

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

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS,

Plaintiff,

v.

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

Defendants.

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

Plaintiff,

v.

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

Defendants.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

Adv. Pro. No. 21-03029

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.



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

Plaintiff,

Adv. Pro. No. 22-03029

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.

**PLAINTIFF’S MOTION TO COMPEL APPLICATION OF CERTAIN
RELEVANT SEARCH TERMS TO DOCUMENT DISCOVERY**

The Official Committee of Asbestos Personal Injury Claimants (the “Committee” or “Plaintiff”), in its capacity as a committee and on behalf of the estates of Aldrich Pump LLC (“Aldrich”) and Murray Boiler LLC (“Murray” and together with Aldrich, the “Debtors”), by and through its undersigned attorneys, submits this *Motion to Compel Application of Certain Relevant Search Terms to Document Discovery* (the “Motion”), and states as follows:

PRELIMINARY STATEMENT

1. With the help of the Court-imposed deadlines to reach agreement, the Committee, the Debtors and the above-captioned non-Debtor affiliate defendants (collectively with the Debtors, the “Defendants”) have made significant strides toward resolving which custodians will

be subject to discovery and what search terms will be applied to certain electronically stored information. As the Court knows, the relevant case management order provides that the deadline for the Defendants to substantially produce documents to the Committee hinges on agreement as to custodians and search terms.

2. With the provision of requested information by Defendants on Monday, December 22, 2025, the parties have reached agreement on the list of custodians whose emails and other documents will be searched.² The parties have reached agreement on a number of search terms as well, leaving only a handful of search terms in dispute.

3. However, these disputed searches go to the heart of the allegations in the Adversary Proceedings. As will be described further below, some of the disputed search terms (like derivations of the word “bankruptcy” and “debtor”) would likely hit on exactly the kinds of documents pertinent to the allegations in the Adversary Proceeding complaints. And, as the Court no doubt knows, the parties could agree to 100 search terms, but pertinent documents may not be captured for review if the 101st term is unique to a particular document. For example, an email between two Defendant individuals during the relevant time frame may contain no subject and simply say “we are keeping this a secret, right?” or “these entities will go bankrupt, right?” or “are we making insolvent entities?” As for the last example, it is particularly feasible that such an email could exist, as the Corporate Restructuring here was structured and executed almost entirely by attorneys.³ It is with this backdrop that the Committee seeks that a limited number of additional searches be run, to ensure a comprehensive data set is reviewed and relevant documents ultimately

² Of course, as described below, the Defendants still have an obligation to search for documents that are not maintained by a particular custodian.

³ *Findings of Fact and Conclusions of Law Regarding Order: (I) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting in Part Denying in Part the Motion to Compel* [Adv. Pro. No. 20-03041, ECF No. 308] (“Findings and Conclusions”), ¶ 44 (“Project Omega was an attorney-created and implemented strategy.”).

produced. To be sure, application of the disputed search terms would require Defendants to review 3,619 more documents at most (a number that is not extreme in proportion to the document review set), and Defendants would still have an opportunity to screen them for responsiveness and privilege.

4. In light of the progress made, and the intention to continue the discussions toward resolution, the Committee files this limited motion to preserve the right to seek Court relief regarding the remaining disputed search terms. While the Committee remains hopeful that the parties can resolve these issues in advance of the next omnibus hearing on January 15, 2026, given the significant relevance of the disputed search terms, Plaintiff submits this motion to ensure compliance with the Court's deadlines should resolution not be reached.

RELEVANT BACKGROUND

A. Relevant Procedural Background

5. On June 18, 2020, the Debtors filed (i) voluntary petitions for relief under chapter 11 of title 11 of the United States Code; and (ii) a complaint and motion for a temporary restraining order initiating the preliminary injunction proceeding ("PI Proceeding").⁴ The parties engaged in truncated discovery in connection with the PI Proceeding, which provided critical insight into the issues fundamental to these Adversary Proceedings,⁵ and informed Plaintiff's proposed search terms in the Adversary Proceedings.

⁴ See Debtors' Complaint for Injunctive and Declaratory Relief (I) Preliminarily Enjoining Certain Actions Against Non-Debtors, or (II) Declaring that the Automatic Stay Applies to Such Actions, and (III) Granting a Temporary Restraining Order Pending a Final Hearing [Adv. Pro. No. 20-03041, ECF No. 1] ("PI Complaint"); Motion of the Debtors for an Order (I) Preliminarily Enjoining Certain Actions Against Non-Debtors, or (II) Declaring that the Automatic Stay Applies to Such Actions, and (III) Granting a Temporary Restraining Order Pending a Final Hearing [Adv. Pro. No. 20-03041, ECF No. 2] ("PI Motion").

⁵ Adv. Pro. No. 21-03029 (LMJ) (the "SubCon Proceeding"); Adv. Pro. No. 22-03028 (LMJ) (the "Fraudulent Transfer Proceeding"); and Adv. Pro. No. 22-03029 (LMJ) (the "Fiduciary Duty Proceeding" and, together with the SubCon Proceeding and the Fraudulent Transfer Proceeding, the "Adversary Proceedings").

6. The first *Case Management Order*⁶ (“CMO”) entered in these Adversary Proceedings on January 10, 2023 states that “incorporation of the Prior Discovery into the Adversary Proceedings shall not preclude or prejudice any party’s . . . ability to seek further Post-CMO Discovery from parties, entities, or individuals who received discovery requests in connection with the Prior Discovery [from the PI Proceeding].” *Id.* at 6.

7. Pursuant to the *Order Establishing Joint Discovery Plan and Report (ESI Protocol)* entered on April 24, 2023, the right to negotiate additional search terms and custodians—whether previously agreed to in the PI Proceeding or newly proposed—is expressly preserved.⁷

8. Significant discovery requests and responses, and meet-and-confer efforts, have been undertaken in the Adversary Proceedings. Written discovery has been propounded and answered, and the parties have held multiple calls and engaged in extensive communications to address and negotiate various disputes.

9. On November 20, 2025, the Court entered the *First Amended Case Management Order* (“First CMO”), which, among other things, set November 14, 2025 as the deadline to reach agreement on custodians and search terms, and November 26, 2025 as the deadline to file motion practice as to any remaining disputes.⁸

10. With these deadlines in mind, the parties continued to negotiate the custodians and search terms. Despite the November 14, 2025 deadline to reach agreement, on November 19, 2025, Defendants responded with further information related to the search terms, necessitating a request to further adjourn the deadline to resolve all custodian and search term disputes.

⁶ *Case Management Order* [Adv. Pro. No. 21-03029, ECF No. 117; Adv. Pro. No. 22-03028, ECF No. 39; Adv. Pro. No. 22-03029, ECF No. 35].

⁷ Adv. Pro. No. 21-03029, ECF No. 142, ¶ 8; Adv. Pro. No. 22-03028, ECF No. 69, ¶ 8.

⁸ *First Amended Case Management Order* [Adv. Pro. No. 21-03029, ECF No. 196; Adv. Pro. No. 22-03028, ECF No. 123; Adv. Pro. No. 22-03029, ECF No. 97.].

11. At the request of the parties, on November 25, 2025, the Court entered the *Second Amended Case Management Order*, extending the deadline to resolve all custodian and search term disputes to December 12, 2025, and extending the deadline for filing motion practice to resolve remaining disputes to December 24, 2025.⁹

B. Relevant History of Custodian and Search Term Negotiations

12. Custodians. On June 11, 2024, Plaintiff proposed an initial list of custodians; Defendants challenged nearly half without explanation. Plaintiff provided detailed, custodian-specific support on August 15, 2024, but Defendants continued to object without basis. The parties subsequently reached agreement on certain custodians, but remained at an impasse with respect to six custodians. After months of negotiations and repeated requests, Defendants provided some requested factual information by letter response on December 22, 2025 as to the still-disputed custodians. Ultimately, the parties agreed to a total of 24 custodians, nine of whom were custodians during the PI proceeding.¹⁰

13. Search Terms. The parties have likewise been negotiating search terms for over a year. Plaintiff first proposed a list of search terms on October 10, 2024, and the parties exchanged correspondence and held multiple meet-and-confers, making substantial progress. However, five keyword searches remain in dispute. Those searches, along with the number of unique hits generated by those searches, are as follows:

⁹ *Second Amended Case Management Order* [Adv. Pro. No. 21-03029, ECF No. 197; Adv. Pro. No. 22-03028, ECF No. 124; Adv. Pro. No. 22-03029, ECF No. 98] (hereinafter the “Second CMO”).

¹⁰ As is always the case in discovery, while the parties have agreed to the list of custodians, (a) the Defendants’ obligation to search for documents that are not maintained by a particular custodian remains, and (b) such agreement is with a reservation of rights to the extent that newly provided information to the Plaintiff demonstrates a need for further or additional searches.

No.	Keyword Search	Unique Hits
1.	bankrupt*	1,045
2.	debtor*	210
3(a)	Secret OR shred OR “under wraps”	1,348
3(b)	Keep* W/2 (confidential OR private)	404
3(c) ¹¹	(Talk* OR chat* OR discuss* OR keep* OR take) W/5 offline	106
4.	Insolven*	74
5.	solven*	432

14. Defendants’ repeated objections to each of Plaintiff’s proposed searches is that they are “overbroad, unduly burdensome, and not proportional,” and would require review of “substantial irrelevant material.”¹² But when Plaintiff asked during the December 22, 2025 meet-and-confer for specifics, Plaintiff learned that (A) Defendants had not reviewed or sampled any documents, despite this being standard practice in search term negotiations and specifically requested by Plaintiff, and (B) when discussing proportionality, despite agreeing to include other search terms that reflected a small number of “hits,” Defendants still refuse to include the similarly small searches listed above.

¹¹ While searches 3(a), 3(b), and 3(c) were proposed to the Defendants as individual sets in order to run unique hits, Plaintiff has combined these into one requested search for this Court’s consideration because together, this request aims to discover the same concepts (*i.e.* colloquial discussions of whether information should be kept secret).

¹² See *Disputed AP Search Terms* attachment to Email from Shawn Smith, Partner, McCarter & English to Carrie Hardman, Partner, Winston & Strawn (Dec. 22, 2025), attached hereto as **Exhibit A**.

15. Accordingly, the Committee moves to compel Defendants to apply the five disputed search terms to the records of the agreed-upon custodians.

ARGUMENT

16. Parties are entitled to discover any material that is relevant to any party's claim or defense, is nonprivileged, and is proportional to the needs of the case. Fed. R. Civ. P. 26(b)(1) (made applicable by Fed. R. Bankr. P. 7026). In terms of the discovery rules, "relevance" should be read liberally.¹³

17. When a motion to compel discovery is filed, the party resisting discovery bears the burden to prove why the requested evidence is not discoverable.¹⁴ When electronically stored information (ESI) is implicated, like here, the party resisting its production must show that the ESI is not reasonably accessible due to burden or cost, and, even if such a showing is made, the Court may nevertheless order its production if the requesting party shows good cause, following Rule 26(a)(2)(C). Fed. R. Civ. P. 26(a)(2)(B).

18. Courts and leading authorities—including The Sedona Conference—recognize that application of keyword searches across ESI requires validation to ensure accuracy and proportionality.¹⁵ For example, sampling of the documents that search terms capture, including

¹³ See, e.g., *Carefirst of Md., Inc. v. Carefirst Pregnancy Ctrs., Inc.*, 334 F.3d 390, 402 (4th Cir. 2003) (stating that discovery under the Federal Rules "is broad in scope and freely permitted"); *Tucker v. Momentive Performance Materials USA*, 2:13-cv-04480, 2016 WL 8252929, at *3 (S.D.W. Va. Nov. 23, 2016) (discovery standard for relevance is broader than relevance under the Federal Rules of Evidence); *Doe v. Old Dominion Univ.*, 289 F. Supp. 3d 744, 749 (E.D. Va. 2018) (quoting *Kline v. Martin*, 345 F. Supp. 3d 31, 32 (E.D. Va. 1972)) ("The Federal Rules contemplate the broadest discovery possible in the search of the truth."); Fed. R. Civ. P. 26(b)(1) ("Information within this scope of discovery need not be admissible in evidence to be discoverable.").

¹⁴ *Old Dominion*, 89 F. Supp. 3d at 749 ("On a motion to compel, the burden of proof is with the party objecting to the discovery to establish that the challenged production should not be permitted") (citation omitted); see also *Hughes v. Res. Triangle Inst.*, No. 1:11CV546, 2014 WL 4384078, at *2 (M.D.N.C. Sept. 3, 2014) ("[D]istrict judges and magistrate judges in the Fourth Circuit . . . have repeatedly ruled that the party or person resisting discovery, not the party moving to compel discovery, bears the burden of persuasion.") (citing *Kinetic Concepts, Inc. v. ConvaTec Inc.*, 268 F.R.D. 226, 243–44 (M.D.N.C. 2010)).

¹⁵ See The Sedona Principles, Third Edition: Best Practices, Recommendations & Principles for Addressing Electronic Document Production, 19 SEDONA CONF. J. 1, 126–27 (2018).

an analysis of false hits (*i.e.*, where a search term captures documents for review that are ultimately deemed irrelevant), is a critical measure to confirm that search terms retrieve relevant material without overwhelming the process with irrelevant data.¹⁶ The Sedona Conference emphasizes that statistically sound sampling and iterative refinement are reasonable and necessary components of any defensible e-discovery process.¹⁷

19. Defendants’ refusal to implement quality controls during the process of negotiating search terms undermines the process. “[W]hat is required is something other than a lawyer’s guesses, without client input, and without any quality control testing to see if the search terms produce reasonably all the responsive ESI and limited ‘false positives.’”¹⁸ Courts consistently hold that failure to employ quality measures (*i.e.*, sampling) compromises the integrity of search term negotiations.¹⁹

20. Plaintiff is at an informational disadvantage, with no access to Defendants’ ESI and therefore unable to run searches or perform sampling. Defendants refuse to apply the disputed keyword searches claiming that the searches will hit on documents that contain irrelevant material,

¹⁶ *See id.* at 167.

¹⁷ *See id.* at 164–68.

¹⁸ *William A. Gross Const. Assocs., Inc. v. Am. Mfrs. Mut. Ins. Co.*, 256 F.R.D. 134, 135 n.3 (S.D.N.Y. 2009) (“strongly endor[ing] *The Sedona Conference*”).

¹⁹ *See, e.g., Andersen v. Stability AI Ltd.*, No. 23-cv-00201-WHO, 2025 WL 870358, at *5 (N.D. Cal. Mar. 19, 2025) (ordering disclosure of search term hit reports to assess efficacy of terms, and noting that “[t]he effectiveness of meet and confers depends on the parties’ candor, and this is especially true when the parties are addressing potential search terms”); *EEOC v. FedEx Ground Package Sys., Inc.*, No. 2:15-cv-256, 2018 WL 1441426, at *4 (W.D. Pa. Mar. 21, 2018) (noting that if defendant “initially focused its considerable legal energy on working with [plaintiff] to conduct the sample analysis and then refine (and perhaps refine again, and if necessary, again) search terms, [defendant] might have saved time, resources, and expense by avoiding work that was performed to generate and support an argument, as opposed to just doing that discovery work”); *Gardner v. Cont’l Casualty Co.*, No. 3:13 CV 1918, 2016 WL 155002, at *3 (D. Conn. Jan. 13, 2016) (ordering the parties to meet and confer regarding validation efforts, including “sampling and iterative refinement” or using a “quick peek protocol” to test the search terms). *See also Order Regarding Certain Disc. Dispts., In re Gen. Motors LLC Ignition Switch Litig.*, No. 14-MD-2543 JMF, at *1 (S.D.N.Y. 2015) (ordering parties to qualitatively validate custodial search terms); *In re Lithium Ion Batteries Antitrust Litig.*, No. 13-MD-02420, 2015 WL 833681, at *3 (N.D. Cal. Feb. 24, 2015) (ordering defendants to engage in qualitative sampling in order to “prevent irrelevant documents from being produced in the litigation, and . . . obviate, or at least clarify, motion practice over the search terms themselves”).

but Defendants have not reviewed a single document to confirm that is the case.

21. Moreover, as detailed below, these five keyword searches are highly relevant to core issues in these Adversary Proceedings:

a. **Searches 1 & 2: bankrupt* (1,045 Unique Hits) and debtor* (210 Unique Hits)** – These terms are directly tied to Defendants’ intent and motivation behind the Corporate Restructuring and resulting bankruptcy, which are crucial aspects of the Adversary Proceedings. By non-exclusive example, despite statements from Defendants to the contrary,²⁰ initial discovery from the PI Proceeding revealed documents showing that bankruptcy was not incidental, or contemplated independently by the Debtors—rather, bankruptcy was the very purpose of the restructuring from its inception.²¹ Defendants referred to these entities as “debtors” months before they were even formed or had names.²² Defendants’ refusal to run these searches is based on a claim that these terms would return irrelevant material, speculating that the Defendants may have customers that have been in bankruptcy or are debtors themselves. However, again, Defendants confirmed that they had not reviewed a single document or conducted any sampling to demonstrate the claim that these searches would, in fact, return irrelevant material. Thus, Defendants’ objection rests entirely on speculation—contrary to best practices and accepted e-discovery standards.

b. **Searches 4 and 5: insolven*(74 Unique Hits) and solven* (432 Unique**

²⁰ *Informational Brief of Aldrich Pump LLC and Murray Boiler LLC* [ECF No. 5], at 34–35; *Decl. of Ray Pittard in Support of First Day Pleadings* [ECF No. 27], ¶¶ 21–22; PI Complaint ¶ 37; PI Motion at 19; Findings and Conclusions ¶¶ 50, 112–120, ¶ 118 n.167. References herein to “ECF No.,” unless otherwise stated, shall refer to filings in the case *In re Aldrich Pump LLC*, No. 20-30608 (LMJ) (Bankr. W.D.N.C.).

²¹ See Findings and Conclusions, ¶ 119 (“[O]ne cannot credibly suggest that a corporate enterprise the size and sophistication of Old IRNJ and Old Trane would restructure their entire business configuration, and then just leave it to the Debtors’ Boards to determine whether to file the Chapter 11 Cases that fulfilled the (sole) business purpose of the Corporate Restructuring.”); *id.* at ¶ 120 (“[T]he weight of the evidence suggests the decision to file these two entities in bankruptcy was not made the night before the bankruptcy filings on June 17, 2020. . . . The 2020 Corporate Restructuring and the Divisional merger were undertaken so that the Trane Enterprise might obtain the injunctive benefits of an asbestos bankruptcy plan and trust without filing themselves.”) Project Omega materials produced during the PI Proceeding included [REDACTED] (TRANE_00003758), [REDACTED] (TRANE_00000545). [REDACTED] (TRANE_00014949).

²² Findings and Conclusions, ¶ 50. Documents produced during the PI Proceeding include: (i) [REDACTED] (TRANE_00001745); (ii) [REDACTED] (TRANE_00000557); and (iii) [REDACTED] (PRIV_TRANE_00001550). Other emails reference [REDACTED] (TRANE_00000560), [REDACTED] (TRANE_00003162), and include [REDACTED] (TRANE_00012076). Similarly, a spreadsheet produced in the PI Proceeding contains an “[REDACTED]” that includes, among other things: “[REDACTED]” and “[REDACTED]” (PRIV_TRANE_00002284).

Hits) – Similar to searches regarding bankruptcy and debtor, the search terms “insolven*” (intended to capture “insolvent” and “insolvency”) and “solven*” (intended to capture “solvent” and “solvency”) are critical. For example, in the Fraudulent Transfer Proceeding, any discussion about the solvency (or lack thereof) of the enterprise or its formed entities would be relevant to the analysis of the elements of a fraudulent transfer claim. Defendants have claimed that, at all relevant times, the enterprise and its subsidiaries have been solvent.²³ Plaintiff is, thus, entitled to stress-test those assertions by and through the claims made in the Adversary Proceedings. Communications discussing solvency, insolvency, or related financial conditions are highly probative of intent, knowledge, and the financial reality surrounding the Corporate Restructuring and resulting Debtors’ bankruptcy. These terms are necessary to capture documents addressing these key concepts and are proportional to the needs of the case.

c. Searches 3(a)–(c): secret OR shred OR “under wraps” OR (keep* W/2 (confidential OR private)) OR ((talk* OR chat* OR discuss* OR keep* OR take) W/5 offline) (together, 1,858 Unique Hits) – This search is narrowly tailored to identify documents showing the extent to which Defendants sought to keep Project Omega (including the Corporate Restructuring and resulting bankruptcy) secret. Among other reasons that these search terms are relevant, intent is usually proven by inference, and concealment is a recognized badge of fraud in the fraudulent transfer context.²⁴ In the Substantive Consolidation Proceeding as well, documents containing these terms may provide evidence of an intentional effort to hinder and delay the asbestos claimants.²⁵ Judge Whitley has also already found:

“Project Omega was also a secret endeavor. Before employees could work on Project Omega, they were required to sign nondisclosure agreements to keep the project confidential, even within the Trane organization. The number of employees privy to Project Omega was initially limited and relatively small—initially as few as seven people, four of whom were in-house counsel—but grew as Project Omega took shape and required the involvement of additional personnel.”²⁶

This search is designed to capture a very specific subset of communications related to secrecy and confidentiality. Defendants have offered no alternative and simply refuse to apply the term, again without reviewing a single document or conducting any sampling.

22. In sum, as noted above, these keyword searches in dispute are not peripheral; they address the heart of the allegations in the Adversary Proceedings. Despite the limited and targeted

²³ See *Defendants’ Answer and Affirmative Defenses*, Adv. Pro. No. 22-03028, ECF No. 11, ¶¶ 10, 67, 75, 101, 107, 138, 146, 157, 176, 183.

²⁴ N.C. Gen. Stat. § 39-23.4(b)(3); Del. Code Ann. tit. 6, § 1304(b)(3); Tex. Bus. & Com. Code Ann. § 24.005(b)(3); 12 Pa. Con. Stat. Ann. § 5104(b)(3).

²⁵ See, e.g., *Motion of the Official Committee of Asbestos Personal Injury Claimants for Substantive Consolidation of Debtors’ Estates with Certain Nondebtor Affiliates or, Alternatively, to Reallocate Debtors’ Asbestos Liabilities to Those Affiliates*, ECF No. 2 (No. 21-3029), ¶ 60.

²⁶ Findings and Conclusions, ¶ 45.

scope of the disputed keyword searches, Defendants continue refusing to include them in searching the agreed-upon custodians' documents. While the Committee acknowledges that Defendants have proposed alternative search terms to some of the disputed searches, Defendants have provided no explanation for their counterproposals and admitted they performed no sampling of documents to validate their changes and would not undertake such efforts absent a court order. Thus, in other words, Defendants appear to have proposed altered search terms based on conceptual (rather than actual) justification, which undermines the integrity of the search term negotiation process. Prompt resolution is essential to maintain the schedule set forth in the Second CMO²⁷ and to allow these Adversary Proceedings to proceed efficiently.

23. The Committee remains hopeful that a resolution can be reached if Defendants agree to engage and review the documents hitting on these keyword searches. However, to preserve the Committee's rights and ensure compliance with the Court's deadlines, the Committee seeks the relief requested in the Motion, which it believes is reasonable, appropriate and necessary, should resolution not be achieved before the next omnibus hearing.

CONCLUSION

24. For the reasons stated above, the Committee respectfully requests the Court grant the relief requested herein.

²⁷ Adv. Pro. No. 21-03029, ECF No. 197; Adv. Pro No. 22-03028, ECF No. 124; Adv. Pro. No. 22-03029. ECF No. 98.

Dated: December 23, 2025

HAMILTON STEPHENS STEELE
+ MARTIN, PLLC

/s/ Robert A. Cox, Jr.

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

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

CAPLIN & DRYSDALE, CHARTERED
Kevin C. Maclay (admitted *pro hac vice*)
Todd E. Phillips (admitted *pro hac vice*)
1200 New Hampshire Ave. NW, 8th Floor
Washington, DC 20036
Telephone: (202) 862-5000
Facsimile: (202) 429-3301
Email: kmaclay@capdale.com
tphillips@capdale.com

*Counsel to the Official Committee of Asbestos
Personal Injury Claimants*

WINSTON & STRAWN LLP
Carrie V. Hardman (admitted *pro hac vice*)
Cristina Calvar (admitted *pro hac vice*)
200 Park Avenue
New York, NY 10166
Telephone: (212) 294-6700
Fax: (212) 294-4700
Email: chardman@winston.com
ccalvar@winston.com

*Special Litigation Counsel to the Official
Committee of Asbestos Personal Injury
Claimants*

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

*Counsel to the Official Committee
of Asbestos Personal Injury Claimants*

EXHIBIT A

Official Committee of Asbestos Personal Injury Claimants v. Aldrich Pump LLC, et al., Adv. Pro. No. 21-03029 (JCW);
Official Committee of Asbestos Personal Injury Claimants v. Ingersoll-Rand Global Holding Company Limited, et al., Adv. Pro. No. 22-03028 (JCW) (collectively, the “Active Proceedings”)

Trane Defendants’ 12/22/25 Update to Objections to ACC’s Proposed Search Terms and Proposed Alternate Search Terms for the Active Proceedings¹

# ²	ACC’s Search (Modified, Where Applicable)	ACC’s Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs’ Alternative Search (Where Applicable)	Agreed-Upon PI Search (Y/N)	Trane Defs’ Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits
1	solven*	1/1/19-6/18/20	5,100	26,800	432	<p>The volume of ESI confirms this proposed search is overbroad, unduly burdensome, and not proportional to the needs of the case.</p> <p>The proposed search term also will likely require reviewing a substantial amount of irrelevant material.</p> <p>In a good faith effort to reach an agreement, Defendants propose using the following alternative search term.</p>	solven* w/10 (Aldrich OR Murray OR Trane* OR Ingersoll* OR IRGH OR IRNJ OR "MB Holdings" OR Thermo OR TTC OR TUI OR THI OR THL OR TKC OR TTHI)	N	1/1/19-6/18/20	917	2,209	39
2	insolven*	1/1/19-6/18/20	6,525	21,762	74	<p>The volume of ESI confirms this proposed search is overbroad, unduly burdensome, and not proportional to the needs of the case.</p> <p>The proposed search term also will likely require reviewing a substantial amount of irrelevant material.</p> <p>In a good faith effort to reach an agreement, Defendants propose using the following alternative search term.</p>	insolven* w/10 (Aldrich OR Murray OR Trane* OR Ingersoll* OR IRGH OR IRNJ OR "MB Holdings" OR Thermo OR TTC OR TUI OR THI OR THL OR TKC OR TTHI)	N	1/1/19-6/18/20	117	298	0

¹ This updated hit report—like the hit reports provided on March 7, 2025, September 8, 2025, November 26, 2025, and December 18, 2025—includes the files of the following agreed-upon custodians: Cathleen Bowen, Sara Brown, Eric Hankins, Heather Howlett, Michael Lamach, Chris Kuehn, Mark Majocha, Phyllis Morey, Rolf Paeper, Ray Pittard, Dave Regnery, Amy Roeder, Robert Sands, Allan Tananbaum, Evan Turtz, and Manlio Valdes, Jr. Trane Defendants’ collection of ESI and hard-copy documents continues for Wayne Agostini, Richard Daudelin, Maria Green, Christopher Uhlich, Mikhael Vitenson, and Scott Williams. The proposed alternate searches do not constitute an agreement or acquiescence to: (i) search any other proposed custodian to which Trane Defendants have objected; or (ii) run the alternate search terms using the Committee’s proposed expanded date ranges. Except where otherwise agreed, Trane Defendants maintain that the relevant time period for searching for responsive documents in Active Proceedings is January 1, 2019 through the June 18, 2020 Petition Date—the period agreed to in the preliminary injunction proceeding. Trane Defendants reserve all rights, remedies, and objections available to them, including the right to further supplement their position regarding the custodians and the date range for the search terms.

² This column corresponds to the search term numbers in Appendix A to the Committee’s 12/10/25 Letter.

# ²	ACC's Search (Modified, Where Applicable)	ACC's Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs' Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs' Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits
3	apprais*	Search Term Withdrawn										
4	Fraud* w/25 (asbest* OR liab* OR lawsuit* OR litigat* OR debt*)	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC's proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant's proposed search terms as set forth herein.									
5	stay* W/5 (lawsuit* OR litigat* OR claim* OR proceed* OR action* OR suit*)	1/1/19- 6/18/20	The ACC has agreed to Defendants' proposed alternative search.									
6	"524g"	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC's proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant's proposed search terms as set forth herein.									
7	"Income Statement"	1/1/19- 6/18/20	5,655	53,573	1,046	<p>The volume of ESI confirms this proposed search is overbroad, unduly burdensome, and not proportional to the needs of the case.</p> <p>The proposed search term also will likely require reviewing a substantial amount of irrelevant material.</p> <p>The proposed search also overlaps with the following more targeted, agreed-upon search term, thereby rendering the proposed search both redundant and unnecessary.</p>	("balance sheet" OR "income statement*" OR (cash W/5 flow*) OR (financ* W/5 statement*)) W/100 (solven* or insolven*)	N	1/1/19- 6/18/20	567	3,402	30
8	"Jones Day" OR jonesday* OR mccarterenglish* OR "McCarter & English"	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC's proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant's proposed search terms as set forth herein.									
	(shsmith OR torborg OR Gordon OR gmgordon OR Hirst OR mascitti OR Erens OR macody OR bedavis OR jmjones OR tblewis OR	1/1/19- 6/18/20										

#²	ACC’s Search (Modified, Where Applicable)	ACC’s Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs’ Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs’ Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits						
	McCarter) W/50 (retain* OR retention OR engage* OR employ* OR hire* OR hiring OR select*)																	
9	(expert* OR consultant* OR accountant* OR accounting OR professional* OR advisor OR banker) W/50 (report OR analysis OR analyz* OR summar* OR memo* OR present*)	1/1/19- 6/18/20	Search Term Withdrawn															
10	"O-I"	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.															
11	"P&L"	Search Term Withdrawn																
12	"services agreement" OR "facil* agreement" OR "supply agreement"	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative search.															
13	"Texas business"	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative search.															
14	Second* W/5 (employee OR officer)	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.															
15	FT OR FC	Search Term Withdrawn																
16	(transfer* OR assign* OR apportion* OR allocat* OR remov*) W/10 (asset* OR liab* OR obligation)	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.															

# ²	ACC’s Search (Modified, Where Applicable)	ACC’s Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs’ Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs’ Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits
17	redeem* OR repurchas* OR redemption	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative searches.									
	Dividend* W/5 Trane	1/1/19- 6/18/20										
18	("PI" OR injunction) W/10 (Aldrich OR Murray OR Trane* OR Ingersoll* OR IRGH OR IRNJ OR "MB Holdings" OR Thermo OR TTC OR TUI OR THI OR THL OR TKC OR TTHI)	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									
19	Name* W/5 (Trane OR reserv* OR change OR Aldrich OR Murray)	1/1/19- 6/18/20	Search Term Withdrawn									
20	agree* W/5 settle*	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein..									
21	Bankrupt*	1/1/19- 6/18/20	15,648	72,403	1,045	<p>The volume of ESI confirms this proposed modified search is overbroad, unduly burdensome, and not proportional to the needs of the case.</p> <p>The proposed search term also will likely require reviewing a substantial amount of irrelevant material.</p> <p>In a good faith effort to reach an agreement, Defendants propose using the following alternative search term.</p>	Bankrupt* w/10 (Aldrich OR Murray OR Trane* OR Ingersoll* OR IRGH OR IRNJ OR "MB Holdings" OR Thermo OR TTC OR TUI OR THI OR THL OR TKC OR TTHI)	N	1/1/19- 6/18/20	1,860	5,669	158
22	Mullin	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									

# ²	ACC’s Search (Modified, Where Applicable)	ACC’s Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs’ Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs’ Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits
23	Gallardo*	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									
24	Alvarez W/3 Marsal	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative search.									
	(Alvarez OR Marsal) W/5 (retain* OR retention OR engage* OR employ* OR hire* OR hiring)	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									
25	Budget AND asbest*	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									
26	(Cash W/5 flow) AND asbest*	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									
27	CertainTeed OR DBMP OR SGC	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative search.									
28	(cost* W/10 (shar* OR method* OR allocat* OR assign* OR distribut* OR classif*)) W/20 (Aldrich OR Murray OR Trane* OR Ingersoll* OR IRGH OR IRNJ OR "MB Holdings" OR Thermo OR TTC OR TUI OR THI OR THL OR TKC OR TTHI)	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									
29	estimat* W/10 (asbestos OR liability OR tort)	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative search.									

#²	ACC’s Search (Modified, Where Applicable)	ACC’s Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs’ Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs’ Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	
30	(Financial W/5 statement) AND asbest*	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.										
31	harm* W/10 (creditor* OR tort* OR plaintiff* OR asbest*)	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.										
32	Asbestos	Search Term Withdrawn											
33	544 W/5 (Sec. OR Section OR Code OR bankr*)	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.										
34	548 W/5 (Sec. OR Section OR Code OR bankr*)	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.										
35	“Project Olive”	1/1/19- 6/18/20	2,214	3,800	1,289	The volume of ESI confirms this proposed search is overbroad, unduly burdensome, and not proportional to the needs of the case. The proposed search term also will likely require reviewing a substantial amount of irrelevant material.							
36	isolat* W/5 (liab* OR asbest* OR debt)	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.										
37	(LTL OR JNJ) AND (Bankrupt* OR Merger OR Debtor* OR restructur* OR reorganiz*)	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.										
38	PI	Search Term Withdrawn											
39	plan* W/3 merg*	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative search.										

# ²	ACC's Search (Modified, Where Applicable)	ACC's Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs' Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs' Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits
40	PWC AND (asbest*) AND (restructur* OR bankr* OR reorganiz* OR consolidat* OR de-consolidat*)	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC's proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant's proposed search terms as set forth herein.									
41	reorganiz* W/10 (Aldrich OR Murray OR Trane* OR Ingersoll* OR IRGH OR IRNJ OR "MB Holdings" OR Thermo OR TTC OR TUI OR THI OR THL OR TKC OR TTHI)	1/1/19- 6/18/20	The ACC has agreed to Defendants' proposed alternative search.									
42	restructur* W/10 (Aldrich OR Murray OR Trane* OR Ingersoll* OR IRGH OR IRNJ OR "MB Holdings" OR Thermo OR TTC OR TUI OR THI OR THL OR TKC OR TTHI)	1/1/19- 6/18/20	The ACC has agreed to Defendants' proposed alternative search.									
43	Fitzgerald	1/1/19- 6/18/20	<i>Search Term Withdrawn</i>									
44	Manville	1/1/19- 6/18/20	<i>Search Term Withdrawn</i>									
45	Robins	1/1/19- 6/18/20	<i>Search Term Withdrawn</i>									
46	Project* W/10 (restructur* OR bankrupt*)	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC's proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant's proposed search terms as set forth herein.									
47	Debtor*	1/1/19- 6/18/20	6,411	16,758	210	The volume of ESI confirms this proposed search is overbroad, unduly burdensome, and not proportional to the needs of the case.	Debtor* w/10 (Aldrich OR Murray OR Trane* OR Ingersoll* OR IRGH OR IRNJ OR "MB Holdings" OR Thermo OR TTC OR TUI OR THI OR THL OR TKC OR TTHI)	N	1/1/19- 6/18/20	1,134	2,823	19

#2	ACC's Search (Modified, Where Applicable)	ACC's Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs' Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs' Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits
						<p>The proposed search term also will likely require reviewing a substantial amount of irrelevant material.</p> <p>In a good faith effort to reach an agreement, Defendants propose using the following alternative search term.</p>						
48	(Step W/3 plan) AND asbest*	1/1/19-6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC's proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant's proposed search terms as set forth herein.									
49	Independ* W/10 (board OR manager* OR director*) W/20 (decision OR decid* OR choice OR vote* OR member)	1/1/19-6/18/20	The ACC has agreed to Defendants' proposed alternative search.									
50	((Board OR member OR manager* OR exec* OR director*) W/10 (choice* OR vote* OR select* OR minute* OR agenda OR present* OR report* OR meeting OR material* OR document OR analy* OR chart OR spreadsheet OR excel OR slide* OR powerpoint OR PPT OR distribut* OR book)) W/25 (asbest* OR bankr* OR reorganiz* OR restructur* OR debtor)	1/1/19-6/18/20	The ACC has agreed to Defendants' proposed alternative search.									
51	Securit* W/20 (contract* OR agree*)	1/1/19-6/18/20	<i>Search Term Withdrawn</i>									

# ²	ACC’s Search (Modified, Where Applicable)	ACC’s Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs’ Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs’ Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits
52	(deconsolidat* OR de-consolidat* OR separat* OR segregat* OR split OR divi*) W/10 (Aldrich OR Murray OR Trane* OR Ingersoll* OR debtor OR entit* OR NC OR "200 Park" OR ClimateLab* OR "CL LLC" OR “climate lab”-or subsidiary* OR affiliate*)	1/1/19-6/18/20	37,725	131,639	17,009	The volume of ESI confirms this proposed search is overbroad, unduly burdensome, and not proportional to the needs of the case. The proposed search term also will likely require reviewing a substantial amount of irrelevant material.						
53	("Employer identification" OR "Employer ID" OR "EIN") W/5 (new OR prior OR previous OR same OR different)	1/1/19-6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									
54	“internal control”	1/1/19-6/18/20	3,336	10,392	1,081	The volume of ESI confirms this search is overbroad, unduly burdensome, and not proportional to the needs of the case. The proposed search term also will likely require reviewing a substantial amount of irrelevant material.						
55	Upstream* W/10 (cash OR asset* OR fund* OR credit* OR capital OR money OR income OR revenue OR profit*)	1/1/19-6/18/20	The ACC has agreed to Defendants’ proposed alternative search.									
56	((no OR "will not") W/5 (effect OR affect OR impact OR consequence*)) W/5 (asbest* OR reorgan* OR restruct* OR bankr*)	1/1/19-6/18/20	The ACC has agreed to Defendants’ proposed alternative search.									

# ²	ACC’s Search (Modified, Where Applicable)	ACC’s Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs’ Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs’ Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits
57	Secret or-classified OR shred OR "under wraps"	1/1/19- 6/18/20	5,211	16,606	1,348	The volume of ESI confirms these proposed modified searches are overbroad, unduly burdensome, and not proportional to the needs of the case. The proposed search terms also will likely require reviewing a substantial amount of irrelevant material.						
	Keep* W/2 (confidential OR private)	1/1/19- 6/18/20	1,158	3,521	404							
	(Talk* OR chat* OR discuss* OR keep* OR take) W/5 offline	1/1/19- 6/18/20	161	312	106							
58	Strateg* W/25 (asbest* W/5 plaintiff* or tort* or debt*))	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative search.									
59	(operation* OR financ* OR internal) W/10 control*	1/1/19- 6/18/20	Search Term Withdrawn									
60	(deconsolidat* OR de- consolidat* OR separat* OR segregat* OR split) W/20 (DBMP OR debtor OR entit* OR NC OR Millwork OR M&P OR subsidiar* OR affiliat*)	1/1/19- 6/18/20	Search Term Withdrawn									
61	audit* W/10 (asbestos) AND liab* OR claim OR restructur* OR lawsuit* OR litigat*)	1/1/19- 6/18/20	Objection Withdrawn- Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									
62	ACC	1/1/19- 6/18/20	Search Term Withdrawn									
63	(tax W/5 return) OR (income W/5 tax) OR “form 1120”	Search Term Withdrawn (subject to the ACC’s reservation of rights)										
64	(manager OR director OR officer OR board OR employee OR agent OR representative) W/5	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative search.									

#2	ACC’s Search (Modified, Where Applicable)	ACC’s Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs’ Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs’ Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits
	(appoint* OR assign* OR select* OR designat* OR serve) W/10 (asbest* OR reorgan* OR restruct* OR bankr* OR debtor* OR Aldrich OR Murray)											
65	Intercompany /W5 (agreement OR note)	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									
66	Guarant* W/50 asbest* AND (Aldrich OR Murray OR Trane* OR Ingersoll* OR IRGH OR IRNJ OR "MB Holdings" OR Thermo OR TTC OR TUI OR THI OR THL OR TKC OR TTHI)	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative search.									
67	credit* W/2 facilit*	1/1/19- 6/18/20	<i>Search Term Withdrawn</i>									
68	divisi* W/2 (merger OR support)	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative search.									
69	(apportion* OR transfer* OR allocate*) W/4 liab*	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									
70	(asbestos W/10 (verdict* OR judgment* OR forecast)) OR (estimat* W/10 (asbestos OR liability OR tort))	1/1/19- 6/18/20	The ACC has agreed to Defendants’ proposed alternative search.									

# ²	ACC's Search (Modified, Where Applicable)	ACC's Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs' Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs' Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits
71	Asbestos W/10 ((Legacy OR cabin) W/5 liabilit*)	1/1/19- 6/18/20	The ACC has agreed to Defendants' proposed alternative search.									
72	Discharg* W/20 (liabilit* OR bankr* OR asbest*) AND Aldrich OR Murray OR Trane* OR Ingersoll* OR IRGH OR IRNJ OR "MB Holdings" OR Thermo OR TTC OR TUI OR THI OR THL OR TKC OR TTHI)	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC's proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant's proposed search terms as set forth herein.									
73	(Resolv* OR resolution OR discharg*) W/5 asbestos	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC's proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant's proposed search terms as set forth herein.									
74	(Account* OR finance* OR "balance sheet" OR statement* OR ledger* OR asset* OR liabilit* OR revenue* OR capitaliz* OR profit* OR expens* OR solven* OR valuation* OR "cash flow" OR projection* OR "business plan" OR liquidat* OR "equity value") W/20 asbest*	1/1/19- 6/18/20	16,485	51,662	595	<p>The volume of ESI confirms these proposed searches are overbroad, unduly burdensome, and not proportional to the needs of the case.</p> <p>The proposed search terms also will likely require reviewing a substantial amount of irrelevant material.</p> <p>In a good faith effort to reach an agreement, Defendants propose using the following alternative search term.</p>	(Account* OR finance* OR "balance sheet" OR statement* OR ledger* OR asset* OR liabilit* OR revenue* OR capitaliz* OR profit* OR expens* OR solven* OR valuation* OR "cash flow" OR projection* OR "business plan" OR liquidat* OR "equity value") W/5 asbest*	N	1/1/19- 6/18/20	11,015	42,378	200

#²	ACC’s Search (Modified, Where Applicable)	ACC’s Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs’ Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs’ Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	
	"quality of earnings report"	1/1/19- 6/18/20	<i>Objection Withdrawn</i> - Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.										
	"fairness opinion"	1/1/19- 6/18/20											
75	(general OR ledger OR (“business unit”)) W/10 code*	<i>Search Term Withdrawn</i>											
76	rmt	<i>Search Term Withdrawn</i>											
77	reverse W/5 morris	1/1/19- 6/18/20	2,098	39,387	404	The volume of ESI confirms this proposed search is overbroad, unduly burdensome, and not proportional to the needs of the case. The proposed search term also will likely require reviewing a substantial amount of irrelevant material.							
78	(stock or shares) W/5 contribu*	1/1/19- 6/18/20	887	13,814	48	The volume of ESI confirms this proposed search is overbroad, unduly burdensome, and not proportional to the needs of the case.	(stock or shares) W/5 contribu* w/10 asbest*	N	1/1/19- 6/18/20	2	8	0	

# ²	ACC’s Search (Modified, Where Applicable)	ACC’s Date Range (Updated)	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits	Grounds for Objection	Defs’ Alternative Search (Where Applicable)	Agreed- Upon PI Search (Y/N)	Trane Defs’ Date Range	Docs w/ Hits	Docs w/ Hits + Fam	Unique Hits
						<p>The proposed search term also will likely require reviewing a substantial amount of irrelevant material.</p> <p>In a good faith effort to reach an agreement, Defendants propose using the following alternative search term.</p>						
79	(incentive* OR bonus*) W/15 (Trane* OR Ingersoll* OR Aldrich OR Murray OR asbest* OR second*)	1/1/19-6/18/20	4,812	11,498	2,165	<p>The volume of ESI confirms this proposed modified search is overbroad, unduly burdensome, and not proportional to the needs of the case.</p> <p>The proposed modified search term also will likely require reviewing a substantial amount of irrelevant material.</p> <p>In a good faith effort to reach an agreement, Defendants propose using the following alternative search term.</p>	(incentive* OR bonus*) W/15 (Trane* OR Ingersoll* OR Aldrich OR Murray OR second*) w/20 asbest*	N	1/1/19-6/18/20	35	127	0
80	(KEIP OR KERP OR MIP OR (key W/3 employee)) W/20 (Aldrich OR Murray OR Trane* OR Ingersoll* OR IRGH OR IRNJ OR "MB Holdings" OR Thermo OR TTC OR TUI OR THI OR THL OR TKC OR TTHI)	1/1/19-6/18/20	<i>Objection Withdrawn-</i> Trane Defendants agree to the ACC’s proposed search on the condition that the ACC agrees to the remainder of the Trane Defendant’s proposed search terms as set forth herein.									

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

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS

Plaintiff,

Adv. Pro. No. 21-03029

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,

Adv. Pro. No. 22-03028

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.

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,

Adv. Pro. No. 22-03029

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.

NOTICE OF HEARING

PLEASE TAKE NOTICE that on December 23, 2025, the Official Committee of Asbestos Claimants filed *Plaintiff's Motion To Compel Application Of Certain Relevant Search Terms To Document Discovery* (the "Motion") in this case.

PLEASE TAKE FURTHER NOTICE that your rights may be affected by the Motion. You should read the Motion carefully and discuss them with your attorney. If you do not have an attorney, you may wish to consult with one.

PLEASE TAKE FURTHER NOTICE that, pursuant to Fed. R. Bankr. P. 9006 and the Case Management Order, written responses, if any, must be filed on or before **January 6, 2026** (the "Response Deadline"), in order to be considered. If you do not want the Court to grant the relief requested in the Motion, or if you oppose it in any way, you **MUST**:

1. File a formal, written response with the Bankruptcy Court at:

Clerk, United States Bankruptcy Court
Charles Jonas Federal Building
401 West Trade Street
Charlotte, North Carolina 28202

2. Serve a copy of your response on all parties in interest, including:

- a) U.S. Bankruptcy Administrator
401 West Trade Street, Suite 2400
Charlotte, NC 28202
- b) HAMILTON STEPHENS STEELE + MARTIN, PLLC
Glenn C. Thompson
Robert A. Cox, Jr.
525 North Tryon Street, Suite 1400
Charlotte, North Carolina 28202
- c) ROBINSON & COLE LLP
Natalie D. Ramsey
Davis Lee Wright
1000 N. West Street, Suite 1200
Wilmington, Delaware 19801
- d) CAPLIN & DRYSDALE, CHARTERED
Kevin C. Maclay
Todd E. Phillips
Jeffrey A. Liesemer
One Thomas Circle NW, Suite 1100
Washington, DC 20005
- e) WINSTON & STRAWN LLP
Carrie V. Hardman
Cristina I. Calvar
200 Park Avenue
New York, New York 10166

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **January 15, 2026 at 9:30 a.m. (ET)** before the Honorable Lena M. James at the United States Bankruptcy Court, Charles Jonas Federal Building, Courtroom 2B, 401 West Trade Street, Charlotte, North Carolina 28202.

PLEASE TAKE FURTHER NOTICE that, if you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting the relief requested. No further notice of the hearing will be given.

[Signatures appear on the following page]

Dated: December 23, 2025

Respectfully submitted,

HAMILTON STEPHENS STEELE
+ MARTIN, PLLC

/s/ Robert A Cox, Jr.

Glenn C. Thompson (Bar No. 37221)

Robert A. Cox, Jr. (Bar No. 21998)

525 North Tryon Street, Suite 1400

Charlotte, North Carolina 28202

Telephone: (704) 344-1117

Facsimile: (704) 344-1483

Email: gthompson@lawhssm.com;

rcox@lawhssm.com

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

CAPLIN & DRYSDALE, CHARTERED

Kevin C. Maclay (admitted *pro hac vice*)

Todd E. Phillips (admitted *pro hac vice*)

Jeffrey A. Liesemer (admitted *pro hac vice*)

One Thomas Circle NW, Suite 1100

Washington, D.C. 20005

Telephone: (202) 862-5000

Facsimile: (202) 429-3301

Email: kmaclay@capdale.com;

tphillips@capdale.com;

jliesemer@capdale.com

*Counsel to the Official Committee of
Asbestos Personal Injury Claimants*

WINSTON & STRAWN LLP

Carrie V. Hardman (admitted *pro hac vice*)

Cristina I. Calvar (admitted *pro hac vice*)

200 Park Avenue

New York, New York 10166

Telephone: (212) 294-6700

Facsimile: (212) 294-4700

Email: chardman@winston.com;

ccalvar@winston.com

*Special Litigation and International Counsel to
the Official Committee of Asbestos Personal
Injury Claimants*

ROBINSON & COLE LLP

Natalie D. Ramsey (admitted *pro hac vice*)

Davis Lee Wright (admitted *pro hac vice*)

1201 North Market Street, Suite 1406

Wilmington, Delaware 19801

Telephone: (302) 516-1700

Facsimile: (302) 516-1699

Email: nramsey@rc.com; dwright@rc.com

*Counsel to the Official Committee
of Asbestos Personal Injury Claimants*