

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

In re: :
: Chapter 11
ALDRICH PUMP LLC, :
MURRAY BOILER LLC, : Case No. 20-30608 (JCW)
: Debtors. :

**SUPPLEMENT TO ROBERT SEMIAN AND ALL MRHFM’S CLAIMANTS’¹ REPLY
IN SUPPORT OF MOTION TO REQUIRE THE DEBTORS AND TRANE TO MAKE
IRREVOCABLE, UNEQUIVOCAL, AND UNCONDITIONAL ADMISSIONS
ABOUT THE ENFORCEABILITY OF THE FUNDING AGREEMENTS**

Though not material to the Motion, MRHFM supplements its Reply to make two corrections. *First*, the bottom of page 3-4 of its Reply (Dkt. 2218) should read (**change in bold**): “That the Debtors...**have \$270 million** in a QSF, and **with** insurance assets **have** more than \$540 million.” *Second*, at the bottom of page 6: “the Debtors **total estimated** asbestos liabilities are \$240 million **in excess of insurance assets.**” **Dismissal Order at 14.**

Date: April 23, 2024

Respectfully Submitted,

¹ Movants are Plaintiff Robert Semian (who was not required to file a proof of claim because of when he was diagnosed) and forty-six claimants represented by Maune Raichle Hartley French & Mudd, LLC (“MRHFM”), who filed proofs of claim in this case.



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Counsel for the Movants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing SUPPLEMENT TO ROBERT SEMIAN AND ALL MRHFM'S CLAIMANTS' REPLY IN SUPPORT OF MOTION TO REQUIRE THE DEBTORS AND TRANE TO MAKE IRREVOCABLE, UNEQUIVOCAL, AND UNCONDITIONAL ADMISSIONS ABOUT THE ENFORCEABILITY OF THE FUNDING AGREEMENTS was filed in accordance with the local rules and served upon all parties registered for electronic service and entitled to receive notice thereof through the CM/ECF system.

Respectfully submitted this the 23rd day of April, 2024.

**WALDREP WALL BABCOCK &
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