

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

In re	:	Chapter 11
	:	
ALDRICH PUMP LLC, <i>et al.</i> , ¹	:	Case No. 20-30608
	:	
Debtors.	:	(Jointly Administrated)
	:	
	:	
ALDRICH PUMP LLC, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Adv. Pro. No. 20-03041
	:	
THOSE PARTIES LISTED ON APPENDIX	:	
A TO COMPLAINT and JOHN AND JANE	:	
DOES 1-1000,	:	
	:	
Defendants.	:	
	:	

**NON-DEBTOR AFFILIATES’ MOTION TO FILE
CONFIDENTIAL DOCUMENTS UNDER SEAL**

Trane Technologies Company LLC and Trane U.S. Inc. (collectively, the “**Non-Debtor Affiliates**”), by and through their 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, and Section I(1) of the Agreed Protective Order Governing Confidential Information [Dkt. No. 345] entered on September 23, 2020 (the “**Protective Order**”), hereby file this Motion for an Order Authorizing the Filing of Certain Confidential Documents Under Seal and/or in a

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.



redacted format (the “**Motion**”). The Motion relates to certain of the Official Committee of Asbestos Personal Injury Claimants’ Deposition Designations (the “**Committee Deposition Designations**”) and Exhibits (the “**Committee Exhibits**”) admitted into evidence in connection with the May 5 through 7, 2021 hearing on the *Motion of the Debtors for an Order (I) Preliminary Enjoining Certain Actions Against Non-Debtors, or (II) Declaring that the Automatic Stay Applies to Such Actions, and (III) Granting a Temporary Restraining Order Pending a Final Hearing* [Adv. Dkt. No. 2].

Background

1. The Non-Debtor Affiliates seek an Order permitting the filing under seal of limited portions of certain deposition transcripts included in the Committee Deposition Designations and certain Committee Exhibits. The Non-Debtor Affiliates previously designated such testimony and documents as “Confidential” pursuant to the Protective Order.

2. On September 23, 2020, this Court entered the Protective Order previously executed by the Debtors, the Non-Debtor Affiliates, and the Committee. [Dkt. No. 345.] The Future Claimants’ Representative (“**FCR**”) elected to become a party to the Protective Order on October 15, 2020. *See Notice of Election of Future Claimants Representative to Become a Party to Modified Protective Order* [Dkt. No. 395].

3. The Protective Order governs the rights and obligations of the parties with respect to “Confidential Information,” defined as:

information, 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, (i) 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 and (ii) any Oral Confidential Information.

See Protective Order at 3-4.

4. With respect to documents, Section C.1 of the Protective Order provides that:

Any information designated as Confidential Information shall be stamped “CONFIDENTIAL” on each page being so designated (if the information is produced in written form) or otherwise conspicuously labeling it “CONFIDENTIAL” (if it is in the form of tape, disc or other form that makes it difficult to label each page). Documents produced in native format may be designated as containing Confidential Information by including the term “CONFID” (or similar term) in the name of the folder in which such file is transmitted. Such designations shall be made at the time such Confidential Information is provided or produced.

5. The Protective Order further provides that:

[i]n the case of depositions, if counsel for the Designating Party believes that a portion or all of the testimony given at a deposition constitutes Confidential Information, counsel may so state on the record and request that the entire transcript or relevant portion thereof be sealed. In addition, the Designating Party may also designate the relevant portion of the transcript or videotape of a deposition, and any exhibits thereto, as Confidential Information within 30 days of the Designating Party’s receipt of the transcript from the court reporter. Such designation and notice shall be made in writing to the court reporter, with copies to all other counsel of record at the deposition and any Disclosing Party or Designating Party, in the case where the Disclosing Party and Designating Party were not in attendance at the deposition, identifying the portion of the transcript, or exhibits thereto, that constitute items designated as Confidential Information. All pages of the transcript and exhibits designated as Confidential Information shall be stamped “CONFIDENTIAL.”

See Protective Order at 7.

6. The Non-Debtor Affiliates request this Court seal Committee Exhibits 16, 72, 174, and 177, consisting of various documents containing non-public financial analyses, projections and forecasts prepared for the board and certain committees of Trane Technologies plc, and Committee Exhibit 212, consisting of the confidential Asbestos Claims Tender Agreement. The Non-Debtor Affiliates designated these materials as Confidential under Section C.1 of the Protective Order (the “**Confidential Exhibits**”).

7. The Non-Debtor Affiliates also request this Court seal excerpts from the following deposition transcripts included among the Committee Deposition Designations, and which the Non-Debtor Affiliates designated as Confidential under Section C.2 of the Protective Order (the “**Confidential Deposition Designations**”):

- Transcript of the February 26, 2021 Deposition of Heather Howlett, containing confidential and commercially sensitive information at 94:15-95:3, 150:2-150:9, 155:6-155:14, 159:8-159:14, 161:20-162:21, 179:11-16, and 179:18-180:2.
- Transcript of the March 5, 2021 Deposition of Cathleen Bowen, containing confidential and commercially sensitive information at 46:3-47:2, 47:16-48:12, 51:9-52:11, 53:9-54:6, 54:21-55:8, 57:18-59:1, 69:11-69:19, 69:21-70:6, 70:13-71:15, 75:19-83:16, 86:15-88:17, 88:19-90:23, 91:9-92:3, 108:2-108:21, 110:21-110:25, 116:21-117:12, 118:2-120:22, 127:5-127:33, 128:5-129:2, 129:18-131:8, 132:2-134:25, 138:15-138:25, 139:14-141:25, 147:23-148:15, 149:8-149:25, 157:21-158:7, 160:10-161:11, 161:22-162:2, 162:8, 176:22-179:12, 181:6-182:13, 193:24-194:18, 195:12-195:14, 195:16-196:8, 196:10-196:20, 203:8-203:12, 204:7-204:10, 217:3-219:11, 219:25-220:15, 221:13-221:22, 222:19-223:25, 225:17-226:9, and 227:14-227:23.

- Transcript of the March 9, 2021 Deposition of Richard Daudelin, containing confidential and commercially sensitive information at 86:8-86:20, 103:2-103:13, and 178:2-179:3.
- Transcript of the March 12, 2021 Deposition of David Regnery, containing confidential and commercially sensitive information at 100:14-101:5, 105:22-106:4, 170:3-175:7, 176:24-177:20, 179:8-179:11, 179:19-179:22, 181:4-181:12, 186:8-186:17, 202:17-203:10, 212:16-212:21, 213:4-213:5, 213:11-213:12, 214:2-214:3, 218:15-218:16, 219:2-219:5, 229:17-229:22, and 248:5-248:8.
- Transcript of the March 18, 2021 individual and Rule 30(b)(6) Deposition of Mark Majocha, containing confidential and commercially sensitive information at 56:11-56:15, 77:14-77:25, 96:23-97:2, 97:4-97:12, 110:11-111:5, 113:19-114:7, 114:13-114:22, 115:12-116:13, 116:17-116:23, 118:17-118:21, 118:25-119:5, 120:3-121:5, 128:10-128:21, 128:23-129:11, 130:19-131:2, 131:4-131:18, 132:21-133:8, 136:18-137:13, 182:4-185:23, 190:3-190:15, 193:5-194:12, 194:23-195:4, 196:14-196:21, 207:13-207:24, 208:2-208:13, 210:3-210:11, 210:18-210:24, 211:10-212:11, 212:25-214:7, 227:6-227:9, 229:4-229:14, 229:23-231:9, 231:11-231:22, 232:9-232:19, 238:19-239:13, 239:15-239:20, and 249:5-249:12.
- Transcript of the March 19, 2021 individual Deposition of Chris Kuehn, containing confidential and commercially sensitive information at 101:12-102:9, 104:14-105:18, 114:16-115:8, 115:23-116:3, 118:18-118:21, 119:17-120:4, 128:21-130:11, 148:12-148:19, 156:18-156:21, 174:12-175:14, 176:13-177:21, 195:15-198:4, 242:15-243:2, 243:10-243:11, 243:24-246:7, 246:9-246:17, 247:3-247:4, 255:2-255:8, and 278:12-279:5.

- Transcript of the April 1, 2021 individual and Rule 30(b)(6) Deposition of Sara Brown, containing confidential and commercially sensitive information at 114:18-114:21, 216:20-216:23, 217:12-217:20, 218:4-219:5, and 219:7-219:9.
- Transcript of the April 5, 2021 individual and Rule 30(b)(6) Deposition of Evan Turtz, containing confidential and commercially sensitive information at 79:11-79:17, 79:20-80:10, 80:13-80:16, 81:8-81:14, 141:9, 230:3-230:4, and 240:25-241:10.
- Transcript of the April 9, 2021 Rule 30(b)(6) Deposition of Chris Kuehn, containing confidential and commercially sensitive information at 46:22-47:20, 48:6-50:25, 51:3-52:8, 54:2-54:8, 55:7-55:14, 55:16-57:5, 72:14-73:14, 73:16-73:21, 73:23-79:22, 79:24-80:9, 80:11-82:10, 92:6-92:25, 93:22-96:2, 96:4-96:14, 96:16-96:24, 97:2-97:17, 97:19-98:3, 98:5-98:6, 100:4-103:14, 103:21-107:2, 107:4-108:19, 108:21-108:23, 124:12-126:11, 126:13-127:12, 127:14-129:7, 129:9-131:9, 134:8-135:20, 138:9-143:10, 143:12-143:17, 149:6-149:14, 171:16-171:17, 171:25-172:2, 172:9, 173:8-173:18, 182:22-182:23, 195:13-195:14, 196:3-196:3, 196:16-196:21, and 196:24-196:25.

Argument

8. This Court possesses jurisdiction over this Motion pursuant to 28 *U.S.C.* §§ 157 and 1334, and this matter constitutes a core proceeding within the meaning of 28 *U.S.C.* § 157(b).

9. The Court can grant the requested relief under 11 *U.S.C.* § 105(a), 11 *U.S.C.* § 107(b) and Federal Rule of Bankruptcy Procedure 9018. Section 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.”

10. The Non-Debtor Affiliates seek to seal testimony and documents involving confidential and commercially sensitive business information pertaining to, among other things, non-public (i) financial analyses and forecasts; (ii) estimates of asbestos liabilities and insurance assets; (iii) asbestos litigation and settlements; (iv) certain transactions and related contracts; and (v) the operations, business strategies, revenue, assets, liabilities, corporate structure and credit facilities of the Trane Technologies plc enterprise. The disclosure of this information could cause competitive and/or economic harm to the Non-Debtor Affiliates. *See* Ex. A, Sara Brown Declaration in Support of the Non-Debtor Affiliates’ Motion to File Confidential Documents Under Seal, ¶¶ 4-6.

11. The Non-Debtor Affiliates seek to seal the Confidential Exhibits in their entirety. They have considered redaction of the Confidential Exhibits, but the pervasive nature of the confidential information contained therein renders redaction impracticable.

12. As required by the Protective Order, the Non-Debtor Affiliates will deliver to this Court an un-redacted copy of the Confidential Information sealed pursuant to this Motion.

Wherefore, the Non-Debtor Affiliates respectively request this Court enter the Order, attached hereto as Exhibit B, granting the Non-Debtor Affiliates’ Motion.

Dated: June 4, 2021

Respectfully submitted,

/s/ Stacy C. Cordes

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*Counsel to Trane Technologies Company LLC
and Trane U.S. Inc.*

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

In re	:	
	:	Chapter 11
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ALDRICH PUMP LLC, <i>et al.</i> , ¹	:	Case No. 20-30608
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Debtors.	:	(Jointly Administrated)
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ALDRICH PUMP LLC, <i>et al.</i> ,	:	
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Plaintiffs,	:	
	:	
v.	:	Adv. Pro. No. 20-03041
	:	
THOSE PARTIES LISTED ON APPENDIX	:	
A TO COMPLAINT and JOHN AND JANE	:	
DOES 1-1000,	:	
	:	
Defendants.	:	
	:	
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DECLARATION OF SARA WALDEN BROWN IN SUPPORT OF THE NON-DEBTOR AFFILIATES' MOTION TO FILE CONFIDENTIAL DOCUMENTS UNDER SEAL

I, Sara Walden Brown, being first duly sworn, depose and state as follows:

1. I am Vice President, Deputy General Counsel – Corporate Finance, Securities and Corporate Law of Trane Technologies plc, the ultimate parent of parties in interest Trane Technologies Company LLC and Trane U.S. Inc. (collectively, the “**Non-Debtor Affiliates**”).
2. I base the facts, statements, and opinions in this Declaration on my personal knowledge and my business experience.

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.

3. This Declaration concerns the Official Committee of Asbestos Personal Injury Claimants's Exhibits (the "**Committee Exhibits**") and Deposition Designations (the "**Committee Designations**") admitted into evidence in connection with the May 5 through 7, 2021 hearing on the *Motion of the Debtors for an Order (I) Preliminary Enjoining Certain Actions Against Non-Debtors, or (II) Declaring that the Automatic Stay Applies to Such Actions, and (III) Granting a Temporary Restraining Order Pending a Final Hearing* [Adv. Dkt. No. 2].

4. The public disclosure of the below-identified Exhibits would cause serious competitive injury to the Non-Debtor Affiliates because the documents contain business information maintained as highly confidential by the Non-Debtor Affiliates, and the public disclosure of the documents would aid the Non-Debtor Affiliates' competitors and adversely affect the Non-Debtor Affiliates' operations and employees.

- a. Committee Exhibits 16, 72, 174, and 177 contain non-public and commercially sensitive financial analyses, projections and forecasts prepared for the board and various committees of Trane Technologies plc.
- b. Committee Exhibit 212, the confidential Asbestos Claims Tender Agreement, contains the non-public and commercially sensitive processes and procedures for the tendering of asbestos claims between the parties to the contract.

5. The foregoing Committee Exhibits must be sealed in their entirety. I have considered redaction of those documents, but the pervasive nature of the confidential information contained therein renders redaction impracticable.

6. The public disclosure of the testimony identified below, which is included in the Committee Designations, would cause serious competitive injury to the Non-Debtor Affiliates

because the testimony contains business information maintained as highly confidential by the Non-Debtor Affiliates, and the public disclosure of this testimony would aid the Non-Debtor Affiliates' competitors and adversely affect the Non-Debtor Affiliates' operations and employees:

- a. The Confidential portions of Ms. Howlett's deposition transcript include testimony concerning non-public and commercially sensitive analyses of potential operating subsidiaries for the Debtors, valuations of the investments in the Debtors' operating subsidiaries, estimates of the Debtors' asbestos liabilities, and information regarding the retention of third-party consultants to provide asbestos liability estimates. *See* Howlett Dep. Tr. at 94:15-95:3, 150:2-150:9, 155:6-155:14, 159:8-159:14, 161:20-162:21, 179:11-16, and 179:18-180:2.
- b. The Confidential portions of Ms. Bowen's deposition transcript include testimony concerning non-public and commercially sensitive information related to certain transactions, internal protocols for and procedures related to asbestos insurance and settlements, and estimates of asbestos insurance reserves and liabilities. *See* Bowen Dep. Tr. at 46:3-47:2, 47:16-48:12, 51:9-52:11, 53:9-54:6, 54:21-55:8, 57:18-59:1, 69:11-69:19, 69:21-70:6, 70:13-71:15, 75:19-83:16, 86:15-88:17, 88:19-90:23, 91:9-92:3, 108:2-108:21, 110:21-110:25, 116:21-117:12, 118:2-120:22, 127:5-127:33, 128:5-129:2, 129:18-131:8, 132:2-134:25, 138:15-138:25, 139:14-141:25, 147:23-148:15, 149:8-149:25, 157:21-158:7, 160:10-161:11, 161:22-162:2, 162:8, 176:22-179:12, 181:6-182:13, 193:24-194:18, 195:12-195:14, 195:16-196:8, 196:10-196:20, 203:8-203:12, 204:7-204:10, 217:3-219:11,

219:25-220:15, 221:13-221:22, 222:19-223:25, 225:17-226:9, and 227:14-227:23.

- c. The Confidential portions of Mr. Daudelin's deposition transcript include testimony concerning non-public and commercially sensitive analyses prepared for the Finance Committee of Ingersoll-Rand plc, strategic decisions regarding certain credit facilities, and settlements with various insurers. *See* Daudelin Dep. Tr. at 86:8-86:20, 103:2-103:13, and 178:2-179:3.
- d. The Confidential portions of Mr. Regnery's deposition transcript include testimony concerning non-public and commercially sensitive dollar values for certain transactions, financial analyses prepared for board meetings, profit estimates, analyses of potential operating subsidiaries for the Debtors, and estimates of the Debtors' asbestos liabilities. *See* Regnery Dep. Tr. at 100:14-101:5, 105:22-106:4, 170:3-175:7, 176:24-177:20, 179:8-179:11, 179:19-179:22, 181:4-181:12, 186:8-186:17, 202:17-203:10, 212:16-212:21, 213:4-213:5, 213:11-213:12, 214:2-214:3, 218:15-218:16, 219:2-219:5, 229:17-229:22, and 248:5-248:8.
- e. The Confidential portions of Mr. Majocha's individual and Rule 30(b)(6) deposition transcript include testimony concerning non-public and commercial sensitive costs, negotiations, terms and rationales for certain transactions, and analyses of potential operating subsidiaries for the Debtors. *See* Majocha Dep. Tr. at 56:11-56:15, 77:14-77:25, 96:23-97:2, 97:4-97:12, 110:11-111:5, 113:19-114:7, 114:13-114:22, 115:12-116:13,

116:17-116:23, 118:17-118:21, 118:25-119:5, 120:3-121:5, 128:10-128:21,
128:23-129:11, 130:19-131:2, 131:4-131:18, 132:21-133:8, 136:18-137:13,
182:4-185:23, 190:3-190:15, 193:5-194:12, 194:23-195:4, 196:14-196:21,
207:13-207:24, 208:2-208:13, 210:3-210:11, 210:18-210:24, 211:10-
212:11, 212:25-214:7, 227:6-227:9, 229:4-229:14, 229:23-231:9, 231:11-
231:22, 232:9-232:19, 238:19-239:13, 239:15-239:20, and 249:5-249:12.

- f. The Confidential portions of Mr. Kuehn's individual deposition transcript include testimony concerning non-public and commercially sensitive analyses and materials prepared for board meetings, business strategies and models, estimates of the Debtors' asbestos liabilities, strategies related to certain credit facilities, analyses of potential operating subsidiaries for the Debtors, information related to asbestos litigation settlements, and costs for certain transactions. *See* Kuehn Dep. Tr. at 101:12-102:9, 104:14-105:18, 114:16-115:8, 115:23-116:3, 118:18-118:21, 119:17-120:4, 128:21-130:11, 148:12-148:19, 156:18-156:21, 174:12-175:14, 176:13-177:21, 195:15-198:4, 242:15-243:2, 243:10-243:11, 243:24-246:7, 246:9-246:17, 247:3-247:4, 255:2-255:8, and 278:12-279:5.
- g. The Confidential portions of my individual and Rule 30(b)(6) deposition transcript include testimony concerning non-public and commercially sensitive analyses of potential operating subsidiaries for the Debtors, expenses incurred for asbestos litigation, and estimates of the Debtors' asbestos liabilities. *See* Brown Dep. Tr. at 114:18-114:21, 216:20-216:23, 217:12-217:20, 218:4-219:5, and 219:7-219:9.

- h. The Confidential portions of Mr. Turtz's individual and Rule 30(b)(6) deposition transcript include testimony concerning non-public and commercially sensitive contracts, costs for transactions, and asbestos litigation settlements. *See* Turtz Dep. Tr. at 79:11-79:17, 79:20-80:10, 80:13-80:16, 81:8-81:14, 141:9, 230:3-230:4, and 240:25-241:10.
- i. The Confidential portions of Mr. Kuehn's Rule 30(b)(6) deposition transcript include testimony concerning non-public and commercially sensitive information regarding the operations, revenue, corporate structure, dollar value estimates of assets and liabilities, business strategies and forecasts of the Non-Debtor Affiliates, their affiliates and the Trane Technologies plc enterprise, and Trane Technologies plc's cash management system. *See* Kuehn 30(b)(6) Dep. Tr. at 46:22-47:20, 48:6-50:25, 51:3-52:8, 54:2-54:8, 55:7-55:14, 55:16-57:5, 72:14-73:14, 73:16-73:21, 73:23-79:22, 79:24-80:9, 80:11-82:10, 92:6-92:25, 93:22-96:2, 96:4-96:14, 96:16-96:24, 97:2-97:17, 97:19-98:3, 98:5-98:6, 100:4-103:14, 103:21-107:2, 107:4-108:19, 108:21-108:23, 124:12-126:11, 126:13-127:12, 127:14-129:7, 129:9-131:9, 134:8-135:20, 138:9-143:10, 143:12-143:17, 149:6-149:14, 171:16-171:17, 171:25-172:2, 172:9, 173:8-173:18, 182:22-182:23, 195:13-195:14, 196:3-196:3, 196:16-196:21, and 196:24-196:25.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

EXECUTED on this 4th day of June 2021.

/s/ Sara Walden Brown

Sara Walden Brown

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

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In re	:
	: Chapter 11
	:
ALDRICH PUMP LLC, <i>et al.</i> , ¹	: Case No. 20-30608
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Debtors.	: (Jointly Administrated)
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ALDRICH PUMP LLC, <i>et al.</i> ,	:
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Plaintiffs,	:
	:
v.	: Adv. Pro. No. 20-03041
	:
THOSE PARTIES LISTED ON APPENDIX	:
A TO COMPLAINT and JOHN AND JANE	:
DOES 1-1000,	:
	:
Defendants.	:
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NOTICE OF HEARING

PLEASE TAKE NOTICE that Trane Technologies Company LLC and Trane U.S. Inc. (the “**Non-Debtor Affiliates**”) filed a Motion to File Confidential Documents Under Seal (the “**Motion**”) related to certain Deposition Designations and Exhibits of the Official Committee of Asbestos Personal Injury Claimants admitted into evidence in connection with the May 5 through 7, 2021 hearing on the *Motion of the Debtors for an Order (I) Preliminary Enjoining Certain Actions Against Non-Debtors, or (II) Declaring that the Automatic Stay Applies to Such Actions, and (III) Granting a Temporary Restraining Order Pending a Final Hearing.*

PLEASE TAKE FURTHER NOTICE that your rights may be affected by this Motion. You should read the Motion carefully and discuss it with your attorney. If you do not have an attorney, you may wish to consult with one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the Motion, or if you oppose it in any way, then on or before June 18, 2021 you MUST:

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.

1. File a formal, written response with the Bankruptcy Court at:

Clerk, United States Bankruptcy Court
Charles Jonas Federal Building
401 West Trade Street
Charlotte, North Carolina 28202

2. Serve a copy of your response on all parties in interest, including:
 - a. U.S. Bankruptcy Administrator
402 West Trade Street
Charlotte, NC 28202

 - b. CORDES LAW, PLLC
Stacy C. Cordes
122 Cherokee Road, Suite 1
Charlotte, NC 28207

 - c. McCARTER & ENGLISH, LLP
Gregory J. Mascitti
Steven H. Weisman
Phillip S. Pavlick
825 Eighth Avenue, 31st Floor
New York, NY 10019

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 you or your attorney should attend the hearing on **June 24, 2021 at 9:30 a.m. before the Honorable J. Craig Whitley at the United States Bankruptcy Court, Charles Jonas Federal Building, Courtroom 2B, 401 West Trade Street, Charlotte, North Carolina 28202.**

PLEASE TAKE FURTHER NOTICE that the Court may grant the relief requested in the Motion. No further notice of the hearing on the Motion will be given.

Dated: June 4, 2021

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/s/ Stacy C. Cordes

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