

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

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| <p>In re</p> <p>ALDRICH PUMP LLC, <i>et al.</i>,<sup>1</sup></p> <p>Debtors.</p> | <p>Chapter 11</p> <p>Case No. 20-30608 (JCW)</p> <p>(Joint Administration Requested)</p> |
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**FIFTH 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 Partner and Managing Director of AlixPartners, LLP (“**AlixPartners**”), which has a place of business at 300 N. LaSalle Street, Suite 1800, Chicago, IL 60654.
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], my third supplemental declaration dated January 28, 2022 [ECF No. 975], and my fourth supplemental declaration dated July 28, 2022 [ECF No. 1290].

<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.



4. Unless otherwise noted, references to AP<sup>2</sup> below collectively refer to AlixPartners, AP Holdings and each of their respective subsidiaries. AlixPartners would like to disclose the following:

- 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:
  - Federal Insurance Company (Chubb), an insurer to the Debtors, is a vendor to an AP investor or one of its affiliates.
- ACE American Insurance Company and ACE Property & Casualty Insurance Company, insurers to the Debtors, and affiliates, are shareholders to a former AP client 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, are subsidiaries to a former AP client in matters unrelated to the Debtors.
- Ballard Spahr LLP, counsel to parties who were served subpoenas pursuant to the Trust Discovery Order in this bankruptcy matter, is a professional and opposing counsel to current and former AP clients in matters unrelated to the Debtors.
- Belluck & Fox, LLP, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Bergman Draper Oslund Udo, counsel to certain asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Brayton Purcell LLP, counsel to certain asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Brent Coon & Associates, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Brookman, Rosenberg, Brown & Sandler, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.

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<sup>2</sup> Capitalized terms used herein shall have meanings ascribed to them in the Original Declaration.

- Caplin & Drysdale, Chartered, a known professional for certain non-debtor parties-in-interest in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Chipman, Brown, Cicero & Cole LLP, counsel to parties served subpoenas pursuant to the Trust Discovery Order in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Clark Equipment Company, a contract counterparty to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Dean Omar Branham, LLP, counsel to certain asbestos claimants in this bankruptcy matter, is opposing counsel to current AP clients in matters unrelated to the Debtors.
- Dentons US LLP, a professional in this bankruptcy matter, is a former employer of a current AP employee.
- Dresser-Rand Company, a contract party to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Early, Lucarelli, Sweeney & Meisenkothen, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Federal Insurance Company (Chubb), an insurer to the Debtors, and affiliates (“**Chubb**”) are bondholders, litigation parties, and investors to current and former AP clients in matters unrelated to the Debtors. Chubb is a current and former AP client 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 Chubb at group rates.
- Fox Rothschild LLP, an ordinary course professional to the Debtors, is counsel to current and former AP clients in matters unrelated to the Debtors.
- Frank Gecker LLP, counsel to parties that have filed a notice of appearance in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtors.
- Gardner Denver Holdings, Inc., a contract party to the Debtors, is a former employer of a current AP employee in matters unrelated to the Debtors.
- Hartford Accident and Indemnity Company, an insurance provider to the Debtors, and affiliates, are current and former AP clients in matters unrelated to the Debtors.
- Hendler Lyons Flores, PLLC, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.

- Hogan McDaniel, counsel to parties who were served subpoenas pursuant to the Trust Discovery Order in this bankruptcy matter, is a professional to current and former AP clients 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, and affiliates, are current AP clients in matters unrelated to the Debtors.
- James F. Humphreys & Associates L.C., a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Kazan, McClain, Satterley & Greenwood, counsel to certain asbestos claimants in this bankruptcy matter, is opposing counsel to current AP clients in matters unrelated to the Debtors.
- Kitch, Drutchas, Wagner, Valitutti & Sherbrook, an ordinary course professional to the Debtors, is counsel to a current AP client in matters unrelated to the Debtors.
- Law Offices of Peter G. Angelos, PC, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Levin Simes LLP, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Levy Konigsberg LLP, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to current AP clients in matters unrelated to the Debtors.
- Lipsitz & Ponterio LLC, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Lowenstein Sandler LLP (“**Lowenstein**”), counsel to parties who were served subpoenas pursuant to the Trust Discovery Order in this bankruptcy matter, is a professional and counsel to current and former AP clients in matters unrelated to the Debtors. Lowenstein is a former AP client in matters unrelated to the Debtors. An AlixPartners Partner and Managing Director is in a personal relationship with an attorney at Lowenstein.
- Maune Raichle Hartley French & Mudd, LLC, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to current AP clients in matters unrelated to the Debtors.

- Meagher & Geer P.L.L.P., an ordinary course professional to the Debtors, is a professional to a current AP client in matters unrelated to the Debtors.
- Mitsubishi Electric Trane HVAC US LLC, a non-debtor affiliate to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Pattern, Wornom, Hatten & Diamonstein, L.C., a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Potter Anderson & Corroon LLP (“**Potter**”), counsel to parties who were served subpoenas pursuant to the Trust Discovery Order in this bankruptcy matter, is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtors. Potter is a former AP client in matters unrelated to the Debtors.
- Provost Umphrey Law Firm, L.L.P., a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Rayburn Cooper & Durham, P.A., a Debtors’ retained professional, is counsel to a current AP client in matters unrelated to the Debtors.
- Richards, Layton & Finger, P.A. (“**Richards**”), counsel to parties who were served subpoenas pursuant to the Trust Discovery Order in this bankruptcy matter, is a professional and opposing counsel to current and former AP clients in matters unrelated to the Debtors. Richards is a former AP client in matters unrelated to the Debtors.
- Robert Peirce & Associates, P.C., a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Robinson, Bradshaw & Hinson, P.A., counsel to parties who were served subpoenas pursuant to the Trust Discovery Order in this bankruptcy matter, is counsel to current AP clients in matters unrelated to the Debtors.
- Shepard Law, P.C., a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Shrader & Associates LLP, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Stark & Stark, counsel to parties who were served subpoenas pursuant to the Trust Discovery Order in this bankruptcy matter, is opposing counsel to current AP clients in matters unrelated to the Debtors.

- Sullivan Hazeltine Allinson LLC, counsel to parties who were served subpoenas pursuant to the Trust Discovery Order in this bankruptcy matter, is opposing counsel to current AP clients in matters unrelated to the Debtors.
- Swartz Campbell LLC, counsel to parties who were served subpoenas pursuant to the Trust Discovery Order in this bankruptcy matter, is a professional and counsel to current AP clients in matters unrelated to the Debtors.
- SWMW Law, a law firm with significant representation of asbestos claimants in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Ward & Smith, P.A., counsel to parties that have filed notices of appearance in this bankruptcy matter, is a professional and opposing counsel to current and former AP clients in matters unrelated to the Debtors.
- Waters & Krause, LLP (“**Waters**”), counsel to parties that have filed notices of appearance in this bankruptcy matter, is counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors. Waters is a current AP client in matters unrelated to the Debtors.
- Wollmuth Maher & Deutsch LLP (“**Wollmuth**”), counsel to parties who were served subpoenas pursuant to the Trust Discovery Order in this bankruptcy matter, is a professional and counsel to current AP clients in matters unrelated to the Debtors. Wollmuth is a former 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: February 1, 2023

AlixPartners, LLP

*/s/ Carrienne Basler*

Carrienne Basler

Partner and Managing Director