

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

In re:

Chapter 11

ALDRICH PUMP LLC, *et al.*,¹

Case No. 20-30608

Debtors.

Jointly Administered

**SUMMARY OF FIFTEENTH INTERIM APPLICATION OF ANDERSON KILL P.C.
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS SPECIAL INSURANCE COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM JUNE 1, 2025 THROUGH SEPTEMBER 30, 2025**

Name of Applicant:	Anderson Kill P.C.
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Order Approving Retention:	December 23, 2020 (Docket No. 486)
Period for which compensation and reimbursement is sought:	June 1, 2025 – September 30, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$31,520.37
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$31,520.37 ²

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.

² This amount includes a reduction of a \$3,460.13 unapplied credit.



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

In re:

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608

Jointly Administered

**FIFTEENTH INTERIM APPLICATION OF ANDERSON KILL P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS SPECIAL INSURANCE COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM JUNE 1, 2025 THROUGH SEPTEMBER 30, 2025**

Anderson Kill P.C. ("Anderson"), Special Insurance Counsel to Joseph W. Grier, III, the Court-appointed future claimants' representative in these cases (the "FCR"), hereby brings its fifteenth interim application for allowance of compensation of \$31,520.87 and reimbursement of expenses of \$0.00 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 (Docket. No. 171) (the "Fee Procedures Order"), and in support, respectfully represents as follows:

BACKGROUND

1. On June 18, 2020 (the "Petition Date"), the above-captioned Debtors commenced their bankruptcy cases (together, the "Chapter 11 Case") by filing voluntary petitions 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 (Docket. No. 114). The Debtors are authorized to continue to manage their property and operate their businesses as debtors-in-

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.

possession pursuant to §§ 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 Chapter 11 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.

4. On December 23, 2020, the Court entered an order authorizing the FCR to retain Anderson as his special insurance counsel in this Chapter 11 Case (Docket No. 486).

5. Pursuant to the Fee Procedures Order, professionals may request monthly compensation and reimbursement of expenses. 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 Procedures 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

6. Pursuant to the Fee Procedures Order, Anderson has submitted monthly fee statements to the Debtors for the Interim Period. Copies of the relevant monthly fee statements are attached as **Exhibit A-1 through A-4**. Summarized below are the requested professional fees, expenses and payments that Anderson has received on the same.

Date of Monthly Fee Statement	Description	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
07/09/2025	Fifty-Second Monthly	06/01/2025-06/30/2025	\$4,056.00	\$0.00	\$3,650.40	\$405.60
08/15/2025	Fifty-Third Monthly	07/01/2025-07/31/2025	\$8,388.00	\$0.00	\$7,549.20	\$838.80
09/08/2025	Fifty-Fourth Monthly	08/01/2024-08/31/2025	\$5,942.50	\$0.00	\$0.00	\$5,942.50
10/06/2025	Fifty-Fifth Monthly	09/01/2025-09/30/2025	\$13,134.37	\$0.00	\$0.00	\$13,134.37
TOTAL:			\$31,520.87	\$0.00	\$11,199.60	\$20,321.27
UNAPPLIED CREDIT Remaining:						\$0.00²
TOTAL Amount Outstanding:						\$20,321.27

7. In total, Anderson has submitted fee statements during the Interim Period for total fees of \$31,520.87 and total expenses of \$0.00. As of the date of this Application, no party has objected to the fee statements circulated by Anderson.

SUMMARY OF SERVICES RENDERED

8. Attached hereto as **Exhibits A-1 through A-4** are Anderson's monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by Anderson during the Interim Period. In summary, during the Interim Period, Anderson expended a total of 42.80 hours rendering necessary services in this Chapter 11 Case and incurred total fees of \$31,520.87 and \$0.00 in expenses.

9. As special insurance counsel to the FCR, Anderson provided a variety of insurance-related services to the FCR in connection with the Chapter 11 Case as set forth in the summary description below and in detail in **Exhibits A-1 through A-4**.

10. Anderson believes that the services it provided to the FCR in the context of the Chapter 11 Case during the Interim Period were necessary and beneficial to the administration of this case. Anderson further believes that its services were performed within a reasonable amount

² Anderson Kill received a payment beyond what was currently due and applied it (\$3,460.13) to invoice #327373. With this interim period, any unapplied credit is now depleted.

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

11. Anderson has attempted to assign time entries for its professionals to the categories that best relate to those services. The following is a summary of the services provided to the FCR during the Interim Period, organized by project billing category:

A. **B120 Asset Analysis and Recovery – 18.80 hours, \$25,621.00.** During the Interim Period, Anderson professionals prepared for, and participated in Court hearings, and monitored the proceedings and filings regarding insurance issues.

B. **B160 Fee/Employment Applications – 24.00 hours, \$9,360.00.** During the Interim Period, Anderson professionals prepared and circulated their invoices and monthly fee statements for June 2025, July 2025, August 2025, and September 2025, and prepared the interim fee application for the prior period.

12. **Exhibit B** provides a summary of Anderson’s time by the project categories recommended by the Guidelines for Compensation and Reimbursement of Professionals referenced in Rule 2016-1 of this Court’s Local Rules of Practice and Procedure.

13. **Exhibit C** reflects a summary by category of the expenses that Anderson incurred during the Interim Period, which totaled \$0.00.

14. **Exhibit D** provides information as to Anderson’s professionals, including years of practice, position, billing rates, and the total number of hours billed during the Interim Period. Anderson maintains that its billing rates for the Interim Period, which reflect its customary hourly rates for the year 2025, should be deemed a “reasonable billing rate” for purposes of this Court’s determination of the “reasonableness” of the fees for the services that Anderson has rendered.

15. **Exhibit E** is a summary of Anderson’s prior interim applications for compensation in this Chapter 11 Case.

DISBURSEMENTS

16. Anderson must incur certain expenses in the course of rendering services to the FCR. 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, professional service charges, transcription charges, and the like.

17. Anderson requests reimbursement for its actual and necessary expenses incurred during the Interim Period in the amount of \$0.00. A detailed breakdown of such expenses were included in Anderson's invoices (attached hereto as **Exhibits A-1 through A-4**) and those expenses are summarized in **Exhibit C**. Anderson's expenses during the Interim Period were necessary and reasonable under the circumstances of this Chapter 11 Case.

NOTICE

18. 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 and Fee Procedures Order entered in this Chapter 11 Case. Anderson submits that, in light of the nature of the relief requested, no other or further notice need be provided.

NO PRIOR REQUEST

19. Anderson has not made a prior request for the relief sought in this Application to this or any other Court.

CONCLUSION

20. Based on the foregoing, Anderson makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred in connection with representing the FCR as special insurance counsel in the Chapter 11 Case.

WHEREFORE, Anderson respectfully requests that the Court enter an Order:

1) Allowing interim compensation to Anderson in the amount of \$31,520.87 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 \$0.00 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay Anderson the amount of \$31,520.87, which is equal to 100% of Anderson's requested compensation for the Interim Period and 100% of Anderson's requested expense reimbursement for the Interim Period, less all previous payments made to Anderson pursuant to the Fee Procedures Order; and

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

Dated: November 13, 2025

Respectfully submitted,

/s/ A. Cotten Wright

A. Cotten Wright (State Bar No. 28162)

Grier Wright Martinez, PA

521 E Morehead Street, Suite 440

Charlotte, NC 28202

Telephone: (704) 332-0207

Facsimile: (704) 332-0215

Email: cwright@grierlaw.com

-and-

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

Counsel for Joseph W. Grier, III,

Future Claimants' Representative

EXHIBIT A-1

**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 Administered)
)	

**FIFTY-SECOND MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY ANDERSON KILL P.C. AS SPECIAL INSURANCE COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM JUNE 1, 2025 THROUGH JUNE 30, 2025**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Anderson Kill P.C. as Special Insurance Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of December 23, 2020* (Docket No. 486) (the “Anderson Retention Order”), Anderson Kill P.C. (“Anderson”), as Special Insurance Counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Second Monthly Statement of Fees and Expenses Incurred by Anderson Kill PC as Special Insurance Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from June 1, 2025 through June 30, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Anderson's invoice for the period June 1, 2025 through June 30, 2025 (the "Fee Statement Period").

Total Fees and Expenses for the Fee Statement Period

2. The total amounts of fees and expenses incurred by Anderson during the Fee Statement Period are as follows:

Fee Statement Period: June 1, 2025 – June 30, 2025	
Total Fees:	\$4,056.00
Total Expenses:	\$0.00
TOTAL DUE:	\$4,056.00

3. Pursuant to the Interim Compensation Order, Anderson seeks payment of \$3,650.40 from the Debtors for the Fee Statement Period (the "Interim Amount"), representing (a) 90% of Anderson's fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors' counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator for the Western District of North Carolina, 402 West

Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.: (i) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamo@mcarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mcarter.com and Phillip S. Pavlick, Esq., ppavlick@mcarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mcarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@cordes-law.com); (e) counsel to the Official Asbestos Claimants' Committee: (i) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com, and Todd E. Phillips, Esq., tphillips@capdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Anderson, no later than July 23, 2025 (the "Objection Deadline"). Any Objection must set forth

the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay Anderson an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Anderson.

This is the 9th day of July 2025.

ANDERSON KILL P.C.

/s/ Robert M. Horkovich

Robert M. Horkovich (admitted pro hac vice)

7 Times Square

15th Floor

New York, NY 10036

Telephone: (212) 278-1000

Facsimile: (212) 278-1733

E-mail: rhorkovich@andersonkill.com

Special Insurance Counsel for

Joseph W. Grier, III

Future Claimants' Representative

Exhibit A

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq.
Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

Invoice No. 326383
Invoice Date: July 9, 2025
Client Matter ID: 106539.10997
Billing Attorney: Robert M Horkovich

Joseph W. Grier, III, Esq.

Aldrich Pump-FCR

Professional Services:	\$4,056.00
Costs:	\$0.00
Total Current Invoice:	\$4,056.00
Outstanding Balance from Prior Invoices (see listing):	\$2,388.78
Total Amount:	\$6,444.78

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

July 9, 2025

Invoice No. 326383

MATTER: Aldrich Pump-FCR

INVOICE LIST

INVOICE	DATE	INVOICE TOTAL
325119	04/03/25	\$504.80
325462	05/13/25	\$142.50
325853	06/11/25	\$1,741.48
OUTSTANDING BALANCE FROM PRIOR INVOICES		\$2,388.78

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq.
Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

Billing Attorney Robert M Horkovich
Invoice No. 326383
Invoice Date July 9, 2025

Client Matter #: 106539.10997
Joseph W. Grier, III, Esq.
RE: Aldrich Pump-FCR

FOR PROFESSIONAL SERVICES RENDERED THROUGH June 30, 2025

Date	Professional	Hours	Task	Activity	Narrative	Amount
06/03/25	AHP	0.80	B160	A103	Drafting the 51st monthly fee application.	312.00
06/03/25	AHP	1.20	B160	A103	Begin drafting the 14th interim fee application.	468.00
06/04/25	AHP	0.60	B160	A103	Revise 51st fee application.	234.00
06/04/25	AHP	0.40	B160	A103	Prepare and send Order for Review and Acknowledgment to be signed by new timekeeper.	156.00
06/11/25	AHP	1.40	B160	A103	Continue drafting 14th interim fee application.	546.00
06/11/25	AHP	0.40	B160	A103	Finalize 51st monthly fee application for submission.	156.00
06/17/25	AHP	1.40	B160	A103	Continue working 14th interim fee application, monitoring chart and exhibits.	546.00
06/24/25	AHP	0.60	B160	A101	Begin to prepare for Zoom meeting with counsel.	234.00
06/25/25	AHP	1.30	B160	A101	Continue to prepare for Zoom, gather documents and information from Accounting.	507.00
06/26/25	AHP	0.80	B160	A107	Zoom Conference with J. Gale and C. Bowen.	312.00

Date	Professional	Hours	Task	Activity	Narrative	Amount
06/27/25	AHP	0.90	B160	A103	Finalize draft of 14th interim fee application for first and second reviews.	351.00
06/30/25	AHP	0.60	B160	A103	Draft 52nd monthly fee application.	234.00
Total Fees:						\$4,056.00

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	RATE	AMOUNT
Arline H Pelton	10.40	390.00	4,056.00
	<u>10.40</u>		<u>\$4,056.00</u>

SUMMARY OF SERVICES BY ACTIVITY

	HOURS	RATE	AMOUNT
ACTIVITY CODE B160 -FEE/EMPLOYMENT APPLICATIONS			
Pelton, Arline H	10.40	390.00	\$4,056.00
	<u>10.40</u>		<u>\$4,056.00</u>

TOTAL CURRENT BILLING: \$4,056.00

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

Joseph W. Grier, III, Esq.
Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

MATTER: 106539. 10997
INVOICE: 326383

July 9, 2025

MATTER: Aldrich Pump-FCR

REMITTANCE COPY

Professional Services \$4,056.00

Costs: \$0.00

Total Current Invoice: \$4,056.00

Outstanding Amount From Prior Invoices: \$2,388.78

TOTAL AMOUNT DUE: \$6,444.78

PLEASE SEND YOUR REMITTANCE TO US AT:

OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

Anderson Kill P.C.
7 Times Square
New York, NY 10036

BANK: WELLS FARGO BANK, N.A.
ABA NUMBER FOR WIRES: 121000248
ABA NUMBER FOR ACHs: 026012881
CREDIT TO: ANDERSON KILL P.C.
OPERATING ACCOUNT
ACCOUNT NUMBER: 2000037634722

KINDLY INDICATE:

CLIENT NUMBER: 106539
INVOICE NUMBER: 326383
YOUR FIRM NAME: Joseph W. Grier, III, Esq.

THIS INVOICE IS PAYABLE UPON RECEIPT

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

EXHIBIT A-2

**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 Administered)
)	

**FIFTY-THIRD MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
ANDERSON KILL P.C. AS SPECIAL INSURANCE COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM JULY 1, 2025 THROUGH JULY 31, 2025**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Anderson Kill P.C. as Special Insurance Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of December 23, 2020* (Docket No. 486) (the “Anderson Retention Order”), Anderson Kill P.C. (“Anderson”), as Special Insurance Counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Third Monthly Statement of Fees and Expenses Incurred by Anderson Kill PC as Special Insurance Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from July 1, 2025 through July 31, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Anderson's invoice for the period July 1, 2025 through July 31, 2025 (the "Fee Statement Period").

Total Fees and Expenses for the Fee Statement Period

2. The total amounts of fees and expenses incurred by Anderson during the Fee Statement Period are as follows:

Fee Statement Period: July 1, 2025 – July 31, 2025	
Total Fees:	\$8,388.00
Total Expenses:	\$0.00
TOTAL DUE:	\$8,388.00

3. Pursuant to the Interim Compensation Order, Anderson seeks payment of \$7,549.20 from the Debtors for the Fee Statement Period (the "Interim Amount"), representing (a) 90% of Anderson's fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors' counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator for the Western District of North Carolina, 402 West

Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.: (i) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamo@mcarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mcarter.com and Phillip S. Pavlick, Esq., ppavlick@mcarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mcarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@cordes-law.com); (e) counsel to the Official Asbestos Claimants' Committee: (i) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com, and Todd E. Phillips, Esq., tphillips@capdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Anderson, no later than August 29, 2025 (the "Objection Deadline"). Any Objection must set

forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay Anderson an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Anderson.

This is the 15th day of August 2025.

ANDERSON KILL P.C.

/s/ Robert M. Horkovich

Robert M. Horkovich (admitted pro hac vice)

7 Times Square

15th Floor

New York, NY 10036

Telephone: (212) 278-1000

Facsimile: (212) 278-1733

E-mail: rhorkovich@andersonkill.com

Special Insurance Counsel for

Joseph W. Grier, III

Future Claimants' Representative

Exhibit A

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq.
Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

Invoice No. 326689
Invoice Date: August 7, 2025
Client Matter ID: 106539.10997
Billing Attorney: Robert M Horkovich

Joseph W. Grier, III, Esq.

Aldrich Pump-FCR

Professional Services:	\$8,388.00
Costs:	\$0.00
Total Current Invoice:	\$8,388.00
Outstanding Balance from Prior Invoices (see listing):	\$4,252.39
Total Amount:	\$12,640.39

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

August 7, 2025

Invoice No. 326689

MATTER: Aldrich Pump-FCR

INVOICE LIST

INVOICE	DATE	INVOICE TOTAL
325119	04/03/25	\$196.39
326383	07/09/25	\$4,056.00
OUTSTANDING BALANCE FROM PRIOR INVOICES		\$4,252.39

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq.
Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

Billing Attorney Robert M Horkovich
Invoice No. 326689
Invoice Date August 7, 2025

Client Matter #: 106539.10997
Joseph W. Grier, III, Esq.
RE: Aldrich Pump-FCR

FOR PROFESSIONAL SERVICES RENDERED THROUGH July 31, 2025

Date	Professional	Hours	Task	Activity	Narrative	Amount
07/01/25	RMH	0.30	B120	A104	Attention to creditors committee motion for reconsideration of appointment of Brattle Group for estimation.	439.50
07/07/25	AHP	0.20	B160	A103	Revise 14th interim to be filed.	78.00
07/09/25	AHP	0.50	B160	A103	Finalize 52nd monthly fee application.	195.00
07/14/25	RMH	1.00	B120	A104	Attention to TCC opposition to FCR selection of Brattle Group to perform estimation.	1,465.00
07/15/25	RMH	1.00	B120	A104	Attention to claimants' committee objection to FCR's selection of Brattle Group for estimation.	1,465.00
07/15/25	JAS	1.30	B120	A104	Review and analyze case documents to prepare demonstrative detailing the same for attorney use and review.	487.50
07/16/25	RMH	0.80	B120	A104	Attention to TCC objection to FCR's selection of Brattle Group for estimation.	1,172.00
07/18/25	AHP	0.40	B160	A107	Review and respond to counsel's questions.	156.00
07/23/25	RMH	1.00	B120	A101	Attention to upcoming hearing re opposition to FCR retention of Brattle Group as experts.	1,465.00
07/24/25	RMH	1.00	B120	A109	Listen to portions of the bankruptcy court hearing.	1,465.00
Total Fees:						\$8,388.00

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	RATE	AMOUNT
Robert M Horkovich	5.10	1,465.00	7,471.50
Arline H Pelton	1.10	390.00	429.00
Jonathan A. Schwartz	1.30	375.00	487.50
	<u>7.50</u>		<u>\$8,388.00</u>

SUMMARY OF SERVICES BY ACTIVITY

	HOURS	RATE	AMOUNT
ACTIVITY CODE B120 ASSET ANALYSIS & RECOVERY			
Horkovich, Robert M	5.10	1,465.00	\$7,471.50
Schwartz, Jonathan A.	1.30	375.00	\$487.50
	<u>6.40</u>		<u>\$7,959.00</u>
ACTIVITY CODE B160 FEE/EMPLOYMENT APPLICATIONS			
Pelton, Arline H	1.10	390.00	\$429.00
	<u>1.10</u>		<u>\$429.00</u>

TOTAL CURRENT BILLING: \$8,388.00

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

Joseph W. Grier, III, Esq.
Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

MATTER: 106539. 10997
INVOICE: 326689

August 7, 2025

MATTER: Aldrich Pump-FCR

REMITTANCE COPY

Professional Services \$8,388.00

Costs: \$0.00

Total Current Invoice: \$8,388.00

Outstanding Amount From Prior Invoices: \$4,252.39

TOTAL AMOUNT DUE: \$12,640.39

PLEASE SEND YOUR REMITTANCE TO US AT:

OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

Anderson Kill P.C.
7 Times Square
New York, NY 10036

BANK: WELLS FARGO BANK, N.A.
ABA NUMBER FOR WIRES: 121000248
ABA NUMBER FOR ACHs: 026012881
CREDIT TO: ANDERSON KILL P.C.
OPERATING ACCOUNT
ACCOUNT NUMBER: 2000037634722

KINDLY INDICATE:

CLIENT NUMBER: 106539
INVOICE NUMBER: 326689
YOUR FIRM NAME: Joseph W. Grier, III, Esq.

THIS INVOICE IS PAYABLE UPON RECEIPT

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

EXHIBIT A-3

**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 Administered)
)	

**FIFTY-FOURTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY ANDERSON KILL P.C. AS SPECIAL INSURANCE COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM AUGUST 1, 2025 THROUGH AUGUST 31, 2025**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Anderson Kill P.C. as Special Insurance Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of December 23, 2020* (Docket No. 486) (the “Anderson Retention Order”), Anderson Kill P.C. (“Anderson”), as Special Insurance Counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Fourth Monthly Statement of Fees and Expenses Incurred by Anderson Kill PC as Special Insurance Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from August 1, 2025 through August 31, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Anderson's invoice for the period August 1, 2025 through August 31, 2025 (the "Fee Statement Period").

Total Fees and Expenses for the Fee Statement Period

2. The total amounts of fees and expenses incurred by Anderson during the Fee Statement Period are as follows:

Fee Statement Period: August 1, 2025 – August 31, 2025	
Total Fees:	\$5,942.50
Total Expenses:	\$0.00
TOTAL DUE:	\$5,942.50

3. Pursuant to the Interim Compensation Order, Anderson seeks payment of \$5,942.50 from the Debtors for the Fee Statement Period (the "Interim Amount"), representing (a) 90% of Anderson's fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors' counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator for the Western District of North Carolina, 402 West

Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.: (i) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamo@mcarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mcarter.com and Phillip S. Pavlick, Esq., ppavlick@mcarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mcarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@cordes-law.com); (e) counsel to the Official Asbestos Claimants' Committee: (i) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com, and Todd E. Phillips, Esq., tphillips@capdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Anderson, no later than September 22, 2025 (the "Objection Deadline"). Any Objection must set

forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay Anderson an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Anderson.

This is the 8th day of September 2025.

ANDERSON KILL P.C.

/s/ Robert M. Horkovich

Robert M. Horkovich (admitted pro hac vice)

7 Times Square

15th Floor

New York, NY 10036

Telephone: (212) 278-1000

Facsimile: (212) 278-1733

E-mail: rhorkovich@andersonkill.com

Special Insurance Counsel for

Joseph W. Grier, III

Future Claimants' Representative

Exhibit A

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq.
Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

Invoice No. 327042
Invoice Date: September 4, 2025
Client Matter ID: 106539.10997
Billing Attorney: Robert M Horkovich

Joseph W. Grier, III, Esq.

Aldrich Pump-FCR

Professional Services:	\$5,942.50
Costs:	\$0.00
Total Current Invoice:	\$5,942.50
Outstanding Balance from Prior Invoices (see listing):	\$8,584.39
Total Amount:	\$14,526.89

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

September 4, 2025

Invoice No. 327042

MATTER: Aldrich Pump-FCR

INVOICE LIST

INVOICE	DATE	INVOICE TOTAL
326383	07/09/25	\$196.39
326689	08/17/25	\$8,388.00
OUTSTANDING BALANCE FROM PRIOR INVOICES		\$8,584.39

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq.
Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

Billing Attorney Robert M Horkovich
Invoice No. 327042
Invoice Date September 4, 2025

Client Matter #: 106539.10997
Joseph W. Grier, III, Esq.
RE: Aldrich Pump-FCR

FOR PROFESSIONAL SERVICES RENDERED THROUGH August 31, 2025

Date	Professional	Hours	Task	Activity	Narrative	Amount
08/06/25	AHP	0.80	B160	A103	Revise 53rd monthly fee application.	312.00
08/08/25	AHP	0.30	B160	A103	Revision for 2nd review of 53rd monthly fee application.	117.00
08/15/25	AHP	0.40	B160	A104	Finalize 53rd monthly fee application and submit.	156.00
08/20/25	AHP	0.40	B160	A103	Email to debtors' counsel advising of status of debtor's fees.	156.00
08/20/25	AHP	0.40	B160	A104	Review newly received information regarding fee payment history.	156.00
08/27/25	AHP	4.20	B160	A103	Begin pulling all documentation for debtors' counsel and setting up spreadsheet to relay all information regarding debtors' fees.	1,638.00
08/28/25	AHP	1.60	B160	A103	Continue to prepare spreadsheet to relay information.	624.00
08/28/25	RMH	1.90	B120	A109	Attend Court hearing.	2,783.50
Total Fees:						\$5,942.50

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	RATE	AMOUNT
Robert M Horkovich	1.90	1,465.00	2,783.50
Arline H Pelton	8.10	390.00	3,159.00
	<u>10.00</u>		<u>\$5,942.50</u>

SUMMARY OF SERVICES BY ACTIVITY

	HOURS	RATE	AMOUNT
ACTIVITY CODE B120 – ASSET ANALYSIS & RECOVERY			
Horkovich, Robert M	1.90	1,465.00	\$2,783.50
	<u>1.90</u>		<u>\$2,783.50</u>
ACTIVITY CODE B160 – FEE/EMPLOYMENT APPLICATIONS			
Pelton, Arline H	8.10	390.00	\$3,159.00
	<u>8.10</u>		<u>\$3,159.00</u>

TOTAL CURRENT BILLING: \$5,942.50

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

Joseph W. Grier, III, Esq.
Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

MATTER: 106539. 10997
INVOICE: 327042

September 4, 2025

MATTER: Aldrich Pump-FCR

REMITTANCE COPY

Professional Services \$5,942.50

Costs: \$0.00

Total Current Invoice: \$5,942.50

Outstanding Amount From Prior Invoices: \$8,584.39

TOTAL AMOUNT DUE: \$14,526.89

PLEASE SEND YOUR REMITTANCE TO US AT:

OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

Anderson Kill P.C.
7 Times Square
New York, NY 10036

BANK: WELLS FARGO BANK, N.A.
ABA NUMBER FOR WIRES: 121000248
ABA NUMBER FOR ACHs: 026012881
CREDIT TO: ANDERSON KILL P.C.
OPERATING ACCOUNT
ACCOUNT NUMBER: 2000037634722

KINDLY INDICATE:

CLIENT NUMBER: 106539
INVOICE NUMBER: 327042
YOUR FIRM NAME: Joseph W. Grier, III, Esq.

THIS INVOICE IS PAYABLE UPON RECEIPT

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

EXHIBIT A-4

**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 Administered)
)	

**FIFTY-FIFTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
ANDERSON KILL P.C. AS SPECIAL INSURANCE COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM SEPTEMBER 1, 2025 THROUGH SEPTEMBER 30, 2025**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Anderson Kill P.C. as Special Insurance Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of December 23, 2020* (Docket No. 486) (the “Anderson Retention Order”), Anderson Kill P.C. (“Anderson”), as Special Insurance Counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Fifth Monthly Statement of Fees and Expenses Incurred by Anderson Kill PC as Special Insurance Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from September 1, 2025 through September 30, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Anderson's invoice for the period September 1, 2025 through September 30, 2025 (the "Fee Statement Period").

Total Fees and Expenses for the Fee Statement Period

2. The total amounts of fees and expenses incurred by Anderson during the Fee Statement Period are as follows:

Fee Statement Period: September 1, 2025 – September 30, 2025	
Total Fees:	\$5,942.50
Total Expenses:	\$0.00
TOTAL DUE:	\$5,942.50
LESS Total UNAPPLIED CREDIT:	-\$3,460.13²
NEW Total Current Invoice:	\$13,134.37

3. Pursuant to the Interim Compensation Order, Anderson seeks payment of \$11,820.93³ from the Debtors for the Fee Statement Period (the "Interim Amount"), representing (a) 90% of Anderson's fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors' counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A.,

² On September 17, 2025, Anderson Kill received a payment in excess of what was currently due. The excess "unapplied credit" is being applied to the current invoice.

³ This represents 90% of the current invoice amount, less the "unapplied credit."

227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.: (i) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoamccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartellmccarter.com and Phillip S. Pavlick, Esq., ppavlickmccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascittimccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordescordes-law.com); (e) counsel to the Official Asbestos Claimants' Committee: (i) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramseyrc.com and Davis Lee Wright, Esq., dwrightrc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. MacLay, Esq., kmaclaycapdale.com, James P. Wehner, Esq., jwehnercapdale.com, and Todd E. Phillips, Esq., tphillipscapdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompsonlawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwrightgrierlaw.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an “Objection”), if any, must be served upon the Notice Parties, including Anderson, no later than October 20, 2025 (the “Objection Deadline”). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay Anderson an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Anderson.

This is the 6th day of October 2025.

ANDERSON KILL P.C.

/s/ Robert M. Horkovich

Robert M. Horkovich (admitted pro hac vice)

7 Times Square

15th Floor

New York, NY 10036

Telephone: (212) 278-1000

Facsimile: (212) 278-1733

E-mail: rhorkovich@andersonkill.com

Special Insurance Counsel for

Joseph W. Grier, III

Future Claimants' Representative

Exhibit A

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq.
Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

Invoice No. 327373
Invoice Date: October 3, 2025
Client Matter ID: 106539.10997
Billing Attorney: Robert M Horkovich

Joseph W. Grier, III, Esq.

Aldrich Pump-FCR

Professional Services:	\$16,594.50
Costs:	\$0.00
Total Current Invoice:	\$16,594.50
LESS Total UNAPPLIED CREDIT:	-\$3,460.13
NEW Total Current Invoice:	\$13,134.37
Outstanding Balance from Prior Invoices (see listing):	\$6,977.69
Total Amount:	\$20,112.06

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

October 3, 2025

Invoice No. 327373

MATTER: Aldrich Pump-FCR

INVOICE LIST

INVOICE	DATE	INVOICE TOTAL
326383	07/09/25	\$196.39
326689	08/17/25	\$838.80
327042	09/08/25	\$5,942.50
OUTSTANDING BALANCE FROM PRIOR INVOICES		\$6,977.69

Anderson Kill P.C.

7 Times Square, New York, NY 10036
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

Joseph W. Grier III, Esq.
Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

Billing Attorney Robert M Horkovich
Invoice No. 327373
Invoice Date October 3, 2025

Client Matter #: 106539.10997
Grier, Joseph W., III, Esq.
RE: Aldrich Pump-FCR

FOR PROFESSIONAL SERVICES RENDERED THROUGH September 30, 2025

Date	Professional	Hours	Task	Activity	Narrative	Amount
09/04/25	AHP	0.80	B160	A103	Draft 54th monthly fee application.	312.00
09/08/25	AHP	0.60	B160	A103	Finalize 54th monthly fee application for submission.	234.00
09/17/25	AHP	0.60	B160	A104	Review latest payment information.	234.00
09/23/25	RMH	0.40	B120	A104	Review of demands re confidentiality of expert reports.	586.00
09/23/25	MG	0.60	B120	A104	Analyze debtor proposal re OIC insolvent dividend payment.	627.00
09/24/25	MG	0.60	B120	A104	Analyze debtor proposal re OIC insolvent dividend payment.	627.00
09/24/25	RMH	0.60	B120	A104	Review of expert report confidentiality dispute.	879.00
09/25/25	AHP	0.60	B160	A103	Draft 55th monthly fee application.	234.00
09/26/25	AHP	1.40	B160	A103	Begin drafting the 15th interim fee application.	546.00
09/28/25	RMH	0.20	B120	A107	Confer with ACC counsel Katy Zeyhda.	293.00
09/28/25	RMH	3.80	B120	A104	Review and analyze claims that producing claimant information voids coverage.	5,567.00

Date	Professional	Hours	Task	Activity	Narrative	Amount
09/29/25	RMH	0.20	B120	A107	Confer with ACC counsel.	293.00
09/29/25	RMH	0.20	B120	A107	Confer with debtor counsel Heather Frazier.	293.00
09/29/25	RMH	0.20	B120	A108	Confer with insurance counsel.	293.00
09/29/25	RMH	1.40	B120	A104	Review of alleged coverage defenses and release of claimant information.	2,051.00
09/30/25	RMH	2.30	B120	A104	Review of ACC demand for ATO designation of expert reports and meet and confer regarding same.	3,369.50
09/30/25	AHP	0.40	B160	A104	Email confidentiality agreement to first year with instructions.	156.00
Total Fees:						\$16,594.50
LESS Total UNAPPLIED CREDIT:						-\$3,460.13
NEW Total Current Invoice:						\$13,134.37

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	RATE	AMOUNT
Robert M Horkovich	9.30	1,465.00	13,624.50
Mark Garbowski	1.20	1,045.00	1,254.00
Arline H Pelton	4.40	390.00	1,716.00
	<u>14.90</u>		<u>\$16,594.50</u>

SUMMARY OF SERVICES BY ACTIVITY

	HOURS	RATE	AMOUNT
ACTIVITY CODE B120 ASSET ANALYSIS & RECOVERY			
Horkovich, Robert M	9.30	1,465.00	\$13,624.50
Garbowski, Mark	1.20	1,045.00	\$1,254.00
	<u>10.50</u>		<u>\$14,878.50</u>
ACTIVITY CODE B160 FEE/EMPLOYMENT APPLICATIONS			
Pelton, Arline H	4.40	390.00	\$1,716.00
	<u>4.40</u>		<u>\$1,716.00</u>

TOTAL CURRENT BILLING:	\$16,594.50
LESS Total UNAPPLIED CREDIT:	-\$3,460.13
NEW Total Current Invoice:	\$13,134.37

Anderson Kill P.C.

7 Times Square, New York, NY 10036
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Grier Wright Martinez PA
521 E. Morehead Street, Suite 440
Charlotte, NC 28202

MATTER: 106539. 10997
INVOICE: 327373

October 3, 2025

MATTER: Aldrich Pump-FCR

REMITTANCE COPY

Professional Services	\$16,594.50
Costs:	\$0.00
Total Current Invoice:	\$16,594.50
LESS Total UNAPPLIED CREDIT:	-\$3,460.13
NEW Total Current Invoice:	\$13,134.37
Outstanding Amount From Prior Invoices:	\$6,977.69
TOTAL AMOUNT DUE:	\$20,112.06

PLEASE SEND YOUR REMITTANCE TO US AT:

Anderson Kill P.C.
7 Times Square
New York, NY 10036

OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

BANK: WELLS FARGO BANK, N.A.
ABA NUMBER FOR WIRES: 121000248
ABA NUMBER FOR ACHs: 026012881
CREDIT TO: ANDERSON KILL P.C.
OPERATING ACCOUNT
ACCOUNT NUMBER: 2000037634722

KINDLY INDICATE:

CLIENT NUMBER: 106539
INVOICE NUMBER: 327373
YOUR FIRM NAME: Joseph W. Grier, III, Esq.

THIS INVOICE IS PAYABLE UPON RECEIPT

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

June 1, 2025 through September 30, 2025

Project Category ¹	Matter Number	Total Hours for the Interim Period	Total Hours from the Petition Date	Total Fees for the Interim Period	Total Fees from the Petition Date
Asset Analysis and Recovery (formerly Insurance)	B120/A2	18.80	1,296.80	\$25,621.00	\$1,075,616.50
Case Administration (formerly Due Diligence)	B110/A3	0.00	0.30	\$0.00	\$324.00
Fee/Employment Applications (formerly Anderson Compensation)	B160/A8	24.00	195.90	\$9,360.00	\$66,980.95
TOTAL:		42.80	1,497.70	\$31,520.87	\$1,142,597.45

¹ Due to the case beginning e-billing, the prior categories of Insurance, Due Diligence and Anderson Compensation are hereinafter blended to now be: B120 Asset Analysis and Recovery, B110 Case Administration, and B160 Fee/Employment Applications.

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

June 1, 2025 through September 30, 2025

Expense Category	Total Expenses for the Period	Total Expenses from the Petition Date
Professional Services (Database Hosting Fees)	\$0.00	\$3,698.51
Transcripts & Depositions	\$0.00	\$59.40
Library & Legal Research (Westlaw)	\$0.00	\$40.30
TOTAL:	\$0.00	\$3,798.21

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

June 1, 2025 through September 30, 2025

Name of Professional	Position - Bar Year	2025 Hourly Billing Rate	Total Hours Billed	Total Compensation
Robert M. Horkovich	Managing Shareholder - 1980	\$1,465	16.30	\$23,879.50
Mark Garbowski	Shareholder - 1988	\$1,045	1.20	\$1,254.00
Arline Pelton	Senior Legal Assistant	\$390	24.00	\$9,360.00
Jonathan A. Schwartz	Legal Assistant	\$375	1.30	\$487.50
		TOTAL:	42.80	\$31,520.87

EXHIBIT E

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

June 1, 2025 through September 30, 2025

Document	Application Date Docket No.	Period Covered	Fees Requested/ Allowed	Expenses Requested /Allowed	Order Approving Interim Application
1 st Interim	03/11/2021; Docket No. 619	12/23/2020 - 01/31/2021	\$47,974.50	\$0.00	Docket No. 662; 04/02/2021
2 nd Interim	07/09/2021; Docket No. 764	02/01/2021- 05/31/2021	\$425,925.00	\$900.50	Docket No. 798, 08/02/2021
3 rd Interim	10/29/2021; Docket No. 864	06/01/20201- 09/30/2021	\$208,062.00	\$526.01	Docket No. 929; 12/08/2021
4 th Interim	03/01/2022; Docket No. 1009	10/01/2021- 01/31/2022	\$107,343.50	\$513.05	Docket No. 1062; 03/23/2022
5 th Interim	07/11/22; Docket No. 1261	02/01/2022- 05/31/2022	\$52,985.50	\$513.02	Docket No. 1315; 08/03/2022
6 th Interim	11/08/2022; Docket No. 1396	06/01/2022- 09/30/2022	\$27,530.13	\$178.15	Docket No. 1460; 12/07/2022
7 th Interim	03/08/2023; Docket No. 1632	10/01/2022- 01/31/2023	\$42,205.50	\$613.61	Docket No. 1825; 06/21/2023
8 th Interim	07/12/2023; Docket No. 1868	02/01/2023- 05/31/2023	\$75,463.50	\$199.56	Docket No. 1901; 08/02/2023
9 th Interim	11/07/2023; Docket No. 1991	06/01/2023- 09/30/2023	\$74,596.60	\$305.49	Docket No. 2027; 11/30/2027
10 th Interim	03/15/2024; Docket No. 2143	10/01-2023- 01/31/2024	\$11,433.50	\$49.08	Docket No. 2191; 04/11/2024
11 th Interim	07/11/2024; Docket No. 2301	02/01/2024- 05/31/2024	\$8,464.00	\$0.00	Docket No. 2340; 08/02/2024
12 th Interim	11/13/2024; Docket No. 2443	06/01/2024- 09/30/2024	\$3,218.95	\$0.00	Docket No. 2482; 12/12/2024
13 th Interim	03/13/2025; Docket No. 2588	10/01/2024- 01/31/2025	\$10,545.00	\$0.00	Docket No. 2638; 04/04/2025
14 th Interim	07/09/2025; Docket No. 2702	02/01/2025- 05/31/2025	\$11,897.00	\$0.00	Docket No. 2758; 08/04/2025