

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

<p><b>In re:</b></p> <p><b>ALDRICH PUMP LLC, et al.,<sup>1</sup></b></p> <p style="text-align: center;"><b>Debtors.</b></p>	<p>Chapter 11</p> <p>Case No. 20-30608</p> <p>Jointly Administered</p>
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**SUMMARY OF ELEVENTH INTERIM APPLICATION OF ORRICK, HERRINGTON & SUTCLIFFE LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS’ REPRESENTATIVE, FOR THE PERIOD FROM OCTOBER 1, 2023 THROUGH JANUARY 31, 2024**

Name of Applicant:	Orrick, Herrington & Sutcliffe LLP
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants’ Representative
Date of Order Approving Retention:	October 15, 2020, effective as of August 21, 2020 (Doc. No. 394)
Period for which compensation and reimbursement is sought:	October 1, 2023 – January 31, 2024
Amount of compensation sought as actual, reasonable, and necessary:	<b>\$115,605.00</b>
Amount of expense reimbursement sought as actual, reasonable and necessary:	<b>\$730.90</b>
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	<b>\$116,335.90</b>

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.



**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

**ELEVENTH INTERIM APPLICATION OF ORRICK, HERRINGTON &  
SUTCLIFFE LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO JOSEPH W.  
GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE, FOR THE PERIOD  
FROM OCTOBER 1, 2023 THROUGH JANUARY 31, 2024**

Orrick, Herrington & Sutcliffe LLP (“Orrick”), counsel to Joseph W. Grier, III, the Court-appointed future claimants’ representative in these cases (the “FCR”), hereby brings its eleventh interim application for allowance of compensation of \$115,605.00 and reimbursement of expenses of \$730.90 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 (Doc. 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 (Doc. No. 114). The Debtors are

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<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 sections 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 October 15, 2020, the Court entered an order authorizing the FCR to retain Orrick as his counsel in this Chapter 11 Case, effective as of August 21, 2020. (Doc. No. 394).

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, Orrick 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 and A-4**. Summarized below are the requested professional fees and expenses and payments that Orrick has received on the same.

Date of Monthly Fee Statement	Description	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
11/7/2023	Thirty-Eighth Monthly	10/1/2023-10/31/2023	\$21,057.50	\$464.90	\$19,557.13	\$1,965.27
12/6/2023	Thirty-Ninth Monthly	11/1/2023 – 11/30/2023	\$13,775.00	\$0.00	\$12,397.51	\$1,377.49
1/8/2024	Fortieth Monthly	12/1/2023 – 12/31/2023	\$11,318.00	\$0.00	\$10,186.20	\$1,131.80
2/16/2024	Forty-First Monthly	1/1/2024 – 1/31/2024	\$69,454.50	\$266.00	\$0.00	\$69,720.50
<b>Total:</b>			<b>\$115,605.00</b>	<b>\$730.90</b>	<b>\$42,140.84</b>	<b>\$74,195.06</b>

7. In total, Orrick has submitted fee statements during the Interim Period for total fees of \$115,605.00 and total expenses of \$730.90. As of the date of this Application, no party has objected to the fee statements circulated by Orrick.

**SUMMARY OF SERVICES RENDERED**

8. Attached hereto as **Exhibits A-1 through A-4** are Orrick’s monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by Orrick during the Interim Period. In summary, during the Interim Period, Orrick expended a total of 106.40 hours rendering necessary services in this Chapter 11 Case and incurred total fees of \$115,605.00 and \$730.90 in expenses.

9. As counsel to the FCR, Orrick provided a variety of services 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. Orrick 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. Orrick 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. Orrick 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. **Litigation – 95.20 hours, \$104,156.50.** During the Interim Period, counsel for the FCR corresponded with counsel for the Debtors and ACC regarding the sampling protocol, case status, and next steps, participated in telephonic hearings in DBMP and Bestwall, and reviewed filings regarding the same. Counsel for the FCR also participated in the December 2023 omnibus hearing in this Chapter 11 Case. In addition, counsel for the FCR reviewed the order denying dismissal of this Chapter 11 Case, the ACC's and Semian's motions for leave to appeal and stipulations regarding the same, and the ACC's and Semian's requests for direct certification. Counsel for the FCR also prepared its opposition to the certification requests and strategized regarding the same.

B. **Orrick Compensation – 2.50 hours, \$2,687.50.** During the Interim Period, counsel for the FCR prepared and circulated Orrick's invoices and monthly fee statements for September, October, and November. Counsel for the FCR also prepared and finalized its interim fee application for the period June 1, 2023 through September 30, 2023.

C. **FCR and Other Professionals' Retention – 0.90 hours, \$1,143.00.** During the Interim Period, counsel for the FCR corresponded with the FCR regarding his financial advisors.

D. **FCR and Other Professionals' Compensation – 7.80 hours, \$7,618.00.** During the Interim Period, counsel for the FCR reviewed and/or prepared monthly fee statements for Anderson Kill, Ankura, the FCR, and the FCR's counsel at Grier Wright Martinez PA, and reviewed interim fee applications regarding the same.

12. **Exhibit B** provides a summary of Orrick'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 Orrick incurred during the Interim Period, which totaled \$730.90.

14. **Exhibit D** provides information as to Orrick's professionals, including years of practice, position, billing rates, and the total number of hours billed during the Interim Period. Orrick maintains that its billing rates for the Interim Period, which reflect its customary hourly rates for 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 Orrick has rendered.

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

#### **DISBURSEMENTS**

16. Orrick 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, transcription charges, and the like.

17. Orrick requests reimbursement for its actual and necessary expenses incurred during the Interim Period in the amount of \$730.90. A detailed breakdown of such expenses were included in Orrick's invoices (attached hereto as **Exhibits A-1 through A-4**) and those expenses are summarized in **Exhibit C**. Orrick'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. Orrick submits that, in light of the nature of the relief requested, no other or further notice need be provided.

**NO PRIOR REQUEST**

19. Orrick 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, Orrick 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.

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

1) Allowing interim compensation to Orrick in the amount of \$115,605.00 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 \$730.90 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay Orrick the amount of \$116,335.90, which is equal to 100% of Orrick's requested compensation for the Interim Period and 100% of

Orrick's requested expense reimbursement for the Interim Period, less all previous payments made to Orrick pursuant to the Fee Procedures Order; and

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

<p>Dated: March 15, 2024</p>	<p>Respectfully submitted,</p> <p><u>/s/ A. Cotten Wright</u> 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</p> <p>-and-</p> <p>Jonathan P. Guy, Esq. (admitted <i>pro hac vice</i>) Debbie L. Felder, Esq. (admitted <i>pro hac vice</i>) ORRICK, HERRINGTON &amp; SUTCLIFFE LLP 2100 Pennsylvania Avenue, N.W. Washington, D.C. 20037 Telephone: (202) 339-8400 Facsimile: (202) 339-8500 Email: jguy@orrick.com; dfelder@orrick.com</p> <p><i>Counsel for Joseph W. Grier, III, Future Claimants' Representative</i></p>
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# **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-EIGHTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED  
BY ORRICK, HERRINGTON & SUTCLIFFE LLP AS 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* (Dkt. 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 Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Thirty-Eighth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as 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”).

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<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 Orrick’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 Orrick during the Fee Statement Period are as follows:

<b>Fee Statement Period: October 1, 2023 – October 31, 2023</b>	
Total Fees:	\$21,057.50
Total Expenses:	\$464.90
<b>TOTAL:</b>	<b>\$21,522.40</b>

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$19,416.65 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’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., stacy@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 Orrick, no later than November 21, 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 Orrick 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 Orrick.

This is the 7<sup>th</sup> day of November 2023.

/s/ Jonathan P. Guy

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

1152 15th Street, N.W.

Washington, D.C. 20005

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**



Grier Wright Martinez PA  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

November 6, 2023  
Client No. 24998  
Invoice No. 2141887

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through October 31, 2023 in connection with the matters described on the attached pages:	\$ 21,057.50
DISBURSEMENTS as per attached pages:	464.90
<b>TOTAL CURRENT FEES &amp; DISBURSEMENTS (Pay this Amount):</b>	<b>\$ <u>21,522.40</u></b>

Matter(s): 24998/2014, 2019, 2021

**DUE UPON RECEIPT**

The following is for information only:  
Previous Balance not included in this invoice:  
\$40,151.98  
If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,  
please reference your **INVOICE** and **CLIENT** numbers on your remittance.  
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

**REMITTANCE COPY - PLEASE RETURN WITH PAYMENT**

**REMITTANCE ADDRESS:**  
*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
Reference: 24998/ Invoice: 2141887*

**ELECTRONIC FUNDS TRANSFERS:**  
**ACH & Wire Transfers:**  
**ABA Number 121000248**  
**SWIFT CODE: WFBIUS6S**  
**Account Number: 4123701088**  
*Wells Fargo  
420 Montgomery Street  
San Francisco, CA 94104  
Account of  
Orrick, Herrington & Sutcliffe LLP  
Reference: 24998/ Invoice: 2141887  
E.I.N. 94-2952627*

**OVERNIGHT DELIVERY:**  
*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
(304) 231-2703  
Reference: 24998/ Invoice: 2141887*

**To pay online visit [www.e-billexpress.com/ebpp/Orrick/](http://www.e-billexpress.com/ebpp/Orrick/)**



Grier Wright Martinez PA  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

November 6, 2023  
Client No. 24998  
Invoice No. 2141887

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through October 31, 2023 in Connection With:

**Matter: 2014 - Aldrich Pump - Litigation**

10/10/23	J. Guy	Emails with parties regarding sampling protocol, analyze related issues.	0.40	508.00
10/11/23	J. Guy	Analyze issues regarding amici filings in Purdue Scotus case and review related pleadings.	1.50	1,905.00
10/12/23	S. Whitney	Attend DBMP Status Conference Hearing on estimation discovery and a form of an agreed order under FRE 502(d).	1.00	655.00
10/12/23	J. Guy	Emails from/to C. Wright and others regarding DBMP hearing (.2); review Bestwall, DBMP, and Aldrich dockets (separate occasions) (.5).	0.70	889.00
10/13/23	S. Whitney	Summarize Bestwall Stay Relief Motion and related filings from FCR, Debtors' Objection, and Official Committee of Asbestos Claimants' Statement ISO of Stay Relief Motion (Dkt. 3127, 3139, 3140, 3141).	0.40	262.00
10/13/23	J. Guy	Analyze issues presented by motion for relief from stay in Bestwall.	0.70	889.00
10/14/23	J. Guy	Review Bestwall motion for relief from stay filings and analyze same (1.2); review Bestwall, DBMP, and Aldrich docket (collected over separate occasions) (1.2).	2.40	3,048.00
10/17/23	J. Guy	Further correspondence with parties on sampling protocol.	0.20	254.00
10/18/23	J. Guy	Analysis of Purdue release issues.	0.40	508.00





Grier, Joseph W. III. - 24998  
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November 6, 2023  
Invoice No. 2141887

10/19/23	S. Whitney	Attend hearing regarding motion to lift stay to allow plaintiff to litigate asbestos claim in state court.	1.90	1,244.50
10/19/23	D. Felder	Telephonic participation in Bestwall lift stay motion.	2.30	2,472.50
10/19/23	J. Guy	Review Aldrich, DBMP, and Bestwall dockets (separate occasions) (.3); teleconference with B. Erens regarding case status and related issues (.3); attend Bestwall hearing on motion for relief from the stay (2.5); strategize regarding next steps in case (.3).	3.40	4,318.00
10/20/23	J. Guy	Continued analysis of plan release issues, emails regarding same.	0.40	508.00
10/23/23	J. Guy	Emails with court and parties regarding canceling Oct hearing (.2); emails with parties regarding sampling protocol (.2).	0.40	508.00
10/24/23	J. Guy	Emails with FCR regarding case status and next steps (.2); review dockets of pending asbestos cases (separate occasions) (.4).	0.60	762.00
10/26/23	J. Guy	Emails to/from FCR regarding amici issues (.2); emails with parties regarding sampling protocols (.2) (separate occasions).	0.40	508.00
10/31/23	S. Whitney	Review Bestwall Dkt. 1983 and pull final amici brief filed in Purdue Pharma for J. Grier.	0.30	196.50
		Total Hours	17.40	
		Total For Services	\$	19,435.50



Grier, Joseph W. III. - 24998  
page 3

November 6, 2023  
Invoice No. 2141887

<b><u>Timekeeper Summary</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Debra L. Felder	2.30	1,075.00	2,472.50
Jonathan P. Guy	11.50	1,270.00	14,605.00
Sean Whitney	3.60	655.00	2,358.00
Total All Timekeepers	17.40	\$1,116.98	\$19,435.50

Disbursements

Public Access to Court Electronic Records	464.90	
Total Disbursements		\$464.90

**Total For This Matter** **\$19,900.40**



Grier, Joseph W. III. - 24998  
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November 6, 2023  
Invoice No. 2141887

For Legal Services Rendered Through October 31, 2023 in Connection With:

**Matter: 2019 - Aldrich Pump - Orrick Compensation**

10/05/23	D. Felder	Review, draft, and finalize Orrick's September monthly fee statement and invoice.	0.40	430.00
		Total Hours	0.40	
		Total For Services	\$	430.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.40	1,075.00	430.00
Total All Timekeepers	0.40	\$1,075.00	\$430.00
<b>Total For This Matter</b>			<b>\$430.00</b>



Grier, Joseph W. III. - 24998  
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November 6, 2023  
Invoice No. 2141887

For Legal Services Rendered Through October 31, 2023 in Connection With:

**Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation**

10/04/23	J. Guy	Review various professional fee applications.	0.30	381.00
10/05/23	J. Guy	Review fee applications (separate occasions).	0.30	381.00
10/08/23	D. Felder	Review September monthly fee statements for Grier Wright Martinez and J. Grier and provide comments regarding same.	0.40	430.00
		Total Hours	1.00	
		Total For Services	\$	1,192.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.40	1,075.00	430.00
Jonathan P. Guy	0.60	1,270.00	762.00
Total All Timekeepers	1.00	\$1,192.00	\$1,192.00

**Total For This Matter \$1,192.00**

**\*\*\* COMBINED TOTALS \*\*\***

Total Hours	18.80	
Total Fees, all Matters		\$21,057.50
Total Disbursements, all Matters		\$464.90
Total Amount Due		\$21,522.40

# **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-NINTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED  
BY ORRICK, HERRINGTON & SUTCLIFFE LLP AS 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* (Dkt. 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 Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Thirty-Ninth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as 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”).

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<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 Orrick’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 Orrick during the Fee Statement Period are as follows:

<b>Fee Statement Period: November 1, 2023 – November 30, 2023</b>	
Total Fees:	\$13,775.00
Total Expenses:	\$0.00
<b>TOTAL:</b>	<b>\$13,775.00</b>

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$12,397.50 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’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., stacy@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 Orrick, 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 Orrick 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 Orrick.

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

/s/ Jonathan P. Guy

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

1152 15th Street, N.W.

Washington, D.C. 20005

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**



Grier Wright Martinez PA  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

December 5, 2023  
Client No. 24998  
Invoice No. 2149999

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through November 30, 2023 in connection with the matters described on the attached pages:	\$ 13,775.00
DISBURSEMENTS as per attached pages:	0.00
<b>TOTAL CURRENT FEES &amp; DISBURSEMENTS (Pay this Amount):</b>	<b>\$ <u>13,775.00</u></b>

Matter(s): 24998/2014, 2019, 2020, 2021

**DUE UPON RECEIPT**

The following is for information only:  
Previous Balance not included in this invoice:  
\$49,368.12 If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,  
please reference your **INVOICE** and **CLIENT** numbers on your remittance.  
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

**REMITTANCE COPY - PLEASE RETURN WITH PAYMENT**

**REMITTANCE ADDRESS:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
Reference: 24998/ Invoice: 2149999*

**ELECTRONIC FUNDS TRANSFERS:**

**ACH & Wire Transfers:**  
**ABA Number 121000248**  
**SWIFT CODE: WFBIUS6S**  
**Account Number: 4123701088**  
Wells Fargo  
420 Montgomery Street  
San Francisco, CA 94104  
Account of  
Orrick, Herrington & Sutcliffe LLP  
Reference: 24998/ Invoice: 2149999  
E.I.N. 94-2952627

**OVERNIGHT DELIVERY:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
(304) 231-2703  
Reference: 24998/ Invoice:  
2149999*

**To pay online visit [www.e-billexpress.com/ebpp/Orrick/](http://www.e-billexpress.com/ebpp/Orrick/)**



Grier Wright Martinez PA  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

December 5, 2023  
Client No. 24998  
Invoice No. 2149999

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through November 30, 2023 in Connection With:

**Matter: 2014 - Aldrich Pump - Litigation**

11/06/23	S. Whitney	Analyze various pleadings for activities related to exposure evidence and sampling.	1.10	720.50
11/06/23	J. Guy	Emails to/from Orrick counsel regarding claims review and next steps in case (.2); work on case strategy (.3).	0.50	635.00
11/07/23	S. Whitney	Review and summarize motion for direct appeal (Bestwall Dkts. 3172 and 3173) for D. Felder and J. Guy.	1.30	851.50
11/07/23	J. Guy	Review Bestwall district court decision.	0.30	381.00
11/08/23	J. Guy	Emails to/from S. Whitney regarding claim review and related issues.	0.20	254.00
11/10/23	S. Whitney	Summarize Aldrich Dkt. 2006 - Notice of Supplemental Authority for D. Felder and J. Guy.	0.20	131.00
11/14/23	J. Guy	Strategize regarding case (.3); review dockets of asbestos cases (separate occasions) (.7).	1.00	1,270.00
11/15/23	D. Felder	Telephone conference with M. Evert regarding updates (.2); email correspondence with J. Guy regarding same (.2).	0.40	430.00



Grier, Joseph W. III. - 24998  
page 2

December 5, 2023  
Invoice No. 2149999

11/20/23	J. Guy	Emails to/from Debtors and ACC regarding sampling protocol and related order (various occasions).	0.70	889.00
11/30/23	J. Guy	Review dockets of asbestos cases (separate occasions).	0.60	762.00
		Total Hours	6.30	
		Total For Services	\$	6,324.00

**Timekeeper Summary**                      **Hours**                      **Rate**                      **Amount**

Debra L. Felder	0.40	1,075.00	430.00
Jonathan P. Guy	3.30	1,270.00	4,191.00
Sean Whitney	2.60	655.00	1,703.00
Total All Timekeepers	6.30	\$1,003.81	\$6,324.00

**Total For This Matter                      \$6,324.00**



Grier, Joseph W. III. - 24998  
page 3

December 5, 2023  
Invoice No. 2149999

For Legal Services Rendered Through November 30, 2023 in Connection With:

**Matter: 2019 - Aldrich Pump - Orrick Compensation**

11/01/23	D. Felder	Prepare Orrick's interim fee application for the period June 1, 2023 through September 30, 2023.	0.80	860.00
11/06/23	D. Felder	Revise and finalize Orrick's interim fee application for the period June 1, 2023 through September 30, 2023.	0.80	860.00
		Total Hours	1.60	
		Total For Services	\$	1,720.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	1.60	1,075.00	1,720.00
Total All Timekeepers	1.60	\$1,075.00	\$1,720.00

**Total For This Matter \$1,720.00**



Grier, Joseph W. III. - 24998  
page 4

December 5, 2023  
Invoice No. 2149999

For Legal Services Rendered Through November 30, 2023 in Connection With:

**Matter: 2020 - Aldrich Pump - FCR and Other Professionals Retention**

11/07/23	J. Guy	Emails to FCR and Orrick team regarding financial consultant matters.	0.30	381.00
11/11/23	J. Guy	Emails to/from Orrick team and FCR regarding financial consultants.	0.20	254.00
		Total Hours	0.50	
		Total For Services	\$	635.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jonathan P. Guy	0.50	1,270.00	635.00
Total All Timekeepers	0.50	\$1,270.00	\$635.00
<b>Total For This Matter</b>			<b>\$635.00</b>



Grier, Joseph W. III. - 24998  
page 5

December 5, 2023  
Invoice No. 2149999

For Legal Services Rendered Through November 30, 2023 in Connection With:

**Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation**

11/01/23	D. Felder	Prepare interim fee application for Ankura for June 1, 2023 through September 30, 2023.	0.80	860.00
11/06/23	S. Whitney	Review LAS fee applications for Bestwall, DBMP, and Aldrich.	1.10	720.50
11/06/23	D. Felder	Review and revise Ankura's interim fee application for the period June 1, 2023 through September 30, 2023 (.7); prepare monthly fee statement for September 2023 (.5); review interim fee applications for GWM, J. Grier, and Anderson Kill and provide comments (.7).	1.90	2,042.50
11/07/23	S. Whitney	Review and summarize Legal Analysis Systems fee applications in Aldrich/Bestwall/DBMP.	1.10	720.50
11/09/23	D. Felder	Review J. Grier and GWM monthly fee statement and invoice for October.	0.30	322.50
11/13/23	D. Felder	Prepare Ankura's monthly fee statement for October 2023 and email to notice parties regarding same.	0.40	430.00
		Total Hours	5.60	
		Total For Services	\$	5,096.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	3.40	1,075.00	3,655.00
Sean Whitney	2.20	655.00	1,441.00
Total All Timekeepers	5.60	\$910.00	\$5,096.00

**Total For This Matter \$5,096.00**

\*\*\* COMBINED TOTALS \*\*\*

Total Hours	14.00	
Total Fees, all Matters		\$13,775.00
Total Disbursements, all Matters		\$0.00
Total Amount Due		\$13,775.00



# **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)
	)	

**FORTIETH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
ORRICK, HERRINGTON & SUTCLIFFE LLP AS 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* (Dkt. 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 Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fortieth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as 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”).

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<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 Orrick’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 Orrick during the Fee Statement Period are as follows:

<b>Fee Statement Period: December 1, 2023 – December 31, 2023</b>	
Total Fees:	\$11,318.00
Total Expenses:	\$0.00
<b>TOTAL:</b>	<b>\$11,318.00</b>

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$10,186.20 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’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., pamoamccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartellmccarter.com and Phillip S. Pavlick, Esq., ppavlickmccarter.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., gmascittimccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., stacycordes-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., nramseyrc.com and Davis Lee Wright, Esq., dwrightrc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclaycapdale.com, James P. Wehner, Esq., jwehnercapdale.com, and Todd E. Phillips, Esq., tphillipscapdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompsonlawhssm.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, cwrightgrierlaw.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 Orrick, no later than January 22, 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 Orrick 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 Orrick.

This is the 8<sup>th</sup> day of January 2024.

/s/ Jonathan P. Guy

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

1152 15th Street, N.W.

Washington, D.C. 20005

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**



Grier Wright Martinez PA  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

January 4, 2024  
Client No. 24998  
Invoice No. 2156608

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through December 31, 2023 in connection with the matters described on the attached pages:	\$ 11,318.00
DISBURSEMENTS as per attached pages:	0.00
<b>TOTAL CURRENT FEES &amp; DISBURSEMENTS (Pay this Amount):</b>	<b>\$ <u>11,318.00</u></b>

Matter(s): 24998/2014, 2019, 2020, 2021

**DUE UPON RECEIPT**

The following is for information only:  
Previous Balance not included in this invoice:  
\$15,740.27 If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,  
please reference your **INVOICE** and **CLIENT** numbers on your remittance.  
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

**REMITTANCE COPY - PLEASE RETURN WITH PAYMENT**

**REMITTANCE ADDRESS:**  
*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
Reference: 24998/ Invoice: 2156608*

**ELECTRONIC FUNDS TRANSFERS:**  
**ACH & Wire Transfers:**  
**ABA Number 121000248**  
**SWIFT CODE: WFBIUS6S**  
**Account Number: 4123701088**  
*Wells Fargo  
420 Montgomery Street  
San Francisco, CA 94104  
Account of  
Orrick, Herrington & Sutcliffe LLP  
Reference: 24998/ Invoice: 2156608  
E.I.N. 94-2952627*

**OVERNIGHT DELIVERY:**  
*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
(304) 231-2703  
Reference: 24998/ Invoice: 2156608*

**To pay online visit [www.e-billexpress.com/ebpp/Orrick/](http://www.e-billexpress.com/ebpp/Orrick/)**



Grier Wright Martinez PA  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

January 4, 2024  
Client No. 24998  
Invoice No. 2156608

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through December 31, 2023 in Connection With:

**Matter: 2014 - Aldrich Pump - Litigation**

12/05/23	J. Guy	Telephone conference with B. Erens regarding case status and emails to FCR and D. Felder regarding same.	0.30	381.00
12/07/23	J. Guy	Emails to/from parties regarding sample and docket review.	0.50	635.00
12/14/23	S. Whitney	Attend DBMP hearing regarding discovery update and adversary proceeding.	0.50	327.50
12/14/23	D. Felder	Telephonic participation in DBMP omnibus hearing regarding status conference on estimation order and discovery issues.	0.60	645.00
12/14/23	J. Guy	Review asbestos dockets - separate occasions.	0.80	1,016.00
12/15/23	J. Stephens	Transfer, receipt, tracking, inventory for secure disposition of Debtors' production.	0.20	40.00
12/15/23	D. Felder	Summary email to J. Guy regarding DBMP omnibus hearing.	0.20	215.00
12/15/23	J. Guy	Emails with client and Orrick team regarding case status and next steps.	0.20	254.00
12/20/23	J. Guy	Emails with parties regarding sampling motion.	0.20	254.00
12/22/23	S. Whitney	Pull Honx, Inc. settlement term sheet and amended plan.	0.10	65.50
12/22/23	J. Guy	Review asbestos dockets and recent rulings.	1.20	1,524.00
12/24/23	S. Whitney	Review FCR Objection to Confirmation of Chapter 11 Plan of Honx, Inc. for J. Guy.	0.10	65.50
12/27/23	S. Whitney	Pull all related motions for Aldrich Pump hearing on 12/28/2023 for J. Guy.	0.20	131.00





Grier, Joseph W. III. - 24998  
page 2

January 4, 2024  
Invoice No. 2156608

12/27/23	J. Guy	Review emails and drafts regarding sampling order - separate occasions.	0.80	1,016.00
12/28/23	D. Felder	Telephonic participation in omnibus hearing.	0.50	537.50
12/28/23	J. Guy	Attend court hearing (.7); review and analyze court rulings (1.2).	1.90	2,413.00
Total Hours			8.30	
Total For Services			\$	9,520.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	1.30	1,075.00	1,397.50
Jonathan P. Guy	5.90	1,270.00	7,493.00
John G. Stephens	0.20	200.00	40.00
Sean Whitney	0.90	655.00	589.50
Total All Timekeepers	8.30	\$1,146.99	\$9,520.00

**Total For This Matter** **\$9,520.00**







Grier, Joseph W. III. - 24998  
page 5

January 4, 2024  
Invoice No. 2156608

For Legal Services Rendered Through December 31, 2023 in Connection With:

**Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation**

12/05/23	D. Felder	Review Anderson Kill's November monthly fee statement and invoice (.1); email to A. Pelton regarding same (.1).	0.20	215.00
12/25/23	D. Felder	Review Ankura's November invoice and provide comments (.1); prepare Ankura's monthly fee statement for November (.2).	0.30	322.50
12/28/23	D. Felder	Update Monthly fee statement for Ankura's November monthly and email same to J. Grier and C. Wright.	0.20	215.00
		Total Hours	0.70	
		Total For Services	\$	752.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.70	1,075.00	752.50
Total All Timekeepers	0.70	\$1,075.00	\$752.50

**Total For This Matter \$752.50**

**\*\*\* COMBINED TOTALS \*\*\***

Total Hours	9.90	
Total Fees, all Matters		\$11,318.00
Total Disbursements, all Matters		\$0.00
Total Amount Due		\$11,318.00

# **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)

**FORTY-FIRST MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
ORRICK, HERRINGTON & SUTCLIFFE LLP AS 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* (Dkt. 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 Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Forty-First Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as 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”).

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<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 Orrick’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 Orrick during the Fee Statement Period are as follows:

<b>Fee Statement Period: January 1, 2024 – January 31, 2024</b>	
Total Fees:	69,454.50 <sup>2</sup>
Total Expenses:	\$266.00
<b>TOTAL:</b>	<b>\$69,720.50</b>

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$62,775.05 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’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

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<sup>2</sup> In accordance with Orrick’s retention application regarding periodic adjustments to its hourly rates, Orrick’s hourly rates increased effective January 1, 2024.

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., pamoamccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartellmccarter.com and Phillip S. Pavlick, Esq., ppavlickmccarter.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., gmascittimccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., stacycordes-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., nramseyrc.com and Davis Lee Wright, Esq., dwrightrc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclaycapdale.com, James P. Wehner, Esq., jwehnercapdale.com, and Todd E. Phillips, Esq., tphillipscapdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompsonlawhssm.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, cwrightgrierlaw.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 Orrick,



no later than March 1, 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 Orrick 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 Orrick.

This is the 16<sup>th</sup> day of February 2024.

*/s/ Jonathan P. Guy*

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

1152 15th Street, N.W.

Washington, D.C. 20005

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**



Grier Wright Martinez PA  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

February 16, 2024  
Client No. 24998  
Invoice No. 2167627

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through January 31, 2024 in connection with the matters described on the attached pages:	\$ 69,454.50
DISBURSEMENTS as per attached pages:	266.00
<b>TOTAL CURRENT FEES &amp; DISBURSEMENTS (Pay this Amount):</b>	<b>\$ <u>69,720.50</u></b>

Matter(s): 24998/2014, 2021

**DUE UPON RECEIPT**

The following is for information only:  
Previous Balance not included in this invoice:  
\$13,339.63  
If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,  
please reference your **INVOICE** and **CLIENT** numbers on your remittance.  
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

**REMITTANCE COPY - PLEASE RETURN WITH PAYMENT**

**REMITTANCE ADDRESS:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
Reference: 24998/ Invoice: 2167627*

**ELECTRONIC FUNDS TRANSFERS:**

**ACH & Wire Transfers:**  
**ABA Number 121000248**  
**SWIFT CODE: WFBIUS6S**  
**Account Number: 4123701088**  
Wells Fargo  
420 Montgomery Street  
San Francisco, CA 94104  
Account of  
Orrick, Herrington & Sutcliffe LLP  
Reference: 24998/ Invoice: 2167627  
E.I.N. 94-2952627

**OVERNIGHT DELIVERY:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
(304) 231-2703  
Reference: 24998/ Invoice:  
2167627*

**To pay online visit [www.e-billexpress.com/ebpp/Orrick/](http://www.e-billexpress.com/ebpp/Orrick/)**



Grier Wright Martinez PA  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

February 16, 2024  
Client No. 24998  
Invoice No. 2167627

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through January 31, 2024 in Connection With:

**Matter: 2014 - Aldrich Pump - Litigation**

01/02/24	J. Guy	Analysis of dismissal order and strategize regarding next steps.	1.30	1,768.00
01/03/24	S. Whitney	Call with D. Felder and J. Guy for Aldrich update and 2024 timeline.	0.30	232.50
01/03/24	J. Guy	Prepare for call with Orrick team and attend same.	0.50	680.00
01/06/24	J. Guy	Emails to N. Ramsey and FCR regarding status of cases (.2); review various asbestos dockets (separate occasions) (.7).	0.90	1,224.00
01/10/24	J. Guy	Telephone conference with B. Erens regarding pending matters (.1); review various asbestos dockets (separate occasions) (.6).	0.70	952.00
01/12/24	J. Guy	Review filings by claimants and ACC regarding leave to appeal and for certification and analyze related issues.	1.80	2,448.00
01/12/24	J. Guy	Telephone conference with B. Erens regarding case status.	0.10	136.00
01/16/24	S. Whitney	Review and summarize motions related to appeals of orders denying motions to dismiss (Dkts. 2059, 2060, 2061, 2064, 2065).	2.80	2,170.00
01/16/24	D. Felder	Review ACC and Semian's motions for leave to appeal (3.5); review motion to continue same (.5).	4.00	4,620.00
01/16/24	J. Guy	Emails to/from Debtors regarding stipulations on leave to appeal.	0.20	272.00



Grier, Joseph W. III. - 24998  
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February 16, 2024  
Invoice No. 2167627

01/17/24	S. Whitney	Debtors' Objection to Request of ACC for Cert of Direct Appeal to Court of Appeals (Dkt. 962) and call with D. Felder to discuss strategy.	1.10	852.50
01/17/24	D. Felder	Review Semian's request for direct certification (1.0); review motion to continue Semian motion for leave to appeal (.3); review emails from Debtors' counsel regarding same (.2); review related filings in Bestwall (1.0).	2.50	2,887.50
01/17/24	J. Guy	Work on preparation of opposition to certification requests.	1.50	2,040.00
01/18/24	S. Whitney	Attend Bestwall January 18, 2024 hearing and summarize decision denying motion for relief from automatic stay.	3.80	2,945.00
01/18/24	D. Felder	Telephonic participation in Bestwall hearing on motion for stay (3.8); review ACC's request for direct certification (1.0).	4.80	5,544.00
01/18/24	J. Guy	Attend Bestwall hearing (3.0); work on case strategy (.6).	3.60	4,896.00
01/20/24	J. Guy	Work on opposition to certification requests (4.0); email same to FCR (.1); strategize regarding next steps (.8).	4.90	6,664.00
01/22/24	J. Guy	Emails to/from FCR regarding opposition to certification requests.	0.30	408.00
01/23/24	S. Whitney	Review and revise draft of FCR response to Semian and ACC Motion for Certification of Direct Appeal to Court of Appeals.	2.40	1,860.00
01/24/24	J. Guy	Emails with Debtors and ACC regarding discovery matters (separate occasions).	0.30	408.00
01/25/24	S. Whitney	Review and revise draft of FCR Response to ACC and Robert Semian Requests for Certification of Direct Appeal of Dismissal Order to Court of Appeals.	6.80	5,270.00
01/28/24	J. Guy	Work on objection to requests for certification and various emails with FCR, Orrick team, and C. Wright regarding same.	2.50	3,400.00
01/29/24	S. Whitney	Revise draft and update citations to FCR Opposition to ACC and Mr. Semian Requests for Certification.	3.80	2,945.00
01/29/24	D. Felder	Review and revise FCR's objection to motions for certification (4.0); review draft from Debtors (.5); emails with S. Whitney and J. Guy regarding same (various occasions) (1.0).	5.50	6,352.50



Grier, Joseph W. III. - 24998  
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February 16, 2024  
Invoice No. 2167627

01/30/24	S. Whitney	Revise FCR draft opposition to Semian and ACC requests for certification.	1.60	1,240.00
01/30/24	D. Felder	Review and revise FCR's objection to certification motions (1.5); emails with S. Whitney, C. Wright, and J. Guy regarding same (.5).	2.00	2,310.00
01/31/24	J. Guy	Work on objection to requests for certification (2.6); strategize regarding next steps (.6).	3.20	4,352.00
Total Hours			63.20	
Total For Services			\$	68,877.00

<b><u>Timekeeper Summary</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Debra L. Felder	18.80	1,155.00	21,714.00
Jonathan P. Guy	21.80	1,360.00	29,648.00
Sean Whitney	22.60	775.00	17,515.00
Total All Timekeepers	63.20	\$1,089.83	\$68,877.00

Disbursements

Public Access to Court Electronic Records	266.00	
Total Disbursements		\$266.00

**Total For This Matter** **\$69,143.00**



Grier, Joseph W. III. - 24998  
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February 16, 2024  
Invoice No. 2167627

For Legal Services Rendered Through January 31, 2024 in Connection With:

**Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation**

01/12/24	D. Felder	Review Anderson Kill's December monthly fee statement and invoice and email with A. Pelton regarding same.	0.30	346.50
01/18/24	D. Felder	Review Ankura's December invoice and prepare monthly fee statement.	0.20	231.00
		Total Hours	0.50	
		Total For Services	\$	577.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.50	1,155.00	577.50
Total All Timekeepers	0.50	\$1,155.00	\$577.50

**Total For This Matter \$577.50**

**\*\*\* COMBINED TOTALS \*\*\***

Total Hours	63.70	
Total Fees, all Matters		\$69,454.50
Total Disbursements, all Matters		\$266.00
Total Amount Due		\$69,720.50

# EXHIBIT B

## CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

October 1, 2023 through January 31, 2024

Project Category	Matter Number	Total Hours for the Interim Period (10/1/2023-1/31/2024)	Total Hours from the Petition Date (6/18/2020-1/31/2024)	Total Fees for the Interim Period (10/1/2023- 1/31/2024)	Total Fees from the Petition Date (6/18/2020- 1/31/2024)
Case Administration	2012	-	3.10	\$0.00	\$3,878.00
Insurance	2013	-	37.80	\$0.00	\$40,402.00
Litigation	2014	95.20	1,968.70	\$104,156.50	\$2,048,226.00
Adversary Proceeding Litigation	2015	-	467.20	\$0.00	\$450,032.50
Plan & Disclosure Statement	2016	-	204.30	\$0.00	\$213,988.00
Due Diligence	2017	-	82.00	\$0.00	\$89,511.50
Orrick Retention	2018	-	56.30	\$0.00	\$47,570.00
Orrick Compensation	2019	2.50	92.20	\$2,687.50	\$89,822.50
FCR and Other Professionals - Retention	2020	0.90	64.80	\$1,143.00	\$64,122.50
FCR and Other Professionals - Compensation	2021	7.80	125.90	\$7,618.00	\$123,930.50
Non-Working Travel	2022	-	110.90	\$0.00	\$66,322.50
<b>TOTAL:</b>		<b>106.40</b>	<b>3,213.20</b>	<b>\$115,605.00</b>	<b>\$3,237,806.00</b>



# EXHIBIT C

## CUMULATIVE EXPENSE SUMMARY

October 1, 2023 through January 31, 2024

<b>Expense Category</b>	<b>Total Expenses for the Interim Period (10/1/2023-1/31/2024)</b>	<b>Total Expenses from the Petition Date (6/18/2020-1/31/2024)</b>
Document Reproduction (@ .20/page)	\$0.00	\$506.20
Hotel	\$0.00	\$6,389.52
Lexis Research	\$0.00	\$1,552.00
Out of Town Business Meals	\$0.00	\$1,072.89
Outside Services – Data Processing of Debtors and Non-Debtors Document Productions	\$0.00	\$2,033.60
PACER Charges	\$730.90	\$6,214.30
Parking Expense	\$0.00	\$748.00
Taxi Expense	\$0.00	\$911.71
Travel Expense, Air Fare (coach fare)	\$0.00	\$9,212.85
Westlaw Research	\$0.00	\$8,638.00
Word Processing	\$0.00	\$341.40
<b>TOTAL:</b>	<b>\$730.90</b>	<b>\$37,620.47</b>

# EXHIBIT D

## SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

October 1, 2023 through January 31, 2024

<b>Name of Professional</b>	<b>Position - Bar Year</b>	<b>2023 Hourly Billing Rate</b>	<b>2024 Hourly Billing Rate</b>	<b>Total Hours Billed (10/1/2023-1/31/2024)</b>	<b>Total Compensation (10/1/2023-1/31/2024)</b>
Jonathan P. Guy	Senior Counsel - 1996	\$1,270	\$1,360	44.00	\$57,842.00
Debra L. Felder	Senior Associate - 2002	\$1,075	\$1,155	30.30	\$34,116.50
John Stephens	Project Support Specialist	\$200	--	0.20	\$40.00
Sean Whitney	Associate - 2022	\$655	\$775	31.90	\$23,606.50
<b>TOTAL:</b>				<b>106.40</b>	<b>\$115,605.00</b>

# EXHIBIT E

## SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

Document	Interim Fee Application Date; Dkt. No.	Period Covered	Fees Requested/ Allowed	Expenses Requested/ Allowed	Order Approving Interim Application
1 <sup>st</sup> Interim	11/9/2020; Dkt. No. 423	8/21/2020- 9/30/2020	\$46,289.00	\$0.00	Dkt. No. 459; 12/3/2020
2 <sup>nd</sup> Interim	3/11/2021; Dkt. No. 617	10/1/2020- 1/31/2021	\$488,022.50	\$5,033.60	Dkt. No. 661; 4/2/2021
3 <sup>rd</sup> Interim	7/9/2021; Dkt. No. 762	2/1/2021- 5/31/2021	\$630,867.00	\$6,609.60	Dkt. No. 795; 8/2/2021
4 <sup>th</sup> Interim	10/29/2021; Dkt. No. 863	6/1/2021- 9/30/2021	\$240,028.50	\$1,488.88	Dkt. No. 928; 12/8/2021
5 <sup>th</sup> Interim	3/1/2022; Dkt. No. 1008	10/1/2021- 1/31/2022	\$251,136.00	\$1,506.62	Dkt. No. 1065; 3/23/2022
6 <sup>th</sup> Interim	7/11/2022; Dkt. No. 1262	2/1/2022- 6/31/2022	\$299,435.00	\$3,405.87	Dkt. No. 1311; 8/3/2022
7 <sup>th</sup> Interim	11/7/2022; Dkt. No. 1388	1/1/2022- 9/30/2022	\$289,310.50	\$5,524.85	Dkt. No. 1458; 12/7/2022
8 <sup>th</sup> Interim	3/8/2023; Dkt. No. 1631	10/1/2022- 1/31/2023	\$212,252.50	\$4,182.20	Dkt. No. 1827; 6/21/2023
9 <sup>th</sup> Interim	8/3/2023; Dkt. No. 1902	2/1/2023- 5/31/2023	\$368,257.00	\$3,956.38	Dkt. No. 1902; 8/2/2023
10 <sup>th</sup> Interim	11/7/2023; Dkt. No. 1990	6/1/2023- 9/30/2023	\$295,603.00	\$5,181.57	Dkt. No. 2026; 11/30/2023
<b>TOTAL:</b>			<b>\$3,121,201.00</b>	<b>\$36,889.57</b>	