

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)
(Jointly Administered)

FOURTH SUPPLEMENTAL DECLARATION OF DAVID F. MCGONIGLE IN CONNECTION WITH *EX PARTE* APPLICATION OF THE DEBTORS FOR AN ORDER AUTHORIZING THEM TO RETAIN AND EMPLOY K&L GATES LLP AS SPECIAL INSURANCE COUNSEL AS OF THE PETITION DATE

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2014-1 of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the “Local Bankruptcy Rules”), I, David F. McGonigle, hereby declare:

1. I am an attorney at law admitted and in good standing to practice in the Commonwealth of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States District Court for the Western District of Pennsylvania. I am a partner of K&L Gates LLP (“K&L Gates”) and am duly authorized to make this declaration on behalf of K&L Gates. I make this declaration in connection with the *Ex Parte Application of the Debtors for an Order Authorizing Them to Retain and Employ K&L Gates LLP as Special Insurance Counsel as of the Petition Date* [Dkt. 25] (the “Application”).² The facts set forth in this declaration are personally known to me and, if called as a witness, I could and would testify thereto.

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.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Application.



Fourth Supplemental Disclosure

2. K&L Gates offers this Supplemental Declaration consistent with the continuing disclosure requirements in Bankruptcy Rule 2014.

3. K&L Gates offers a Supplement to Schedule 2 to the Application, attached as Exhibit A hereto.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 30, 2020

Pittsburgh, PA

/s/ David F. McGonigle

David F. McGonigle
K&L Gates LLP

EXHIBIT A

Supplement to Schedule 2

<u>Name Searched</u>	<u>Relationship to Debtors</u>	<u>Name of Entity and/or Affiliate of Entity that is a K&L Gates Client</u>	<u>Client Status</u>	<u>Nature of Representation</u>
The Claro Group	Parties to Material Contracts, Unexpired Leases, and License Agreements with the Debtors/ Ordinary Course Professional	The Claro Group	Active Client	Representation in matters unrelated to the Debtors