

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

**In re:** )  
 ) **Chapter 11**  
**ALDRICH PUMP LLC, et al.,**<sup>1</sup> )  
 ) **Case No. 20-30608 (LMJ)**  
 )  
**Debtors.** )

**SUPPLEMENTAL DECLARATION OF CONOR P. TULLY IN SUPPORT OF THE  
ORDER GRANTING THE SUPPLEMENTAL *EX PARTE* APPLICATION OF THE  
OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS FOR AN  
ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF FTI  
CONSULTING, INC. AS FINANCIAL ADVISOR FOR THE COMMITTEE OF  
ASBESTOS PERSONAL INJURY CLAIMANTS**

Pursuant to 28 U.S.C § 1746, Conor P. Tully declares as follows:

1. I am a Senior Managing Director with FTI Consulting, Inc., together with its wholly owned subsidiaries (“FTI”), an international consulting firm. I submit this Declaration on behalf of FTI (the “Declaration”) in further support of the retention of FTI by the Official Committee of Asbestos Personal Injury Claimants (the “Committee”) of the above captioned debtors and debtors-in-possession (the “Debtors”) in the above-captioned chapter 11 cases. Except as otherwise noted, I have personal knowledge of the matters set forth herein.<sup>2</sup>

**Background**

2. On August 21, 2020, the Committee filed its *Ex Parte* Application of the Official Committee of Asbestos Personal Injury Claimants for an Order Authorizing the Employment and

<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.  
<sup>2</sup> Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at FTI and are based on information provided by them.

Retention of FTI Consulting, Inc. as Financial Advisor Effective as of July 16, 2020 [Dkt. No. 277] (the “Application”).

3. On August 24, 2020, the Court entered the Order Authorizing Retention of FTI Consulting, Inc. as Financial Advisor for the Official Committee of Asbestos Personal Injury Claimants Effective as of July 16, 2020 [Dkt. No. 284] (the “Retention Order”).

4. On February 12, 2026, the Committee filed its Supplemental *Ex Parte* Application of the Official Committee of Asbestos Personal Injury Claimants for an Order Authorizing the Employment and Retention of FTI Consulting, Inc. as Financial Advisor to the Committee, which sought to expand the scope of the services FTI has been authorized to perform [Dkt. No. 3033] (the “Supplemental Application”).

5. On February 18, 2026, Certain Underwriters at Lloyd’s, London and Certain London Market Insurers (collectively, “LMI”) filed a letter expressing certain concerns regarding the Supplemental Application [Dkt. No. 3042] (the “LMI Letter”).

6. On February 27, 2026, the Court entered the Order Granting the Supplemental *Ex Parte* Application of the Official Committee of Asbestos Personal Injury Claimants for an Order Authorizing the Employment and Retention of FTI Consulting, Inc. as Financial Advisor for the Committee of Asbestos Personal Injury Claimants [Dkt. No. 3059].

7. In discussions with counsel to the Committee, LMI identified certain cases where FTI’s Forensic and Litigation Consulting segment provided expert services to LMI: The Diocese of Rochester, Case No. 19-20905 (PRW) (Bankr. W.D.N.Y.); The Roman Catholic Diocese of Syracuse, New York, Case No. 20-30663 (Bankr. N.D.N.Y.); and The Diocese of Camden, New Jersey, Case No. 20-21257 (Bankr. D.N.J.) (collectively, the “LMI Identified Engagements”). For the avoidance of doubt, the LMI Identified Engagements are unrelated to the Debtors and their

chapter 11 cases. FTI believes that its work on the LMI Identified Engagements does not (i) compromise its ability to provide services to the Committee in the Debtors' chapter 11 cases or (ii) represent an adverse interest with respect to the Debtors' estates.

8. Out of an abundance of caution and to address issues raised by the LMI Letter regarding the LMI Identified Engagements, FTI has instituted its Ethical Wall Procedures detailed below. This Supplemental Declaration is being filed to inform the Court, the Committee, and LMI that such Ethical Wall Procedures have been adopted.

#### **Ethical Wall Procedures**

9. To maintain the confidentiality of the client information, FTI has implemented the following Ethical Wall Procedures:

A. Each FTI professional working on the Committee Engagement (each a "Committee Engagement Professional") and collectively, the "Committee Engagement Professionals") shall acknowledge in writing that he or she may receive certain nonpublic information and that he or she is aware of the ethical wall in effect and will follow these ethical wall procedures;

B. No individual who works on, or worked on, the LMI Identified Engagements shall (A) serve as an Committee Engagement Professional, (B) provide any advice or services to the Committee Engagement or (C) directly or indirectly share with the Committee members or professionals any nonpublic information generated by, received in connection with, or relating to the Identified Engagements;

C. Committee Engagement Professionals shall not directly or indirectly share any nonpublic information generated by, received from or relating to Committee activities or Committee membership with other FTI colleagues, except that a good-faith communication

of publicly-available information shall not be presumed to be a breach of the obligations of FTI or any Committee Engagement Professionals under these ethical wall procedures;

D. FTI has implemented electronic internal security walls to ensure that only Committee Engagement Professionals and other employees involved with or working on the Committee Engagement have access to the electronic files relating to the Committee Engagement, and to ensure that none of the Committee Engagement Professionals or other employees involved with or working on the Committee Engagement may have access to the electronic files relating to the LMI Identified Engagements;

E. Consistent with its ordinary course compliance practice, FTI will periodically audit these software walls and related security for compliance; and

F. FTI shall immediately disclose to Committee counsel, LMI Counsel, and the Bankruptcy Administrator any material breaches of the procedures described herein. If FTI ceases to act as advisor to the Committee, it will continue to follow the procedures set forth above until a plan has been confirmed in the Debtors' chapter 11 cases or the chapter 11 cases have been converted or dismissed.

I declare under penalty of perjury that the foregoing is true and correct

Executed on March 10, 2026

/s/ Conor P. Tully  
Conor P. Tully  
Senior Managing Director  
FTI Consulting, Inc.