

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,¹
Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Joint Administration Requested)

**SUPPLEMENTAL DECLARATION OF
CARRIANNE BASLER OF ALIXPARTNERS, LLP**

Pursuant to 28 U.S.C. § 1746, I, Carrienne Basler, state under penalty of perjury, that:

1. I am a Managing Director of AlixPartners, LLP (“**AlixPartners**”), which has a place of business at 909 Third Avenue, Floor 30, New York, New York 10022.

2. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

3. I submit this supplemental declaration in the cases of the above-captioned debtors (collectively, the “**Debtors**”) to supplement the disclosures set forth in my original declaration dated June 18, 2020 [ECF No.23].

4. Unless otherwise noted, references to AP below collectively refer to AlixPartners, AP Holdings and each of their respective subsidiaries. AlixPartners would like to disclose the following:

- ACE American Insurance Company and ACE Property & Casualty Insurance Company, insurers to the Debtors, and affiliates (“**ACE**”) are adverse litigation parties, lienholders and bondholders to current and former AP clients in matters unrelated to the Debtors. ACE is a current AP client in matters unrelated to the Debtors. ACE is an insurance provider to AP.

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.



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- Crowell & Moring LLP, a professional in this bankruptcy matter, is a professional, opposing counsel and adverse litigation party to current and former AP clients in matters unrelated to the Debtors. Crowell & Moring is a current AP client in matters unrelated to the Debtors.
- Duane Morris LLP, a professional in this bankruptcy matter, is counsel, professional and adverse litigation party to current and former AP clients in matters unrelated to the Debtors. Duane Morris is a current and former AP client in matters unrelated to the Debtors.
- Kirkland & Ellis, a professional in this bankruptcy matter, is a professional, adverse litigation party, opposing counsel and counsel, to current and former AP clients in matters unrelated to the Debtors. Kirkland & Ellis is a current and former AP client in matters unrelated to the Debtors.
- Steptoe & Johnson LLP, a professional in this bankruptcy matter, is an adverse litigation party, counsel, opposing counsel and professional to current and former AP clients in matters unrelated to the Debtor. Steptoe & Johnson is a current and former AP client in matters unrelated to the Debtors.
- Troutman Pepper Hamilton Sanders LLP, a professional in this bankruptcy matter, and affiliates (“**TPHS**”) are opposing counsel, professionals, counsel and litigation parties to current and former AP clients in matters unrelated to the Debtors. TPHS is a current and former AP client in matters unrelated to the Debtors. TPHS is a former employer of a current AP employee.
- Willkie Farr & Gallagher LLP (“**Willkie**”), a professional in this bankruptcy matter, is a bondholder, counsel, professional and litigation party to current and former AP clients in matters unrelated to the Debtors. Willkie is a current and former AP client in matters unrelated to the Debtors. Willkie provides legal services to AP.
- Winston & Strawn, LLP (“**Winston**”), a professional in this bankruptcy, is a professional, opposing counsel, counsel and adverse litigation party to current and former AP clients in matters unrelated to the Debtors. Winston is a current and former AP client in matters unrelated to the Debtors. Winston is a former employer of a current AP employee.
- Zurich American Insurance Company, Zurich Insurance Company Ltd., and Zurich Reinsurance Company, Ltd., insurers to the Debtors, and affiliates (“**Zurich**”) are litigation parties, adverse litigation parties, lienholders, bondholders and joint venture entities to current and former AP clients in matters unrelated to the Debtors. Zurich is a current and former AP client in matters unrelated to the Debtors. Zurich is an insurance provider to AP.

5. AlixPartners does not believe that the supplemental disclosures above impact its disinterestedness. I continue to reserve the right to supplement AlixPartners' disclosures in the event that AlixPartners learns of any additional connections that require disclosure. If any new material relevant facts or relationships are discovered or arise, AlixPartners will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Dated: December 11, 2020

AlixPartners, LLP

/s/Carrienne Basler

Carrienne Basler
Managing Director