

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

<p>In re:</p> <p>ALDRICH PUMP LLC, et al.,¹</p> <p align="center">Debtors.</p>	<p>CASE NO. 20-30608</p> <p>CHAPTER 11</p> <p>Jointly Administered</p>
--	--

**SUMMARY OF ELEVENTH INTERIM APPLICATION FOR COMPENSATION OF
GRIER WRIGHT MARTINEZ, PA FOR SERVICES RENDERED TO AND FOR
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:	Grier Wright Martinez, PA
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Appointment:	October 14, 2020
Period for which compensation and reimbursement is sought:	October 1, 2023 through January 31, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$6,438.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$39.00
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$6,477.00

This is a(n) x interim final application.

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.



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

In re:

ALDRICH PUMP LLC, et al.,¹

Debtors.

CASE NO. 20-30608

CHAPTER 11

Jointly Administered

**ELEVENTH INTERIM APPLICATION FOR COMPENSATION OF GRIER WRIGHT
MARTINEZ, PA FOR SERVICES RENDERED TO AND FOR 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**

Grier Wright Martinez, PA (“GWM”), counsel to Joseph W. Grier, III, the Future Claimants’ Representative in this case (the “FCR”), through counsel, hereby brings its eleventh interim application for allowance of compensation of \$10,110.00 and reimbursement of expenses of \$29.10 for the period of October 1, 2023 through January 31, 2024 (the “Compensation Period”) in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Doc. No. 171) (the “Fee Procedure Order”), and in support, respectfully represents as follows:

BACKGROUND

1. On June 18, 2020 (the “Petition Date”), the Debtors commenced their bankruptcy cases (together, the “Chapter 11 Case”) by filing a voluntary petition 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 authorized to continue to

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

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 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. On October 15, 2020, the Court entered Orders authorizing the FCR to retain Orrick, Herrington & Sutcliffe, LLP (“Orrick”) and Grier Wright Martinez, PA (“GWM”) to represent him in this case. (Doc. Nos. 393 & 394).

4. Pursuant to the Fee Procedure Order, professionals may request monthly compensation and reimbursement. 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 Procedure 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

5. Pursuant to the Fee Procedure Order, GWM has submitted fee statements to the Debtors for the Interim Period. Copies of the relevant invoices are attached as **Exhibit A**. Summarized below are the requested professional fees and expenses and payments that GWM has received on the same.

Date of Request	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
11/14/2023	10/1/2023-10/31/2023	\$810.00	\$2.70	\$731.71	\$80.99
12/11/2023	11/1/2023-11/30/2023	\$1,440.00	\$7.00	\$1,303.00	\$144.00
1/10/2024	12/1/2023-12/31/2023	\$1,260.00	\$27.10	\$1,161.11	\$125.99
2/16/2024	1/1/2024-1/31/2024	\$2,928.00	\$2.20	\$0.00	\$2,930.20

6. In total, GWM has submitted fee statements during the Interim Period for total fees of \$6,438.00 and total expenses of \$39.00. As of the date of this Application, no party has objected to the fee statements circulated by GWM.

SUMMARY OF SERVICES RENDERED

7. Attached here as **Exhibit A** are GWM’s monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by GWM during the Interim Period. In summary, GWM expended a total of 13.9 hours rendering necessary services in this Chapter 11 proceeding during the Interim Period. GWM’s fees total \$6,438.00 for the Interim Period.

8. As attorneys for the FCR, GWM has provided a variety of services in the Debtors’ bankruptcy case as set forth in the summary description below and in detail in **Exhibit A**.

9. GWM believes that the services the firm has provided to the FCR in the context of the Debtors’ bankruptcy case during the Interim Period were necessary and beneficial to the administration of this case. GWM further believes that its services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the tasks addressed.

10. GWM 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. **Case Administration and Business Operations** – 2.5 hours, \$1,128. During the Interim Period, GWM kept the FCR and his professionals abreast of case issues and reviewed and responded to emails from attorneys for the parties.

B. **Professional Retention/Fee Issues** – 2.2 hours, \$1,011.00. GWM reviewed fee requests for FCR’s professionals.

C. **Litigation** – 5.5 hours, \$2,634.00. GWM reviewed and edited a draft pleading and filed the same on behalf of the FCR. GWM also reviewed pleadings filed by other parties.

D. **Fee Application Preparation** – 3.0 hours, \$1,350.00. GWM prepared applications for compensation for the FCR and GWM.

E. **Asbestos Matters** – 0.7 hours, \$315.00. GWM reviewed pleadings prepared for other asbestos cases.

11. In **Exhibit B**, GWM has categorized the firm’s time by project categories recommended by the Guidelines for Compensation and Expense Reimbursement of Professionals referenced in Rule 2016-1 of this Court’s Local Rules of Practice and Procedure (the “Local Rules”).

12. **Exhibit C** reflects a summary by category of the expenses that GWM incurred during the Interim Period, which totaled \$39.00.

13. **Exhibit D** provides information as to GWM’s professionals, including years of practice, billing rates, and the total number of hours billed during the Interim Period. GWM maintains that its billing rates for the Interim Period should be deemed reasonable for purposes of this Court’s determination of the “reasonableness” of the fees for the services that GWM has rendered.

14. Attached as **Exhibit E** is a summary of GWM’s prior applications for compensation in this case.

DISBURSEMENTS

15. GWM 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.

16. GWM requests reimbursement for the firm’s actual and necessary expenses incurred during the Interim Period in the amount of \$39.00. A detailed breakdown of such expenses is provided in GWM’s invoices included in **Exhibit A**, and those expenses are summarized in **Exhibit C**. GWM’s expenses during the Interim Period were necessary and reasonable under the circumstances of this case.

NOTICE

17. 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 entered in this case. GWM submits that, given the nature of the relief requested, no other or further notice need be provided.

NO PRIOR REQUEST

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

CONCLUSION

19. Based on the foregoing, GWM makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred representing the Court-appointed FCR.

WHEREFORE, Grier Wright Martinez, PA respectfully requests that the Court enter an Order:

1) Allowing interim compensation to GWM in the amount of \$6,438.00 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 \$39.00 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay GWM the amount of \$6,477.00, which is equal to 100% of GWM's requested compensation for the Interim Period and 100% of GWM's

requested expense reimbursement for the Interim Period, less all previous payments made to GWM pursuant to the Fee Procedure Order; and

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

This is the 15th day of March, 2024.

/s/ A. Cotten Wright
A. Cotten Wright (State Bar No. 28162)
Grier Wright Martinez, PA
521 E Morehead Street, Suite 440
Charlotte, NC 28202
704-332-0207
cwright@grierlaw.com
*Attorneys for Joseph W. Grier, III,
Future Claimants' Representative*

EXHIBIT A



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
United States
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1017
Date: 11/08/2023
Due Upon Receipt

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
10/06/2023	Professional Retention/Fee Issues: Reviewed and edited thirty-seventh fee requests for FCR and GWM.	ACW	0.30	\$450.00	\$135.00
10/11/2023	Fee Application Preparation: Reviewed draft application for compensation for GWM and made edits.	ACW	1.10	\$450.00	\$495.00
10/11/2023	Asbestos Matters: Brief review of draft of amici brief of "Texas Two-Step" victims in support of petitioner in Harrington v. Purdue Pharma.	ACW	0.30	\$450.00	\$135.00
10/23/2023	Case Administration and Business Operations: Reviewed email from J.Miller suggesting cancelation of October hearing and responses in support of cancelation.	ACW	0.10	\$450.00	\$45.00
				Quantity Subtotal	1.8
				Services Subtotal	\$810.00

Expenses

Date	Notes	Quantity	Rate	Total
07/14/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$2.70	\$2.70
Expenses Subtotal				\$2.70

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	1.8	\$450.00	\$810.00
Quantity Total			1.8
Subtotal			\$812.70
Total			\$812.70
Payment (01/19/2024)			-\$731.71
Balance Owing			\$80.99

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1050	12/05/2023	\$1,447.00	\$1,303.00	\$144.00
1080	01/09/2024	\$1,287.10	\$1,161.11	\$125.99
1105	03/04/2024	\$2,930.20	\$0.00	\$2,930.20

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1017	11/08/2023	\$812.70	\$731.71	\$80.99
Outstanding Balance				\$3,281.18
Total Amount Outstanding				\$3,281.18

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255

Payment is due upon receipt.



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
United States
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1050
Date: 12/05/2023
Due Upon Receipt

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
11/06/2023	Fee Application Preparation: Prepared applications for compensation for filing for FCR, GWM, Orrick, Anderson Kill. Drafted notice of opportunity for hearing for applications. Sent email to D.Felder requesting Ankura's application for compensation.	ACW	1.50	\$450.00	\$675.00
11/07/2023	Asbestos Matters: Reviewed District Court Order in Bestwall denying motion for leave to appeal order denying dismissal of bankruptcy case.	ACW	0.40	\$450.00	\$180.00
11/07/2023	Fee Application Preparation: Reviewed and signed off on Ankura's monthly fee request. Reviewed draft of ninth application for compensation for Ankura and prepared same for filing. Added information regarding Ankura fee application to Notice relative to applications for compensation for FCR's professionals.	ACW	0.40	\$450.00	\$180.00
11/16/2023	Case Administration and Business Operations: Reviewed email from D.Felder re: updates on case matters and sent reply.	ACW	0.20	\$450.00	\$90.00

11/28/2023	Professional Retention/Fee Issues: Reviewed docket report for responses to applications for compensation for FCR and his professionals. Drafted orders on applications.	ACW	0.70	\$450.00	\$315.00
------------	---	-----	------	----------	----------

Quantity Subtotal	3.2
Services Subtotal	\$1,440.00

Expenses

Date	Notes	Quantity	Rate	Total
11/29/2023	Online Research - Pacer	1.00	\$7.00	\$7.00
Expenses Subtotal				\$7.00

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	3.2	\$450.00	\$1,440.00
Quantity Total			3.2
Subtotal			\$1,447.00
Total			\$1,447.00
Payment (01/19/2024)			-\$1,303.00
Balance Owing			\$144.00

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1017	11/08/2023	\$812.70	\$731.71	\$80.99
1080	01/09/2024	\$1,287.10	\$1,161.11	\$125.99
1105	03/04/2024	\$2,930.20	\$0.00	\$2,930.20

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1050	12/05/2023	\$1,447.00	\$1,303.00	\$144.00

Outstanding Balance	\$3,281.18
Total Amount Outstanding	\$3,281.18

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255

Payment is due upon receipt.



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
United States
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1080
Date: 01/09/2024
Due Upon Receipt

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
12/05/2023	Professional Retention/Fee Issues: Reviewed email from A.Pelton re: Anderson Kill monthly fee request and sent reply.	ACW	0.10	\$450.00	\$45.00
12/05/2023	Case Administration and Business Operations: Reviewed email from J.Guy re: status of survey motion and related issues.	ACW	0.10	\$450.00	\$45.00
12/07/2023	Case Administration and Business Operations: Reviewed email from M.Evert re: sample of dismissed claims.	ACW	0.10	\$450.00	\$45.00
12/07/2023	Professional Retention/Fee Issues: Reviewed fee requests for FCR and GWM for November, 2023 and noted edits.	ACW	0.30	\$450.00	\$135.00
12/13/2023	Case Administration and Business Operations: Reviewed and responded to email from S.Mendez re: service of orders on motions filed by other counsel.	ACW	0.10	\$450.00	\$45.00

12/13/2023	Case Administration and Business Operations: Reviewed email from N.Ramsey re: ACC's review of sample.	ACW	0.10	\$450.00	\$45.00
12/14/2023	Case Administration and Business Operations: Reviewed email from J.Guy re: order on sampling; hearing scheduled for 12/28/23 and related matters.	ACW	0.10	\$450.00	\$45.00
12/15/2023	Litigation and Adversary Proceedings: Reviewed email from R.Hart re: production to committee on estimated-related requests.	ACW	0.10	\$450.00	\$45.00
12/18/2023	Litigation and Adversary Proceedings: Reviewed email from D.Wright re: production of random sample of 200 dismissed or zero pay claims.	ACW	0.10	\$450.00	\$45.00
12/20/2023	Case Administration and Business Operations: Reviewed email from M.Tomsic re: plans for 12/28/23 hearing; reviewed response from N.Ramsey.	ACW	0.10	\$450.00	\$45.00
12/20/2023	Reviewed email from chambers re: hearing scheduled for 12/28/2023 and response from M.Tomsic.	ACW	0.10	\$450.00	\$45.00
12/21/2023	Case Administration and Business Operations: Reviewed email from M.Tomsic to chambers requesting court hold Teams hearing on 12/28/2023; reviewed response from law clerk.	ACW	0.10	\$450.00	\$45.00
12/26/2023	Case Administration and Business Operations: Reviewed email from M.Evert re: agreed order on sampling.	ACW	0.10	\$450.00	\$45.00
12/27/2023	Case Administration and Business Operations: Reviewed email from D.Wright confirming consent to sampling order.	ACW	0.10	\$450.00	\$45.00
12/28/2023	Case Administration and Business Operations: Reviewed email from J.Miller requesting sign-off on agreed order on sampling and confirmed same.	ACW	0.20	\$450.00	\$90.00
12/28/2023	Case Administration and Business Operations: Reviewed orders denying motion to dismiss and denying motion to withdraw derivative standing.	ACW	0.70	\$450.00	\$315.00
12/28/2023	Case Administration and Business Operations: Reviewed emails from J.Guy re: orders entered on 12/28/2023.	ACW	0.20	\$450.00	\$90.00
12/28/2023	Professional Retention/Fee Issues: Reviewed email from D.Felder and draft fee request for Ankura for November, 2023 and signed off on same.	ACW	0.10	\$450.00	\$45.00
				Quantity Subtotal	2.8
				Services Subtotal	\$1,260.00

Expenses

Date	Notes	Quantity	Rate	Total
12/07/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$11.00	\$11.00
12/07/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$1.50	\$1.50
12/18/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$2.40	\$2.40
12/18/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$0.30	\$0.30
12/18/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$0.30	\$0.30
12/18/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$2.50	\$2.50
12/18/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$1.80	\$1.80
12/18/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$2.10	\$2.10
12/18/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$0.10	\$0.10
12/27/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$2.10	\$2.10
12/27/2023	Online Research - Pacer: Online Research - Pacer	1.00	\$3.00	\$3.00
Expenses Subtotal				\$27.10

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	2.8	\$450.00	\$1,260.00
Quantity Total			2.8
Subtotal			\$1,287.10
Total			\$1,287.10
Payment (02/26/2024)			-\$754.72
Payment (02/26/2024)			-\$406.39
Balance Owing			\$125.99

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1017	11/08/2023	\$812.70	\$731.71	\$80.99

1050	12/05/2023	\$1,447.00	\$1,303.00	\$144.00
1105	03/04/2024	\$2,930.20	\$0.00	\$2,930.20

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1080	01/09/2024	\$1,287.10	\$1,161.11	\$125.99
			Outstanding Balance	\$3,281.18
			Total Amount Outstanding	\$3,281.18

Please make all amounts payable to: Grier Wright Martinez, PA
 Our tax ID is 56-1643255

Payment is due upon receipt.



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
United States
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1105
Date: 02/16/2024
Due On: 03/04/2024

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
01/08/2024	Case Administration and Business Operations: Reviewed email from J.Miller to chambers requesting special setting for February 9 for arguments on certification of appeals; reviewed response from law clerk re: same.	ACW	0.10	\$480.00	\$48.00
01/08/2024	Professional Retention/Fee Issues: Reviewed draft fee request from Orrick and approved same.	ACW	0.10	\$480.00	\$48.00
01/09/2024	Professional Retention/Fee Issues: Reviewed draft monthly fee requests for FCR and GWM.	ACW	0.30	\$480.00	\$144.00
01/12/2024	Professional Retention/Fee Issues: Reviewed draft fee request from Anderson Kill and approved same.	ACW	0.20	\$480.00	\$96.00
01/16/2024	Litigation and Adversary Proceedings: Reviewed and responded to emails from J.Miller re: motion to defer briefing on ACC motion for leave to appeal dismissal order. Exchanged emails with D.Felder & J.Guy re: same.	ACW	0.30	\$480.00	\$144.00

01/18/2024	Litigation and Adversary Proceedings: Reviewed ACC motion for certification of direct appeal.	ACW	0.50	\$480.00	\$240.00
01/18/2024	Professional Retention/Fee Issues: Reviewed draft fee request for Ankura and approved same.	ACW	0.10	\$480.00	\$48.00
01/22/2024	Litigation and Adversary Proceedings: Reviewed email from J.Guy re: response to motions for certification of direct appeal and email from JWG re: same.	ACW	0.50	\$480.00	\$240.00
01/29/2024	Litigation and Adversary Proceedings: Reviewed Orrick draft of response to motions for certification of direct appeal; conveyed comments from JWG to Orrick team.	ACW	0.60	\$480.00	\$288.00
01/30/2024	Litigation and Adversary Proceedings: Reviewed Orrick draft and prepared suggested revisions to objection to ACC and Semien motions for certification of direct appeal; circulated proposed edits by email.	ACW	1.80	\$480.00	\$864.00
01/31/2024	Litigation and Adversary Proceedings: Incorporated edits from J.Guy & D.Felder in FCR's objection to motions to certify direct appeal and circulated revised draft. Made additional edits and prepared objection for filing.	ACW	1.60	\$480.00	\$768.00

Quantity Subtotal 6.1
Services Subtotal \$2,928.00

Expenses

Date	Notes	Quantity	Rate	Total
01/30/2024	Online Research - Pacer: Online Research - Pacer	1.00	\$2.20	\$2.20

Expenses Subtotal \$2.20

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	6.1	\$480.00	\$2,928.00

Quantity Total 6.1
Subtotal \$2,930.20
Total \$2,930.20

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1017	11/08/2023	\$812.70	\$731.71	\$80.99
1050	12/05/2023	\$1,447.00	\$1,303.00	\$144.00
1080	01/09/2024	\$1,287.10	\$1,161.11	\$125.99

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1105	03/04/2024	\$2,930.20	\$0.00	\$2,930.20
Outstanding Balance				\$3,281.18
Total Amount Outstanding				\$3,281.18

Please make all amounts payable to: Grier Wright Martinez, PA
 Our tax ID is 56-1643255

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

October 1, 2023 through January 31, 2024

Project Category	Total Hours for the Period	Total Hours from the Petition Date	Total Fees for the Period	Total Fees from the Petition Date
Case Administration & Business Operations	2.5	51.0	\$1,128.00	\$19,593.00
Court Hearings	0.0	61.3	\$0.00	\$24,975.00
Professional Retention / Fee Issues	2.2	17.15	\$1,011.00	\$7,062.25
Fee Application Preparation	3	86.7	\$1,350.00	\$12,755.00
Asbestos Matters	.7	30.2	\$315.00	\$12,240.00
Litigation	5.5	50.8	\$2,634.00	\$21,361.50
Plan & Disclosure Statement	0.0	0.20	\$0.00	\$80.00
Total	13.9	297.35	\$6,438.00	\$98,066.75

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

Expense Category	Total Expenses for the Interim Period	Total Expenses from the Petition Date
Court Fee – <i>Pro Hac Vice</i> Applications	\$0.00	\$1,131.00
Westlaw – Online Research	\$0.00	\$268.46
Pacer – Online Research	\$39.00	\$466.74
TOTAL	\$39.00	\$1,866.20

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

Name of Professional	Position – Bar Year	Hourly Billing Rate	Total Hours Billed	Total Compensation
A. Cotten Wright	Member – 2001	\$450	7.8	\$3,510
A. Cotten Wright	Member- 2001	\$480	6.1	\$2,928
Brittany L. Franklin	Paralegal	\$175	0.0	\$0.00
Summer Clerk	Summer Clerk	\$175	0.0	\$0.00

EXHIBIT E

SUMMARY OF PRIOR FEE APPLICATIONS

Document	Interim Fee Application Date and Doc. No.	Period Covered	Fees Requested/Allowed	Expenses Requested/Allowed	Order Approving Interim Application
1 st Interim	11/9/2020 Doc. No. 421	9/23/2020 – 9/30/2020	\$1,960.00	\$281.00	Doc. No. 460 12/3/2020
2 nd Interim	3/11/2021 Doc. No. 615	October 1, 2020 – January 31, 2021	\$21,926.25	\$355.00	Doc. No. 660 4/2/2021
3 rd Interim	7/9/2021 Doc. No.763	February 1, 2021- May 31, 2021	\$17,825.00	\$915.78	Doc. No. 794 8/2/2021
4 th Interim	10/29/2021 Doc. No. 862	June 1, 2021 – September 30, 2021	\$14,200.00	\$96.32	Doc No. 927 12/8/2021
5 th Interim	03/01/2022 Doc. No. 1007	October 1, 2021 – January 31, 2022	\$6,542.50	\$44.00	Doc. No. 1064 03/23/2022
6 th Interim	07/11/2022 Doc. No. 1263	February 1, 2022- May 31, 2022	\$4,335.00	\$31.90	Doc. No. 1314 08/03/2022
7 th Interim	11/7/2022 Doc. No. 1389	June 1, 2022- September 30, 2022	\$4,797.50	\$37.30	Doc. No. 1456 12/7/2022
8 th Interim	3/8/2023 Doc. No. 1630	October 1, 2022 – January 31, 2023	\$4,017.50	\$8.70	Doc. No. 1826 6/21/2023
9 th Interim	7/12/23 Doc. No 1866	February 1, 2023 – May 31, 2023	\$5,915.00	\$309.30	Doc. No. 1904 8/2/2023

10 th Interim	11/7/2023 Doc. No. 1989	June 1, 2023 – September 30, 2023	\$10,110.00	\$29.10	Doc. No. 2025 11/30/2023
-----------------------------	-------------------------------	--	-------------	---------	--------------------------------