

**STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

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

**SUMMARY OF TENTH INTERIM APPLICATION OF ANDERSON KILL P.C. FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL INSURANCE COUNSEL TO JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS’ REPRESENTATIVE, FOR THE PERIOD FROM OCTOBER 1, 2023 THROUGH JANUARY 31, 2024**

Name of Applicant:	Anderson Kill P.C.
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants’ Representative
Date of Order Approving Retention:	December 23, 2020 (Docket No. 486)
Period for which compensation and reimbursement is sought:	October 1, 2023 – January 31, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$11,433.50
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$49.08
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$11,482.58 <sup>2</sup>

This is a(n)   x   interim      final application.

<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.

<sup>2</sup> This includes a reduction of \$12.90 that has been showing as a credit.



**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**In re:**

**ALDRICH PUMP LLC, et al.,<sup>1</sup>**

**Debtors.**

Chapter 11

Case No. 20-30608

Jointly Administered

**TENTH INTERIM APPLICATION OF ANDERSON KILL P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES AS SPECIAL INSURANCE COUNSEL TO  
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,  
FOR THE PERIOD FROM OCTOBER 1, 2023 THROUGH JANUARY 31, 2024**

Anderson Kill P.C. (“Anderson”), Special Insurance Counsel to Joseph W. Grier, III, the Court-appointed future claimants’ representative in these cases (the “FCR”), hereby brings its tenth interim application for allowance of compensation of \$11,433.50 and reimbursement of expenses of \$49.08 for the period of October 1, 2023 through January 31, 2024 (the “Interim Period”) in accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals (Docket. No. 171) (the “Fee Procedures Order”), and in support, respectfully represents as follows:

**BACKGROUND**

1. On June 18, 2020 (the “Petition Date”), the above-captioned Debtors commenced their bankruptcy cases (together, the “Chapter 11 Case”) by filing voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code. On June 25, 2020, the Court entered an Order directing that the Debtors’ cases be jointly administered (Docket. No. 114). The Debtors are

---

<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.

authorized to continue to manage their property and operate their businesses as debtors-in-possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code.

2. On July 7, 2020, the Court entered its *Order Appointing the Official Committee of Asbestos Personal Injury Claimants* (Doc. No. 147), appointing a committee (the “ACC”) to represent personal injury claimants in this Chapter 11 Case.

3. On October 14, 2020, the Court entered its *Order Appointing Joseph W. Grier, III as Legal Representative for Future Asbestos Claimants* (Doc. No. 389), appointing the FCR.

4. On December 23, 2020, the Court entered an order authorizing the FCR to retain Anderson as his special insurance counsel in this Chapter 11 Case (Docket No. 486).

5. Pursuant to the Fee Procedures Order, professionals may request monthly compensation and reimbursement of expenses. Such requests are to be served on certain identified interested parties for review. If no objection to a professional’s request is received within fourteen (14) days of such request, the Debtors are authorized to pay 90% of the fees and 100% of the expenses requested. The Fee Procedures Order also requires each retained professional to file, approximately every four months, an application for interim Court approval and allowance pursuant to section 331 of the Bankruptcy Code of 100% of the compensation and reimbursement of expenses for the prior four-month period.

#### **COMPENSATION RECEIVED DURING THE INTERIM PERIOD**

6. Pursuant to the Fee Procedures Order, Anderson has submitted monthly fee statements to the Debtors for the Interim Period. Copies of the relevant monthly fee statements are attached as **Exhibit A-1 through A-4**. Summarized below are the requested professional fees, expenses and payments that Anderson has received on the same.

Date of Monthly Fee Statement	Description	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
11/03/23	Thirty-Fourth Monthly	10/01/2023-10/31/2023	\$2,345.00	\$0.00	\$2,110.50	\$234.50
12/06/23	Thirty-Fifth Monthly	11/01/2023-11/30/2023	\$525.00	\$49.08	\$521.58	\$52.50
01/12/24	Thirty-Sixth Monthly	12/01/2023-12/31/2023	\$2,159.50	\$0.00	\$1,943.10	\$215.90
02/07/24	Thirty-Seventh Monthly	01/01/2024-01/31/2024	\$6,404.50	\$0.00	\$0.00	\$6,404.50
<b>TOTAL:</b>			<b>\$11,433.50</b>	<b>\$49.08</b>	<b>\$4,575.18</b>	<b>\$6,907.40</b>

7. In total, Anderson has submitted fee statements during the Interim Period for total fees of \$11,433.50 and total expenses of \$49.08. As of the date of this Application, no party has objected to the fee statements circulated by Anderson.

**SUMMARY OF SERVICES RENDERED**

8. Attached hereto as **Exhibits A-1 through A-4** are Anderson’s monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by Anderson during the Interim Period. In summary, during the Interim Period, Anderson expended a total of 17.70 hours rendering necessary services in this Chapter 11 Case and incurred total fees of \$11,433.50 and \$49.08 in expenses.

9. As special insurance counsel to the FCR, Anderson provided a variety of insurance-related services to the FCR in connection with the Chapter 11 Case as set forth in the summary description below and in detail in **Exhibits A-1 through A-4**.

10. Anderson believes that the services it provided to the FCR in the context of the Chapter 11 Case during the Interim Period were necessary and beneficial to the administration of this case. Anderson further believes that its services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the tasks addressed.

11. Anderson has attempted to assign time entries for its professionals to the categories that best relate to those services. The following is a summary of the services provided to the FCR

during the Interim Period, organized by project billing category:

A. **A2 - Insurance – 5.50 hours, \$7,121.50.** During the Interim Period, Anderson professionals obtained and reviewed the Debtors’ insurance policies and settlements, reviewed the ACC’s discovery requests to the Debtors regarding insurance issues, and discussed the same with the FCR’s bankruptcy counsel. In addition, Anderson professionals prepared for, and participated in a call with insurance counsel for the ACC and participated in Court hearings.

B. **A8 - Anderson Kill Compensation – 12.20 hours, \$4,312.00.** During the Interim Period, Anderson professionals prepared and circulated their invoices and monthly fee statements for October 2023, November 2023, December 2023 and January 2024, and prepared the interim fee application for the prior period.

12. **Exhibit B** provides a summary of Anderson’s time by the project categories recommended by the Guidelines for Compensation and Reimbursement of Professionals referenced in Rule 2016-1 of this Court’s Local Rules of Practice and Procedure.

13. **Exhibit C** reflects a summary by category of the expenses that Anderson incurred during the Interim Period, which totaled \$49.08.

14. **Exhibit D** provides information as to Anderson’s professionals, including years of practice, position, billing rates, and the total number of hours billed during the Interim Period. Anderson maintains that its billing rates for the Interim Period, which reflect its customary hourly rates for the years 2023 and 2024, should be deemed a “reasonable billing rate” for purposes of this Court’s determination of the “reasonableness” of the fees for the services that Anderson has rendered.

15. **Exhibit E** is a summary of Anderson’s prior interim applications for compensation in this Chapter 11 Case.

### **DISBURSEMENTS**

16. Anderson must incur certain expenses in the course of rendering services to the FCR. Those expenses may include items such as court fees, copying charges, regular and express mail charges, special or hand delivery charges, photocopying charges, travel expenses, expenses for working meals, computerized research charges, professional service charges, transcription charges, and the like.

17. Anderson requests reimbursement for its actual and necessary expenses incurred during the Interim Period in the amount of \$49.08. A detailed breakdown of such expenses were included in Anderson's invoices (attached hereto as **Exhibits A-1 through A-4**) and those expenses are summarized in **Exhibit C**. Anderson's expenses during the Interim Period were necessary and reasonable under the circumstances of this Chapter 11 Case.

### **NOTICE**

18. Notice of this Application has been provided to: (a) the office of the United States Bankruptcy Administrator for the Western District of North Carolina; (b) counsel for the Debtors; (c) counsel for the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.; (d) counsel to the ACC; and (e) the other parties on the Service List established by the Case Management Order and Fee Procedures Order entered in this Chapter 11 Case. Anderson submits that, in light of the nature of the relief requested, no other or further notice need be provided.

### **NO PRIOR REQUEST**

19. Anderson has not made a prior request for the relief sought in this Application to this or any other Court.

**CONCLUSION**

20. Based on the foregoing, Anderson makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred in connection with representing the FCR as special insurance counsel in the Chapter 11 Case.

WHEREFORE, Anderson respectfully requests that the Court enter an Order:

1) Allowing interim compensation to Anderson in the amount of \$11,433.50 as reasonable, actual and necessary for professional services rendered by it on behalf of the FCR during the Interim Period and interim reimbursement of expenses incurred during the Interim Period of \$49.08 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay Anderson the amount of \$11,482.58, which is equal to 100% of Anderson's requested compensation for the Interim Period and 100% of Anderson's requested expense reimbursement for the Interim Period, less all previous payments made to Anderson pursuant to the Fee Procedures Order; and

3) Granting such further relief as is just and proper.

Dated: March 15, 2024

Respectfully submitted,

/s/ A. Cotten Wright

A. Cotten Wright (State Bar No. 28162)

Grier Wright Martinez, PA

521 E Morehead Street, Suite 440

Charlotte, NC 28202

Telephone: (704) 332-0207

Facsimile: (704) 332-0215

Email: cwright@grierlaw.com

-and-

Jonathan P. Guy, Esq. (admitted *pro hac vice*)  
Debbie L. Felder, Esq. (admitted *pro hac vice*)  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
2100 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037  
Telephone: (202) 339-8400  
Facsimile: (202) 339-8500  
Email: [jguy@orrick.com](mailto:jguy@orrick.com)  
[dfelder@orrick.com](mailto:dfelder@orrick.com)

*Counsel for Joseph W. Grier, III,  
Future Claimants' Representative*



# **EXHIBIT A-1**

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

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

**THIRTY-FOURTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED  
BY ANDERSON KILL P.C. AS SPECIAL INSURANCE COUNSEL TO  
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,  
FOR THE PERIOD FROM OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Anderson Kill P.C. as Special Insurance Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of December 23, 2020* (Docket No. 486) (the “Anderson Retention Order”), Anderson Kill P.C. (“Anderson”), as Special Insurance Counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Thirty-Fourth Monthly Statement of Fees and Expenses Incurred by Anderson Kill PC as Special Insurance Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from October 1, 2023 through October 31, 2023* (the “Monthly Fee Statement”).

---

<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.

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as **Exhibit A** is Anderson’s invoice for the period October 1, 2023 through October 31, 2023 (the “Fee Statement Period”).

**Total Fees and Expenses for the Fee Statement Period**

2. The total amounts of fees and expenses incurred by Anderson during the Fee Statement Period are as follows:

<b>Fee Statement Period: October 1, 2023 – October 31, 2023</b>	
Total Fees:	\$2,345.00
Total Expenses:	\$0.00
<b>TOTAL:</b>	<b>\$2,345.00</b>

3. Pursuant to the Interim Compensation Order, Anderson seeks payment of \$2,110.50 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Anderson’s fees and (b) 100% of its incurred expenses.

**Notice and Objection Procedures**

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors’ counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator for the Western District of North Carolina, 402 West

Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.: (i) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoam@mccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and Phillip S. Pavlick, Esq., ppavlick@mccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31<sup>st</sup> Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@cordes-law.com); (e) counsel to the Official Asbestos Claimants' Committee: (i) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com, and Todd E. Phillips, Esq., tphillips@capdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Anderson, no later than November 17, 2023 (the "Objection Deadline"). Any Objection must set

forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay Anderson an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Anderson.

This is the 3<sup>rd</sup> day of November 2023.

ANDERSON KILL P.C.

/s/ Robert M. Horkovich

Robert M. Horkovich (admitted pro hac vice)

1251 Avenue of the Americas

New York, NY 10020-1182

Telephone: (212) 278-1000

Facsimile: (212) 278-1733

E-mail: rhorkovich@andersonkill.com

Special Insurance Counsel for

Joseph W. Grier, III

Future Claimants' Representative

# **Exhibit A**

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

Joseph W. Grier III, Esq.  
Grier Wright Martinez PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202

Invoice No. 318908  
Invoice Date: November 3, 2023  
Client Matter ID: 106539.10997  
Billing Attorney: Robert M Horkovich

**Joseph W. Grier, III, Esq.**

**Aldrich Pump-FCR**

Professional Services:	\$2,345.00
Costs:	\$0.00
Total Current Invoice:	\$2,345.00
Outstanding Balance from Prior Invoices (see listing):	\$10,127.17
<b>Total Amount:</b>	<b>\$12,472.17</b>

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

November 3, 2023

Invoice No. 318908

**MATTER:** Aldrich Pump-FCR

**INVOICE LIST**

<b>INVOICE</b>	<b>DATE</b>	<b>INVOICE TOTAL</b>
317622	07/07/23	\$4,425.70
318009	08/07/23	\$2,041.10
318424	09/18/23	\$693.95
318579	10/05/23	\$2,966.42
<b>OUTSTANDING BALANCE FROM PRIOR INVOICES</b>		<b>\$10,127.17</b>



**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

Joseph W. Grier III, Esq.  
Grier Wright Martinez PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202

Billing Attorney Robert M Horkovich  
Invoice No. 318908  
Invoice Date November 3, 2023

Client Matter #: 106539.10997  
Joseph W. Grier, III, Esq.  
RE: Aldrich Pump-FCR

**FOR PROFESSIONAL SERVICES RENDERED THROUGH October 31, 2023**

Date	Professional	Hours	Task	Narrative	Amount
10/02/23	AHP	0.30	A8	Begin drafting 33rd monthly.	105.00
10/03/23	AHP	0.70	A8	Finish drafting 33rd monthly fee application.	245.00
10/03/23	AHP	0.60	A8	Begin drafting 9th interim fee application.	210.00
10/05/23	AHP	0.40	A8	Prepare draft of 33rd monthly for 1st and 2nd review.	140.00
10/06/23	AHP	0.60	A8	Finalize and submit 33rd monthly fee application.	210.00
10/13/23	AHP	0.90	A8	Continue drafting monitoring chart for 9th interim fee application.	315.00
10/13/23	AHP	1.20	A8	Prepare 9th interim fee application.	420.00
10/16/23	AHP	0.90	A8	Finalize 9th interim fee application and exhibits for 1st and 2nd review.	315.00
10/19/23	AHP	0.30	A8	Revisions to monitoring chart.	105.00
10/23/23	AHP	0.80	A8	Revise 9th interim for review.	280.00
<b>Total Fees:</b>					<b>\$2,345.00</b>

**SUMMARY OF PROFESSIONAL SERVICES**

<b>PROFESSIONAL</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Arline H Pelton	<u>6.70</u>	350.00	<u>2,345.00</u>
	<b>6.70</b>		<b>\$2,345.00</b>

**SUMMARY OF SERVICES BY ACTIVITY**

	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
<b>ACTIVITY CODE A8 – ANDERSON KILL COMPENSATION</b>			
Pelton, Arline H	<u>6.70</u>	350.00	<u>\$2,345.00</u>
	<b>6.70</b>		<b>\$2,345.00</b>
<b>TOTAL CURRENT BILLING:</b>			<b>\$2,345.00</b>

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

Joseph W. Grier, III, Esq.  
Grier Wright Martinez PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202

MATTER: 106539. 10997  
INVOICE: 318908

November 3, 2023

Joseph W. Grier, III, Esq.  
MATTER: Aldrich Pump-FCR

**REMITTANCE COPY**

Professional Services	\$2,345.00
Costs:	\$0.00
Total Current Invoice:	\$2,345.00
Outstanding Amount From Prior Invoices:	\$10,127.17
<b>TOTAL AMOUNT DUE:</b>	<b>\$12,472.17</b>

PLEASE SEND YOUR REMITTANCE TO US AT:

Anderson Kill P.C.  
1251 Avenue of the Americas  
New York, NY 10020

OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

BANK: WELLS FARGO BANK, N.A.  
ABA NUMBER FOR WIRES: 121000248  
ABA NUMBER FOR ACHs: 026012881  
CREDIT TO: ANDERSON KILL P.C.  
OPERATING ACCOUNT  
ACCOUNT NUMBER: 2000037634722

KINDLY INDICATE:

CLIENT NUMBER: 106539  
INVOICE NUMBER: 318908  
YOUR FIRM NAME: Joseph W. Grier, III, Esq.

**THIS INVOICE IS PAYABLE UPON RECEIPT**

**PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE**

# **EXHIBIT A-2**

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

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

**THIRTY-FIFTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
ANDERSON KILL P.C. AS SPECIAL INSURANCE COUNSEL TO  
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,  
FOR THE PERIOD FROM NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Anderson Kill P.C. as Special Insurance Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of December 23, 2020* (Docket No. 486) (the “Anderson Retention Order”), Anderson Kill P.C. (“Anderson”), as Special Insurance Counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Thirty-Fifth Monthly Statement of Fees and Expenses Incurred by Anderson Kill PC as Special Insurance Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from November 1, 2023 through November 30, 2023* (the “Monthly Fee Statement”).

---

<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.

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as **Exhibit A** is Anderson’s invoice for the period November 1, 2023 through November 30, 2023 (the “Fee Statement Period”).

**Total Fees and Expenses for the Fee Statement Period**

2. The total amounts of fees and expenses incurred by Anderson during the Fee Statement Period are as follows:

<b>Fee Statement Period: November 1, 2023 – November 30, 2023</b>	
Total Fees:	\$525.00
Total Expenses:	\$49.08
<b>TOTAL:</b>	<b>\$574.08</b>

3. Pursuant to the Interim Compensation Order, Anderson seeks payment of \$521.58 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Anderson’s fees and (b) 100% of its incurred expenses.

**Notice and Objection Procedures**

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors’ counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator for the Western District of North Carolina, 402 West

Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.: (i) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoam@mccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and Phillip S. Pavlick, Esq., ppavlick@mccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31<sup>st</sup> Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@cordes-law.com); (e) counsel to the Official Asbestos Claimants' Committee: (i) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com, and Todd E. Phillips, Esq., tphillips@capdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Anderson, no later than December 20, 2023 (the "Objection Deadline"). Any Objection must set

forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay Anderson an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Anderson.

This is the 6<sup>th</sup> day of December 2023.

ANDERSON KILL P.C.

/s/ Robert M. Horkovich

Robert M. Horkovich (admitted pro hac vice)

1251 Avenue of the Americas

New York, NY 10020-1182

Telephone: (212) 278-1000

Facsimile: (212) 278-1733

E-mail: rhorkovich@andersonkill.com

Special Insurance Counsel for

Joseph W. Grier, III

Future Claimants' Representative



# **Exhibit A**

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

Joseph W. Grier III, Esq.  
Grier Wright Martinez PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202

Invoice No. 319214  
Invoice Date: December 4, 2023  
Client Matter ID: 106539.10997  
Billing Attorney: Robert M Horkovich

**Joseph W. Grier, III, Esq.**

**Aldrich Pump-FCR**

Professional Services:	\$525.00
Costs:	\$49.08
Total Current Invoice:	\$574.08
Outstanding Balance from Prior Invoices (see listing):	\$9,809.91
<b>Total Amount:</b>	<b>\$10,383.99</b>

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

December 4, 2023

Invoice No. 319214

**MATTER:** Aldrich Pump-FCR

**INVOICE LIST**

<b>INVOICE</b>	<b>DATE</b>	<b>INVOICE TOTAL</b>
317622	07/07/23	\$4,425.70
318009	08/07/23	\$2,041.10
318424	09/18/23	\$693.95
318579	10/05/23	\$304.16
318908	11/03/23	\$2,345.00
<b>OUTSTANDING BALANCE FROM PRIOR INVOICES</b>		<b>\$9,809.91</b>

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

---

Joseph W. Grier III, Esq.  
Grier Wright Martinez PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202

Billing Attorney Robert M Horkovich  
Invoice No. 319214  
Invoice Date December 4, 2023

Client Matter #: 106539.10997  
Joseph W. Grier, III, Esq.  
RE: Aldrich Pump-FCR

**FOR PROFESSIONAL SERVICES RENDERED THROUGH November 30, 2023**

<b>Date</b>	<b>Professional</b>	<b>Hours</b>	<b>Task</b>	<b>Narrative</b>	<b>Amount</b>
11/03/23	AHP	0.90	A8	Prepare draft of 34th monthly fee application.	315.00
11/03/23	AHP	0.40	A8	Prepare multiple formats of documents to be circulated.	140.00
11/17/23	AHP	0.20	A8	Update monitoring chart.	70.00
<b>Total Fees:</b>					<b>\$525.00</b>

**SUMMARY OF PROFESSIONAL SERVICES**

<b>PROFESSIONAL</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Arline H Pelton	1.50	350.00	525.00
	<u>1.50</u>		<u>\$525.00</u>

**SUMMARY OF SERVICES BY ACTIVITY**

	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
<b>ACTIVITY CODE A8 ANDERSON KILL COMPENSATION</b>			
Pelton, Arline H	1.50	350.00	\$525.00
	<u>1.50</u>		<u>\$525.00</u>

**DISBURSEMENTS**

10/20/2023	MR	Vendor: NUIX NORTH AMERICA INC; Invoice#: INUS08925; Date: 10/20/2023 - SEPT 2023 DATABASE HOSTING FEES	49.08
<b>Sub-Total Disbursements:</b>			<b>\$49.08</b>

**SUMMARY OF DISBURSEMENT BY TYPE**

<b>TYPE</b>	<b>WORK DESCRIPTION</b>	<b>AMOUNT</b>
PS	Professional Services – Database Hosting Fees	\$49.08
<b>TOTAL CURRENT BILLING:</b>		<b>\$574.08</b>

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

Joseph W. Grier, III, Esq.  
Grier Wright Martinez PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202

MATTER: 106539. 10997  
INVOICE: 319214

December 4, 2023

Joseph W. Grier, III, Esq.  
MATTER: Aldrich Pump-FCR

**REMITTANCE COPY**

Professional Services	\$525.00
Costs:	\$49.08
Total Current Invoice:	\$574.08
Outstanding Amount From Prior Invoices:	\$9,809.91
<b>TOTAL AMOUNT DUE:</b>	<b>\$10,383.99</b>

PLEASE SEND YOUR REMITTANCE TO US AT:

Anderson Kill P.C.  
1251 Avenue of the Americas  
New York, NY 10020

OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

BANK: WELLS FARGO BANK, N.A.  
ABA NUMBER FOR WIRES: 121000248  
ABA NUMBER FOR ACHs: 026012881  
CREDIT TO: ANDERSON KILL P.C.  
OPERATING ACCOUNT  
ACCOUNT NUMBER: 2000037634722

KINDLY INDICATE:

CLIENT NUMBER: 106539  
INVOICE NUMBER: 319214  
YOUR FIRM NAME: Joseph W. Grier, III, Esq.

**THIS INVOICE IS PAYABLE UPON RECEIPT**

**PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE**

# **EXHIBIT A-3**

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

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

**THIRTY-SIXTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
ANDERSON KILL P.C. AS SPECIAL INSURANCE COUNSEL TO  
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS’ REPRESENTATIVE,  
FOR THE PERIOD FROM DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Anderson Kill P.C. as Special Insurance Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of December 23, 2020* (Docket No. 486) (the “Anderson Retention Order”), Anderson Kill P.C. (“Anderson”), as Special Insurance Counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Thirty-Sixth Monthly Statement of Fees and Expenses Incurred by Anderson Kill PC as Special Insurance Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from December 1, 2023 through December 31, 2023* (the “Monthly Fee Statement”).

<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.



**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as **Exhibit A** is Anderson’s invoice for the period December 1, 2023 through December 31, 2023 (the “Fee Statement Period”).

**Total Fees and Expenses for the Fee Statement Period**

2. The total amounts of fees and expenses incurred by Anderson during the Fee Statement Period are as follows:

<b>Fee Statement Period: December 1, 2023 – December 31, 2023</b>	
Total Fees:	\$2,159.00
Total Expenses:	\$0.00
<b>TOTAL:</b>	<b>\$2,159.00</b>

3. Pursuant to the Interim Compensation Order, Anderson seeks payment of \$1,943.10 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Anderson’s fees and (b) 100% of its incurred expenses.

**Notice and Objection Procedures**

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors’ counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator for the Western District of North Carolina, 402 West

Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.: (i) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoam@mccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and Phillip S. Pavlick, Esq., ppavlick@mccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31<sup>st</sup> Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@cordes-law.com); (e) counsel to the Official Asbestos Claimants' Committee: (i) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com, and Todd E. Phillips, Esq., tphillips@capdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Anderson, no later than January 26, 2024 (the "Objection Deadline"). Any Objection must set

forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay Anderson an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Anderson.

This is the 12<sup>th</sup> day of January 2024.

ANDERSON KILL P.C.

/s/ Robert M. Horkovich

Robert M. Horkovich (admitted pro hac vice)

1251 Avenue of the Americas

New York, NY 10020-1182

Telephone: (212) 278-1000

Facsimile: (212) 278-1733

E-mail: rhorkovich@andersonkill.com

Special Insurance Counsel for

Joseph W. Grier, III

Future Claimants' Representative

# **Exhibit A**

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

Joseph W. Grier, III, Esq.  
Grier Wright Martinez PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202

Invoice No. 319610  
Invoice Date: January 9, 2024  
Client Matter ID: 106539.10997  
Billing Attorney: Robert M Horkovich

**Joseph W. Grier, III, Esq.**

**Aldrich Pump-FCR**

Professional Services:	\$2,159.00
Costs:	\$0.00
Total Current Invoice:	\$2,159.00
Outstanding Balance from Prior Invoices (see listing):	\$821.48
<b>Total Amount:</b>	<b>\$2,980.48</b>

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

January 9, 2024

Invoice No. 319610

**MATTER:** Aldrich Pump-FCR

**INVOICE LIST**

<b>INVOICE</b>	<b>DATE</b>	<b>INVOICE TOTAL</b>
318579	10/05/23	\$12.90
318908	11/03/23	\$234.50
319214	12/04/23	\$574.08
<b>OUTSTANDING BALANCE FROM PRIOR INVOICES</b>		<b>\$821.48</b>

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

---

Joseph W. Grier III, Esq.  
Grier Wright Martinez PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202

Billing Attorney Robert M Horkovich  
Invoice No. 319610  
Invoice Date January 9, 2024

Client Matter #: 106539.10997  
Joseph W. Grier, III, Esq.  
RE: Aldrich Pump-FCR

**FOR PROFESSIONAL SERVICES RENDERED THROUGH December 31, 2023**

Date	Professional	Hours	Task	Narrative	Amount
12/04/23	AHP	0.80	A8	Draft 35th monthly fee application for review.	280.00
12/05/23	AHP	0.20	A8	Revise format for 2nd review of 35th monthly fee application.	70.00
12/06/23	AHP	0.60	A8	Finalize 35th fee application for submission.	210.00
12/18/23	AHP	0.30	A8	Revisions to monitoring chart.	105.00
12/27/23	RMH	0.20	A2	Preparation for hearing before Judge Whitley.	249.00
12/28/23	RMH	0.50	A2	Hearing before Judge Whitley.	622.50
12/28/23	RMH	0.50	A2	Follow up re minute orders.	622.50
<b>Total Fees:</b>					<b>\$2,159.00</b>

**SUMMARY OF PROFESSIONAL SERVICES**

<b>PROFESSIONAL</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Robert M Horkovich	1.20	1,245.00	1,494.00
Arline H Pelton	1.90	350.00	665.00
	<u>3.10</u>		<u>\$2,159.00</u>

**SUMMARY OF SERVICES BY ACTIVITY**

	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
<b>ACTIVITY CODE A2 – INSURANCE</b>			
Horkovich, Robert M	1.20	1,245.00	\$1,494.00
	<u>1.20</u>		<u>\$1,494.00</u>
<b>ACTIVITY CODE A8 – ANDERSON KILL COMPENSATION</b>			
Pelton, Arline H	1.90	350.00	\$665.00
	<u>1.90</u>		<u>\$665.00</u>

**TOTAL CURRENT BILLING: \$2,159.00**



**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

Joseph W. Grier III, Esq.  
Grier Wright Martinez PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202

MATTER: 106539. 10997  
INVOICE: 319610

January 9, 2024

Joseph W. Grier, III, Esq.  
MATTER: Aldrich Pump-FCR

**REMITTANCE COPY**

Professional Services	\$2,159.00
Costs:	\$0.00
Total Current Invoice:	\$2,159.00
Outstanding Amount From Prior Invoices:	\$821.48
<b>TOTAL AMOUNT DUE:</b>	<b>\$2,980.48</b>

PLEASE SEND YOUR REMITTANCE TO US AT:

Anderson Kill P.C.  
1251 Avenue of the Americas  
New York, NY 10020

OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

BANK: WELLS FARGO BANK, N.A.  
ABA NUMBER FOR WIRES: 121000248  
ABA NUMBER FOR ACHs: 026012881  
CREDIT TO: ANDERSON KILL P.C.  
OPERATING ACCOUNT  
ACCOUNT NUMBER: 2000037634722

KINDLY INDICATE:

CLIENT NUMBER: 106539  
INVOICE NUMBER: 319610  
YOUR FIRM NAME: Joseph W. Grier, III, Esq.

**THIS INVOICE IS PAYABLE UPON RECEIPT**

**PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE**

# **EXHIBIT A-4**

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

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

**THIRTY-SEVENTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED  
BY ANDERSON KILL P.C. AS SPECIAL INSURANCE COUNSEL TO  
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,  
FOR THE PERIOD FROM JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Anderson Kill P.C. as Special Insurance Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of December 23, 2020* (Docket No. 486) (the “Anderson Retention Order”), Anderson Kill P.C. (“Anderson”), as Special Insurance Counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Thirty-Seventh Monthly Statement of Fees and Expenses Incurred by Anderson Kill PC as Special Insurance Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from January 1, 2024 through January 31, 2024* (the “Monthly Fee Statement”).

<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.

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as **Exhibit A** is Anderson’s invoice for the period January 1, 2024 through January 31, 2024 (the “Fee Statement Period”).

**Total Fees and Expenses for the Fee Statement Period**

2. The total amounts of fees and expenses incurred by Anderson during the Fee Statement Period are as follows:

<b>Fee Statement Period: January 1, 2024 – January 31, 2024</b>	
Total Fees:	\$6,404.50
Total Expenses:	\$0.00
<b>TOTAL:</b>	<b>\$6,404.50</b>

3. Pursuant to the Interim Compensation Order, Anderson seeks payment of \$5,764.05 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Anderson’s fees and (b) 100% of its incurred expenses.

**Notice and Objection Procedures**

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors’ counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator for the Western District of North Carolina, 402 West

Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.: (i) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoam@mccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and Phillip S. Pavlick, Esq., ppavlick@mccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31<sup>st</sup> Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@cordes-law.com); (e) counsel to the Official Asbestos Claimants' Committee: (i) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com, and Todd E. Phillips, Esq., tphillips@capdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Anderson, no later than February 21, 2024 (the "Objection Deadline"). Any Objection must set

forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay Anderson an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Anderson.

This is the 7<sup>th</sup> day of February 2024.

ANDERSON KILL P.C.

/s/ Robert M. Horkovich

Robert M. Horkovich (admitted pro hac vice)

1251 Avenue of the Americas

New York, NY 10020-1182

Telephone: (212) 278-1000

Facsimile: (212) 278-1733

E-mail: rhorkovich@andersonkill.com

Special Insurance Counsel for

Joseph W. Grier, III

Future Claimants' Representative

# **Exhibit A**

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

Joseph W. Grier III, Esq.  
Grier Wright Martinez PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202

Invoice No. 319862  
Invoice Date: February 6, 2024  
Client Matter ID: 106539.10997  
Billing Attorney: Robert M Horkovich

**Joseph W. Grier, III, Esq.**

**Aldrich Pump-FCR**

Professional Services:	\$6,404.50
Costs:	\$0.00
Total Current Invoice:	\$6,404.50
Outstanding Balance from Prior Invoices (see listing):	\$2,967.58
<b>Total Amount:</b>	<b>\$9,372.08</b>



**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

February 6, 2024

Invoice No. 319862

**MATTER:** Aldrich Pump-FCR

**INVOICE LIST**

<b>INVOICE</b>	<b>DATE</b>	<b>INVOICE TOTAL</b>
318908	11/03/23	\$234.50
319214	12/04/23	\$574.08
319610	01/09/24	\$2,159.00
<b>OUTSTANDING BALANCE FROM PRIOR INVOICES</b>		<b>\$2,967.58</b>

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
 (212) 278-1000 EIN:13-2743351  
 E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

Joseph W. Grier III, Esq.  
 Grier Wright Martinez PA  
 521 E. Morehead Street, Suite 440  
 Charlotte, NC 28202

Billing Attorney Robert M Horkovich  
 Invoice No. 319862  
 Invoice Date February 6, 2024

Client Matter #: 106539.10997  
 Grier, Joseph W., III, Esq.  
 RE: Aldrich Pump-FCR

**FOR PROFESSIONAL SERVICES RENDERED THROUGH January 31, 2024**

Date	Professional	Hours	Task	Narrative	Amount
01/02/24	MDS	0.50	A2	Review of court's opinion on viability of "two step" corporate restructuring process.	497.50
01/03/24	RMH	1.00	A2	Read Judge Whitley's opinion re motion to dismiss.	1,350.00
01/05/24	AHP	0.90	A8	Draft 36th monthly fee application.	333.00
01/09/24	AHP	0.60	A8	Revise draft of 36th monthly fee application for 1st and 2nd reviews.	222.00
01/11/24	RMH	1.00	A2	Attention to appeals of Judge's decisions.	1,350.00
01/12/24	AHP	0.60	A8	Finalize documents for submission.	222.00
01/12/24	RMH	0.80	A2	Review of appeal of Judge Whitley's orders.	1,080.00
01/23/24	RMH	1.00	A2	Analysis of appeals.	1,350.00
<b>Total Fees:</b>					<b>6,404.50</b>

**SUMMARY OF PROFESSIONAL SERVICES**

<b>PROFESSIONAL</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Robert M Horkovich	3.80	1,350.00	5,130.00
Mark D Silverschotz	0.50	995.00	497.50
Arline H Pelton	2.10	370.00	777.00
	<u>6.40</u>		<u>\$6,404.50</u>

**SUMMARY OF SERVICES BY ACTIVITY**

	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
<b>ACTIVITY CODE A2 INSURANCE</b>			
Horkovich, Robert M	3.80	1,350.00	\$5,130.00
Silverschotz, Mark D	0.50	995.00	\$497.50
	<u>4.30</u>		<u>\$5,627.50</u>
<b>ACTIVITY CODE A8 ANDERSON KILL COMPENSATION</b>			
Pelton, Arline H	2.10	370.00	\$777.00
	<u>2.10</u>		<u>\$777.00</u>

**TOTAL CURRENT BILLING: \$6,404.50**

**Anderson Kill P.C.**

1251 Avenue of the Americas, New York, NY 10020  
(212) 278-1000 EIN:13-2743351  
E-Mail: [Accounting@andersonkill.com](mailto:Accounting@andersonkill.com)

Joseph W. Grier, III, Esq.  
Grier Wright Martinez PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202

MATTER: 106539. 10997  
INVOICE: 319862

February 6, 2024

MATTER: Aldrich Pump-FCR

**REMITTANCE COPY**

Professional Services	\$6,404.50
Costs:	\$0.00
Total Current Invoice:	\$6,404.50
Outstanding Amount From Prior Invoices:	\$2,967.58
<b>TOTAL AMOUNT DUE:</b>	<b>\$9,372.08</b>

PLEASE SEND YOUR REMITTANCE TO US AT:

OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

Anderson Kill P.C.  
1251 Avenue of the Americas  
New York, NY 10020

BANK: WELLS FARGO BANK, N.A.  
ABA NUMBER FOR WIRES: 121000248  
ABA NUMBER FOR ACHs: 026012881  
CREDIT TO: ANDERSON KILL P.C.  
OPERATING ACCOUNT  
ACCOUNT NUMBER: 2000037634722

KINDLY INDICATE:

CLIENT NUMBER: 106539  
INVOICE NUMBER: 319862  
YOUR FIRM NAME: Joseph W. Grier, III, Esq.

**THIS INVOICE IS PAYABLE UPON RECEIPT**

**PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE**

# EXHIBIT B

## CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

October 1, 2023 through January 31, 2024

<b>Project Category</b>	<b>Matter Number</b>	<b>Total Hours for the Interim Period</b>	<b>Total Hours from the Petition Date</b>	<b>Total Fees for the Interim Period</b>	<b>Total Fees from the Petition Date</b>
Insurance	A2	5.50	1,260.80	\$7,121.50	\$1,029,497.50
Due Diligence	A3	0.00	0.30	\$0.00	\$324.00
Anderson Compensation	A8	12.20	135.60	\$4,312.00	\$43,994.00
<b>TOTAL:</b>		<b>17.70</b>	<b>1,396.70</b>	<b>\$11,433.50</b>	<b>\$1,073,815.50</b>

# EXHIBIT C

## CUMULATIVE EXPENSE SUMMARY

October 1, 2023 through January 31, 2024

<b>Expense Category</b>	<b>Total Expenses for the Period</b>	<b>Total Expenses from the Petition Date</b>
Professional Services (Database Hosting Fees)	\$49.08	\$3,698.51
Transcripts & Depositions	\$0.00	\$59.40
Library & Legal Research (Westlaw)	\$0.00	\$40.30
<b>TOTAL:</b>	<b>\$49.08</b>	<b>\$3,798.21</b>

# EXHIBIT D

## SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

October 1, 2023 through January 31, 2024<sup>1</sup>

Name of Professional	Position - Bar Year	2023 Hourly Billing Rate	2024 Hourly Billing Rate	Total Hours Billed	Total Compensation
Robert M. Horkovich	Senior Shareholder – 1980	\$1,245	\$1,350	5.00	\$6,624.00
Mark D. Silverschotz	Of Counsel – 1981	\$950	\$995	.50	\$497.50
Arline Pelton	Senior Legal Assistant	\$350	\$370	12.20	\$4,312.00
		<b>TOTAL:</b>		<b>17.70</b>	<b>\$11,433.50</b>

<sup>1</sup> Note that since this interim crosses over years, rates for both 2023 and 2024 are being provided.

# EXHIBIT E

## SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

**October 1, 2023 through January 31, 2023**

<b>Document</b>	<b>Application Date Docket No.</b>	<b>Period Covered</b>	<b>Fees Requested/ Allowed</b>	<b>Expenses Requested /Allowed</b>	<b>Order Approving Interim Application</b>
1 <sup>st</sup> Interim	03/11/2021; Docket No. 619	12/23/2020 - 01/31/2021	\$47,974.50	\$0.00	Docket No. 662; 04/02/2021
2 <sup>nd</sup> Interim	07/09/2021; Docket No. 764	02/01/2021- 05/31/2021	\$425,925.00	\$900.50	Docket No. 798, 08/02/2021
3 <sup>rd</sup> Interim	10/29/2021; Docket No. 864	06/01/20201- 09/30/2021	\$208,062.00	\$526.01	Docket No. 929; 12/08/2021
4 <sup>th</sup> Interim	03/01/2022; Docket No. 1009	10/01/2021- 01/31/2022	\$107,343.50	\$513.05	Docket No. 1062; 03/23/2022
5 <sup>th</sup> Interim	07/11/22; Docket No. 1261	02/01/2022- 05/31/2022	\$52,985.50	\$513.02	Docket No. 1315; 08/03/2022
6 <sup>th</sup> Interim	11/08/2022; Docket No. 1396	06/01/2022- 09/30/2022	\$27,530.13	\$178.15	Docket No. 1460; 12/07/2022
7 <sup>th</sup> Interim	03/08/2023; Docket No. 1632	10/01/2022- 01/31/2023	\$42,205.50	\$613.61	Docket No. 1825; 06/21/2023
8 <sup>th</sup> Interim	07/12/2023; Docket No. 1868	02/01/2023- 05/31/2023	\$75,463.50	\$199.56	Docket No. 1901; 08/02/2023
9 <sup>th</sup> Interim	11/07/2023; Docket No. 1991	06/01/2023- 09/30/2023	\$74,596.60	\$305.49	Docket No. 2027; 11/30/2027