

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

IN RE: ) Misc. No. 1:22-00080-TJK-RMM  
)  
ALDRICH PUMP, LLC, et al. ) Underlying Case: 20-BK-30608 (JCW)  
) (U.S. Bankr. W.D.N.C.)  
Debtor. )

**CONSENT MOTION OF MOVANTS THE MANVILLE TRUST MATCHING  
CLAIMANTS FOR EXTENSION OF TIME  
TO FILE REPLY BRIEF**

Movants The Manville Trust Matching Claimants (collectively, “Movants”), by counsel, file this unopposed Motion requesting a one-week extension of time to file their Reply to the Respondents’ Opposition to Movants’ Motion To Quash or Modify Subpoena, or Alternatively for Protective Order (the “Motion to Quash”) [Dkt. 2]. In support of this Motion, Movants state as follows:

1. Absent an extension, the Reply to the Opposition to the Motion to Quash would be due Tuesday, September 20, 2022, 7 days after service of the Opposition.
2. In conjunction with their Opposition to the Motion to Quash, Respondents have also filed a Motion to Transfer this Motion to the United States Bankruptcy Court for the Western District of North Carolina, and have combined their Memorandum in Support for both their Opposition to the Motion to Quash and the Motion to Transfer into a single 35-page Memorandum. [Dkt. 7-2].
3. Movants seek a one-week extension for their Reply to the Motion to Quash to September 27, 2022, which would be the same date that their Opposition to the Respondents’ Motion to Transfer would be due.



4. Movants have not previously sought an extension of time in this matter.
5. Good cause supports granting this Motion.
  - a. Movants request only a modest one-week extension, which has been consented to by opposing counsel.
  - b. Respondents' Memorandum in Opposition to the Motion to Quash and the Motion to Transfer is 35 pages long with numerous lengthy exhibits. Movants anticipate that their Reply will necessarily be lengthy, largely given a need to respond to the arguments made in the Opposition.
6. Granting the extension will not affect any other deadlines.
7. Opposing counsel has consented to the Movants' request for an extension.

For the foregoing reasons, the Court should grant the Movants' motion for extension of time to reply to the Respondents' Opposition to the Motion to Quash.

Dated: September 14, 2022

Respectfully submitted,

/s/ David I. Bledsoe-----

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Counsel for Movants The Manville Trust  
Matching Claimants

**CERTIFICATE OF SERVICE**

I certify that on September 14, 2022, I filed the foregoing with the Clerk of Court via ECF, who will serve notice by email to all parties registered for service of pleadings in this matter.

\_\_\_\_\_  
/s/David I. Bledsoe

David I. Bledsoe

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**[PROPOSED] ORDER**

Upon consideration of the Manville Trust Matching Claimants’ Motion for Extension of Time to File Reply Brief, and for good cause shown, it is hereby ORDERED:

The Motion is GRANTED. Movants’ Reply to the Respondents’ Opposition to the Motion to Quash shall be due September 27, 2022.

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

\_\_\_\_\_  
Robin M. Meriweather  
United States Magistrate Judge