

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

<p>In re</p> <p>ALDRICH PUMP LLC, <i>et al.</i>,¹</p> <p>Debtors.</p>	<p>Chapter 11</p> <p>Case No. 20-30608 (JCW)</p> <p>(Joint Administration Requested)</p>
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**FOURTH 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] (the “Original Declaration”), my first supplemental declaration dated December 11, 2020 [ECF No. 469], my second supplemental declaration dated June 18, 2021 [ECF No. 745], and my third supplemental declaration dated January 28, 2022 [ECF No. 975].

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.



- As set forth in the Original Declaration, AP follows a practice to solicit from the members of its Boards their connections to the parties in interest independent of AP. In response, one or more of the members of its Boards have offered the following disclosures:
 - ACE American Insurance Company and ACE Property & Casualty Insurance Company and affiliates (“ACE”) are insurers to the Debtors. AP has a group insurance program in place for all U.S. managing directors and AP board members under which personal excess liability (umbrella) insurance may be purchased from an affiliate of ACE, at group rates.
 - Westchester Fire Insurance Company and affiliates (“Westchester”) are insurers to the Debtors. AP has a group insurance program in place for all U.S. managing directors and AP board members under which personal excess liability (umbrella) insurance may be purchased from Westchester, at group rates.
- Accident & Casualty Co. and Accident & Casualty Insurance of Winterthur, insurers to the Debtors, are 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, are affiliates to current AP clients in matters unrelated to the Debtors. AP has a group insurance program in place for all U.S. managing directors and AP board members under which personal excess liability (umbrella) insurance may be purchased from an affiliate of ACE, at group rates.
- AIU Insurance Company, an insurer to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- American Home Assurance Company, an insurer to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Blanco Tackabery & Matamoros, P.A., an interested party in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Caplin & Drysdale, Chartered, a professional in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors. Caplin & Drysdale is a former AP client in matters unrelated to the Debtors.
- Century Indemnity Company, an insurer to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Columbia Casualty Company, an insurer to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Continental Casualty Company and Continental Insurance Company, insurers to the Debtors, are insurance providers to AP.

- Dentons US LLP, a professional in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Doosan Infracore Co., Ltd., a contract counterparty to the Debtors, and affiliates, are professionals to a current AP client in matters unrelated to the Debtors.
- Employers Mutual Insurance Company, an insurance provider to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Evanston Insurance Company, an insurer to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Fireman's Fund Insurance Company, an insurer to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- First State Insurance Company, an insurer to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Granite State Insurance Company, an insurer to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Greenberg Traurig, LLP, a professional this bankruptcy matter, is a current AP client in matters unrelated to the Debtors.
- Ingersoll-Rand Climate Solutions Private Limited, Ingersoll-Rand Company of Peru S.A.C., Ingersoll-Rand Latin America, S. de R.L. de C.V., Ingersoll-Rand Manufactura, S. de R.L. de C.V., Ingersoll-Rand Polska sp. z o.o., Ingersoll-Rand Zimbabwe (Private) Limited, Ingersoll-Dresser Pump Company, and Ingersoll-Rand U.S. HoldCo., Inc., non-debtor affiliates and contract parties to the Debtors, are adverse litigation parties to a former AP client in matters unrelated to the Debtors.
- JP Morgan Chase, a depository and disbursement bank to the Debtors, and affiliates, are limited partners to a former AP client in matters unrelated to the Debtors.
- Landmark Insurance Company, an insurer to the Debtors, and affiliates, are adverse litigation parties and litigation parties to current AP clients in matters unrelated to the Debtors.
- Latham & Watkins LLP ("Latham"), an interested party in this bankruptcy matter, is counsel, opposing counsel and a professional to current and former AP clients in matters unrelated to the Debtors. Latham is a current and former AP client in matters unrelated to the Debtors.

- Nelson Mullins Riley and Scarborough LLP, an ordinary course professional, consultant, and service provider to the Debtors, is counsel to a current AP client in matters unrelated to the Debtors.
- Robinson, Bradshaw & Hinson, P.A., an interested party in this bankruptcy matter, is counsel to a former 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, and affiliates (“St. Paul”) are lessors to a current AP client in matters unrelated to the Debtors. St. Paul is a former AP client in matters unrelated to the Debtors.
- TIG Insurance Company, an insurer to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Travelers Casualty and Surety Company, an insurer to the Debtors, and affiliates, are litigation parties to a current AP client in matters unrelated to the Debtors.
- Twin City Fire Insurance Company, an insurer to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Waters & Kraus, LLP (“Waters”), counsel to certain asbestos claimants in this bankruptcy matter, is counsel and opposing counsel to current AP clients in matters unrelated to the Debtors. Waters is a current AP client in matters unrelated to the Debtors.
- Westchester Fire Insurance Company and affiliates (“Westchester”) are insurers to the Debtors. AP has a group insurance program in place for all U.S. managing directors and AP board members under which personal excess liability (umbrella) insurance may be purchased from Westchester, at group rates.
- Wilmer Cutler Pickering Hale and Dorr LLP, a professional in this bankruptcy matter, is a vendor to AP.
- Winterthur Swiss Insurance Company, an insurer to the Debtors, and affiliates (“Winterthur”) are litigation parties to a current AP client in matters unrelated to the Debtors. Winterthur is a vendor to AP.
- World Auxiliary Insurance Corporation Limited, an insurer to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Yasuda Fire & Marine Insurance Company (UK) Limited, an insurer to the Debtors, and affiliates (“Yasuda”) are litigation parties to a current AP client in matters unrelated to the Debtors. Yasuda is a vendor to AP.

- Zurich American Insurance Company, Zurich Insurance Company Ltd., and Zurich Reinsurance Company, Ltd., insurers to the Debtors, are former employers of a current AP employee.

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: July 25, 2022

AlixPartners, LLP

/s/ Carrienne Basler

Carrienne Basler
Managing Director