

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

In re

ALDRICH PUMP LLC, *et al.*,<sup>1</sup>  
Debtors.

Chapter 11

Case No. 20-30608 (LMJ)

(Jointly Administered)

OFFICIAL COMMITTEE OF ASBESTOS  
PERSONAL INJURY CLAIMANTS,  
Plaintiff,

v.

Adv. Pro. No. 21-03029 (LMJ)

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.

Adv. Pro. No. 22-03028 (LMJ)

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.

**DEFENDANTS' MOTION TO FILE DOCUMENTS UNDER SEAL**

<sup>1</sup> 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.



Aldrich Pump LLC (“Aldrich”) and Murray Boiler LLC (“Murray”), as debtors and debtors in possession (together, the “Debtors”), Trane Global Holding Company Limited f/k/a Ingersoll-Rand Global Holding Company Limited, Trane Technologies Holdco Inc., Trane Technologies Company LLC (“TTC”), Trane Inc., TUI Holdings Inc., Trane U.S. Inc. (“TUI,” and together with TTC, the “NDAs”), and Murray Boiler Holdings LLC (collectively, the “Trane Defendants,” and together with the Debtors, “Movants”), 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 States District Court for the Western District of North Carolina, Rule 9037-1 of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina and Section I.1 of the Agreed Protective Order Governing Confidential Information (Case No. 20-30608, Dkt. No. 345) entered on September 23, 2020 (“Protective Order”), hereby file this Motion (the “Motion”) for an Order authorizing Movants to file the Defendants’ Motion to Compel the Committee to Provide Adequate Responses to Discovery Requests (the “Motion to Compel”) and the exhibits thereto with certain confidential information contained therein under seal.

In support, the Movants respectfully state 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, 2020. The Protective Order governs the parties’ rights and obligations with respect to “Confidential Information,” defined in the 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.

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

5. On February 5, 2026, Movants filed the Motion to Compel in the above-captioned adversary proceedings. Included as exhibits to the Motion to Compel are Exhibits B, C and J, each of which were designated as “Confidential Information” subject to the Protective Order by the Official Committee of Asbestos Personal Injury Claimants (the “ACC”) (the “Confidential Information”). In accordance with the Protective Order, Movants have filed the Motion to Compel with Exhibits B, C and J withheld from the public docket.

6. The parties have not reached an agreement that avoids the need to file such Confidential Information under seal. Therefore, Movants are bringing this Motion to comply with the terms of the Protective Order.

7. Movants will work with the ACC to determine which, if any, of the Confidential Information may be unsealed. By filing this Motion, Movants are not taking a position as to whether the materials would be appropriately designated as “Confidential.”

8. As provided for in the Protective Order, Movants will deliver an unredacted copy of the Motion, together with all exhibits, to the Court.

WHEREFORE, Movants respectfully request that the Court enter an order substantially in the form attached hereto as **Exhibit A**: (a) authorizing the filing of the Confidential Information as contained in the Motion to Compel 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 Movants as the Court may deem proper.

Dated: February 5, 2026  
Charlotte, North Carolina

Bradley R. Kutrow (NC Bar No. 13851)  
McGUIREWOODS LLP  
201 North Tryon Street, Suite 3000  
Charlotte, NC 28202  
Telephone: (704) 343-2000  
Facsimile: (704) 343-2300  
Email: bkutrow@mcguirewoods.com

K. Elizabeth Sieg (admitted *pro hac vice*)  
McGUIREWOODS LLP  
800 East Canal Street  
Richmond, VA 23141  
Telephone: (804) 775-1137  
Facsimile: (804) 698-2257  
Email: bsieg@mcguirewoods.com

-and-

Gregory J. Mascitti (admitted *pro hac vice*)  
Phillip S. Pavlick (admitted *pro hac vice*)  
McCARTER & ENGLISH, LLP  
250 W. 55th Street, 13th Floor  
New York, NY 10019  
Telephone: (212) 609-6810  
Facsimile: (212) 609-6921  
Email: gmascitti@mccarter.com  
ppavlick@mccarter.com

COUNSEL TO TRANE TECHNOLOGIES  
COMPANY LLC AND TRANE U.S. INC.

Respectfully submitted,

/s/ John R. Miller, Jr.  
C. Richard Rayburn, Jr. (NC 6357)  
John R. Miller, Jr. (NC 28689)  
RAYBURN COOPER & DURHAM, P.A.  
227 West Trade Street, Suite 1200  
Charlotte, North Carolina 28202  
Telephone: (704) 334-0891  
Facsimile: (704) 377-1897  
E-mail: rrayburn@rcdlaw.net  
jmiller@rcdlaw.net

-and-

Brad B. Erens (IL Bar No. 06206864)  
Mark A. Cody (IL Bar No. 6236871)  
David S. Torborg (DC Bar No. 475598)  
Morgan R. Hirst (IL Bar No. 6275128)  
JONES DAY  
110 North Wacker Drive  
Chicago, Illinois 60606  
Telephone: (312) 782-3939  
Facsimile: (312) 782-8585  
E-mail: bberens@jonesday.com  
macody@jonesday.com  
dstorborg@jonesday.com  
mhirst@jonesday.com  
(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTORS AND  
DEBTORS IN POSSESSION

**EXHIBIT A**

**PROPOSED ORDER**

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

In re

ALDRICH PUMP LLC, *et al.*,<sup>2</sup>  
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 (LMJ)

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 (LMJ)

**ORDER GRANTING DEFENDANTS' MOTION TO FILE DOCUMENTS UNDER SEAL**

<sup>2</sup> 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.

Upon consideration of the Defendants' Motion to File the Defendants' Motion to Compel the Committee to Provide Adequate Responses to Discovery Requests and certain exhibits thereto containing Confidential Information (the "Motion to Compel") under seal (the "Motion"); and based upon the statements of counsel at that hearing on \_\_\_\_\_, 2026, and for good cause shown:

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. Any references in the Motion to Compel or its exhibits to Confidential Information shall remain sealed in the Motion to Compel filed on the public docket.
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

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

In re  ALDRICH PUMP LLC, <i>et al.</i> , <sup>1</sup> 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 (LMJ)
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 (LMJ)

**NOTICE OF HEARING**

<sup>1</sup> 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.

NOTICE IS HEREBY GIVEN that Aldrich Pump LLC., et al., Defendants in the above-captioned cases, have filed the Defendants' Motion to File Documents Under Seal (the "Motion").

If a copy of the Motion is not included with this Notice, a copy may be viewed at the Court's website, [www.ncwb.uscourts.gov](http://www.ncwb.uscourts.gov) under Debtor Aldrich Pump LLC's name and case number, you may obtain a copy of the Motion from the Debtors' claims and noticing agent at [www.kcellc.net/aldrich](http://www.kcellc.net/aldrich), or you may request in writing a copy from the undersigned counsel to the Debtors.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THESE BANKRUPTCY CASES. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)**

**IF YOU DO NOT WANT THE COURT TO GRANT THE RELIEF REQUESTED IN THE MOTION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE MOTION, THEN ON OR BEFORE THURSDAY, FEBRUARY 19, 2026, YOU MUST:**

- (1) A. File with the Bankruptcy Court a written objection at:

Clerk, United States Bankruptcy Court  
401 W. Trade Street  
Charlotte, North Carolina 28202

- B. If you have your attorney file a written objection then the objection should be filed with the Bankruptcy Court by electronic means through the Court's website, [www.ncwb.uscourts.gov](http://www.ncwb.uscourts.gov) under the jointly administered name and case number shown above.

(2) Serve the objection pursuant to the procedures set forth in the Order Establishing Certain Notice, Case Management, and Administrative Procedures (Docket No. 123).

(3) Attend the hearing scheduled for February 26, 2026, at 9:30 a.m. EDT or as soon thereafter as the matter can be heard in the Bankruptcy Courtroom 2B, 401 West Trade Street, Charlotte, North Carolina. You should attend this hearing if you file an objection.

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

This the 5<sup>th</sup> day of February, 2026.

RAYBURN COOPER & DURHAM, P.A.

s/ John R. Miller, Jr.  
John R. Miller, Jr.  
N.C. State Bar No. 28689  
1200 Carillon, 227 W. Trade Street  
Charlotte, North Carolina 28202  
Telephone: 704-334-0891

ATTORNEYS FOR DEBTORS