

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

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

**FOURTH 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"); (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*

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.



Employ Jones Day as Counsel as of the Petition Date [Dkt. 742] (the "Second Supplemental Declaration"); and (e) the *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* [Dkt. 1361] (the "Third Supplemental Declaration" and, together with the First and Second Supplemental Declarations, 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; June 15, 2021 and October 11, 2022, 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 "Fourth Supplemental Conflicts Search") to determine whether:

- (a) since the completion of the Third 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 Third 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 July 1, 2022 through October 25, 2023. 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") and the counsel that represented the subpoenaed parties. In connection therewith, Jones Day performed the Fourth 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 Fourth Supplemental Conflicts Search (collectively, the "Additional Parties") is set forth on Schedule 1 attached hereto.

Disinterestedness

8. To the extent that the Fourth 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 January 4, 2023, 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, the Schedule 1 attached to the Third 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: January 23, 2024
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

Verus Claims Services, LLC

Parties That Have Filed A Notice of Appearance and Their Counsel

Alexander Ricks PLLC
Brooks, Pierce, McLendon, Humphrey & Leonard, LLP
Christopher Kuehn
David Regnery
Evan Turtz
Galiher DeRobertis & Waxman LLP
Heather Howlett
Michael Lamach
McGuireWoods LLP
Nemeroff Law, PC
Richard Daudelin
Sara Brown
The Ruckdeschel Law Firm, LLC
Waldrep Wall Babcock & Bailey PLLC
Ward and Smith, P.A.
Waters & Krause, LLP

Counsel for Parties Served Subpoenas Pursuant to the Trust Discovery Order

A.M Sacculo Legal LLC
Anselmi & Carvelli, LLP
Ballard Spahr LLP
Blanco Tackabery & Matamoros, P.A.
Bradley Arant Boult Cummings LLC
Campbell & Levine, LLC
Chipman, Brown, Cicero & Cole LLP
David I. Bledsoe
HoganMcDaniel
Latham & Watkins LLP
Lowenstein Sandler LLP
Potter Anderson & Corroon LLP
Richards, Layton & Finger P.A.
Robinson, Bradshaw & Hinson, P.A.
Stark & Stark
Sullivan Hazeltine Allinson LLC
Swartz Campbell LLC
Wollmuth Maher & Deutsch LLP

SCHEDULE 2

FOURTH 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
UPDATES TO PRIOR DISCLOSURE¹		
<p>Advent International Corporation <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> • <i>Advent International Corporation</i> is: (a) a current client; and (b) a stockholder of current client <i>InPost UK Limited</i>. 	<p>Major Current Business Affiliations of Debtors Managers</p>	<ul style="list-style-type: none"> • Advent International Corporation is: (a) now a former client (closed 2023); and (b) the parent company of current clients <i>GfK SE</i> and <i>Innio Jenbacher GmbH & Co. OG</i>; and new client <i>Idemia France</i> (opened 2023). <p>InPost UK Limited, an entity of which Advent International Corporation is a stockholder, is now a former client (closed 2022).</p>
<p>Allianz SpA Allianz Versicherungs AG, AM, Ins. Co. <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> • Affiliate company and current client <i>Pacific Investment Management Company (PIMCO)</i> is (a) a member of a current <i>ad hoc</i> group representation of certain unsecured noteholders; and (b) a member of a current <i>ad hoc</i> group representation of term loan lenders; 	<p>Insurers and Their Counsel</p>	<ul style="list-style-type: none"> • The <i>ad hoc</i> group representation of term loan lenders, of which affiliate company and current client <i>Pacific Investment Management Company (PIMCO)</i> was a member, was closed in 2022; • The <i>ad hoc</i> group of unsecured noteholders, of which affiliate company <i>Pacific Investment Management Company (PIMCO)</i> was a member, was closed in 2023; • Chapter Master L.P., an entity of which parent company Allianz SE is a 45.5% shareholder, is now a former client (closed 2023); and

¹ 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
<ul style="list-style-type: none"> • Parent company Allianz SE is a 47.5% owner of Chapter Master Unit Trust, a former joint venture partner with current client Greystar Real Estate Partners LLC in a matter closed in 2020; • Affiliate company Allianz Real Estate Investment S.A. is a 45.5% shareholder of current client Chapter Master L.P.; • Affiliate company AGF Private Equity is a stockholder of current client Integragen; • Affiliate companies Allianz ECO Innovation 2 and Allianz Innovation 7 are stockholders of current client Idinvest Partners S.A.; and • Affiliate companies Allianz Global Investors GmbH, France Titrisation Allianz FCT Mid Cap Loans and Allianz Private Credit Fund S.A. SICAV-RAIF are current clients. 		<ul style="list-style-type: none"> • Idinvest Partners S.A., an entity of which affiliate companies Allianz ECO Innovation 2 and Allianz Innovation 7 are stockholders, is now a former client (closed 2023).
<p>Allstate Insurance Company <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> • Allstate Investments is a member of an <i>ad hoc</i> group representation of term loan lenders. 	Material Insurers	<ul style="list-style-type: none"> • The <i>ad hoc</i> group representation of term loan lenders, of which Allstate Investments was a member, closed in 2022.
<p>Bestwall LLC <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> • Bestwall LLC is a current client and the Debtor in a current chapter 11 proceeding in which Jones Day is debtor's counsel; 	Parties That Have Filed A Notice of Appearance and Their Counsel	<ul style="list-style-type: none"> • Flint Group GmbH, an entity of which parent company Koch Industries, Inc. is the ultimate joint venture owner, is now a former client (closed 2022); • Infor, Inc. an entity of which parent company Koch Industries, Inc. is a majority shareholder, is now a former client (closed 2021);

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> Parent company Koch Industries, Inc. is: (a) a current client; (b) a stockholder of current client Global Medical Response, Inc.; (c) a majority shareholder of current client Infor, Inc.; (d) the ultimate joint venture owner of current client Flint Group GmbH; and (d) an equity holder of former client Truck-Lite Co., LLC (closed 2020); Affiliate companies Koch Strategic Platforms, Koch Technology Solutions LLC, Koch Technology Solutions UK Limited, Koch Real Estate Investments, Koch Financial Assets III, LLC, Koch Chemicals Technology Group Italia S.r.l., Koch Chemical Technology Group S.L., Koch Agronomic Services, Flint Hills Resources, L.P., Invista International S.a.r.l., DSS Optical Solutions, Koch Shipping Pte Ltd., Koch Companies Public Sector LLC, Bittware, Inc., Guardian Industries, Guardian Europe Sàrl, Guardian Flachglas GmbH, Koch Disruptive Technologies, SRG Global, Inc., Koch Minerals LLC, Koch Equity Development, Koch Fertilizer LLC, Koch Supply & Trading, LP, LLC, Molex Incorporated n/k/a Molex, LLC and Molex Elektronik GmbH are current clients; and 		<ul style="list-style-type: none"> Affiliate companies Georgia-Pacific LLC, Koch-Glitsch Italia Srl, Koch Engineered Solutions, LLC, and Koch Treasury (all opened 2021); Koch Fertiliser Australia Pty Ltd., b/s/t GmbH Koch Kunststofftechnologie, and Koch Exploration Company LLC (all opened 2022); and Koch Capabilities LLC, Koch Icon Investments LLC, Illiquid Markets 1888 Fund LLC and Koch Minerals & Trading LLC (all opened 2023) are new clients; Affiliate company Koch Separation Solutions was opened in 2021 and is now a former client (closed 2023); Affiliate company Koch Financial Assets V, LLC is a former member of an <i>ad hoc</i> group representation of term loan lenders that was closed in 2022; and <p>Affiliate companies Koch Shipping Pte Ltd. (closed 2021); Koch Agronomic Services, Koch Technology Solutions, LLC, Koch Technology Solutions UK Limited, and Koch Financial Assets III, LLC (all closed 2022); and Koch Minerals, Koch Chemicals Technology Group Italia S.r.l., and Koch Chemical Technology Group S.L. (all closed 2023) are now former clients.</p>

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> Affiliate companies Arteva Holdings GmbH (closed 2018); KCTG Japan Holdings Limited, Koch AG & Energy Solutions, Koch-Glitsch Italia S.R.L., Molex Japan Co., Ltd. n/k/a Molex Japan LLC and Molex Zetronic S.R.L. (all closed 2019); and Koch Biological Solutions LLC and Koch Supply & Trading LLC (both closed 2020) are former clients. 		
<p>Doosan Infracore Co., Ltd. <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> Affiliate company Doosan Bobcat North America and Oceania is a current client. 	<p>Previous Contract Counterparties and Their Counsel</p>	<p>Affiliate company Doosan Bobcat North America and Oceania is now a former client (closed 2021).</p>
<p>Federal-Mogul U.S. Asbestos Personal Injury Trust (Ferodo, Flexallic, FMP, T&N) Tenneco, Inc. <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> Ultimate parent company Tenneco, Inc., parent company Tenneco GmbH; and affiliate companies Tenneco Automotive Ibérica, S.A., Tenneco Innovacion, S.L., Tenneco Automotive Europe BVBA, Federal-Mogul Corporation, Federal-Mogul Deva GmbH (FM Deva), Federal-Mogul Friction Products Limited, Federal Mogul Motorparts LLC, Federal Mogul Friction Products, S.A., Federal Mogul LLC and Federal Mogul SAS are current clients; and 	<p>Adverse Parties</p>	<ul style="list-style-type: none"> Affiliate companies Federal Mogul Aftermarket France, d/b/a FM Aftermarket France SAS and Federal-Mogul Aftermarket EMEA BV are new clients (both opened 2023); and Affiliate companies Federal-Mogul Corporation and Federal-Mogul Friction Products Limited are now former clients (both closed 2022).

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> 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 2022) are former clients. 		
<p>Gardner Denver Holdings, Inc. (n/k/a Ingersoll-Rand, Inc.)</p> <p>Ingersoll-Rand, Plc (n/k/a Trane Technologies Plc) and its affiliated companies as listed on Schedule 1 to Jones Days retention application</p> <p>The Trane Company and its affiliated companies are listed on Schedule 1 to Jones Days retention application</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> Following a Reverse Morris Trust transaction in 2020, affiliated entity Ingersoll-Rand Plc changed its name and is now known as current client <i>Trane Technologies Plc</i>, the parent company of the debtor in these chapter 11 cases; and 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 2018). 	<p>Other Non-Debtor Affiliates</p>	<ul style="list-style-type: none"> Parent company Trane Technologies Plc is now a former client (closed 2022); and Related entities, Ingersoll-Rand Company Collective Trust and Trane Merged Hourly Pension Plan are former members of an <i>ad hoc</i> group representation of term loan lenders that closed in 2022.

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<p>Government Employees Insurance Company</p> <p>Wellfleet New York Insurance Company</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> • Affiliate companies <i>Mouser Electronics, Energy West Mining Company, The Lubrizol Corporation, Clayton Homes Incorporated</i> and <i>Johns Manville Corporation</i> are current clients; and • Affiliate company <i>BNSF Railway Company</i> is: <ul style="list-style-type: none"> (a) a current client; (b) a member of current client <i>California Railroad Group</i>; and (c) a member of former client National Rail Group (closed 2020); and • Affiliate company Scott Fetzer Company is a former client (closed 2021). 	<p>Insurers and Their Counsel</p>	<ul style="list-style-type: none"> • Affiliate company <i>NetJets, Inc.</i> is a new client (opened 2023); and • Affiliate companies Clayton Homes Incorporated, Mouser Electronics, Inc. and Energy West Mining Company are now former clients (all closed 2023).

<p>JP Morgan Chase <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> • JPMorgan Chase Bank, N.A. is: (a) a current client; and (b) a former member of a group representation of term lenders closed in 2019; • Affiliate companies JPMorgan Securities Plc, JP Morgan Trust Company of Delaware, JPMorgan AG, and JPMorgan Chase Bank, N.A., London Branch are current clients; • Parent company JPMorgan Chase & Co. is: (a) a current client; (b) the employer of an individual who is a current client (opened 2021); (c) a co-client in a current joint defense group representation; (d) a member of a current <i>ad hoc</i> group representation of unsecured noteholders; (f) a member of a current joint defense group representation of underwriters; (g)) a stockholder of Nine Point Energy Holdings, Inc., the parent company of former client Nine Point Energy, LLC (closed 2022), 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); • Affiliate company JPMorgan Securities LLC is: (a) a current client; and (b) with respect only to its Credit Trading Group, a significant equity holder of former client Nine Point Energy, LLC (closed 2022), one of the debtors in a current chapter 11 proceeding in which Jones Day is special litigation counsel to the debtors; • Affiliate company Highbridge 	<p>Depository and Disbursement Bank</p>	<ul style="list-style-type: none"> • JPMorgan Chase Bank, N.A. is the former employer of an individual who is a new client (opened 2023); • Affiliate company JP Morgan Asset Investment a/k/a JP Morgan Investment Management, Inc. is a new client (opened 2023); • The <i>ad hoc</i> group representation of unsecured noteholders, in which parent company JPMorgan Chase & Co. was a member, was closed in 2023; • The joint defense group, in which parent company JPMorgan Chase & Co. was a member, was closed in 2023; • The individual previously disclosed as a client and an employee of JPMorgan Chase & Co. is now a former client (closed 2023); • Affiliated entity Highbridge Tactical Credit Master Fund, L.P. is a member of a new joint representation of debtholders that opened in 2022; and • Affiliate companies JPMorgan Trust Company of Delaware and JPMorgan AG are now former clients (both closed 2022).
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INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<p>Capital Management LLC is a member of a former <i>ad hoc</i> group representation of term loan lenders that closed in 2019;</p> <ul style="list-style-type: none"> • Affiliated entities JPMorgan Chase Retirement Plan Brigade and JPMorgan Chase Retirement Plan Brigade Bank Loan; JPMorgan Funds – Multi-Manager Alternatives Fund and JPMorgan Trust III – JPMorgan Multi-Manager Alternatives Fund are former members of a joint group representation of noteholders that closed in 2019; • Affiliated entity JPMorgan Chase Retirement Plan Brigade is: (a) a former member of two former group representations of lenders and noteholders that closed in 2020 and 2022, respectively; and (b) a former member of a group representation of second lien noteholders that closed in 2019; • Affiliated entity JPMorgan Chase Retirement Plan Brigade Bank Loan is: (a) former member of two former group representations lenders and noteholders that closed in 2020 and 2022, respectively; (b) a former member of a former <i>ad hoc</i> group representation of bondholders that closed in 2022; and (c) a former member of a former group representation of term lenders that closed in 2019; and 		

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> Affiliate companies JPMorgan Grupo Financiero, S.A. de C.V., JPMorgan Chase, National Association, JPMorgan Business Credit Corporation; and JPMorgan (all closed 2018); JPMorgan LLC (closed 2019); and JPMorgan Private Bank and JPMorgan Whitefriars, Inc. (both closed 2021) are former clients. 		
<p>Navigant Consulting, Inc. <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> Navigant Consulting, Inc. and affiliate company Navigant Capital Advisors are former clients (both closed 2020). 	<p>Parties to Material Contracts, Unexpired Leases and License Agreements with the Debtors</p>	<ul style="list-style-type: none"> Affiliate company Guidehouse LLP is a new client (opened 2023).
<p>Owens Corning Fibreboard Asbestos Personal Injury Trust (FB and OT subfunds) Pittsburgh Corning Corporation Asbestos PI Trust <i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> Parent company Owens Corning is: (a) a current client; and (b) the indemnitor for current client TAMKO Building Products, LLC; Affiliate companies Pittsburgh Corning LLC, Owens Corning Roofing & Asphalt LLC, Owens Corning Infrastructure Solutions, LLC, Owens Corning Insulating Systems, LLC, Owens Corning Sales, LLC, Owens Corning Science and Technology, LLC, Interwrap Corporation and Owens Corning Composite Materials LLC are current clients; and 	<p>Adverse Parties</p>	<ul style="list-style-type: none"> TAMKO Building Products LLC, an entity for which parent company Owens Corning is an indemnitor, is now a former client (closed 2023).

INTERESTED PARTY	RELATIONSHIP TO THE DEBTORS	CLIENTS AND THEIR AFFILIATES
<ul style="list-style-type: none"> Affiliate companies Pittsburgh Corning Corporation (closed 2020); and Owens Corning Mexico S. De R.L. De C.V. (closed 2021) are former clients. 		
<p>WABCO Holdings, Inc. Westinghouse Air Brake Company (WABCO)</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> Affiliate company Wabtec Corporation (d/b/a Westinghouse Air Brake Technologies Corporation) is a current client; Affiliate companies Wabtec France SAS and Faiveley Transport S.A., are former clients in a joint representation that was closed in 2021; and Affiliate companies WABCO Europe BVBA (closed 2019); and Wabtec Transportation Netherlands B.V and Wabtec Investments Ltd. LLC (both closed 2021) are former clients. 	Contractually Indemnified Parties	<ul style="list-style-type: none"> Affiliate companies Wabtec Transportation Systems LLC (opened 2021) and Wabtec Netherlands Holdings, B.V. (opened 2023) are new clients.
<p>Winterthur Swiss Insurance Company</p> <p><i>PRIOR DISCLOSURE:</i></p> <ul style="list-style-type: none"> Affiliate companies AXA Home Loan SFH and AXA Banque are co-clients in a current matter with current client Natixis; Affiliate company Vendome Immobilier Commercial is a 50% owner of current client Hauteville 2011; 	Insurers and Their Counsel	<ul style="list-style-type: none"> Hauteville 2011, of which affiliate company Vendome Immobilier Commercial is a 50% owner, is now a former client (closed 2023); and Siresa House SL (f/k/a Mirtocan Spain SL), an entity in which affiliate company ESI ONE is a joint venture partner, is now a former client (closed 2021).

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<ul style="list-style-type: none"> Affiliate company ESI ONE is a joint venture partner in Siresa House SL (f/k/a Mirtocan Spain SL) a co-client in a current matter with current client Greystar Real Estate Partners; Affiliate company AB Private Credit Investors LLC is a current client; and Affiliate company Union de gestion Immobilière pur le Commerce et l'Industrie (UGICOMI) is a former client (closed 2018). 		
<p>PREVIOUSLY SEARCHED PARTIES IN INTEREST (OR AFFILIATED ENTITIES) WHO ARE NEW CLIENTS OR RELATED TO NEW CLIENTS OR FORMER CLIENTS CLOSED IN THE PAST TWO YEARS</p>		
<p>Filairco, Inc. Filairco Technical Services Co., Inc.</p>	<p>Other Non-Debtor Affiliates</p>	<ul style="list-style-type: none"> Parent company PX Ventures Pte. Ltd. (a/k/a Ora Group) is a new client (opened 2022).
<p>Mitsubishi Electric Trane HVAC US LLC</p>	<p>Other Non-Debtor Affiliates</p>	<ul style="list-style-type: none"> Affiliate company Mitsubishi Electric Europe B.V. is a new client (opened 2022).
<p>TUI Holdings, Inc.</p>	<p>Other Non-Debtor Affiliates</p>	<ul style="list-style-type: none"> Affiliate company TUIFly GmbH is a new client (opened 2022).