

- **Order Establishing Joint Discovery Plan and Report (ESI Protocol)** [Docket No. 142]

Dated: April 27, 2023

/s/ Hannah Bussey

Hannah Bussey

KCC

222 N Pacific Coast Highway, 3rd Floor

El Segundo, CA 90245

Tel 310.823.9000

Exhibit A

Description	CreditorName	CreditorNoticeName	Email
Debtors	Aldrich Pump LLC and Murray Boiler LLC	Attn Allan Tananbaum	atananbaum@tranetechnologies.com
Counsel to Verus Claim Services, LLC	Anselmi & Carvelli, LLP	Andrew E. Anselmi and Zachary D. Wellbrock	aanselmi@aclip.com; zwellbrock@aclip.com
Counsel to Paddock Enterprises, LLC	Blanco Tackabery & Matamoros, PA	Ashley S. Rusher	asr@blancolaw.com
Counsel for Verus Claim Services, LLC	Bradley Arant Boult Cummings LLP	Anna-Bryce Hobson	ahobson@bradley.com
Local Counsel to Trane Technologies Company LLC and Trane U.S. Inc.	Burt & Cordes, PLLC	Stacy C. Cordes and Meghan Abernathy	scordes@burtcordeslaw.com
Counsel to the Official Committee of Asbestos Personal Injury Claimants	Caplin & Drysdale Chartered	Kevin C Maclay, Todd E Phillips	kmaclay@capdale.com; tphillips@capdale.com
Counsel to Century Indemnity Company, Federal Insurance Company, Pacific Employers Insurance Company, Westchester Fire Insurance Company, ACE American Insurance Company, and ACE Property & Casualty Insurance Company; Zurich American Insurance Company, Zurich Insurance Company Ltd, Zurich Reinsurance Company, Ltd., and American Guarantee & Liability Insurance Company	Crowell & Moring LLP	Mark D. Plevin	mplevin@crowell.com
Counsel to Century Indemnity Company, Federal Insurance Company, Pacific Employers Insurance Company, Westchester Fire Insurance Company, ACE American Insurance Company, and ACE Property & Casualty Insurance Company; Zurich American Insurance Company, Zurich Insurance Company Ltd, Zurich Reinsurance Company, Ltd., and American Guarantee & Liability Insurance Company	Crowell & Moring LLP	Tacie H. Yoon	tyoon@crowell.com
Counsel to Honeywell International Inc.	Davis & Hamrick, LLP	Jason L. Walters	jwalters@davisandhamrick.com
Counsel to Affiliated FM Insurance Company	Dentons US LLP	Geoffrey M. Miller	Geoffrey.miller@dentons.com
Counsel to Affiliated FM Insurance Company	Dentons US LLP	Robert B. Millner and Patrick C. Maxcy	Robert.millner@dentons.com; patrick.maxcy@dentons.com
Counsel to AIU Insurance Company; America Home Assurance Company; AIG Property Casualty Insurance Company, formerly known as Birmingham Fire Insurance Company of Pennsylvania; Granite State Insurance Company; Insurance Company of The State of Pennsylvania; Landmark Insurance Company; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburg, PA; Continental Casualty Company and Continental Insurance Company (in its own right and as successor to Harbor Insurance Company as Successor by Merger to the Fidelity & Casualty Company of New York); Government Employees Insurance Company; Certain Underwriters at Lloyd's, London; Accident & Casualty Co.; Accident & Casualty Insurance of Winterthur; Winterthur Swiss Insurance Company; World Auxiliary Insurance Corporation Limited; Yasuda Fire & Marine Insurance Company (UK) Limited; Wellfleet New York Insurance Company; The Ocean Marine Insurance Company Limited f/k/a Indemnity Marine JT and Columbia Casualty Company; NRG Victory Reinsurance Company Limited f/k/a New London Per Haywood/Gen Re Synd.; Republic Insurance Company	Duane Morris LLP	Russell W. Roten, Jeff D. Kahane, Andrew E. Mina	RWRoten@duanemorris.com; JKahane@duanemorris.com; AMina@duanemorris.com
Local Counsel to Billy Washburn, Paul Beckett and others represented in this action by The Gori Law Firm	Essex Richards, PA	Heather W Culp and John C Woodman	jwoodman@essexrichards.com
Counsel to The Oakfabco Liquidating Trust	FrankGecker LLP	Joseph D. Frank	jfrank@fgllp.com
Counsel to U.S. Bank National Association, as Proposed Trustee	Greenberg Traurig, LLP	Peter D. Kieselbach	kieselbachp@gtlaw.com
Counsel to U.S. Bank National Association, as Proposed Trustee	Greenberg Traurig, LLP	Ryan Reimers	reimersr@gtlaw.com
Counsel to Joseph W. Grier, III, the Legal Representative for Future Asbestos Claimants	Grier Wright Martinez, PA	A. Cotten Wright	cwright@grierlaw.com
Local Counsel for the Official Committee of Asbestos Personal Injury Claimants	Hamilton Stephens Steele Martin PLLC	Glenn C Thompson and Kenneth B. Dantinne	gthompson@lawhssm.com; kdantinne@lawhssm.com
Counsel to Earl Gross	Higgins & Owens, PLLC	Sara (Sally) W. Higgins	shiggins@higginsowens.com
Counsel to TIG Insurance Company, Everest Reinsurance Company, and Hudson Insurance Company	James McElroy & Diehl, PA	Adam Ross	aross@jmdlaw.com
Counsel for Debtors	Jones Day	Brad B Erens, Mark A Cody, Caitlin K Cahow	bberens@jonesday.com; macody@jonesday.com; ccahow@jonesday.com
Counsel for Debtors	Jones Day	Gregory M Gordon	gmgordon@jonesday.com
Counsel to Bestwall LLC	King & Spalding LLP	Cory Hohnbaum	chohnbaum@kslaw.com
Counsel to Bestwall LLC	King & Spalding LLP	Richard A. Schneider	dschneider@kslaw.com

Description	CreditorName	CreditorNoticeName	Email
Counsel to Paddock Enterprises, LLC	Lathan & Watkins LLP	Jeffrey E. Bjork, Kimberly A. Posin, Amy C. Quartarolo, Helena G. Tseregounis	jeff.bjork@lw.com; kim.posin@lw.com; amy.quartarolo@lw.com; helena.tseregounis@lw.com
Counsel to Verus Trusts	Lowenstein Sandler LLP	Lynda A. Bennett	lbennett@lowenstein.com
Counsel for Allstate Insurance Company, as successor in interest to Northbrook Excess & Surplus Insurance Company, formerly Northbrook Insurance Company	Mays Law Firm, PLLC	Robert A. Mays	rmays@mayslawfirmnc.com
Local Counsel to Trane Technologies Company LLC and Trane U.S. Inc.	McCarter & English LLP	Anthony Bartell and Phillip S. Pavlick	abartell@mccarter.com; ppavlick@mccarter.com
Counsel to Trane Technologies Company LLC and Trane U.S. Inc.	McCarter & English LLP	Gregory J Mascitti	gmascitti@mccarter.com
Local Counsel to Trane Technologies Company LLC and Trane U.S. Inc.	McCarter & English LLP	Philip D. Amoa	pamoam@mccarter.com
Counsel to The Oakfabco Liquidating Trust	Moon Wright & Houston, PLLC	Andrew T. Houston	ahouston@mwhattorneys.com
Counsel to Affiliated FM Insurance Company	Moore & Van Allen PLLC	Hillary B. Crabtree and Zachary H. Smith	hillarycrabtree@mvalaw.com; zacharysmith@mvalaw.com
Counsel to Motley Rice LLC	Motley Rice LLC	John D. Hurst	jhurst@motleyrice.com
Counsel to First State Insurance Company and Twin City Fire Insurance Company; Hartford Accident and Indemnity Company, First State Insurance Company, New England Insurance Company, and Twin City Fire Insurance Company	Nexsen Pruet PLLC	Carl H. Petkoff	cpetkoff@nexsenpruet.com
Counsel to Century Indemnity Company, Federal Insurance Company, Pacific Employers Insurance Company, Westchester Fire Insurance Company, ACE American Insurance Company, and ACE Property & Casualty Insurance Company; Zurich American Insurance Company, Zurich Insurance Company Ltd, Zurich Reinsurance Company, Ltd., and American Guarantee & Liability Insurance Company	Nexsen Pruet PLLC	Lisa P. Sumner	LSumner@nexsenpruet.com
Office of the Bankruptcy Administrator	Office of the United States Bankruptcy Administrator, Western District of North Carolina	Attn Shelley K Abel	shelley_abel@ncwba.uscourts.gov
Counsel to Joseph W. Grier, III, the Legal Representative for Future Asbestos Claimants	Orrick, Herrington & Sutcliffe LLP	Jonathan P. Guy and Debra L. Felder	kguy@orrick.com; dfelder@orrick.com
Counsel for Debtors	Rayburn Cooper & Durham PA	C Richard Rayburn Jr, John R. Miller Jr, Matthew L. Tomsic, Ross R. Fulton, Ashley B. Oldfield	rrayburn@rcdlaw.net; jmiller@rcdlaw.net; mtomsic@rcdlaw.net; aoldfield@rcdlaw.net
Counsel to Certain Asbestos Plaintiffs	Richardson, Patrick, Westbrook & Brickman, LLC	J. David Butler	dbutler@rpwb.com
Counsel to Allianz Underwriters Ins. Co., Allianz Versicherungs AG, AM. Ins. Co., Chicago Ins. Co., Fireman's Fund Ins. Co., and Allianz SPA (f/k/a Riunione Adriatic Di Sicurta)	Rivkin Radler LLP	Michael A. Kotula	michael.kotula@rivkin.com
Counsel to Dairyland Insurance Company	Rivkin Radler LLP	Stuart I. Gordon and Matthew V. Spero	stuart.gordon@rivkin.com; matthew.spero@rivkin.com
Counsel to the Official Committee of Asbestos Personal Injury Claimants	Robinson & Cole, LLP	Natalie D Ramsey, Davis Lee Wright	nramsey@rc.com; dwright@rc.com
Counsel to Bestwall LLC	Robinson, Bradshaw & Hinson PA	Garland S. Cassada, Richard C. Worf, Jr., Kevin R. Crandall	gcassada@robinsonbradshaw.com; rworf@robinsonbradshaw.com; kcrandall@robinsonbradshaw.com
Counsel to The Travelers Indemnity Company, United States Fidelity and Guaranty Company, Travelers Casualty and Surety Company f/k/a The Aetna Casualty and Surety Company, St. Paul Surplus Lines Insurance Company, St. Paul Guardian Insurance Company, and St. Paul Fire and Marine Insurance Company	Steptoe & Johnson LLP	Joshua R Taylor, Catherine D. Cockerham	jrtaylor@steptoe.com; ccockerham@steptoe.com
Counsel to Billy Washburn, Paul Beckett and Others Represented in This Action by The Gori Law Firm	The Gori Law Firm	Sara M. Salger and Beth Gori	sara@gorilaw.com; beth@gorilaw.com
Counsel to Allianz Underwriters Ins. Co., Allianz Versicherungs AG, AM. Ins. Co., Chicago Ins. Co., Fireman's Fund Ins. Co., and Allianz SPA (f/k/a Riunione Adriatic Di Sicurta)	Troutman Pepper Hamilton Sanders LLP	Leslie A. Davis	leslie.davis@troutman.com
Counsel to Allianz Underwriters Ins. Co., Allianz Versicherungs AG, AM. Ins. Co., Chicago Ins. Co., Fireman's Fund Ins. Co., and Allianz SPA (f/k/a Riunione Adriatic Di Sicurta)	Troutman Pepper Hamilton Sanders LLP	Victoria A. Alvarez	victoria.alvarez@troutman.com
Counsel to United States of America, on behalf of the Department of Health and Human Services (HHS)	U.S. Department of Justice	Seth B. Shapiro, Senior Trial Counsel	seth.shapiro@usdoj.gov

Description	CreditorName	CreditorNoticeName	Email
Counsel to Zurich American Insurance Company, Zurich Insurance Company Ltd, Zurich Reinsurance Company, Ltd., and American Guarantee & Liability Insurance Company	Willkie Farr & Gallagher LLP	Richard Mancino	rmancino@willkie.com
Counsel to The Official Committee of Asbestos Personal Injury Claimants	Winston & Strawn LLP	David Neier, Carrie V. Hardman, George E. Mastoris, Cristina I. Calvar	dneier@winston.com; chardman@winston.com; gmastoris@winston.com; ccalvar@winston.com
Special Litigation Counsel for the Official Committee of Asbestos Personal Injury Claimants	Winston & Strawn LLP	Katherine A. Preston	kpreston@winston.com

Exhibit B

Description	CreditorName	CreditorNoticeName	Email
Debtors	Aldrich Pump LLC and Murray Boiler LLC	Attn Allan Tananbaum	atananbaum@tranetechnologies.com
Counsel for Sander L. Esserman, in his capacity as the Future Claimants Representative for DBMP LLC (the "DBMP FCR")	Alexander Ricks PLLC	Felton E. Parrish and Miller F. Capps	felton.parrish@alexanderricks.com; miller.capps@alexanderricks.com
Counsel to Verus Claim Services, LLC	Anselmi & Carvelli, LLP	Andrew E. Anselmi and Zachary D. Wellbrock	aanselmi@aclip.com; zwellbrock@aclip.com
Counsel for Debtors	Jones Day	Brad B Erens, Mark A Cody, Caitlin K Cahow	bberens@jonesday.com; macody@jonesday.com; ccahow@jonesday.com
Counsel for Debtors	Jones Day	Gregory M Gordon	gmgordon@jonesday.com
Local Counsel to Trane Technologies Company LLC and Trane U.S. Inc.	McCarter & English LLP	Anthony Bartell and Phillip S. Pavlick	abartell@mccarter.com; ppavlick@mccarter.com
Counsel to Trane Technologies Company LLC and Trane U.S. Inc.	McCarter & English LLP	Gregory J Mascitti	gmascitti@mccarter.com
Counsel for Debtors	Rayburn Cooper & Durham PA	C Richard Rayburn Jr, John R. Miller Jr, Matthew L. Tomsic, Ross R. Fulton, Ashley B. Oldfield	rrayburn@rcdlaw.net; jmiller@rcdlaw.net; mtomsic@rcdlaw.net; aoldfield@rcdlaw.net
Counsel for Sander L. Esserman, in his capacity as the Future Claimants Representative for DBMP LLC (the "DBMP FCR")	Young Conaway Stargatt & Taylor, LLP	Sharon M. Zieg and Sean T. Greecher	szieg@ycst.com; sgreecher@ycst.com

Exhibit C

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Internal Revenue Service	Internal Revenue Service		4905 Koger Boulevard		Greensboro	NC	27407
North Carolina Department of Revenue	North Carolina Department of Revenue	Bankruptcy Unit	PO Box 1168		Raleigh	NC	27602
Securities & Exchange Commission	Securities & Exchange Commission	Office of Reorganization	950 East Paces Ferry Rd, NE	Suite 900	Atlanta	GA	30326-1382
Securities And Exchange Commission	Securities And Exchange Commission		100 F Street, NE		Washington	DC	20549
Local Counsel to Jesus Perez and others represented in this action by Schrader & Associates, LLP	Touchstone Family Law	Christopher J. Culp	6101 Carnegie Boulevard, Suite 100		Charlotte	NC	28209
United States Attorney's Office, Western District of North Carolina	United States Attorney	Attn Civil Division	227 West Trade Street	Suite 1650	Charlotte	NC	28202