigation and Adversary Proceedings: Review email from J. Miller re proposed order on ACC motion to substitute committee members.	JWG	0.10	\$880.00	\$88.00
09/11/2025	Litigation and Adversary Proceedings: Review draft expert report from Brattle Group.	JWG	1.50	\$880.00	\$1,320.00
09/11/2025	Litigation and Adversary Proceedings: Meeting with Brattle Group re expert report.	JWG	0.80	\$880.00	\$704.00
09/12/2025	Litigation and Adversary Proceedings: Review emails and pleadings: Official Committee of Asbestos Claimants v. Robert Semian and Other Clients of MRHFM et al Motion for Joinder.	JWG	0.30	\$880.00	\$264.00
09/12/2025	Litigation and Adversary Proceedings: Phone call J. Guy re filings in District Court appeal and expert reports.	JWG	0.60	\$880.00	\$528.00
09/14/2025	Litigation and Adversary Proceedings: Review draft report from Brattle Group.	JWG	1.00	\$880.00	\$880.00
09/15/2025	Litigation and Adversary Proceedings: Review draft expert report from Brattle Group and exchange emails re same with Orrick attorneys and Brattle Group.	JWG	1.10	\$880.00	\$968.00
09/15/2025	Asbestos Matters: Attend FCR meeting (1/2 time - .5); multiple meetings w/ ACC counsel (both for committee and members) to discuss plan related issues.	JWG	1.00	\$880.00	\$880.00
09/16/2025	Litigation and Adversary Proceedings: Review proposed order on ACC motion and related emails.	JWG	0.20	\$880.00	\$176.00
09/16/2025	Litigation and Adversary Proceedings: Preliminary review of expert reports	JWG	1.00	\$880.00	\$880.00
09/16/2025	Litigation and Adversary Proceedings: Multiple meetings with ACC committee counsel and attorneys for committee members to discuss plan related issues.	JWG	2.50	\$880.00	\$2,200.00

09/17/2025	Litigation and Adversary Proceedings: Multiple conversations with ACC attorneys re plan issues.	JWG	1.00	\$880.00	\$880.00
09/17/2025	Asbestos Matters: Telephone call J. Guy re amicus brief in Bestwall - Fourth Circuit case (en banc).	JWG	0.40	\$880.00	\$352.00
09/18/2025	Litigation and Adversary Proceedings: Review expert report of Charles H. Mullin.	JWG	1.50	\$880.00	\$1,320.00
09/20/2025	Litigation and Adversary Proceedings: Review letter to BA re committee composition.	JWG	0.30	\$880.00	\$264.00
09/23/2025	Asbestos Matters: Review material on Bestwall petition for en banc hearing.	JWG	0.30	\$880.00	\$264.00
09/23/2025	Case Administration and Business Operations: Due diligence on claims processing and calculator tools.	JWG	0.30	\$880.00	\$264.00
09/24/2025	Litigation and Adversary Proceedings: Review Debtors' draft 2004 Motion and related discovery.	JWG	0.30	\$880.00	\$264.00
09/24/2025	Litigation and Adversary Proceedings: Review email from J. Guy re Aldrich/Murray OIC/L&O Final Dividend Offer	JWG	0.10	\$880.00	\$88.00
09/24/2025	Asbestos Matters: Listen to DMBP argument.	JWG	1.30	\$880.00	\$1,144.00
09/25/2025	Litigation and Adversary Proceedings: Telephone call J. Guy re pursuing tort case only in estimation.	JWG	0.10	\$880.00	\$88.00
09/25/2025	Asbestos Matters: Review Bestwall debtor draft response to petition for rehearing (4th Cir).	JWG	0.30	\$880.00	\$264.00
09/25/2025	Asbestos Matters: Listen to recording of concluding arguments and status report in DBMP hearing on 9/24/2025.	JWG	0.40	\$880.00	\$352.00
09/26/2025	Asbestos Matters: Review FCR Amicus Brief in Bestwall 4th Circuit appeal.	JWG	0.50	\$880.00	\$440.00
09/29/2025	Litigation and Adversary Proceedings: Review series of emails re impact on insurance coverage of release of expert reports.	JWG	0.10	\$880.00	\$88.00
				Quantity Subtotal	23.8
				Services Subtotal	\$20,944.00

Expenses

Date	Notes	Quantity	Rate	Total
07/24/2025	Parking: Parking - Aldrich Hearing	1.00	\$19.63	\$19.63

Expenses Subtotal \$19.63

Time Keeper	Quantity	Rate	Total
Joseph W. Grier, III	23.8	\$880.00	\$20,944.00
Quantity Total			23.8
Subtotal			\$20,963.63
Total			\$20,963.63

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1421	08/18/2025	\$1,672.00	\$1,504.80	\$167.20
1439	09/24/2025	\$11,000.00	\$9,900.00	\$1,100.00
1444	11/03/2025	\$13,480.00	\$2,953.46	\$10,526.54

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1477	11/12/2025	\$20,963.63	\$0.00	\$20,963.63
Outstanding Balance				\$32,757.37
Total Amount Outstanding				\$32,757.37

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

June 1, 2025 through September 30, 2025

Project Category	Total Hours for the Period	Total Hours from the Petition Date	Total Fees for the Period	Total Fees from the Petition Date
Case Administration & Business Operations	2.6	165.0	\$2,288.00	\$101,429.00
Court Hearings	8.4	142.3	\$7,392.00	\$98,411.50
Professional Retention/Fee Issues	1.6	7.8	\$1,408.00	\$5,663.00
Meetings	0.0	41.2	\$0.00	\$23,917.50
Litigation	35.3	183.5	\$31,064.00	\$129,446.50
Asbestos Matters	5.4	228.7	\$4,752.00	\$155,892.50
Claims Administration & Objections	0.0	4.2	\$0.00	\$2,562.50
Plan and Disclosure Statement	.2	7.1	\$176.00	\$4,316.00
TOTALS	53.5	779.8	\$47,080.00	\$521,638.50

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

Expense Category	Total Expenses for the Period	Total Expenses from the Petition Date
Pacer: Online Research	\$0.00	\$769.50
Westlaw-Online Research	\$0.00	\$47.49
Logikull-Database Management	\$0.00	\$500.00
Amtrak	\$0.00	\$81.70
Out-of-Town Travel	\$0.00	\$1,469.42
Parking	\$35.63	\$213.52
TOTAL	\$35.63	\$3,081.63

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

Name of Professional	Position – Bar Year	Hourly Billing Rate	Total Hours Billed	Total Compensation
Joseph W. Grier, III	Member- 1977	\$880	53.5	\$47,080.00

EXHIBIT E

SUMMARY OF PRIOR FEE APPLICATIONS

Document	Interim Fee Application Date and Doc. No.	Period Covered	Fees Requested/Allowed	Expenses Requested/Allowed	Order Approving Interim Application
1 st Interim	11/9/2020 Doc. No. 420	8/21/2020 – 9/30/2020	\$25,740.00	\$0.00	Doc. No. 461 12/3/2020
2 nd Interim	3/11/2021 Doc. No. 616	October 1, 2020 – January 31, 2021	\$32,040.00	\$508.50	Doc. No. 659 4/2/2021
3 rd Interim	7/9/2021 Doc. No. 761	February 1, 2021-May 31, 2021	\$78,120.00	\$20.20	Doc. No. 796 8/2/2021
4 th Interim	10/29/2021 Doc. No. 861	June 1, 2021 – September 30, 2021	\$37,200.00	\$101.99	Doc. No. 931 12/8/2021
5 th Interim	03/01/2022 Doc. No. 1006	October 1, 2021 – January 31, 2022	\$42,687.50	\$370.16	Doc. No. 1063 3/23/2022
6 th Interim	07/11/2022 Doc. No. 1264	February 1, 2022-May 31, 2022	\$38,500.00	\$70.70	Doc. No. 1313 8/3/2022
7 th Interim	11/7/2022 Doc. No. 1390	June 1, 2022 – September 30, 2022	\$23,187.50	\$116.90	Doc. No. 1457 12/7/2022
8 th Interim	3/8/2023 Doc. No. 1629	October 1, 2022 – January 31, 2023	\$31,587.50	\$18.00	Doc. No. 1829 6/21/2023
9 th Interim	7/12/2023 Doc. No. 1865	February 1, 2023 – May 31- 2023	\$35,700.00	\$439.88	Doc. No 1905 8/02/2023

10 th Interim	11/7/2023 Doc. No. 1988	June 1, 2023 – September 30, 2023	\$33,750.00	\$1,048.38	Doc. No. 2024 11/30/2023
11 th Interim	3/15/2024 Doc. No. 2148	October 1, 2023- January 1, 2024	\$13,230.00	\$98.30	Doc. No. 2194 4/11/2024
12 th Interim	7/11/2024 Doc. No. 2298	February 1, 2024 – May 31, 2024	\$28,480.00	\$177.25	Doc. No. 2337 8/2/2024
13 th Interim	11/13/2024 Doc. No. 2440	June 1, 2024 – September 30, 2024	\$6,400.00	\$14.99	Doc. No. 2480 12/12/2024
14 th Interim	3/13/2025 Doc. No. 2585	October 1, 2024- January 31, 2025	\$27,640.00	\$9.80	Doc. No. 2635 4/4/2025
15 th Interim	7/9/2025 Doc. No. 2699	February 1, 2025 – May 31, 2025	\$21,296.00	\$50.95	Doc. No. 2755 8/4/2025