

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

In re:

Aldrich Pump LLC, et al.¹

Debtor(s).

Chapter 11

Case No. 3:20-bk-30608

(Jointly Administered)

**APPLICATION OF ASHLEY I. STOREY FOR
ADMISSION TO PRACTICE *PRO HAC VICE***

Russell W. Roten hereby moves the Court of entry of an Order pursuant to Local Bankruptcy Rule 2090-2(a) of this Court and Local Rule 83.1 of the United States District Court for the Western District of North Carolina for the admittance *pro hac vice* of Ashely I. Storey (“Application”) to this Court for purposes of representing:

- AIG Property Casualty Insurance Company, fka Birmingham Fire Insurance Company of Pennsylvania,
- AIU Insurance Company,
- Accident & Casualty Co.,
- Accident and Casualty Insurance of Winterthur,
- American Home Assurance Company,
- Certain London Market Companies,
- Certain Underwriters at Lloyd's London,
- Continental Casualty Company and Continental Insurance Company (in its own right and as successor to Harbor Insurance Company and as Successor by Merger to the Fidelity & Casualty Company of New York),
- Government Employees Insurance Company,
- Granite State Insurance Company,
- Insurance Company of the State of Pennsylvania,
- Landmark Insurance Company,
- Lexington Insurance Company,
- NRG Victory Reinsurance Company Limited f/k/a New London Per Haywood/Gen Re Synd., National Union Fire Insurance Company of Pittsburgh, PA,
- Republic Insurance Company,
- The Ocean Marine Insurance Company Limited f/k/a Indemnity Marine JT and Columbia Casualty Company,

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.



- Wellfleet New York Insurance Company (formerly known as Atlanta Insurance Company), Winterthur Swiss Insurance Company,
- World Auxiliary Insurance Corporation Limited,
- Yasuda Fire & Marine Insurance Company (UK) Limited

(collectively, “London Market Insurers” or “LMI”) in the above-referenced chapter 11 bankruptcy case. In support of this Application, the undersigned respectfully states as follows:

1. The undersigned is a member of the bar of this Court in good standing, and is Senior Counsel at Skarzynski Marick & Black LLP (“Skarzynski Marick”), whose office is located 333 S. Grand Avenue, Suite 3550, Los Angeles, California 90071. Ashley I. Storey (“Ms. Storey”) is an associate at Skarzynski Marick in the New York office. Skarzynski Marick is employed as counsel to LMI in these chapter 11 cases. Ms. Storey is admitted to the bar of the State of New York, as well as the bar of the United States District Court for the Southern District of New York, and has not been disciplined by any court or administrative body and does not have any disciplinary proceeding pending.

2. Ms. Storey seeks to appear *pro hac vice* on behalf of LMI in this chapter 11 case and any related adversary proceedings.

3. Ms. Storey is familiar with the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Bankruptcy Procedure published by this Court and understands that she will be subject to the disciplinary jurisdiction of this Court.

4. The undersigned counsel serves as co-counsel in this case, and any related adversary proceedings and will attend all hearings with Ms. Storey unless otherwise permitted by the Court.

5. The \$300.00 fee filing fee is being submitted with the filing of this Application.

6. The Declaration of Ashley I. Storey in support of this Application is attached hereto as Exhibit A.

WHEREFORE, the undersigned respectfully request that the Court enter an Order, substantially in the form uploaded herewith, admitting Ashley I. Storey *pro hac vice* in this matter.

Dated: February 13, 2026

Skarzynski Marick & Black LLP

By: /s/ Russell W. Roten
Russell W. Roten
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Counsel for London Market Insurers

Exhibit A

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

In re:

Aldrich Pump LLC, et al.²

Debtor(s).

Chapter 11

Case No. 3:20-bk-30608

(Jointly Administered)

**DECLARATION OF ASHLEY I. STOREY IN SUPPORT OF
APPLICATION FOR ADMISSION TO PRACTICE *PRO HAC VICE***

I, Ashley I. Storey, respectfully submit this Declaration in Support of the Application for Admission to Practice Pro Hac Vice (“Application”) and declare as follows:

1. I am an associate with the law firm of Skarzynski Marick & Black, LLP (“Skarzynski Marick”) am duly admitted to practice law in the State of New York and am in good standing with the New York State Bar. I am also a member in good standing of the bar of the United States District Court for the Southern District of New York.

2. I have never been disbarred, suspended or denied admission to practice. I have never had a *pro hac vice* admission revoked or admission in any other bar revoked. No disciplinary proceeding has been initiated against me and no investigation is currently pending.

3. I am not a member of the North Carolina bar and Skarzynski Marick does not maintain any law office in North Carolina.

² 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.

4. Skarzynski Marick is employed as the counsel to:

- AIG Property Casualty Insurance Company, fka Birmingham Fire Insurance Company of Pennsylvania,
- AIU Insurance Company,
- Accident & Casualty Co.,
- Accident and Casualty Insurance of Winterthur,
- American Home Assurance Company,
- Certain London Market Companies,
- Certain Underwriters at Lloyd's London,
- Continental Casualty Company and Continental Insurance Company (in its own right and as successor to Harbor Insurance Company and as Successor by Merger to the Fidelity & Casualty Company of New York),
- Government Employees Insurance Company,
- Granite State Insurance Company,
- Insurance Company of the State of Pennsylvania,
- Landmark Insurance Company,
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- Republic Insurance Company,
- The Ocean Marine Insurance Company Limited f/k/a Indemnity Marine JT and Columbia Casualty Company,
- Wellfleet New York Insurance Company (formerly known as Atlanta Insurance Company), Winterthur Swiss Insurance Company,
- World Auxiliary Insurance Corporation Limited,
- Yasuda Fire & Marine Insurance Company (UK) Limited

(collectively, "LMI") in the above-referenced chapter 11 bankruptcy case.

5. I am familiar with the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Bankruptcy Procedure published by this Court, and understand that I will be subject to disciplinary jurisdiction of this Court.

6. I understand that my admission *pro hac vice* is for these chapter 11 cases and related adversary proceedings only and does not constitute formal admission to the bar of this Court.

7. The applicable filing fee was paid upon the filing of this Application.

I declare under penalty of perjury that the foregoing representations are true and correct.

Executed on this 13th day of February 2026.

/s/ Ashley I. Storey
Ashley I. Storey

**UNITED STATES BANKRUPTCY COURT
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In re:

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**ORDER ALLOWING MOTION OF ASHLEY I. STOREY
FOR ADMISSION TO PRACTICE *PRO HAC VICE***

THIS MATTER having come before the Court upon the Application for Admission to Practice *Pro Hac Vice* filed by Russell W. Roten, an attorney in good standing with the North Carolina bar and duly admitted to practice before this Court, for the admission *pro hac vice* of Ashley I. Storey, as co-counsel for:

³ 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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- World Auxiliary Insurance Corporation Limited,
- Yasuda Fire & Marine Insurance Company (UK) Limited

in connection with this case; and it appearing to the Court, and the Court so finding, that for good cause show in the Application should be granted;

IT IS HEREBY ORDERED THAT, Ashley I. Storey be and hereby is admitted *pro hac vice* to practice in this Court for these chapter 11 cases and any related adversary proceedings.

**This Order has been signed electronically.
The judge's signature and court's seal
Appear at the top of the Order.**

United States Bankruptcy Court