

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)

STIPULATION WITH RESPECT TO SHAUN AND LISA N. BEAUDOIN'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)

A. On June 18, 2020 (the “**Petition Date**”), Aldrich Pump LLC and Murray Boiler LLC (the “**Debtors**”) commenced the above-captioned bankruptcy cases (the “**Chapter 11 Cases**”) by filing a voluntary petition for relief under chapter 11 of title 11 of the United States Code in this Court.

B. On July 7, 2020, the Court entered its Order Appointing The Official Committee of Asbestos Personal Injury Claimants [Dkt. 147] (the “**ACC**”).

C. On October 14, 2020, the Court entered its Order Appointing Joseph W. Grier, III as Legal Representative for Future Asbestos Claimants [Dkt. 389] (the “**FCR**”)

D. On May 9, 2024 claimants Shaun and Lisa N. Beaudoin ("Movants") filed *Shaun and Lisa N. Beaudoin's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)* [Dkt. 2243] ("**Motion**").

E. The Debtors and FCR oppose the Motion. The ACC supports the Motion.

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.



F. Movants have agreed to withdraw the Motion without prejudice to their right to refile in the future on the condition (to which the Debtors and FCR hereby agree) that neither the Debtors nor the FCR shall oppose any such future motion on behalf of the Movants on the basis of undue delay or laches. The Debtors and FCR preserve any and all other arguments in opposition to any future motion seeking relief from the automatic stay filed by the Movants or any other claimant.

G. Movants shall withdraw the Motion within three (3) business days of the entry of the Stipulation on the docket in the Chapter 11 Cases.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

AGREED AND STIPULATED:

WALDREP WALL BABCOCK
& BAILEY PLLC

/s/ Thomas W. Waldrep, Jr.

Thomas W. Waldrep Jr. (NC State Bar No. 11135)
James C. Lanik (NC State Bar No. 30454)
Ciara L. Rogers (NC State Bar No. 42571)
370 Knollwood Street, Suite 600
Winston-Salem, NC 27103
Telephone: 336-717-1280
Facsimile: 336-717-1340
Email: notice@waldrepwall.com

THE RUCKDESCHEL LAW FIRM, LLC

Jonathan Ruckdeschel

Jonathan Ruckdeschel
(Maryland, CPF: 9712180133)
8357 Main Street
Ellicott City, Maryland 21043
Telephone: (410) 750-7825
Facsimile: (443) 583-0430
Email: ruck@rucklawfirm.com
Admitted Pro Hac Vice

-and

MAUNE RAICHLE HARTLEY FRENCH &
MUDD, LLC

/s/ Clayton L. Thompson

Clayton L. Thompson (NY Bar No. 5628490)
John Louis Steffan IV (Missouri Bar No. 64180)
150 W. 30th Street, Suite 201
New York, NY 10001
Telephone: (800) 358-5922
Email: CThompson@mrhfmlaw.com
Admitted Pro Hac Vice

Counsel for Movants

/s/ John R. Miller, Jr.

C. Richard Rayburn, Jr. (NC 6357)
John R. Miller, Jr. (NC 28689)
RAYBURN COOPER & DURHAM, P.A.
227 West Trade Street, Suite 1200
Charlotte, North Carolina 28202
Telephone: (704) 334-0891
Facsimile: (704) 377-1897
E-mail: rrayburn@rcdlaw.net
jmiller@rcdlaw.net

-and-

Brad B. Erens (IL Bar No. 06206864)
Mark A. Cody (IL Bar No. 6236871)
Amanda Johnson (IL Bar No. 6329873)
JONES DAY
110 N. Wacker Drive, Suite 4800
Chicago, Illinois 60606
Telephone: (312) 782-3939
Facsimile: (312) 782-8585
E-mail: bberens@jonesday.com
macody@jonesday.com
amandajohnson@jonesday.com
(Admitted Pro Hac Vice)

ATTORNEYS FOR DEBTORS AND
DEBTORS IN POSSESSION

/s/ A. Cotten Wright

A. Cotten Wright (State Bar No. 28162)
GRIER WRIGHT MARTINEZ, PA
521 E Morehead Street, Suite 440
Charlotte, NC 28202
Telephone: (704) 332-0207
Facsimile: (704) 332-0215
Email: cwright@grierlaw.com

-and-

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

COUNSEL FOR JOSEPH W. GRIER, III,
FUTURE CLAIMANTS' REPRESENTATIVE

HAMILTON STEPHENS STEELE
& MARTIN, PLLC

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

-and-

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

-and-

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
kmaclay@capdale.com
tphillips@capdale.com
jliesemer@capdale.com

*Co-Counsel for the Official Committee of Asbestos
Personal Injury Claimants*