

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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In re :  
ALDRICH PUMP LLC, *et al.*, :  
Debtors. :  
Misc. No. 1:22-mc-00080-TJK-RMM  
Underlying Case: *In re: Aldrich Pump LLC*, No. 20-30608 (JCW) (U.S. Bankruptcy Court Western District of North Carolina, Charlotte Division)

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**CONSENT MOTION OF ALDRICH PUMP LLC AND MURRAY BOILER LLC  
FOR EXTENSION OF TIME TO FILE OPPOSITION TO THE MANVILLE  
MATCHING CLAIMANTS’ MOTION TO QUASH OR MODIFY SUBPOENA, OR  
ALTERNATIVELY FOR PROTECTIVE ORDER**

Respondents Aldrich Pump LLC and Murray Boiler LLC (collectively, “Respondents”), by and through their attorneys, respectfully file this unopposed Motion requesting a one-week extension of time to file their opposition to *The Manville Matching Claimants’ Motion To Quash or Modify Subpoena, or Alternatively for Protective Order* (the “Matching Claimants’ Motion”) [Dkt. No. 2]. In support of this Motion, Respondents state as follows:

1. Absent an extension, the Respondents’ opposition would be due Tuesday, September 6, 2022, 14 days after service of the Matching Claimants’ Motion.
2. Respondents seek a one-week extension to September 13, 2022.
3. Respondents have not previously sought an extension of time in this matter.
4. Good cause supports granting this Motion.
  - a. Respondents request only a modest one-week extension, which has been consented to by opposing counsel.



b. As evident in the 18-page Matching Claimants' Motion, the background facts pertinent to the instant matter are relatively lengthy and complex. The Respondents anticipate that their opposition will be of similar length and detail, largely given a need to respond to and clarify certain statements in the Matching Claimants' Motion.

c. In addition to opposing the Matching Claimants' Motion, Respondents expect to file simultaneously a request to transfer, under Federal Rule of Civil Procedure 45(f), the Matching Claimants' Motion to the court issuing the Respondents' subpoena to the Manville Trust, the Bankruptcy Court for the Western District of North Carolina, which has already considered (and rejected) the arguments set forth in the Matching Claimants' Motion.

d. Respondents' opposition to the Matching Claimants' Motion will also need to explain the impact of a recent August 24, 2022, decision issued by the Third Circuit Court of Appeals in *In re Bestwall LLC*, which Respondents believe supports their opposition and anticipated request to transfer.

e. At the same time they file their opposition to and request to transfer the Matching Claimants' Motion, Respondents may also seek reconsideration of the *Memorandum and Order* [Dkt. No. 3] granting *The Manville Trust Matching Claimants' Motion to Proceed Anonymously* [Dkt. No. 1].

f. In addition to the Matching Claimants' Motion, Respondents' counsel is currently responding to numerous similar motions across the country.

g. Under the circumstances and given the upcoming holiday weekend, Respondents respectfully submit that good cause supports the requested one-week extension.

5. Granting the extension will not affect any previously-set deadlines.
6. Opposing counsel has consented to the Respondents' request for an extension.

## CONCLUSION

For the foregoing reasons, the Court should grant the Respondents' motion for extension of time to respond to *The Manville Trust Matching Claimants' Motion To Quash or Modify Subpoena, or Alternatively for Protective Order*.

Dated: September 2, 2022

Respectfully submitted,

/s/ David S. Torborg

David S. Torborg (D.C. Bar ID: 475598)

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**[PROPOSED] ORDER GRANTING  
CONSENT MOTION OF ALDRICH PUMP LLC AND MURRAY BOILER LLC  
FOR EXTENSION OF TIME TO FILE OPPOSITION TO THE MANVILLE  
MATCHING CLAIMANTS’ MOTION TO QUASH OR MODIFY SUBPOENA, OR  
ALTERNATIVELY FOR PROTECTIVE ORDER**

THIS MATTER comes before the Court on the *Consent Motion of Aldrich Pump LLC and Murray Boiler LLC for Extension of Time To File Opposition To The Manville Matching Claimants’ Motion To Quash or Modify Subpoena, or Alternatively for Protective Order*.

WHEREAS, The Manville Trust Matching Claimants have filed the following subpoena-related motions in this Court:

1. *The Manville Trust Matching Claimants’ Motion To Quash or Modify Subpoena, or Alternatively for Protective Order* [Dkt. No. 2]; and
2. *Movants The Manville Trust Matching Claimants’ Motion To Proceed Anonymously* [Dkt. No. 1].

WHEREAS, this Court having determined that it has jurisdiction over the instant Motion and there is good cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.

2. The deadline to respond to *The Manville Trust Matching Claimants' Motion To Quash or Modify Subpoena, or Alternatively for Protective Order* is extended to September 13, 2022.

Dated: \_\_\_\_\_, 2022

BY THE COURT:

\_\_\_\_\_  
United States District Judge

*Service Parties:*

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Matching Claimants*

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