

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re	:	Chapter 11
ALDRICH PUMP LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 20-30608 (JCW)
Debtors.	:	(Jointly Administered)

**THIRD SUPPLEMENTAL DECLARATION OF  
BRAD B. ERENS IN SUPPORT OF THE *EX PARTE*  
APPLICATION OF THE DEBTORS FOR AN ORDER AUTHORIZING THEM TO  
RETAIN AND EMPLOY JONES DAY AS COUNSEL AS OF THE PETITION DATE**

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure  
(the "Bankruptcy Rules"), I, Brad B. Erens, hereby declare:

1. I am a partner with the law firm of Jones Day and am duly authorized to make this declaration on behalf of Jones Day. I make this declaration to supplement disclosures set forth in: (a) the *Ex Parte Application of the Debtors for an Order Authorizing Them to Retain and Employ Jones Day as Counsel as of the Petition Date* [Dkt. 20] (the "Application"); (b) the Declaration of Brad B. Erens in support thereof (the "Erens Declaration"), which was attached to the Application as Exhibit C; (c) the *First Supplemental Declaration of Brad B. Erens in Support of the Ex Parte Application of the Debtors for an Order Authorizing Them to Retain and Employ Jones Day as Counsel as of the Petition Date* [Dkt. 399] (the "First Supplemental Declaration"); and (d) the *Second Supplemental Declaration of Brad B. Erens in Support of the Ex Parte Application of the Debtors for an Order Authorizing Them to Retain and*

<sup>1</sup> 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.



*Employ Jones Day as Counsel as of the Petition Date* [Dkt. 742] (the "Second Supplemental Declaration") and, together with the First Supplemental Declaration, the "Prior Supplemental Declarations"). The facts set forth in this supplemental declaration are personally known to me and, if called as a witness, I could and would testify thereto.

2. On June 18, 2020 (the "Petition Date"), Aldrich Pump LLC and Murray Boiler LLC (together, the "Debtors") filed the Application and the Erens Declaration with the Court. By the Application, the Debtors sought authority to retain and employ Jones Day as counsel in these chapter 11 cases (the "Chapter 11 Cases"). On June 19, 2020, the Court entered an *ex parte* order [Dkt. 71] authorizing the retention of Jones Day as the Debtors' counsel in the Chapter 11 Cases. On August 18, 2020, the Court entered an amended order [Dkt. 264] authorizing the retention of Jones Day as the Debtors' counsel in the Chapter 11 Cases based on comments received to the original *ex parte* order from the Official Committee of Asbestos Personal Injury Claimants.

3. In connection with the Application, to check and clear potential conflicts of interest in the Chapter 11 Cases, Jones Day researched its client database (the "Original Conflicts Search") to determine whether it had any relationships with the individuals or institutions set forth on Schedule 1 to the Erens Declaration (together with the parties set forth in Schedule 1 to the Prior Supplemental Declarations, the "Interested Parties").

4. In the Erens Declaration, I stated that I would, in accordance with Bankruptcy Rule 2014(a), supplement the information contained in that declaration with respect to, among other things, new relationships not set forth therein. To that end, Jones Day updated its research of its client database (the "Prior Supplemental Conflicts Searches" and, together with

the Original Conflicts Search, the "Conflicts Searches") and, on October 19, 2020 and June 15, 2021, I filed the Prior Supplemental Declarations respectively.

5. In the Erens Declaration and the Prior Supplemental Declarations (together, the "Declarations"), I disclosed that although Jones Day represented in the past two years or currently represents certain of the Interested Parties included in the Conflicts Searches, those representations were or are in matters unrelated to the Chapter 11 Cases, and Jones Day neither holds nor represents an interest materially adverse to the Debtors or their estates.

#### **Supplemental Disclosure**

6. Jones Day has further updated the examination of its relationships with interested parties in the Chapter 11 Cases. In connection therewith, Jones Day researched its client database for the past two years (the "Third Supplemental Conflicts Search") to determine whether:

- (a) since the completion of the Second Supplemental Declaration, Jones Day has ceased providing client services to any entities (or their affiliates) previously disclosed as clients of Jones Day in the Declarations;
- (b) any information relating to Jones Day's relationship with any of the entities identified in the Declarations, or their affiliates, was inadvertently omitted from the Declarations;
- (c) since the completion of the Second Supplemental Declaration, Jones Day has undertaken to provide client services to any of the entities researched by Jones Day in connection with the Declarations that were not clients of Jones Day at the time of the Declarations; and
- (d) any entities not identified in the Declarations, because such entities
  - (i) were unknown to Jones Day at the time of the Declarations or
  - (ii) have

taken on a role in matters relating to the Chapter 11 Cases since the dates of the Declarations, are current or former clients of Jones Day.

7. In particular, Jones Day looked at all of the notices of appearance and motions to appear *pro hac vice* filed from May 11, 2021 through June 30, 2022. Additionally, Jones Day looked at all parties who were served subpoenas pursuant to the *Order Granting Motion of the Debtors for an Order Authorizing the Debtors to Issue Subpoenas on Asbestos Trusts and Paddock Enterprises, LLC* [Dkt. 1240] (the "Trust Discovery Order"). In connection therewith, Jones Day performed the Third Supplemental Conflicts Search to determine whether such entities are current or former clients of Jones Day. A list of the additional entities included in the Third Supplemental Conflicts Search (collectively, the "Additional Parties") is set forth on Schedule 1 attached hereto.

#### **Disinterestedness**

8. To the extent that the Third Supplemental Conflicts Search indicated that (a) the Declarations required updating or (b) Jones Day has been or currently is employed by any of the Additional Parties, the identities of those entities and the nature of, or change in, Jones Day's relationship to them, as of June 30, 2022, are set forth on Schedule 2 attached hereto ("Schedule 2"). In each instance, any current or prior representation of an interested party is in matters unrelated to the Chapter 11 Cases. As a result, it remains the case that to the best of my knowledge, information, and belief, Jones Day represents no interest materially adverse to the Debtors, their estates, their creditors, or the Bankruptcy Administrator for the Western District of North Carolina, and Jones Day does not represent any other party with an actual or potential interest in the Chapter 11 Cases or such party's respective attorneys or accountants except as set forth in Schedule 2 and in the Declarations.

9. I believe that Jones Day continues to be a "disinterested person," as defined in section 101(14) of the Bankruptcy Code and required by section 327 of the Bankruptcy Code. Despite the efforts described above to identify and disclose connections with parties in interest in these cases, because the Debtors are part of a large enterprise and have thousands of creditors and other relationships, and because Jones Day is an international firm with more than 2,500 attorneys in 42 offices around the globe, Jones Day is unable to state with certainty that every client representation or other connection of Jones Day has been disclosed. In addition, Jones Day has not made an effort to identify every single potential party in interest in these Chapter 11 Cases, including every single insurer, the Debtors' co-defendants in the tort system, or other possible entities, beyond what was on the Schedule 1 attached to the Erens Declaration, the Schedule 1 attached to the First Supplemental Declaration, the Schedule 1 attached to the Second Supplemental Declaration, and the Schedule 1 attached hereto. In this regard, if Jones Day discovers additional information that requires disclosure, it will file an additional supplemental disclosure with the Court.

10. In addition, it is my understanding that if a conflict of interest with respect to a party set forth on Schedule 2 or another party in interest later identified in these cases should arise, the Debtors will use the services of other conflicts counsel in connection with that matter.

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 information, knowledge, and belief.

Dated: October 10, 2022  
Chicago, Illinois

/s/ Brad B. Erens  
Brad B. Erens

**SCHEDULE 1**

**Aldrich Pump LLC, et al.**  
**Additional Potentially Interested Parties**

**Known Professionals for Official Committee of Asbestos Personal Injury Claimants**

Legal System Analysis

**Parties That Have Filed A Notice of Appearance and Their Counsel**

FranGecker LLP  
Greenberg Traurig, LLP  
McDermott Will & Emery LLP  
Moon Wright & Houston, PLLC  
The Oakfabco Liquidating Trust  
U.S. Bank National Association

**Parties Served Subpoenas Pursuant to the Trust Discovery Order**

ACandS Asbestos Settlement Trust  
Armstrong World Industries Asbestos Personal Injury Settlement Trust  
Babcock & Wilcox Company Asbestos Personal Injury Settlement Trust  
Celotex Asbestos Settlement Trust  
Combustion Engineering 524(g) Asbestos PI Trust  
DII Industries, LLC Asbestos PI Trust (Halliburton, Harbison-Walker Subfunds)  
Federal Mogul U.S. Asbestos Personal Injury Trust (T&N, FMP, Flexitallic, Ferodo)  
Flintkote Asbestos Trust  
G-I Holdings Inc. Asbestos Personal Injury Settlement Trust  
GST Settlement Facility  
Kaiser Aluminum & Chemical Corporation Asbestos Personal Injury Trust  
Owens Corning Fibreboard Asbestos Personal Injury Trust (FB and OC Subfunds)  
Paddock Enterprises, LLC  
Pittsburgh Corning Corporation Asbestos PI Trust  
Quigley Company, Inc. Asbestos PI Trust  
T H Agriculture & Nutrition, L.L.C. Asbestos Personal Injury Trust  
The Delaware Claims Processing Facility  
The Manville Personal Injury Settlement Trust  
United States Gypsum Asbestos Personal Injury Settlement Trust  
Verus Claims Services, LLC  
Verus LLC  
WRG Asbestos PI Trust  
Yarway Asbestos Personal Injury Trust

**SCHEDULE 2**

**THIRD SUPPLEMENTAL DISCLOSURE**

**IN RE ALDRICH PUMP LLC, *ET AL.***

**SCHEDULE OF POTENTIALLY INTERESTED PARTIES AS OF JUNE 30, 2022 THAT CURRENTLY EMPLOY OR HAVE FORMERLY EMPLOYED JONES DAY IN MATTERS UNRELATED TO THE DEBTORS OR THEIR CHAPTER 11 CASES**

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<b>NEW PARTIES IN INTEREST<sup>1</sup></b>		
Federal-Mogul U.S. Asbestos Personal Injury Trust (Ferodo, Flextallic, FMP, T&N)  <b><i>Tenneco, Inc.</i></b>	Adverse Parties	<ul style="list-style-type: none"> <li>• Ultimate parent company <b><i>Tenneco, Inc.</i></b>, parent company <b><i>Tenneco GmbH</i></b>; and affiliate companies <b><i>Tenneco Automotive Ibérica, S.A.</i></b>, <b><i>Tenneco Innovacion, S.L.</i></b>, <b><i>Tenneco Automotive Europe BVBA</i></b>, <b><i>Federal-Mogul Corporation</i></b>, <b><i>Federal-Mogul Deva GmbH (FM Deva)</i></b>, <b><i>Federal-Mogul Friction Products Limited</i></b>, <b><i>Federal Mogul Motorparts LLC</i></b>, <b><i>Federal Mogul Friction Products, S.A.</i></b>, <b><i>Federal Mogul LLC</i></b> and <b><i>Federal Mogul SAS</i></b> are current clients; and</li> <li>• Affiliate companies FB Industries USA, Inc. (closed 2020); Tenneco Automotive Gent (Branch) and Federal Mogul Ibérica S.L., (both closed 2021); and Federal Mogul Motorparts Holding GmbH (closed) are former clients.</li> </ul>
GST Settlement Facility	Adverse Party	<ul style="list-style-type: none"> <li>• To the extent it may be related to the named party in interest, an entity named <b><i>GST Taiwan Ltd.</i></b> is a current client.</li> </ul>

<sup>1</sup> The parties listed herein are parties in interest (or affiliated entities) who are current clients of Jones Day or were clients of Jones Day within the last two years. The names of current clients of Jones Day appear in bold and italics. The disclosure of stockholder interests or other affiliate relationships among potentially related entities reflects only information known to Jones Day through its conflict reporting system. Jones Day has not performed independent research to identify all stockholder interests or other affiliate relationships with respect to interested parties. Moreover, Jones Day has not disclosed representations of trade associations and similar industry or special interest organizations in which interested parties are members.



INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
Kaiser Aluminum & Chemical Corporation Asbestos Personal Injury Trust	Adverse Party	<ul style="list-style-type: none"> <li>• <b>Kaiser Aluminum Corporation</b> is a current client.</li> </ul>
Owens Corning Fibreboard Asbestos Personal Injury Trust (FB and OT subfunds) Pittsburgh Corning Corporation Asbestos PI Trust	Adverse Parties	<ul style="list-style-type: none"> <li>• Parent company <b>Owens Corning</b> is: (a) a current client; and (b) the indemnitor for current client <b>TAMKO Building Products, LLC</b>;</li> <li>• Affiliate companies <b>Pittsburgh Corning LLC, Owens Corning Roofing &amp; Asphalt LLC, Owens Corning Infrastructure Solutions, LLC, Owens Corning Insulating Systems, LLC, Owens Corning Sales, LLC, Owens Corning Science and Technology, LLC, Interwrap Corporation</b> and <b>Owens Corning Composite Materials LLC</b> are current clients; and</li> <li>• Affiliate companies Pittsburgh Corning Corporation (closed); and Owens Corning Mexico S. De R.L. De C.V. (closed) are former clients.</li> </ul>
United States Gypsum Asbestos Personal Injury Settlement Trust	Adverse Party	<ul style="list-style-type: none"> <li>• Parent company <b>USG Corporation</b> is a former client (closed).</li> </ul>
<b>U.S. Bank, National Association</b>	Parties That Have Filed a Notice of Appearance and Their Counsel	<ul style="list-style-type: none"> <li>• <b>U.S. Bank, National Association</b>, parent company <b>U.S. Bancorp</b>; and affiliate companies <b>U.S. Bank Trust Company, National Association, U.S. Bancorp Investments, Inc.</b>; and <b>U.S. Bank Corporate Trust Services</b> are current clients.</li> </ul>
<b>UPDATES TO PRIOR DISCLOSURE</b>		
<b>Advent International Corporation</b> <b>PRIOR DISCLOSURE:</b> <ul style="list-style-type: none"> <li>• <b>Advent International Corporation</b> is a current client.</li> </ul>	Major Current Business Affiliations of Debtors' Managers	<ul style="list-style-type: none"> <li>• <b>Advent International Corporation</b> is a stockholder of new client <b>InPost UK Limited</b> (opened 2021).</li> </ul>

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<p>Alliance Compressors LLC</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <li>Parent company <b>Emerson Electric Company</b> is: (a) a current client; and (b) the ultimate parent of former client Solus Industrial Innovations (closed).</li> </ul>	<p>Other Non-Debtor Affiliates</p>	<ul style="list-style-type: none"> <li>Parent company Emerson Electric Company is a former client (closed).</li> </ul>
<p>Allianz SPA</p> <p>Allianz Versicherungs AG, AM, Ins. Co.</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <li>Affiliate company <b>Pacific Investment Management Company (PIMCO)</b> is a client in a current ad hoc group representation of Envision term loan lenders (opened 2020);</li> <li>Parent company Allianz SE is a joint venture owner of a former co-client with current client <b>Greystar Real Estate Partners LLC</b> in a closed matter;</li> <li>Affiliate company Allianz Real Estate Investment S.A. is a partial shareholder of a co-client in a current matter with current client <b>Greystar Real Estate Partners</b>; and</li> <li>Affiliate company AGF Private Equity is a stockholder of current client <b>Integragen</b>.</li> </ul>	<p>Insurers and Their Counsel</p>	<ul style="list-style-type: none"> <li>Affiliate companies <b>Allianz Global Investors GmbH, France Titrisation Allianz FCT Mid Cap Loans</b> and <b>Allianz Private Credit Fund S.A. SICAV-RAIF</b> are new clients (all opened 2021).</li> </ul>

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<p>Ansaldo S.p.A. <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <li>• Parent company <b><i>Ansaldo Energia S.p.A.</i></b> and affiliate company <b><i>Ansaldo Thomassen B.V.</i></b> are current clients; and</li> <li>• Affiliate company Ansaldo Nuclear Limited is a former client (closed).</li> </ul>	<p>Contractually Indemnified Parties</p>	<ul style="list-style-type: none"> <li>• Affiliate company <b><i>Ansaldo Nucleare S.p.A.</i></b> is a new client (opened 2022); and</li> <li>• Affiliate company Ansaldo Thomassen B.V. is now a former client (closed).</li> </ul>
<p><b><i>Flowserve Corporation</i></b> Flowserve Red Corporation <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <li>• <b><i>Flowserve Corporation</i></b> is: (a) a current client; and (b) a co-client with affiliate company and co-client <b><i>Flowserve GB Limited</i></b> in a current matter; and</li> <li>• Affiliate company OOO Flowserve is a former client (closed).</li> </ul>	<p>Contractually Indemnified Parties</p>	<ul style="list-style-type: none"> <li>• Affiliate companies Flowserve GB Limited and Flowserve Spain S.L. are now former clients (both closed); and</li> <li>• Affiliate companies <b><i>Flowserve SIHI France SAS, Flowserve FSD SAS, Flowserve Pompes SAS</i></b> and <b><i>Flowserve Sales International SAS (SIHI)</i></b> are new clients in a current matter.</li> </ul>
<p>Government Employees Insurance Company Wellfleet New York Insurance Company <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <li>• Affiliate companies <b><i>Energy West Mining Company, Scott Fetzer Company, The Lubrizol Corporation</i></b> and <b><i>Johns Manville Corporation</i></b> are current clients; and</li> <li>• Affiliate company <b><i>BNSF Railway Company</i></b> is: (a) a current client; (b) a member of current client <b><i>California Railroad Group</i></b>; and (c) a member of former client National Rail Group (closed).</li> </ul>	<p>Insurers and Their Counsel</p>	<ul style="list-style-type: none"> <li>• Affiliate companies <b><i>Mouser Electronics, Inc.</i></b> (opened 2021) and <b><i>Clayton Homes Incorporated</i></b> (opened 2022) are new clients; and</li> <li>• Affiliate company Scott Fetzer Company is now a former client (closed).</li> </ul>

<p><b>JP Morgan Chase</b>  <b>PRIOR DISCLOSURE:</b></p> <ul style="list-style-type: none"> <li>• <b>JPMorgan Chase Bank, N.A.</b> is: (a) a current client; (b) a former co-client with affiliate company and current client <b>JPMorgan Securities LLC</b> in a group representation of rue21 term lenders (closed); and (c) a co-client in current matters with affiliate companies and current clients <b>JPMorgan Private Bank</b> and <b>JP Morgan Trust Company of Delaware</b>;</li> <li>• Parent company <b>JPMorgan Chase &amp; Co.</b> is: (a) a current client; (b) a co-client in a current joint defense group representation with affiliate company <b>JPMorgan Chase Bank, N.A.</b>; (c) a client in a current matter with current client <b>Banco Santander, S.A.</b>; (d) co-client in a current matter with current client <b>The Bank of Nova Scotia</b>; (e) a client in a current ad hoc group representation of unsecured noteholders; (f) a client in a current joint defense group representation of KWA underwriters; (g) a stockholder of Nine Point Energy Holdings, Inc., the parent company of current client <b>Nine Point Energy, LLC</b>, one of the debtors in a current chapter 11 proceeding in which Jones Day is special litigation counsel to the debtors and (h) the indemnitor and employer of an individual who is a current client (opened 2020);</li> </ul>	<p>Depository and Disbursement Bank</p>	<ul style="list-style-type: none"> <li>• Affiliate companies <b>JPMorgan AG</b> (opened 2021) and <b>JPMorgan Chase Bank, N.A., London Branch</b> (opened 2022) are new clients;</li> <li>• Parent company <b>JPMorgan Chase &amp; Co.</b> is: (a) the employer of an individual who is a new client (opened 2021); and (b) Nine Point Energy, an entity of which <b>JPMorgan Chase &amp; Co.</b> is a stockholder, is now a former client (closed);</li> <li>• Affiliated entity JPMorgan Chase Retirement Plan Brigade is now a former member of an ad hoc group representation of bondholders (closed); and</li> <li>• Affiliate companies JPMorgan Private Bank and JPMorgan Whitefriars, Inc. are former clients (both closed).</li> </ul>
--	---	---

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> <li>• Affiliate company <b>JPMorgan Securities LLC</b> is: (a) a current client; (b) a client in a current matter with current client <b>KeyCorp</b>; (c) a former co-client with current client <b>Citigroup, Inc.</b> in a closed matter; (d) with respect only to its Credit Trading Group, a significant equity holder of current client <b>Nine Point Energy, LLC</b> one of the debtors in a current chapter 11 proceeding in which Jones Day is special litigation counsel to the debtors; (e) a co-client in a current matter with current client <b>Bank of America Corporation</b>; (f) a former co-client with current client <b>Deutsche Bank AG New York</b> in a closed matter and (g) a former co-client with current client <b>BNP Paribas</b> in a closed matter;</li> <li>• Affiliate company <b>JPMorgan Securities Plc</b> is: (a) a current client; (b) a client in a current matter with current client <b>Oddo BHF SCA</b> and (c) a former co-client with current client <b>UniCredit Bank AG</b> in a closed matter;</li> <li>• Affiliate company Highbridge Capital Management LLC is a member of former client Ad Hoc Group of Savers LLC Term Loan Lenders (closed);</li> </ul>		

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> <li>• Affiliated entities and current clients <i>JPMorgan Chase Retirement Plan Brigade</i> and <i>JPMorgan Chase Retirement Plan Brigade Bank Loan</i>; and JPMorgan Funds – Multi-Manager Alternatives Fund and JPMorgan Trust III – JPMorgan Multi-Manager Alternatives Fund are former co-clients in a group representation of Hexion noteholders (closed);</li> <li>• Affiliated entity <i>JPMorgan Chase Retirement Plan Brigade</i> is: (a) a co-client in a current group representation of former lenders and noteholders of iHeart Communications, Inc.; and a former co-client in a group representation of former lenders and noteholders of iHeart Communications, Inc. (closed); and (b) a former co-client in a group representation of Bon-Ton second lien noteholders (closed);</li> <li>• Affiliated entity <i>JPMorgan Chase Retirement Plan Brigade Bank Loan</i> is: (a) a co-client in a current group representation of iHeart Communications, Inc. former lenders and noteholders; (b) a member of a current ad hoc group representation of bondholders; (c) a former co-client with affiliated entity JPMorgan Chase Retirement Plan and current client <i>Brigade Capital Management, L.P.</i> in a closed matter; and (d) a former co-client in a group representation of Preferred Proppants term lenders (closed); and</li> </ul>		

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> <li>Affiliate companies JPMorgan Grupo Financiero, S.A. de C.V., JPMorgan Chase, National Association, JPMorgan Business Credit Corporation; and JPMorgan (all closed); and JPMorgan LLC (closed) are former clients.</li> </ul>		
<p>Gardner Denver Holdings, Inc. (n/k/a Ingersoll-Rand, Inc.)</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <li>Following a Reverse Morris Trust transaction in 2020, affiliated entity Ingersoll-Rand Plc changed its name and is now known as current client <b>Trane Technologies Plc</b>, the parent company of the debtors in these chapter 11 cases; and</li> <li>Affiliate companies Dallah Trane HVAC Maintenance Ltd. and Dallah Trane Manufacturing Company for Air-Conditioning Equipment Ltd. are joint venture partners of former client Ingersoll-Rand European Holding Company B.V. (closed).</li> </ul>	<p>Previous Contract Counterparties and Their Counsel</p>	<ul style="list-style-type: none"> <li>Parent company Trane Technologies Plc is now a former client (closed).</li> </ul>
<p>Navigant Consulting, Inc.</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <li><b>Navigant Consulting, Inc.</b> and affiliate company <b>Navigant Capital Advisors</b> are co-clients in a current matter.</li> </ul>	<p>Parties to Material Contracts, Unexpired Leases and License Agreements with the Debtors</p>	<ul style="list-style-type: none"> <li>Navigant Consulting, Inc. and affiliate company Navigant Capital Advisors are now former clients (both closed).</li> </ul>

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<p>WABCO Holdings, Inc. Westinghouse Air Brake Company (WABCO)</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <li>• Affiliate company <b>Wabtec Corporation</b> (d/b/a Westinghouse Air Brake Technologies Corporation) is a current client;</li> <li>• Affiliate company <b>Wabtec France SAS</b> is a current client in a joint representation with current client <b>Faiveley Transport S.A.</b>;</li> <li>• Affiliate companies <b>Wabtec Transportation Netherlands B.V.</b> and <b>Wabtec Transportation Systems LLC</b> are clients in separate new matters (both opened 2021) with affiliate company and current client <b>Wabtec Corporation</b>;</li> <li>• Affiliate company <b>Wabtec Corporation</b> is a client in <b>Wabtec Investments, Ltd. LLC, et al.</b>, a new matter opened in 2020; and</li> <li>• Affiliate company WABCO Europe BVBA is a former client (closed).</li> </ul>	<p>Contractually Indemnified Parties</p>	<ul style="list-style-type: none"> <li>• The joint representation of affiliate company Wabtec France SAS and Faiveley Transport S.A. (closed); and</li> <li>• Affiliate companies Wabtec Transportation Netherlands B.V., Wabtec Transportation Systems LLC; and Wabtec Investments, Ltd. LLC are now former clients (all closed).</li> </ul>



INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<p>Winterthur Swiss Insurance Company</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> <li>• Affiliate companies <b>AXA Home Loan SFH</b> and <b>AXA Banque</b> are co-clients in a current matter with current client <b>Natixis</b>;</li> <li>• Affiliate company Vendome Immobilier Commercial is a 50% owner of current client <b>Hauteville 2011</b>;</li> <li>• Affiliate company ESI ONE is a joint venture partner in a co-client in a current matter with current client <b>Greystar Real Estate Partners</b>;</li> <li>• Affiliate company <b>AB Private Credit Investors LLC</b> is a current client; and</li> <li>• Affiliate company Union de gestion Immobilière pur le Commerce et l'Industrie (UGICOMI) is a former client (closed).</li> </ul>	<p>Insurers and Their Counsel</p>	<ul style="list-style-type: none"> <li>• An entity in which affiliate company ESI ONE is a joint venture partner, is now a former client (closed).</li> </ul>

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<b>PARTIES IN INTEREST (OR AFFILIATED ENTITIES) WHO WERE INADVERTENTLY OMITTED FROM PRIOR DISCLOSURE</b>		
New England Insurance Company	Insurers and Their Counsel	<ul style="list-style-type: none"> <li>• Affiliated entities Brighthouse Funds Trust I – Brighthouse/Eaton Vance Floating Rate Portfolio and Brighthouse Funds Trust I – BlackRock High Yield Portfolio are members of a current ad hoc group representation of lenders; and</li> <li>• Affiliated entity Brighthouse Funds Trust I – Brighthouse/Eaton Vance Floating Rate Portfolio is a former member of a group representation of term lenders (closed).</li> </ul>