

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,

v.

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

Defendants.

Adv. Pro. No. 21-03029

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.

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
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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.

MOTION TO FILE CONFIDENTIAL INFORMATION UNDER SEAL

The Official Committee of Asbestos Personal Injury Claimants (“Plaintiff” or “Movant”), by and through undersigned counsel, pursuant to 11 U.S.C. § 105(a), 11 U.S.C. § 107(b), Rule 9018 of the Federal Rules of Bankruptcy Procedure, Rule 6.1 of the Rules of Practice and Procedure of the United District Court for the Western District of North Carolina and Section I.1 of the Agreed Protective Order Governing Confidential Information (Case No. 20-bk-30608, Dkt. No. 345) entered on September 23, 2020 (“Protective Order”), hereby files this Motion (the “Motion”) for an Order authorizing the filing of certain confidential information under seal included in *Plaintiff’s Motion to Compel Application of Certain Relevant Search Terms to Document Discovery* (the “Motion to Compel”).

In support, the Movant respectfully states as follows:

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334, and this matter is a core proceeding within the meaning of 28 U.S.C. § 157(b).

2. The statutory bases for the relief requested herein are 11 U.S.C. § 105(a), 11 U.S.C. § 107(b) and Federal Rule of Bankruptcy Procedure 9018. 11 U.S.C. § 105(a) gives this Court authority to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” The Bankruptcy Code authorizes the Court, in appropriate circumstances, to issue orders to protect entities from potential harm that may result from the disclosure of confidential information. 11 U.S.C. § 107(b). Federal Rule of Bankruptcy Procedure 9018 provides that “[o]n motion or on its own initiative, with or without notice, the court may make any order which justice requires (1) to protect the estate or any entity in respect of...confidential...commercial information.”

3. The Protective Order was entered on or about September 23, 2020² and governs the parties’ rights and obligations with respect to “Confidential Information,” defined in the Protective Order as:

[I]nformation, documents or things produced or provided (formally or informally) by the Disclosing Party that such Disclosing Party or a Designating Party reasonably believes in good faith contains confidential, proprietary or commercially sensitive information, including, but not limited to, (a) trade secrets, (b) proprietary business information and (c) information implicating an individual’s legitimate expectation of privacy, including medical information and social security numbers. This term shall include information furnished or otherwise disclosed in any manner, including, without limitation, in written form, orally or through any electronic, facsimile or computer-related communication, and also shall include, without limitation, those portions of deposition testimony (whether based upon oral examination or written questions), answers to interrogatories, requests for admissions, responses to requests for admission, notes, summaries, compilations, memoranda or similar materials disclosing or discussing Confidential Information. Confidential Information also shall include information, documents or things designated by the Disclosing Party or Designating Party as “Confidential – Professional Eyes Only” in accordance with Paragraph J.

² On October 15, 2020, the Future Claimants’ Representative elected to become a party to the Protective Order. See *Notice of Election of Future Claimants Representative to Become a Party to Modified Protective Order*, Case No. 20-bk-30608, Dkt. No. 395.

Protective Order, Case No. 20-bk-30608, Dkt. No. 345, at 3-4.

4. Section I (Disclosure of Covered Information in the Bankruptcy Proceedings), subparagraph 1 (Protection of Covered Information) of the Protective Order provides that:

[T]he Party seeking to use Covered Information in the court may file a Motion to Seal pursuant to Rule 9037-1 of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina and Local Civil Rule 6.1 of the Rules of Practice and Procedure of the United States District Court for the Western District of North Carolina, as appropriate, provided that (a) pending a ruling on such Motion to Seal or other agreement or court order that permits the public filing of the materials at issue, the Parties shall maintain the confidentiality of the Covered Information; (b) where necessary, the moving Party may file a redacted copy of its Motion to Seal, brief or other relevant materials, eliminating the Covered Information; and (c) the moving Party may provide an unredacted copy of these materials to the Court under seal to assist in its consideration of the Motion to Seal.

Protective Order, Case No. 20-bk-30608, Dkt. No. 345, at 15.

5. The Movant believes that the Motion contains, or may contain, references to information designated as Confidential Information pursuant to the Protective Order (the “Confidential Information”). For this reason, Plaintiff has redacted references to such Confidential Information in the Motion filed on the public docket.

6. The parties have not reached an agreement that avoids the need to file the Motion under seal. Therefore, the Movant is bringing this Motion to comply with the terms of the Protective Order and to retain the designation of this material as Confidential thereunder.

7. The Movant, however, will work with the Debtors and Non-Debtor Affiliates to determine which, if any, Confidential Information may be unsealed. By filing this motion, the Movant is not taking a position as to whether the materials were appropriately designated as “Confidential.”

8. As provided for in the Protective Order, the Movant will deliver unredacted copies of the Motion to this Court.

WHEREFORE, the Movant respectfully requests that the Court enter an order substantially in the form attached hereto as **Exhibit A**: (a) authorizing the filing of the Confidential Information under seal; (b) providing that any portion of a hearing requiring the disclosure of the Confidential Information be conducted in camera and (c) granting such other and further relief to the Movant as the Court may deem proper.

Dated: December 23, 2025

HAMILTON STEPHENS STEELE
+ MARTIN, PLLC

/s/ Robert A. Cox, Jr.

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

EXHIBIT A

Proposed Order

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

In re

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Debtors.

Chapter 11

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Defendants.

Adv. Pro. No. 21-03029

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Adv. Pro. No. 22-03028

OFFICIAL COMMITTEE OF ASBESTOS

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REGNERY, AMY ROEDER, ALLAN
TANANBAUM, EVAN TURTZ, MANLIO
VALDES, and ROBERT ZAFARI

Defendants.

Adv. Pro. No. 22-03029

**[PROPOSED] ORDER GRANTING MOTION OF THE OFFICIAL COMMITTEE OF
ASBESTOS CLAIMANTS TO FILE CONFIDENTIAL INFORMATION UNDER SEAL**

Upon consideration of the Motion of the Official Committee of Asbestos Personal Injury Claimants (the “Movant”) to file confidential information under seal [Dkt. No. ____] (the “Motion”);² and the Movant having demonstrated upon the record herein good cause for the relief requested in the Motion; and after due deliberation,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The redacted and sealed portions of the Plaintiffs’ Motion to Compel Application of Certain Relevant Search Terms to Document Discovery (the “Motion”) are to remain filed on the public docket in a redacted and sealed format, subject to any agreement for such redactions to be unsealed.

² Capitalized terms used but not defined herein shall have the respective meanings given to such terms in the Motion.

3. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

This order has been signed electronically. The Judge's signature and Court's seal appear at the top of this Order.	United States Bankruptcy Court Western District of North Carolina
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**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
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Defendants.

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and Murray Boiler LLC,

Plaintiff,

Adv. Pro. No. 22-03028

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COMPANY LIMITED, TRANE
TECHNOLOGIES HOLDCO INC., TRANE
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Defendants.

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TRANE TECHNOLOGIES PLC,
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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 File Confidential Information Under Seal* (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
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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)

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