

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)

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS on behalf of
the estates of Aldrich Pump LLC and Murray Boiler
LLC,

Plaintiff,

Adv. Pro. No. 22-03029

v.

TRANE TECHNOLOGIES PLC, INGERSOLL-
RAND GLOBAL HOLDING COMPANY
LIMITED, TRANE TECHNOLOGIES HOLDCO
INC., TRANE TECHNOLOGIES COMPANY
LLC, TRANE INC., TUI HOLDINGS INC.,
TRANE U.S. INC., MURRAY BOILER
HOLDINGS LLC, SARA BROWN, RICHARD
DAUDELIN, MARC DUFOUR, HEATHER
HOWLETT, CHRISTOPHER KUEHN, MICHAEL
LAMACH, RAY PITTARD, DAVID REGNERY,
AMY ROEDER, ALLAN TANANBAUM, EVAN
TURTZ, MANILO VALDES, and ROBERT
ZAFARI

Defendants.

WAIVER OF THE SERVICE OF SUMMONS

I, Scott P. Vaughn, counsel for Defendants Trane Technologies PLC, Ingersoll-Rand

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.



Global Holding Company Limited, Trane Technologies Holdco Inc., Trane Technologies Company LLC, Trane Inc., TUI Holdings Inc., Trane U.S. Inc., and Murray Boiler Holdings LLC, have received your request to waive service of a Summons in this action along with a copy of the Complaint, a copy of this waiver form, and a means of returning one signed copy of the form to you.

I, or the entities I represent, agree to save the expense of serving a Summons and Complaint in this above-captioned adversary proceeding.

I understand that I, or the entities I represent, will keep all defenses or objections to the lawsuit, the Court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a Summons or of service.

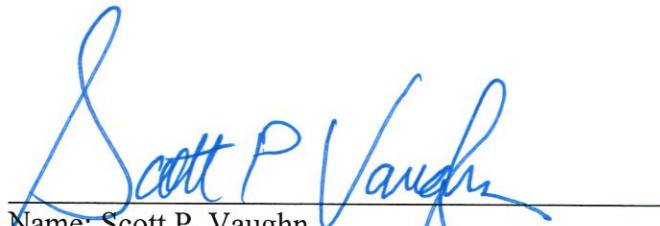
I also understand that, unless further extended by Court order or agreement of the parties, I, or the entities I represent, must file and serve an answer or a motion under Rule 12 by **August 23, 2022**, or a date that will be further set by Court order. If I fail to do so, a default judgment may be entered against the entities I represent.

Name of parties waiving service of process:

Trane Technologies PLC
Ingersoll-Rand Global Holding Company Limited
Trane Technologies Holdco Inc.
Trane Technologies Company LLC
Trane Inc.
TUI Holdings Inc.
Trane U.S. Inc.
Murray Boiler Holdings LLC

(Signature on Next Page)

This the 27 day of June, 2022



Name: Scott P. Vaughn

Title: Attorney

*Counsel for Defendants Trane Technologies PLC,
Ingersoll-Rand Global Holding Company Limited,
Trane Technologies Holdco Inc., Trane
Technologies Company LLC, Trane Inc., TUI
Holdings Inc., Trane U.S. Inc., and Murray Boiler
Holdings LLC*

Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

“Good cause” does not include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant’s property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.