

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)

**THIRD 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], my first supplemental declaration dated December 11, 2020 [ECF No. 469], and my second supplemental declaration dated June 18, 2021 [ECF No. 745].

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:

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.



- AP follows a practice to solicit from its institutional investors their connections to certain parties independent of AP. In response, the foregoing have offered the following disclosures:
 - K & L Gates LLP is a current or former legal services provider to an AP investor or one of its affiliates.
 - McCarter & English is a current or former legal services provider to an AP investor or one of its affiliates.
 - Travelers is a vendor to an AP investor or one of its affiliates.
 - US Bank is a vendor to an AP investor or one of its affiliates.
 - Willkie Farr & Gallagher is a current or former legal services provider to an AP investor or one of its affiliates.
- Accident & Casualty Co. and Accident & Casualty Insurance of Winterthur, insurers to the Debtors, are adverse litigation parties to a current AP client in matters unrelated to the Debtors.
- ACE American Insurance Company and ACE Property & Casualty Insurance Company, insurers to the Debtors, and affiliates (“ACE”) are litigation parties and lenders to current and former AP clients in matters unrelated to the Debtors.
- Affiliated FM Insurance Company, an insurer to the Debtors, is an adverse litigation party to a former AP client in matters unrelated to the Debtors.
- AIG Property Casualty Insurance Company, an insurer to the Debtors, and affiliates (“AIG”) are lessors to a current AP client in matters unrelated to the Debtors. AIG is an insurance provider to AP. Illinois National Insurance Company, an affiliate of AIG, is a former insurance provider to AP. Illinois National Insurance Company was adverse to AP in a former litigation regarding an insurance dispute in matters unrelated to Debtors.
- Airco Limited, a non-debtor affiliate to the Debtors, is a litigation party to a former AP client in matters unrelated to the Debtors.
- AIU Insurance Company, an insurer to the Debtors, is an adverse litigation party to current and former AP clients in matters unrelated to the Debtors.
- Allianz SPA, Allianz Underwriters Insurance Company and Allianz Versicherungs AG, AM, Ins. Co., insurers to the Debtors, and affiliates (“Allianz”) are current AP clients in matters unrelated to the Debtors.
- American Guarantee & Liability Insurance Company, an insurer to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.

- American Home Assurance Company, an insurer to the Debtors, is an adverse litigation party and bondholder to current and former AP clients in matters unrelated to the Debtors.
- Ankura Consulting Group, LLC, a professional in this bankruptcy matter, and affiliates (“**Ankura**”) are professionals to current and former AP clients in matters unrelated to the Debtors.
- Bingham Greenbaum Doll LLP, an ordinary course professional, consultant, and service provider to the Debtors, is a professional to former AP clients in matters unrelated to the Debtors.
- Century Indemnity Company, an insurer to the Debtors, is an adverse litigation party to current and former AP clients in matters unrelated to the Debtors.
- Certain London Market Insurance Companies, an insurer to the Debtors, and affiliates (“**Certain London Market Companies**”) are adverse litigation parties to a former AP client in matters unrelated to the Debtors.
- Certain Underwriters at Lloyd's of London, an insurer to the Debtors, and affiliates (“**Lloyd's**”) are adverse litigation parties and litigation parties to current and former AP clients in matters unrelated to the Debtors. Lloyd's is an insurance provider to AP.
- Clark Equipment Company (“**Clark Equipment**”), a contract counterparty to the Debtors, is an adverse litigation party to a former AP client in matters unrelated to the Debtors. Clark Equipment is a current AP client in matters unrelated to the Debtors.
- Columbia Casualty Company, an insurer to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.
- Continental Casualty Company and Continental Insurance Company, insurers to the Debtors, and affiliates (“**CCC**”) are bondholders, lenders, adverse litigation parties and litigation parties to current and former AP clients in matters unrelated to the Debtors.
- Cooney & Conway, a professional in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Crowell & Moring LLP, a professional in this bankruptcy matter, is counsel to a former AP client in matters unrelated to the Debtors.
- Doosan Infracore Co., Ltd., a contract counterparty to the Debtors, and affiliates (“**Doosan**”) are current AP clients in matters unrelated to the Debtors.
- Evanston Insurance Company, an insurer to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.

- Everest Reinsurance Company, an insurer to the Debtors, and affiliates (“**Everest**”) are adverse litigation parties and litigation parties to current AP clients in matters unrelated to the Debtors. Everest is an insurance provider to AP.
- Federal Insurance Company, an insurer to the Debtors, and affiliates (“**Federal**”) are lenders, lessors and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. Federal is an insurance provider to AP.
- Fireman's Fund Insurance Company, an insurer to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- First State Insurance Company, an insurer to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Flowserve Corporation and Flowserve Red Corporation, contractually indemnified parties to the Debtors, and affiliates (“**Flowserve**”) are former AP clients in matters unrelated to the Debtors.
- FTI Consulting, Inc., a professional in this bankruptcy matter, and affiliates (“**FTI**”) are professionals to current and former AP clients in matters unrelated to the Debtors. FTI is a current AP client in matters unrelated to the Debtors.
- Gardner Denver Holdings, Inc., a contract counterparty to the Debtors, and affiliates (“**Gardner Denver**”) are adverse litigation parties and litigation parties to current and former AP clients in matters unrelated to the Debtors.
- Goldberg, Persky & White, P.C., a professional in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Gordon Rees Scully Mansukhani, a professional in this bankruptcy matter, is a litigation party to a former AP client in matters unrelated to the Debtors.
- Government Employees Insurance Company (“**GEICO**”), an insurer to the Debtors, is an adverse litigation party and litigation party to current and former AP clients in matters unrelated to the Debtors. GEICO is a former AP client in matters unrelated to the Debtors.
- Granite State Insurance Company, an insurer to the Debtors, is an adverse litigation party to current and former AP clients in matters unrelated to the Debtors.
- Greenberg Traurig, LLP (“**Greenberg Traurig**”), a professional this bankruptcy matter, is an adverse litigation party, counsel, litigation party, opposing counsel and professional to current and former AP clients in matters unrelated to the Debtors. Greenberg Traurig is a former AP client in matters unrelated to the Debtors. Greenberg Traurig is a current legal services provider to AP.

- Hartford Accident and Indemnity Company, an insurer to the Debtors, and affiliates (“**Hartford**”) are lenders to a former AP client in matters unrelated to the Debtors.
- Higgins & Owens, PLLC, a professional in this bankruptcy matter, is a professional to a former AP client in matters unrelated to the Debtors.
- Honeywell International Inc., a party in interest in this bankruptcy matter, and affiliates (“**Honeywell**”) are director-affiliated companies, adverse litigation parties, litigation parties and professionals to current and former AP clients in matters unrelated to the Debtors. Honeywell is a current and former AP client in matters unrelated to the Debtors. Honeywell is a former employer of a current AP employee.
- Insurance Company of the State of Pennsylvania, an insurer to the Debtors, is an adverse litigation party to a former AP client in matters unrelated to the Debtors.
- James F. Humphreys & Associates L.C., a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- JP Morgan Chase, a depository and disbursement bank to the Debtors, and affiliates (“**JPMorgan**”) are affiliates to a current AP client in matters unrelated to the Debtors. The spouse of an attorney that works in AP’s Legal Department is a lawyer employed by JPMorgan advising on distressed investments. Strict confidentiality obligations pertaining to all AP employees, as well as general legal professional responsibility, prohibit the AP attorney from discussing or exchanging non-public information related to AP’s client engagements, including these Chapter 11 cases, with third parties, including spouses.
- K&L Gates (“**K&L**”), a professional in this bankruptcy matter, is an adverse litigation party and litigation party to current AP clients in matters unrelated to the Debtors.
- Kazan, McClain, Satterley & Greenwood, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Kitch, Drutchas, Wagner, Valitutti & Sherbrook, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Kuchler Polk Weiner LLC, a professional in this bankruptcy matter, is an adverse litigation party to a former AP client in matters unrelated to the Debtors.
- Lanier Law Firm, PLLC, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Law Offices of Peter G. Angelos, PC, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.

- Levy Konigsberg LLP, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Lexington Insurance Company, an insurer to the Debtors, is an adverse litigation party and litigation party to current and former AP clients in matters unrelated to the Debtors.
- Litchfield Cavo LLP, a professional in this bankruptcy matter, is a current AP client in matters unrelated to the Debtors.
- Marshall Dennehey Warner Coleman and Goggin, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Maune Raichle Hartley French & Mudd, LLC, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- McCarter & English, LLP (“**McCarter & English**”), a professional in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- McDermott Will & Emery LLP, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Meagher & Geer P.L.L.P., a professional in this bankruptcy matter, is a litigation party to a former AP client in matters unrelated to the Debtors.
- Mitsubishi Electric Trane HVAC US LLC, a non-debtor affiliate to the Debtors, and affiliates (“**MUFG**”) were members of the UCC represented by AP in Chesapeake Energy Corporation, a former bankruptcy matter unrelated to the Debtors. MUFG has an accounts receivable factoring arrangement with AP and one of AP’s clients whereby AP’s invoices to that client are sold to MUFG, in a way that improves payment terms to AP in exchange for an invoice discount.
- National Economic Research Associates, Inc. (“**NERA**”), a contract counterparty to the Debtors, is a professional to current and former AP clients in matters unrelated to the Debtors.
- Navigant Consulting, Inc., a contract counterparty to the Debtors, is a former AP client in matters unrelated to the Debtors.
- Nexsen Pruet PLLC, a professional in this bankruptcy matter, is counsel to a former AP client in matters unrelated to the Debtors.
- Parker Poe Adams Bernstein LLP (“**Parker Poe**”), a professional in this bankruptcy matter, is a lessor, professional and adverse litigation party to former AP clients in matters unrelated to the Debtors. Parker Poe is a current AP client in matters unrelated to the Debtors.

- Rayburn Cooper & Durham, P.A., a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Rivkin Radler LLP, a professional in this bankruptcy matter, is counsel to a current AP client in matters unrelated to the Debtors.
- Robert Peirce & Associates, P.C., a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Robinson & Cole, LLP (“**Robinson & Cole**”), a professional in this bankruptcy matter, is a professional and counsel to current and former AP clients in matters unrelated to the Debtors. Robinson & Cole is a former AP client in matters unrelated to the Debtors.
- Shipman & Goodwin LLP, a professional in this bankruptcy matter, is counsel to a former AP client in matters unrelated to the Debtors.
- Simmons Hanly Conroy LLC (“**Simmons Hanly**”), a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors. Simmons Hanly is a former AP client in matters unrelated to the Debtors.
- Simon Greenstone Panatier, PC, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- St. Paul Fire and Marine Insurance Company, St. Paul Guardian Insurance Company and St. Paul Surplus Lines Insurance Company, insurers to the Debtors, are adverse litigation parties and limited partners to former AP clients in matters unrelated to the Debtors.
- Steptoe & Johnson LLP, a professional in this bankruptcy matter, is a litigation party to a current AP client in matters unrelated to the Debtors.
- The Ferraro Law Firm, a professional in this bankruptcy matter, is a professional to current AP clients in matters unrelated to the Debtors.
- The Gori Law Firm PC, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- The Oakfabco Liquidating Trust, a party in interest in this bankruptcy matter, is a litigation party to a former AP client in matters unrelated to the Debtors.
- TIG Insurance Company, an insurer to the Debtors, is an adverse litigation party to current and former AP clients in matters unrelated to the Debtors.
- Travelers Casualty and Surety Company, an insurer to the Debtors, and affiliates (“**Travelers**”) are investors, professionals and lessors to current and former AP clients in matters unrelated to the Debtors. Travelers is an insurance provider to AP.

- Troutman Pepper Hamilton Sanders LLP, a professional in this bankruptcy matter, and affiliates (“**TPHS**”) are adverse litigation parties to a former AP client in matters unrelated to the Debtors.
- Tucker Ellis LLP, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Tuthill Energy Systems and Tuthill Pump Company, contractually indemnified parties to the Debtors, and affiliates (“**Tuthill**”) are adverse litigation parties to a former AP client in matters unrelated to the Debtors.
- Twin City Fire Insurance Company, an insurer to the Debtors, is an adverse litigation party to current and former AP clients in matters unrelated to the Debtors.
- U.S. Bank National Association, a party in interest in this bankruptcy matter, and affiliates (“**U.S. Bank**”) are bondholders, adverse litigation parties, litigation parties, lenders, lessees, lessors, lienholders, professionals and shareholders to current and former AP clients in matters unrelated to the Debtors. U.S. Bank is a current and former AP client in matters unrelated to the Debtors. U.S. Bank was a member of the UCC represented by AP in Tops Holding II Corporation, a former bankruptcy matter unrelated to the Debtors.
- United States Fidelity and Guaranty Company, an insurer to the Debtors, is an adverse litigation party to a former AP client in matters unrelated to the Debtors.
- Weitz & Luxenberg, PC, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Westchester Fire Insurance Company, an insurer to the Debtors, and affiliates (“**Westchester**”) are bondholders, adverse litigation parties and litigation parties to current and former AP clients in matters unrelated to the Debtors.
- Westinghouse Air Brake Company (or WABCO) and WABCO Holdings Inc., contract counterparties to the Debtors, and affiliates (“**Westinghouse**”) are adverse litigation parties to a former AP client in matters unrelated to the Debtors.
- Winston & Strawn, LLP, a professional in this bankruptcy matter, is a former employer of a current AP employee.
- Winterthur Swiss Insurance Company, an insurer to the Debtors, and affiliates (“**Winterthur**”) are adverse litigation parties to current and former AP clients in matters unrelated to the Debtors.
- World Auxiliary Insurance Corporation Limited, an insurer to the Debtors, is an adverse litigation party to current and former AP clients in matters unrelated to the Debtors.

- Yasuda Fire & Marine Insurance Company (UK) Limited, an insurer to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.

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: January 28, 2022

AlixPartners, LLP

/s/ Carrienne Basler

Carrienne Basler
Managing Director