

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS

Plaintiff,

Adv. Pro. No. 21-03029

v.

ALDRICH PUMP LLC, MURRAY BOILER LLC,
TRANE TECHNOLOGIES COMPANY LLC, and
TRANE U.S. INC.,

Defendants.

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS, on behalf of
the estates of Aldrich Pump LLC and Murray Boiler
LLC,

Plaintiff,

Adv. Pro. No. 22-03028

v.

INGERSOLL-RAND GLOBAL HOLDING
COMPANY LIMITED, TRANE TECHNOLOGIES
HOLDCO INC., TRANE TECHNOLOGIES
COMPANY LLC, TRANE INC., TUI HOLDINGS
INC., TRANE U.S. INC., and MURRAY BOILER
HOLDINGS LLC,

Defendants.

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.



**STIPULATION OF THE PARTIES TO EXTEND
WRITTEN DISCOVERY OBJECTION AND RESPONSE DEADLINES**

This Stipulation is made in the above-captioned Adversary Proceeding No. 21-03029 (the “**Substantive Consolidation Proceeding**”) and Adversary Proceeding No. 22-03028 (the “**Fraudulent Transfer Proceeding**” and, together with the Substantive Consolidation Proceeding, the “**Proceedings**”), by the following parties (the “**Parties**”): (a) the Official Committee of Asbestos Personal Injury Claimants (the “**Committee**”), the plaintiff in the Proceedings; (b) Aldrich Pump LLC and Murray Boiler LLC, each defendants in the Substantive Consolidation Proceeding; (c) Trane Technologies Company LLC and Trane U.S. Inc., each defendants in the Proceedings; and (d) Ingersoll-Rand Global Holding Company Limited, Trane Technologies Holdco Inc., Trane Inc., TUI Holdings Inc., and Murray Boiler Holdings LLC, each defendants in the Fraudulent Transfer Proceeding. Aldrich Pump LLC, Murray Boiler LLC, Trane Technologies Company LLC, and Trane U.S. Inc. are collectively the “**Substantive Consolidation Defendants.**” Trane Technologies Company LLC, Trane U.S. Inc., Ingersoll-Rand Global Holding Company Limited, Trane Technologies Holdco Inc., Trane Inc., TUI Holdings Inc., and Murray Boiler Holdings LLC are collectively the “**Fraudulent Transfer Defendants.**”

WHEREAS on March 12, 2024, the Substantive Consolidation Defendants served on the Committee the Defendants’ First Set of Interrogatories, Requests for Production, and Requests for Admission Directed to the Official Committee of Asbestos Personal Injury Claimants in the Substantive Consolidation Proceeding (the “**Substantive Consolidation Written Discovery**”);

WHEREAS also on March 12, 2024, the Fraudulent Transfer Defendants served on the Committee the Trane Defendants’ First Set of Interrogatories, Requests for Production and Requests for Admission to the Official Committee of Asbestos Personal Injury Claimants in the Fraudulent Transfer Proceeding (the “**Fraudulent Transfer Written Discovery,**” and with the Substantive Consolidation Written Discovery, the “**Written Discovery**”);

Now, therefore, based on the foregoing, the Parties hereby agree and stipulate to the following:

1. In accordance with Rule 29(b) of the Federal Rules of Civil Procedure, made applicable in the Proceedings by Rule 7029 of the Federal Rules of Bankruptcy Procedure, the time available to the Committee to object and respond to the Written Discovery is extended and enlarged up to and through May 28, 2024.

2. In accordance with Rules 29(b) and 36(a)(3) of the Federal Rules of Civil Procedure, made applicable in the Proceedings by Rules 7029 and 7036 of the Federal Rules of Bankruptcy Procedure, the Committee will not be deemed to have admitted to any requests for admission in the Written Discovery and will not be prejudiced in the Proceedings for failure to respond to the Written Discovery by April 11, 2024, i.e., within 30 days after the Substantive Consolidation Defendants and Fraudulent Transfer Defendants served the Written Discovery.

3. The extension of time provided in this stipulation will not interfere with the time set for completing discovery, for hearing a motion, or for trial.

Dated: April 11, 2024
Charlotte, North Carolina

AGREED TO AND CONSENTED TO BY:

HAMILTON STEPHENS STEELE
+ MARTIN, PLLC

/s/ Glenn C. Thompson

Glenn C. Thompson (NC Bar No. 37221)
Robert A. Cox, Jr. (NC Bar No. 21998)
525 North Tryon Street, Suite 1400
Charlotte, North Carolina 28202
Telephone: (704) 344-1117
Facsimile: (704) 344-1483
Email: gthompson@lawhssm.com
rcox@lawhassm.com

*Local Counsel for the Official Committee of
Asbestos Personal Injury Claimants*

CAPLIN & DRYSDALE, CHARTERED
Kevin C. Maclay (admitted *pro hac vice*)
Todd E. Phillips (admitted *pro hac vice*)
Jeffrey A. Liesemer (admitted *pro hac vice*)
One Thomas Circle NW, Suite 1100
Washington, DC 20005
Telephone: (202) 862-5000
Facsimile: (202) 429-3301
Email: kmaclay@capdale.com
tphillips@capdale.com
jliesemer@capdale.com

*Counsel to the Official Committee
of Asbestos Personal Injury Claimants*

David Neier (admitted *pro hac vice*)
Carrie V. Hardman (admitted *pro hac vice*)
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 294-6700
Fax: (212) 294-4700
Email: dneier@winston.com
chardman@winston.com

*Special Litigation Counsel to the Official
Committee of Asbestos Personal Injury
Claimants*

ROBINSON & COLE LLP
Natalie D. Ramsey (admitted *pro hac vice*)
Davis Lee Wright (admitted *pro hac vice*)
1201 North Market Street, Suite 1406
Wilmington, Delaware 19801
Telephone: (302) 516-1700
Facsimile: (302) 516-1699
Email: nramsey@rc.com
dwright@rc.com

*Counsel to the Official Committee
of Asbestos Personal Injury Claimants*

/s/ Bradley R. Kutrow
Bradley R. Kutrow (NC Bar No. 13851)
McGUIREWOODS LLP
201 North Tryon Street, Suite 3000
Charlotte, NC 28202
Telephone: (704) 343-2000
Email: bkutrow@mcguirewoods.com

-and-

K. Elizabeth Sieg (admitted *pro hac vice*)
McGUIREWOODS LLP
800 East Canal Street
Richmond, VA 23141
Telephone: (804) 775-1137
Email: bsieg@mcguirewoods.com

-and-

Gregory J. Mascitti (admitted *pro hac vice*)
McCARTER & ENGLISH, LLP
825 Eighth Avenue, 31st Floor
New York, NY 10019
Telephone: (212) 609-6810
Email: gmascitti@mccarter.com

-and-

Phillip S. Pavlick (admitted *pro hac vice*)
McCARTER & ENGLISH, LLP
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102
Telephone: (212) 609-6810
Email: ppavlick@mccarter.com

*Counsel to Trane Technologies Company
LLC, Trane U.S. Inc., Trane Technologies
Global Holding Company Limited,
Trane Technologies Holdco Inc., Trane Inc.,
TUI Holdings Inc., and Murray Boiler
Holdings LLC*

/s/ John R. Miller, Jr.
C. Richard Rayburn, Jr. (NC Bar No. 6357)
John R. Miller, Jr. (NC Bar No. 28689)
Ross R. Fulton (NC Bar No. 31538)
RAYBURN COOPER & DURHAM, P.A.
227 West Trade Street, Suite 1200
Charlotte, NC 28202
Telephone: (704) 344-0891
Facsimile: (704) 377-1897
Email: rrayburn@rcdlaw.net
jmiller@rcdlaw.net
rfulton@rcdlaw.net

-and-

Brad B. Erens (admitted *pro hac vice*)
David S. Torborg (admitted *pro hac vice*)
Morgan R. Hirst (admitted *pro hac vice*)
Caitlin K. Cahow (admitted *pro hac vice*)
JONES DAY
110 North Wacker Drive, Suite 4800
Chicago, IL 60606
Telephone: (312) 782-3939
Facsimile: (312) 782-8585
Email: bberens@jonesday.com
mhirst@jonesday.com
ccahow@jonesday.com

*Counsel to Debtors and Debtors-in-Possession
Aldrich Pump LLC and Murray Boiler LLC*

-and-

C. Michael Evert, Jr. (admitted *pro hac vice*)
EVERT WEATHERSBY HOUFF
3455 Peachtree Road NE, Suite 1550
Atlanta, Georgia 30326
Telephone: (678) 651-1200
Facsimile: (678) 651-1201
Email: cmevert@ewhlaw.com

*Special Asbestos Litigation Counsel for
Debtors and Debtors-in-Possession
Aldrich Pump LLC and Murray Boiler LLC*