

**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)
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**SIXTH INTERIM APPLICATION OF CONSILIO LLC  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS  
ORDINARY COURSE PROFESSIONAL TO THE DEBTORS  
FOR THE PERIOD FROM OCTOBER 1, 2025 THROUGH JANUARY 31, 2026**

Name of Applicant:	Consilio LLC
Authorized to Provide Professional Services to:	The above-captioned Debtors and Debtors in Possession
Date of Order Authorizing Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business:	July 15, 2020
Date of Declaration of Ordinary Course Professional:	May 18, 2023
Petition Date:	June 18, 2020
Period for which compensation and reimbursement are sought:	October 1, 2025 through January 31, 2026
Amount of Compensation sought as actual, reasonable, and necessary in excess of the aggregate OCP Fee Limit <sup>2</sup> :	\$361,473.00

<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> The "OCP Fee Limit" is defined as either monthly fees in excess of \$50,000 or aggregate fees of more than \$500,000 during the pendency of these Chapter 11 Cases.



Amount of Expense Reimbursement sought as actual, reasonable, and necessary in excess of the aggregate OCP Fee Limit:	\$0.00
Total Compensation Approved by OCP Order <sup>3</sup> to Date:	\$500,000.00
Total Expenses Approved by OCP Order to Date:	\$0.00
Total Compensation Approved by the Interim Fee Order to Date:	\$1,231,795.68
Total Expenses Approved by the Interim Fee Order to Date:	\$0.00
Total Allowed Compensation Paid to Date:	\$1,731,795.68
Total Allowed Expenses Paid to Date:	\$0.00
Compensation Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed:	\$231,916.96
Expenses Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed:	\$0.00

This is a(n):  interim  final application

Prior Monthly Fee Statements Submitted During This Period:

Date Submitted	Month Covered	Fees	Expenses
November 12, 2025	October 1, 2025 – October 31, 2025	\$137,064.60	\$0.00
December 10, 2025	November 1, 2025 – November 30, 2025	\$120,620.91	\$0.00
January 4, 2026	December 1, 2025 – December 31, 2025	\$92,848.08	\$0.00
February 13, 2026	January 1, 2026 – January 31, 2026	\$10,939.41	\$0.00

To date, no objections have been received to any prior monthly fee statements.

<sup>3</sup> The "OCP Order" means the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170].

**SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL**

Name of Professional	Position	Hourly Billing Rate	Total Hours Billed	Total Compensation
I. Bergquist	1st Level Reviewer	\$42.00	478.32	\$20,089.44
S. Bier	1st Level Reviewer	\$42.00	422.50	\$17,745.00
C. Domis	1st Level Reviewer	\$42.00	499.03	\$20,959.26
D. Feldstein	1st Level Reviewer	\$42.00	667.84	\$28,049.28
J. Hester*	Team Lead/QC Review	\$42.00	516.40	\$21,688.80
E. Maltby*	Team Lead/QC Review	\$42.00	451.54	\$18,964.68
R. Maxwell	1st Level Reviewer	\$42.00	434.00	\$18,228.00
W. Navarro *	Team Lead/QC Review	\$42.00	382.07	\$16,046.94
W. O'Brien	1st Level Reviewer	\$42.00	330.00	\$13,860.00
M. Pickering *	1st Level Reviewer	\$42.00	549.79	\$23,091.18
J. Plant	1st Level Reviewer	\$42.00	319.91	\$13,436.22
N. Simmons	1st Level Reviewer	\$42.00	657.01	\$27,594.42
P. Tran	1st Level Reviewer	\$42.00	680.00	\$28,560.00
A. White	1st Level Reviewer	\$42.00	510.34	\$21,434.28
C. Gorman	Project Manager	\$75.00	63.50	\$4,762.50
M. Pickering *	Project Manager	\$75.00	4.42	\$331.50
J. Hester*	Project Manager	\$75.00	59.27	\$4,445.25
E. Maltby*	Project Manager	\$75.00	18.99	\$1,424.25
W. Navarro *	Project Manager	\$75.00	74.67	\$5,600.25
L. Pierre	Project Manager	\$75.00	2.43	\$182.25
H. Desmond	Project Manager	\$75.00	11.10	\$832.50
J. VanDee	Project Manager	\$75.00	638.50	\$47,887.50
C. Jackson	Project Manager	\$75.00	80.80	\$6,060.00
M. Artiles	Project Manager	\$75.00	2.16	\$162.00
S. Silverberg	Project Manager	\$75.00	0.50	\$37.50
<b>TOTAL</b>			7,855.09	\$361,473.00

\* These employees engaged in both Review Management, billed at \$75 per hour, and Team Lead / QC Review, billed at \$42 per hour, and therefore appear twice in the summary of hours and compensation.

**COMPENSATION BY PROJECT CATEGORY**

<b>PROJECT CATEGORY</b>	<b>Average Billing Rate</b>	<b>Total Hours</b>	<b>Total Fees</b>
Review Management	\$75.00	956.34	\$71,725.50
1st Level Review	\$42.00	5,539.90	\$232,675.80
Team Lead / QC	\$42.00	1,358.85	\$57,071.70
<b>TOTAL</b>		7,855.09	\$361,473.00

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
<b>TOTAL</b>	N/A	<b>\$0.00</b>

UNITED STATES BANKRUPTCY COURT  
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)

**SIXTH INTERIM APPLICATION OF CONSILIO LLC  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS  
ORDINARY COURSE PROFESSIONAL TO THE DEBTORS  
FOR THE PERIOD FROM OCTOBER 1, 2025 THROUGH JANUARY 31, 2026**

Consilio LLC ("Consilio"), an ordinary course professional providing contract attorney review services to the above-captioned debtors and debtors in possession (the "Debtors") for documents related to the estimation authorized by the Court pursuant to the *Order Authorizing Estimation of Asbestos Claims* [Dkt. 1127], makes its sixth interim application for allowance of compensation of \$361,473.00 for the period from October 1, 2025 through January 31, 2026 (the "Compensation Period") in accordance with the *Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171], as amended on January 23, 2026 [Dkt. 3008] (the "Interim Compensation Order"). Consilio did not incur, and, therefore, is not seeking reimbursement of, any expenses for this compensation period. In support of this Application, Consilio respectfully represents as follows:

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<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.

### Overview

1. Consilio professionals and staff expended a total of 7,855.09 hours during the Compensation Period for which compensation is requested.
2. During the Compensation Period, Consilio did not receive any payments or promises of payment from any source other than the Debtors for services rendered or to be rendered to the Debtors in any capacity whatsoever in connection with the matters covered by this Application. No agreement or understanding exists between Consilio or any third person for the sharing of compensation, except as allowed by section 504(b) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") with respect to the sharing of compensation between and among the members of Consilio.
3. Pursuant to the Interim Compensation Order, included with this Application are: (a) a schedule identifying all Consilio professionals and staff who have performed services in these chapter 11 cases during the Compensation Period, the capacities in which each individual is employed by Consilio, the hourly billing rate charged by Consilio for the services performed by each such individual, the aggregate number of hours expended in these cases during the Compensation Period for each professional and staff, the total fees billed therefor; (b) a summary of services by billing category for services rendered by Consilio during the Compensation Period; and, to the extent applicable, (c) a schedule summarizing, by category, the actual and necessary disbursements that Consilio incurred during the Compensation Period in connection with the performance of professional services for the Debtors and for which it seeks reimbursement.

4. Attached hereto collectively as part of Exhibit A are Consilio's itemized monthly time records for professionals and staff performing services for the Debtors during the Compensation Period.

5. This Application complies with sections 330 and 331 of title 11 of the United States Code (the "Bankruptcy Code"), the Bankruptcy Rules, the Interim Compensation Order, the OCP Order, the *Guidelines for Compensation and Expense Reimbursement of Professionals* issued by this Court (the "Compensation Guidelines"), and the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the "Local Rules").

#### **Background**

6. On June 18, 2020 (the "Petition Date"), the Debtors commenced their reorganization cases (the "Chapter 11 Cases") by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. These Chapter 11 Cases have been consolidated for procedural purposes only and are being administered jointly.

7. On June 18, 2020, the Debtors filed the (i) *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion") and (ii) *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the OCP Order granting the relief requested in the OCP Motion. Also on July 15, 2020, the Bankruptcy Court entered the Interim Compensation Order granting the relief requested in the Interim Compensation Motion. The

Bankruptcy Court further amended the Interim Compensation Order on January 23, 2026 [Dkt. 3008].

8. Pursuant to paragraph 3(1) of the OCP Order, to the extent that an Ordinary Course Professional (as defined in the OCP Motion) seeks compensation in excess of the aggregate OCP Fee Limit (as defined in the OCP Motion as total fees greater than \$500,000 during the pendency of these Chapter 11 Cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the Compensation Guidelines, and any and all applicable orders of the Court.

9. Consilio is an Ordinary Course Professional that filed its *Declaration of Ordinary Course Professional* on May 18, 2023 [Dkt. 1762] (the "OCP Declaration"). As described in the OCP Declaration, the Debtors retained Consilio to provide contract attorney review services for documents related to the estimation authorized by this Court pursuant to the *Order Authorizing Estimation of Asbestos Claims* [Dkt. 1127]. On or about November 30, 2023, Consilio's aggregate fees in the Chapter 11 Cases reached and exceeded the \$500,000 aggregate OCP Fee Limit established in the OCP Order, and as a result, Consilio is required to now file interim applications for amounts in excess of such aggregate OCP Fee Limit.

10. On July 10, 2024, Consilio filed the *First Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professionals to the Debtors for the Period from December 1, 2023 Through May 31, 2024* [Dkt. 2290] seeking compensation in excess of the aggregate OCP Fee Limit.

11. On July 30, 2024, the Court entered the *Order Granting the First Interim Application of Consilio, LLC for Allowance of Compensation for Services Rendered and for*

*Reimbursement of Expenses as Ordinary Course Professionals to the Debtors for the Period from December 1, 2023 Through May 31, 2024* [Dkt. 2330].

12. On November 12, 2024, Consilio filed the *Second Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professional to the Debtors for the Period from June 1, 2024 Through September 30, 2024* [Dkt. 2432] seeking compensation in excess of the aggregate OCP Fee Limit.

13. On December 9, 2024, the Court entered the *Order Granting the Second Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professional to the Debtors for the Period from June 1, 2024 Through September 30, 2024* [Dkt. 2469].

14. On March 12, 2025, Consilio filed the *Third Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professional to the Debtors for the Period from October 1, 2024 Through January 31, 2025* [Dkt. 2570] seeking compensation in excess of the aggregate OCP Fee Limit.

15. On April 4, 2025, the Court entered the *Order Granting the Third Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professional to the Debtors for the Period from October 1, 2024 Through January 31, 2025* [Dkt. 2634].

16. On July 10, 2025, Consilio filed the *Fourth Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professional to the Debtors for the Period from February 1, 2025*

*Through May 31, 2025* [Dkt. 2707] seeking compensation in excess of the aggregate OCP Fee Limit.

17. On August 4, 2025, the Court entered the *Order Granting the Fourth Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professional to the Debtors for the Period from February 1, 2025 Through May 31, 2025* [Dkt. 2762].

18. On November 10, 2025, Consilio filed the *Fifth Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professional to the Debtors for the Period from June 1, 2025 Through September 30, 2025* [Dkt. 2897] seeking compensation in excess of the aggregate OCP Fee Limit.

19. On December 2, 2025, the Court entered the *Order Granting the Fifth Interim Application of Consilio LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professional to the Debtors for the Period from June 1, 2025 Through September 30, 2025* [Dkt. 2951].

### **Jurisdiction**

18. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for this matter is proper in this district pursuant to 28 U.S.C. § 1409.

**Summary of Services**

19. The professional services performed by Consilio were necessary and appropriate to the administration of the Debtors' Chapter 11 Cases, as described in detail below and in Exhibit A. These services were in the best interests of the Debtors and other parties in interest. The compensation requested is commensurate with the complexity and nature of the issues and tasks involved.

20. All of the services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Debtors, and not on behalf of any other entity.

**Prior Monthly Fee Statements**

21. Pursuant to both the OCP Order and the Interim Compensation Order, Consilio has submitted the following monthly fee statements (collectively, the "Prior Monthly Fee Statements") to the Debtors for the four months comprising the Compensation Period, each of which is incorporated herein by reference in its entirety:<sup>2</sup>

<b>Date Submitted</b>	<b>Period Covered</b>	<b>Requested Fees</b>	<b>Requested Expenses</b>	<b>Payment Received</b>	<b>Amount Outstanding</b>
November 12, 2025	October 1, 2025 – October 31, 2025	\$137,064.60	\$0.00	\$123,358.14	\$13,706.46
December 10, 2025	November 1, 2025 – November 30, 2025	\$120,620.91	\$0.00	\$108,558.82	\$12,062.09
January 4, 2026	December 1, 2025 – December 31, 2025	\$92,848.08	\$0.00	\$0	\$92,848.08
February 13, 2026	January 1, 2026 – January 31, 2026	\$10,939.41	\$0.00	\$0	\$10,939.41

22. In total, Consilio has submitted the Prior Monthly Fee Statements during the Compensation Period for total fees of \$361,473.00 and total expenses of \$0.00. As of

<sup>2</sup> Copies of the Prior Monthly Fee Statements are attached hereto collectively as Exhibit A.

the date of this Application, no party has objected to any of Consilio's Prior Monthly Fee Statements.

**Compensation by Project Category**

The following is a summary of the activities performed by Consilio professionals and staff during the Compensation Period, organized by project billing category.<sup>3</sup>

**23. Review Management — 956.34 hours — \$71,725.50**

During the Compensation Period, Consilio professionals and staff reviewed a significant volume of electronically stored information ("ESI") related to court-ordered estimation. These services included the following:

- participating in conference calls and video meetings with the Debtors' counsel to discuss and review key case developments;
- reviewing document requests related to estimation and conferring with Debtor's counsel;
- providing team management to 1st Level Reviewers and Team Lead/QC team for billable hours, work flow and work product to ensure compliance with Debtors' counsel directives;
- providing weekly updates on progress, scope of review and timelines for completion of project;
- coordinating communications with Debtors' counsel to address any questions, concerns or updates in protocol and provided updated information to 1st Level Review Team and Team Lead/QC team; and
- maintaining data management systems.

Consilio believes that it has adopted appropriate procedures for the effective and efficient management of its review of the voluminous ESI related to estimation in these cases.

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<sup>3</sup> The summary set forth below is qualified in its entirety by reference to the time and services detail attached to each Prior Monthly Fee Statement.

24. **1st Level Reviewer — 5,539.90 hours — \$232,675.80**

In accordance with industry best-practices, Consilio's review of ESI has been broken down into two stages – (1) 1st Level Reviewer and (2) Team Lead/QC review. The 1st Level Reviewer responsibilities involve:

- analyzing and categorizing ESI based on relevance to document requests from counsel;
- identifying privileged content and assessing level of confidentiality prior to production to opposing counsel based on parameters dictated by Debtors' counsel; and
- reviewing privileged documents withheld from service to identify any documents containing limited privilege such that with proper redaction to documents could otherwise be produced and to prepare itemized privilege log with descriptions to provide sufficient reason for the identification and withholding of documents as privileged.

25. **Team Lead/QC — 1,358.85 hours — \$57,071.70**

The Team Lead/QC reviewer responsibilities involve:

- quality control of "responsive" and "not responsive" documents; identification of privileged content and level of confidentiality as initially indicated in 1st Level Review;
- quality control of "tagged" documents;
- quality control of redactions to be applied and privilege descriptions for all privileged content; and
- reviewing randomly-selected batches of documents for each category of 1st Level review.

**Expenses Incurred by Consilio**

26. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by professionals employed in a chapter 11 case. Consilio did not

incur, and, therefore, does not seek reimbursement of any expenses during this Compensation Period.

**Conclusion**

27. The fees requested herein by Consilio are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market and should be approved on an interim basis pursuant to sections 330 and 331 of the Bankruptcy Code, the OCP Order, the Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules.

**Notice**

28. This Application has been served in accordance with the Interim Compensation Order on the Notice Parties, as defined therein. In accordance with the Interim Compensation Order, a notice of opportunity for hearing on this Application in accordance with Local Rule 9013-1(e)(7) has been served on the Notice Parties and all parties that have filed a notice of appearance with the Clerk of this Court and requested such notice. Consilio submits that, in light of the nature of the relief requested, no other or further notice need be provided.

**No Prior Request**

29. No prior request for the relief sought in this Application has been made to this or any other court.

WHEREFORE, Consilio respectfully requests that, pursuant to sections 330 and 331 of the Bankruptcy Code, the OCP Order, the Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules, the Court (a) enter an order substantially in the form attached hereto as Exhibit B granting the relief requested herein and (b) grant such other and further relief to Consilio as the Court may deem just and proper.

Dated: March 12, 2026  
Washington D.C.

Respectfully submitted,



Michael Flanagan  
General Counsel  
1828 L Street NW, Suite 1070  
Washington, DC 20036  
Michael.flanagan@consilio.com

EXHIBIT A

**Prior Monthly Fee Statements**

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UNITED STATES BANKRUPTCY COURT  
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)

**NOTICE OF ORDINARY COURSE PROFESSIONAL FEES OF  
CONSILIO, LLC IN EXCESS OF AGGREGATE OCP FEE LIMIT**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. On June 18, 2020, Aldrich Pump LLC and Murray Boiler LLC, as debtors and debtors in possession (together, the "Debtors"), filed (i) the *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion")<sup>2</sup> and (ii) the *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") granting the relief requested in the OCP Motion. Also on July 15, 2020, the Bankruptcy Court entered the *Order Establishing Procedures for Interim*

<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> Capitalized terms not otherwise defined herein shall have the meanings given to them in the OCP Motion.

*Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the "Interim Compensation Order") granting the relief requested in the Interim Compensation Motion.

2. Pursuant to paragraph 3(l) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (i.e., greater than \$500,000 during the pendency of these chapter 11 cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the *Guidelines for Compensation and Expense Reimbursement of Professionals* promulgated by the Court, and any and all applicable orders of the Court.

3. Pursuant to paragraph 2 of the Interim Compensation Order, the party seeking compensation under such order shall serve a "Monthly Statement" on the Notice Parties setting forth the full amount of fees sought in such month. If any Notice Party has an objection to the fees sought in a particular Monthly Statement, such party shall, no later than the 14th day following the service of such Monthly Statement, serve upon the Debtors, the relevant party seeking compensation, and the other Notice Parties a written objection setting forth the nature of the objection (a "Fee Objection"). Under this procedure, the Fee Objection is served on the Notice Parties, but is not filed with the Bankruptcy Court. If no timely Fee Objection is served, the Debtors shall promptly pay an amount (the "Authorized Payment") equal to the lesser of (i) 90% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the "Maximum Payment") and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 2(g) of the Interim Compensation Order.

4. Consilio, LLC ("Consilio") is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on May 18, 2023 [Dkt. 1762]. Consilio provides contract attorney review services to the Debtors for documents related to the estimation authorized by the Court pursuant to the Order Authorizing Estimation of Asbestos Claims [Dkt. 1127]. On or around November 30, 2023, Consilio exceeded the OCP Fee Limit in fees in connection with the services provided to the Debtors in these chapter 11 cases.

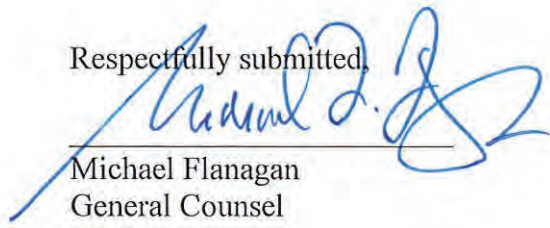
5. In accordance with the procedures established by both the OCP Order and the Interim Compensation Order, Consilio's Monthly Statement for **October 2025** is attached hereto as Exhibit 1. This Monthly Statement details the full amount of fees and expenses sought by Consilio for the month of **October 2025**. For services provided in **October 2025** Consilio has incurred fees totaling **\$137,064.60**. During the month of **October 2025**, Consilio **did not incur any reimbursable expenses**.

6. If no Fee Objections are received by the Debtors, Consilio, and the other Notice Parties prior to **November 26, 2025**, the Monthly Statement shall be deemed approved and the OCP Firm may be paid the Authorized Payment under the Interim Compensation Order, which if no objection is served, would be 90% of the fees (**\$123,358.14**) for **October 2025**. Consilio will file Interim Fee Applications with the Bankruptcy Court in accordance with the terms of the Interim Compensation Order.

7. If a timely Fee Objection is received, any disputed portion of Consilio's fees shall be paid only upon resolution by the parties or determination by the Bankruptcy Court as described in both the OCP Order and the Interim Compensation Order.

Dated: **November 12, 2025**  
Washington, DC

Respectfully submitted,



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Michael Flanagan  
General Counsel  
Michael.flanagan@consilio.com

**EXHIBIT 1**

**Monthly Statement**

# Invoice



**Corporate Office**  
 Consilio LLC  
 1828 L Street NW Suite 1070  
 Washington, DC 20036

**Remittance Address**  
 DEPT CH17174  
 Palatine, IL 60055-7174  
 United States

**Strictly Confidential**

Invoice Date	Invoice Number
10/31/2025	INV579589754

**Entity Tax ID:** 47-4420523  
**Customer Tax ID:**

**Invoice To**  
 Robb Sands  
 Trane Technologies  
 800 E Beaty Street  
 Building E  
 Davidson NC 28036  
 United States

Engagement No.	Engagement Name	Service Period	Client Billing ID	Payment Terms
339584-344505	Jones Day - Aldrich Pump - Review	10/1/25 - 10/31/25		Net 75

Description	Quantity	Unit of Measure	Unit Price	Extended Price
Managed Review - 1st Level Reviewer	2,183.56	Hour	\$42.000	\$91,709.52
Managed Review - Team Lead / QC	543.74	Hour	\$42.000	\$22,837.08
Managed Review - Review Management	300.24	Hour	\$75.000	\$22,518.00

TERMS: Unless otherwise covered by a separate written agreement, this invoice is due and payable within 75 days of receipt and past due after that. Client is subject to maximum allowable finance charges on all past due accounts plus any related attorney fees and collection charges incurred by Consilio LLC

<b>Subtotal</b>	\$137,064.60
<b>Credit</b>	
<b>Tax</b>	\$0.00
<b>Amount Paid</b>	
<b>Total</b>	\$137,064.60 USD
<b>Amount Due</b>	\$137,064.60 USD

**Bank Information**

Bank Name: HSBC  
 Account Name: Consilio LLC  
 Account Number: 622000527 / Routing Number: 022000020 / 021001088 / SWIFT Code: MRMDUS33  
 For electronic payment, kindly send remittance details via email to: accountsreceivable@consilio.com  
 Please include invoice number(s) to ensure proper credit.

	9/28-9/30	10/1-10/5	10/6-10/12	10/13-10/19	10/20-10/26	10/27-10/31	TOTAL BILLABLE TIME
Julia Hester		26.75	40.25	36	47.5	42.75	193.25
WILLIAM NAVARRO		24.92	31.74	38.83	40.92	42.72	179.13
STEVEN BIER		9	40	40	25.5	36	150.50
Richard Maxwell		27	30	40	40	38.5	175.50
John L. Plant		18.75	34.67	27.51	10.5	28.42	119.85
Eliza Maltby		22.53	36.83	37.5	41.25	36.25	174.36
Christian Domis		30.8	44.17	39.73	42.25	42.76	199.71
Nyasha Simmons		40	60.01	60	60	45.42	265.43
MICHAEL PICKERING		44.3	58.84	52.91	58.27	8	222.32
David Feldstein		38	59.02	55	56.82	49	257.84
Ingrid Bergquist		28.25	41	35.83	47.16	40	192.24
Angel White		30	50	59.5	60	14.67	214.17
William OBrien		15	32	29	11	26	113.00
Phi Tran		40	60	60	60	50	270.00
Rev Total Hours	-	395.30	618.53	611.81	601.17	500.49	2,727.30
Rev Billable Rate	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00
REV TOTAL	-	16,602.60	25,978.26	25,696.02	25,249.14	21,020.58	114,546.60
Foreign Language Rev Total Hours	-	-	-	-	-	-	-
Foreign Language Review Rate	-	-	-	-	-	-	-
REV TOTAL	-	-	-	-	-	-	-
Julia Hester		0.5	6.25	11			17.75
WILLIAM NAVARRO			6.08	4.08			10.16
Joyce VanDee		27.7	50	50	46	33.6	207.30
Charles Gorman	3.25	6	9.25	10.25	11.5	11.25	51.50
Laury Pierre		0.08	0.08	0.16	0.16	0.16	0.64
Eliza Maltby		0.22	4.42	3.25			7.89
Heather Desmond			5				5.00
PM Total Hours	3.25	34.50	81.08	78.74	57.66	45.01	300.24
PM Billable Rate	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00
PM TOTAL	243.75	2,587.50	6,081.00	5,905.50	4,324.50	3,375.75	22,518.00
TOTAL BILLABLE	243.75	19,190.10	32,059.26	31,601.52	29,573.64	24,396.33	137,064.60

UNITED STATES BANKRUPTCY COURT  
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)

**NOTICE OF ORDINARY COURSE PROFESSIONAL FEES OF  
CONSILIO, LLC IN EXCESS OF AGGREGATE OCP FEE LIMIT**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. On June 18, 2020, Aldrich Pump LLC and Murray Boiler LLC, as debtors and debtors in possession (together, the "Debtors"), filed (i) the *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion")<sup>2</sup> and (ii) the *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") granting the relief requested in the OCP Motion. Also on July 15, 2020, the Bankruptcy Court entered the *Order Establishing Procedures for Interim*

<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> Capitalized terms not otherwise defined herein shall have the meanings given to them in the OCP Motion.

*Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the "Interim Compensation Order") granting the relief requested in the Interim Compensation Motion.

2. Pursuant to paragraph 3(l) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (i.e., greater than \$500,000 during the pendency of these chapter 11 cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the *Guidelines for Compensation and Expense Reimbursement of Professionals* promulgated by the Court, and any and all applicable orders of the Court.

3. Pursuant to paragraph 2 of the Interim Compensation Order, the party seeking compensation under such order shall serve a "Monthly Statement" on the Notice Parties setting forth the full amount of fees sought in such month. If any Notice Party has an objection to the fees sought in a particular Monthly Statement, such party shall, no later than the 14th day following the service of such Monthly Statement, serve upon the Debtors, the relevant party seeking compensation, and the other Notice Parties a written objection setting forth the nature of the objection (a "Fee Objection"). Under this procedure, the Fee Objection is served on the Notice Parties, but is not filed with the Bankruptcy Court. If no timely Fee Objection is served, the Debtors shall promptly pay an amount (the "Authorized Payment") equal to the lesser of (i) 90% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the "Maximum Payment") and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 2(g) of the Interim Compensation Order.

4. Consilio, LLC ("Consilio") is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on May 18, 2023 [Dkt. 1762]. Consilio provides contract attorney review services to the Debtors for documents related to the estimation authorized by the Court pursuant to the Order Authorizing Estimation of Asbestos Claims [Dkt. 1127]. On or around November 30, 2023, Consilio exceeded the OCP Fee Limit in fees in connection with the services provided to the Debtors in these chapter 11 cases.

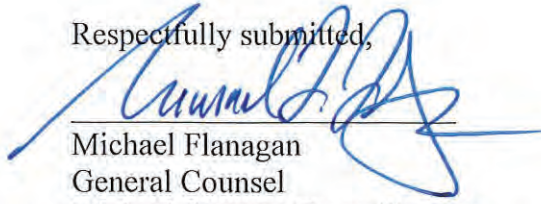
5. In accordance with the procedures established by both the OCP Order and the Interim Compensation Order, Consilio's Monthly Statement for **November 2025** is attached hereto as Exhibit 1. This Monthly Statement details the full amount of fees and expenses sought by Consilio for the month of **November 2025**. For services provided in **November 2025** Consilio has incurred fees totaling **\$120,620.91**. During the month of **November 2025**, Consilio **did not incur any reimbursable expenses**.

6. If no Fee Objections are received by the Debtors, Consilio, and the other Notice Parties prior to **December 24, 2025**, the Monthly Statement shall be deemed approved and the OCP Firm may be paid the Authorized Payment under the Interim Compensation Order, which if no objection is served, would be 90% of the fees (**\$108,558.81**) for **November 2025**. Consilio will file Interim Fee Applications with the Bankruptcy Court in accordance with the terms of the Interim Compensation Order.

7. If a timely Fee Objection is received, any disputed portion of Consilio's fees shall be paid only upon resolution by the parties or determination by the Bankruptcy Court as described in both the OCP Order and the Interim Compensation Order.

Dated: **December 10, 2025**  
Washington, DC

Respectfully submitted,



Michael Flanagan  
General Counsel  
Michael.flanagan@consilio.com

**EXHIBIT 1**

**Monthly Statement**



# Invoice

**Corporate Office**

Consilio LLC  
 1828 L Street NW Suite 1070  
 Washington, DC 20036

**Remittance Address**

DEPT CH17174  
 Palatine, IL 60055-7174  
 United States

**Strictly Confidential**

Invoice Date	Invoice Number
11/30/2025	INV579603455

**Entity Tax ID:** 47-4420523  
**Customer Tax ID:**

**Invoice To**

Robb Sands  
 Trane Technologies  
 800 E Beatty Street  
 Building E  
 Davidson NC 28036  
 United States

Engagement No.	Engagement Name	Service Period	Client Billing ID	Payment Terms
339584-344505	Jones Day - Aldrich Pump - Review	11/1/25 - 11/30/25		Net 75

Description	Quantity	Unit of Measure	Unit Price	Extended Price
<b>Managed Review - 1st Level Reviewer</b>	1,935.33	Hour	\$42.000	\$81,283.86
<b>Managed Review - Team Lead / QC</b>	380.40	Hour	\$42.000	\$15,976.80
<b>Managed Review - Review Management</b>	311.47	Hour	\$75.000	\$23,360.25

TERMS: Unless otherwise covered by a separate written agreement, this invoice is due and payable within 75 days of receipt and past due after that. Client is subject to maximum allowable finance charges on all past due accounts plus any related attorney fees and collection charges incurred by Consilio LLC

<b>Subtotal</b>	\$120,620.91
<b>Credit</b>	
<b>Tax</b>	\$0.00
<b>Amount Paid</b>	
<b>Total</b>	\$120,620.91 USD
<b>Amount Due</b>	\$120,620.91 USD

**Bank Information**

Bank Name: HSBC  
 Account Name: Consilio LLC  
 Account Number: 622000527 / Routing Number: 022000020 / 021001088 / SWIFT Code: MRMDUS33  
 For electronic payment, kindly send remittance details via email to: accountsreceivable@consilio.com  
 Please include invoice number(s) to ensure proper credit.

	11/1-11/2	11/3-11/9	11/10-11/16	11/17-11/23	11/24-11/30	TOTAL BILLABLE TIME
Julia Hester		44	26	43.67	37.42	151.09
WILLIAM NAVARRO		33.92	33.34	0.67	7.08	75.01
STEVEN BIER		40	40	40	40	160.00
Richard Maxwell		38	40	38	30	146.00
John L. Plant		33.08	29.66	33.58	25.41	121.73
Eliza Maltby		32	40.5	41.25	25.96	139.71
Christian Domis	0.8	52.22	34.06	37.38	34.39	158.85
Nyasha Simmons	14.58	60	60	60	50	244.58
MICHAEL PICKERING		55.42	60	50.42	36.67	202.51
David Feldstein	10.5	58	58	59.5	60	246.00
Ingrid Bergquist		38	36.5	43.08	40	157.58
Angel White		9.5	34.33	47.34	53	144.17
William OBrien		35.5	34	30	19	118.50
Phi Tran	10	60	60	60	60	250.00
						-
Rev Total Hours	35.88	589.64	586.39	584.89	518.93	2,315.73
Rev Billable Rate	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00
REV TOTAL	1,506.96	24,764.88	24,628.38	24,565.38	21,795.06	97,260.66
Foreign Language Rev Total Hours	-	-	-	-	-	-
Foreign Language Review Rate	-	-	-	-	-	-
REV TOTAL	-	-	-	-	-	-
Julia Hester		6	4.17	6	4.08	20.25
WILLIAM NAVARRO		8.75	8.09	5	16.17	38.01
Joyce VanDee	4.7	44.7	50	50	50	199.40
Charles Gorman		12				12.00
Laury Pierre		0.33	0.16	0.16	0.08	0.73
Eliza Maltby					5.86	5.86
MICHAEL PICKERING				4.42		4.42
Heather Desmond				2.6		2.60
Christopher Jackson		1.9		14.3	12	28.20
PM Total Hours	4.70	73.68	62.42	82.48	88.19	311.47
PM Billable Rate	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00
PM TOTAL	352.50	5,526.00	4,681.50	6,186.00	6,614.25	23,360.25
TOTAL BILLABLE	1,859.46	30,290.88	29,309.88	30,751.38	28,409.31	120,620.91

UNITED STATES BANKRUPTCY COURT  
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)

**NOTICE OF ORDINARY COURSE PROFESSIONAL FEES OF  
CONSILIO, LLC IN EXCESS OF AGGREGATE OCP FEE LIMIT**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. On June 18, 2020, Aldrich Pump LLC and Murray Boiler LLC, as debtors and debtors in possession (together, the "Debtors"), filed (i) the *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion")<sup>2</sup> and (ii) the *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") granting the relief requested in the OCP Motion. Also on July 15, 2020, the Bankruptcy Court entered the *Order Establishing Procedures for Interim*

<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> Capitalized terms not otherwise defined herein shall have the meanings given to them in the OCP Motion.

*Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the "Interim Compensation Order") granting the relief requested in the Interim Compensation Motion.

2. Pursuant to paragraph 3(l) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (i.e., greater than \$500,000 during the pendency of these chapter 11 cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the *Guidelines for Compensation and Expense Reimbursement of Professionals* promulgated by the Court, and any and all applicable orders of the Court.

3. Pursuant to paragraph 2 of the Interim Compensation Order, the party seeking compensation under such order shall serve a "Monthly Statement" on the Notice Parties setting forth the full amount of fees sought in such month. If any Notice Party has an objection to the fees sought in a particular Monthly Statement, such party shall, no later than the 14th day following the service of such Monthly Statement, serve upon the Debtors, the relevant party seeking compensation, and the other Notice Parties a written objection setting forth the nature of the objection (a "Fee Objection"). Under this procedure, the Fee Objection is served on the Notice Parties, but is not filed with the Bankruptcy Court. If no timely Fee Objection is served, the Debtors shall promptly pay an amount (the "Authorized Payment") equal to the lesser of (i) 90% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the "Maximum Payment") and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 2(g) of the Interim Compensation Order.

4. Consilio, LLC ("Consilio") is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on May 18, 2023 [Dkt. 1762]. Consilio provides contract attorney review services to the Debtors for documents related to the estimation authorized by the Court pursuant to the Order Authorizing Estimation of Asbestos Claims [Dkt. 1127]. On or around November 30, 2023, Consilio exceeded the OCP Fee Limit in fees in connection with the services provided to the Debtors in these chapter 11 cases.

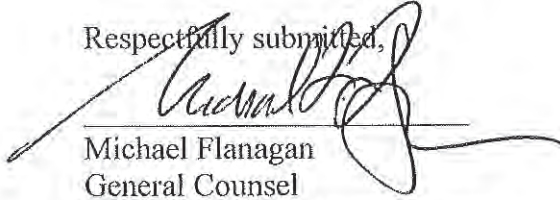
5. In accordance with the procedures established by both the OCP Order and the Interim Compensation Order, Consilio's Monthly Statement for **December 2025** is attached hereto as Exhibit 1. This Monthly Statement details the full amount of fees and expenses sought by Consilio for the month of **December 2025**. For services provided in **December 2025** Consilio has incurred fees totaling **\$92,848.08**. During the month of **December 2025**, Consilio **did not incur any reimbursable expenses**.

6. If no Fee Objections are received by the Debtors, Consilio, and the other Notice Parties prior to **January 28, 2026**, the Monthly Statement shall be deemed approved and the OCP Firm may be paid the Authorized Payment under the Interim Compensation Order, which if no objection is served, would be 90% of the fees (**\$83,563.27**) for **December 2025**. Consilio will file Interim Fee Applications with the Bankruptcy Court in accordance with the terms of the Interim Compensation Order.

7. If a timely Fee Objection is received, any disputed portion of Consilio's fees shall be paid only upon resolution by the parties or determination by the Bankruptcy Court as described in both the OCP Order and the Interim Compensation Order.

Dated: **January 14, 2026**  
Washington, DC

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Flanagan", written over a horizontal line.

Michael Flanagan  
General Counsel  
Michael.flanagan@consilio.com

**EXHIBIT 1**

**Monthly Statement**



# Invoice

**Corporate Office**

Consilio LLC  
 1828 L Street NW Suite 1070  
 Washington, DC 20036

**Remittance Address**

DEPT CH17174  
 Palatine, IL 60055-7174  
 United States

**Strictly Confidential**

Invoice Date	Invoice Number
12/31/2025	INV579617098

**Entity Tax ID:** 47-4420523  
**Customer Tax ID:**

**Invoice To**

Robb Sands  
 Trane Technologies  
 800 E Beatty Street  
 Building E  
 Davidson NC 28036  
 United States

Engagement No.	Engagement Name	Service Period	Client Billing ID	Payment Terms
339584-344505	Jones Day - Aldrich Pump - Review	12/1/25 - 12/31/25		Net 75

Description	Quantity	Unit of Measure	Unit Price	Extended Price
<b>Managed Review - 1st Level Reviewer</b>	1,418.26	Hour	\$42.000	\$59,566.92
<b>Managed Review - Team Lead / QC</b>	349.48	Hour	\$42.000	\$14,678.16
<b>Managed Review - Review Management</b>	248.04	Hour	\$75.000	\$18,603.00

TERMS: Unless otherwise covered by a separate written agreement, this invoice is due and payable within 75 days of receipt and past due after that. Client is subject to maximum allowable finance charges on all past due accounts plus any related attorney fees and collection charges incurred by Consilio LLC

<b>Subtotal</b>	\$92,848.08
<b>Credit</b>	
<b>Tax</b>	\$0.00
<b>Amount Paid</b>	
<b>Total</b>	\$92,848.08 USD
<b>Amount Due</b>	\$92,848.08 USD

**Bank Information**

Bank Name: HSBC  
 Account Name: Consilio LLC  
 Account Number: 622000527 / Routing Number: 022000020 / 021001088 / SWIFT Code: MRMDUS33  
 For electronic payment, kindly send remittance details via email to: accountsreceivable@consilio.com  
 Please include invoice number(s) to ensure proper credit.

	12/1-12/7	12/8-12/14	12/15-12/21	12/22-12/28	12/29-12/31	TOTAL BILLABLE TIME
Julia Hester	41.5	45.83	43.83			131.16
WILLIAM NAVARRO	27.93	33.83	34.59			96.35
STEVEN BIER	40	40	32			112.00
Richard Maxwell	40	46	26.5			112.50
Eliza Maltby	39.97	41.07	40.93			121.97
Christian Domis	55.17	56.86	28.44			140.47
Nyasha Simmons	60	52	35			147.00
MICHAEL PICKERING	51.66	44.11	29.19			124.96
David Feldstein	60	62	42			164.00
Ingrid Bergquist	44.5	46	38			128.50
Angel White	60	52	40			152.00
William OBrien	34	44	20.5			98.50
Phi Tran	60	60	40			160.00
John Plant	23	33.58	21.75			78.33
						-
Rev Total Hours	637.73	657.28	472.73	-	-	1,767.74
Rev Billable Rate	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00
REV TOTAL	26,784.66	27,605.76	19,854.66	-	-	74,245.08
Foreign Language Rev Total Hours	-	-	-	-	-	-
Foreign Language Review Rate	-	-	-	-	-	-
REV TOTAL	-	-	-	-	-	-
Julia Hester	6.25	2.42	5.67			14.34
WILLIAM NAVARRO	10.25	4.84	4.08			19.17
Joyce VanDee	50	50	49	12		161.00
Laury Pierre	0.16	0.41	0.41	0.08		1.06
Eliza Maltby	0.9	0.27	0.24			1.41
Heather Desmond	3					3.00
Christopher Jackson	15.8	15.5	13.5	0.6		45.40
Monique Artiles	1.33	0.83				2.16
Scott Silverberg		0.5				0.50
PM Total Hours	87.69	74.77	72.90	12.68	-	248.04
PM Billable Rate	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00
PM TOTAL	6,576.75	5,607.75	5,467.50	951.00	-	18,603.00
TOTAL BILLABLE	33,361.41	33,213.51	25,322.16	951.00	-	92,848.08

UNITED STATES BANKRUPTCY COURT  
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)

**NOTICE OF ORDINARY COURSE PROFESSIONAL FEES OF  
CONSILIO, LLC IN EXCESS OF AGGREGATE OCP FEE LIMIT**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. On June 18, 2020, Aldrich Pump LLC and Murray Boiler LLC, as debtors and debtors in possession (together, the "Debtors"), filed (i) the *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion")<sup>2</sup> and (ii) the *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") granting the relief requested in the OCP Motion. Also on July 15, 2020, the Bankruptcy Court entered the *Order Establishing Procedures for Interim*

<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.

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2. Pursuant to paragraph 3(l) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (i.e., greater than \$500,000 during the pendency of these chapter 11 cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the *Guidelines for Compensation and Expense Reimbursement of Professionals* promulgated by the Court, and any and all applicable orders of the Court.

3. Pursuant to paragraph 2 of the Interim Compensation Order, the party seeking compensation under such order shall serve a "Monthly Statement" on the Notice Parties setting forth the full amount of fees sought in such month. If any Notice Party has an objection to the fees sought in a particular Monthly Statement, such party shall, no later than the 14th day following the service of such Monthly Statement, serve upon the Debtors, the relevant party seeking compensation, and the other Notice Parties a written objection setting forth the nature of the objection (a "Fee Objection"). Under this procedure, the Fee Objection is served on the Notice Parties, but is not filed with the Bankruptcy Court. If no timely Fee Objection is served, the Debtors shall promptly pay an amount (the "Authorized Payment") equal to the lesser of (i) 90% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the "Maximum Payment") and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 2(g) of the Interim Compensation Order.

4. Consilio, LLC ("Consilio") is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on May 18, 2023 [Dkt. 1762]. Consilio provides contract attorney review services to the Debtors for documents related to the estimation authorized by the Court pursuant to the Order Authorizing Estimation of Asbestos Claims [Dkt. 1127]. On or around November 30, 2023, Consilio exceeded the OCP Fee Limit in fees in connection with the services provided to the Debtors in these chapter 11 cases.

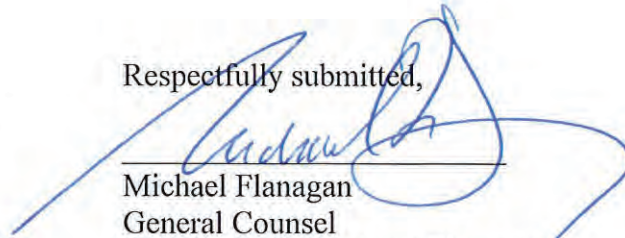
5. In accordance with the procedures established by both the OCP Order and the Interim Compensation Order, Consilio's Monthly Statement for **January 2026** is attached hereto as Exhibit 1. This Monthly Statement details the full amount of fees and expenses sought by Consilio for the month of **January 2026**. For services provided in **January 2026** Consilio has incurred fees totaling **\$10,939.41**. During the month of **January 2026**, Consilio **did not incur any reimbursable expenses**.

6. If no Fee Objections are received by the Debtors, Consilio, and the other Notice Parties prior to **February 27, 2026**, the Monthly Statement shall be deemed approved and the OCP Firm may be paid the Authorized Payment under the Interim Compensation Order, which if no objection is served, would be 90% of the fees (**\$9,845.46**) for **January 2026**. Consilio will file Interim Fee Applications with the Bankruptcy Court in accordance with the terms of the Interim Compensation Order.

7. If a timely Fee Objection is received, any disputed portion of Consilio's fees shall be paid only upon resolution by the parties or determination by the Bankruptcy Court as described in both the OCP Order and the Interim Compensation Order.

Dated: **February 13, 2026**  
Washington, DC

Respectfully submitted,



Michael Flanagan  
General Counsel  
Michael.flanagan@consilio.com

**EXHIBIT 1**

**Monthly Statement**

# Invoice



**Corporate Office**  
 Consilio LLC  
 1828 L Street NW Suite 1070  
 Washington, DC 20036

**Remittance Address**  
 DEPT CH17174  
 Palatine, IL 60055-7174  
 United States

**Strictly Confidential**

Invoice Date	Invoice Number
1/31/2026	INV579630853

**Entity Tax ID:** 47-4420523  
**Customer Tax ID:**

**Invoice To**

Robb Sands  
 Trane Technologies  
 800 E Beaty Street  
 Building E  
 Davidson NC 28036  
 United States

Engagement No.	Engagement Name	Service Period	Client Billing ID	Payment Terms
339584-344505	Jones Day - Aldrich Pump - Review	1/1/26 - 1/31/26		Net 75

Description	Quantity	Unit of Measure	Unit Price	Extended Price
Managed Review - 1st Level Reviewer	2.75	Hour	\$42,000	\$115.50
Managed Review - Team Lead / QC	85.23	Hour	\$42,000	\$3,579.66
Managed Review - Review Management	96.59	Hour	\$75,000	\$7,244.25

TERMS: Unless otherwise covered by a separate written agreement, this invoice is due and payable within 75 days of receipt and past due after that. Client is subject to maximum allowable finance charges on all past due accounts plus any related attorney fees and collection charges incurred by Consilio LLC

<b>Subtotal</b>	\$10,939.41
<b>Credit</b>	
<b>Tax</b>	\$0.00
<b>Amount Paid</b>	
<b>Total</b>	\$10,939.41 USD
<b>Amount Due</b>	\$10,939.41 USD

**Bank Information**

Bank Name: HSBC  
 Account Name: Consilio LLC  
 Account Number: 622000527 / Routing Number: 022000020 / 021001088 / SWIFT Code: MRMDUS33  
 For electronic payment, kindly send remittance details via email to: [accountsreceivable@consilio.com](mailto:accountsreceivable@consilio.com)  
 Please include invoice number(s) to ensure proper credit.

	1/1-1/4	1/5-1/11	1/12-1/18	1/19-1/25	1/26-1/31	TOTAL BILLABLE TIME
JULIA HESTER					40.9	40.90
WILLIAM NAVARRO					31.58	31.58
Eliza Maltby					15.5	15.50
Rev Total Hours	-	-	-	-	87.98	87.98
Rev Billable Rate	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00	\$ 42.00
REV TOTAL	-	-	-	-	3,695.16	3,695.16
Foreign Language Rev Total Hours	-	-	-	-	-	-
Foreign Language Review Rate	-	-	-	-	-	-
REV TOTAL	-	-	-	-	-	-
JULIA HESTER					6.93	6.93
WILLIAM NAVARRO					7.33	7.33
Joyce VanDee		0.8		29.5	40.5	70.80
Eliza Maltby					3.83	3.83
Heather Desmond					0.5	0.50
Christopher Jackson		0.5		1.7	5	7.20
PM Total Hours	-	1.30	-	31.20	64.09	96.59
PM Billable Rate	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00	\$ 75.00
PM TOTAL	-	97.50	-	2,340.00	4,806.75	7,244.25
TOTAL BILLABLE	-	97.50	-	2,340.00	8,501.91	10,939.41

**EXHIBIT B**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
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)

**ORDER GRANTING THE SIXTH INTERIM APPLICATION  
OF CONSILIO LLC FOR ALLOWANCE OF COMPENSATION FOR  
SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES  
AS ORDINARY COURSE PROFESSIONAL TO THE DEBTORS  
FOR THE PERIOD FROM OCTOBER 1, 2025 THROUGH JANUARY 31, 2026**

This matter coming before the Court on the *Sixth Interim Application of Consilio LLC, for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professionals to the Debtors For the Period From October 1, 2025 Through January 31, 2026* (the "Interim Fee Application")<sup>2</sup> filed by Consilio as an

<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> Capitalized terms not otherwise defined herein have the meanings given to them in the Interim Fee Application.

Ordinary Course Professional to the above-captioned debtors and debtors in possession (the "Debtors"); the Court having reviewed the Interim Fee Application; the Court having found that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (iii) notice of the Interim Fee Application and the notice of an opportunity for hearing were served upon the parties required by Local Rule 2002-1(g) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171], as amended on January 23, 2026 [Dkt. 3008] (the "Interim Compensation Order") and no other or further notice is required, (iv) the compensation requested in the Interim Fee Application is reasonable and for actual and necessary services rendered by Consilio on behalf of the Debtors during the period from October 1, 2025 through January 31, 2026 (the "Compensation Period"), and (v) the Interim Fee Application fully complies with the Interim Compensation Order, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the OCP Order, and the Compensation Guidelines; and the Court having determined that the legal and factual bases set forth in the Interim Fee Application establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Interim Fee Application is GRANTED.
2. Consilio is awarded, on an interim basis, compensation for professional services rendered during the Compensation Period in the amount of \$361,473.00.
3. The Debtors are authorized and directed to pay promptly to Consilio the amount of fees and expenses approved by this Order, to the extent that such amounts have not previously been paid by the Debtors.
4. The Debtors and Consilio are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

5. This Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation, enforcement, or interpretation of this Order.

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