

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re	Chapter 11
ALDRICH PUMP LLC, <i>et al.</i> , ¹	Case No. 20-30608 (JCW)
Debtors.	(Jointly Administered)

**ELEVENTH INTERIM APPLICATION OF THE CLARO GROUP, LLC
FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS
ORDINARY COURSE PROFESSIONAL TO THE DEBTORS
FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024**

Name of Applicant:	The Claro Group, LLC
Authorized to Provide Services to:	The above-captioned Debtors and Debtors in Possession
Date of Order Approving Retention	July 15, 2020
Date of Declaration of Ordinary Course Professional	July 31, 2020, and supplemented on August 7, 2020
Petition Date:	June 18, 2020
Period for which compensation and reimbursement are sought:	February 1, 2024 through May 31, 2024
Amount of Compensation sought as actual, reasonable and necessary:	\$143,195
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$600.00
Total Compensation Approved by the OCP Order to Date:	\$500,000

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.



Total Expenses Approved by OCP Order to Date: \$944.44

Total Compensation Approved by the Interim Fee Order to Date: \$1,818,148.05

Total Expenses Approved by the Interim Fee Order to Date: \$7,672.37

Total Allowed Compensation Paid to Date: \$2,318,148.05

Total Allowed Expenses Paid to Date: \$8,616.81

Compensation Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed: \$0.00

Expenses Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed: \$0.00

This is a(n): X interim _____ final application

Prior Monthly Fee Statements Submitted During This Period

Date Submitted	Month Covered	Fees	Expenses
4/26/2024	February 2024	\$35,323.00	\$150.00
4/26/2024	March 2024	\$37,101.00	\$150.00
5/28/2024	April 2024	\$32,740.50	\$150.00
7/2/2024	May 2024	\$38,030.50	\$150.00

To date, no objections have been received to any prior monthly fee statements. The objection deadlines relating to the (i) *Notice of Ordinary Course Professional Fees of The Claro Group, LLC in Excess of Monthly OCP Fee Limit and Aggregate OCP Fee Limit for the period from May 1, 2024 through May 31, 2024* has not yet passed.

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

Name of Professional	Position	Hourly Billing Rate	Total Hours Billed	Total Compensation
M. Uddin	Managing Director	\$750.00	31.4	\$23,550.00
B. Blum	Manager	\$425.00	84.3	\$35,827.50
J. Rothschild	Manager	\$425.00	4.7	\$1,997.50
E. Unverzagt	Manager	\$425.00	5.6	\$2,380.00
A. Mulvey	Senior Consultant	\$345.00	36.7	\$12,661.50
D. Ramljak	Senior Consultant	\$345.00	97.3	\$33,568.50
M. Cortens	Analyst	\$300.00	66.3	\$19,890.00
M. Mazek	Analyst	\$300.00	44.4	\$13,320.00
TOTAL			370.7	\$143,195.00

COMPENSATION BY PROJECT CATEGORY

Project Category	Average Billing Rate	Total Hours	Total Fees
Aldrich Pump LLC - Asbestos Administrative Insurance Support	\$404.49	11.2	\$4,550.50
Aldrich Pump LLC - Insurance Strategy Support	\$382.90	75.8	\$29,023.50
Murray Boiler LLC - Asbestos Administrative Insurance Support	\$405.25	7.1	\$2,857.00
Murray Boiler LLC - Insurance Strategy Support	\$387.82	248.9	\$96,527.50
Clark Equipment Company ("Clark") - Asbestos Administrative Insurance Support	\$490.00	5.0	\$2,450.00
Chapter 11 Compensation (Combined for both Debtors)	\$343.02	22.7	\$7,786.50
TOTAL		370.7	\$143,195.00

EXPENSE SUMMARY

Expense Category	Total Expenses
ShareFile	\$600.00
TOTAL	\$600.00

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

In re ALDRICH PUMP LLC, <i>et al.</i> , ² Debtors.	Chapter 11 Case No. 20-30608 (JCW) (Jointly Administered)
---	---

**ELEVENTH INTERIM APPLICATION OF THE CLARO GROUP, LLC
FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS
ORDINARY COURSE PROFESSIONAL TO THE DEBTORS
FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024**

The Claro Group, LLC (“Claro”), an ordinary course professional providing insurance coverage support services to the above-captioned debtors and debtors in position (the “Debtors”), makes its eleventh interim application for allowance of compensation of \$143,195.00 and reimbursement of expenses of \$600.00 for the period from February 1, 2024 through May 31, 2024 (the “Compensation Period”) in accordance with OCP Order and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the “Interim Compensation Order”). In support of this Application, Claro respectfully represents as follows:

Overview

1. Claro professionals and staff expended a total of 370.7 hours during the Compensation Period for which compensation is requested.

² 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.

2. During the Compensation Period, Claro did not receive any payments or promises of payment from any source other than the Debtors for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Applications. No agreement or understanding exists between Claro or any third person for the sharing of compensation, except as allowed by section 504(b) of the Bankruptcy Code and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) with respect to the sharing of compensation between and among the members of Claro.

3. Pursuant to the Interim Compensation Order, included with this Application are: (a) schedule identifying all Claro professionals and staff who have performed services in these chapter 11 cases during the Compensation Period, the capacities in which each individual is employed by Claro, the hourly billing rate charged by Claro for the services performed by each such individual, the aggregate number of hours expended in this case during the Compensation Period for each professional and staff, and the total fees billed therefor; (b) a summary of services by billing category for services rendered by Claro during the Compensation Period; and (c) a schedule summarizing, by category, the actual and necessary disbursements that Claro incurred during the Compensation Period in connection with the performance of services for the Debtors and for which it seeks reimbursement.

4. Attached hereto collectively as part of Exhibit A are Claro’s itemized monthly time records for professionals and staff performing services for the Debtors for compensation sought during the Compensation Period and Claro’s itemized records detailing expenses incurred on behalf of the Debtors during the Compensation Period.

5. This Application complies with sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), the Bankruptcy Rules, the OCP Order, the Interim

Compensation Order, the *Guidelines for Compensation and Expense Reimbursement of Professionals* issued by this Court (the “Compensation Guidelines”), and the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the “Local Rules”).

Background

6. On June 18, 2020 (the “Petition Date”), the Debtors commenced their reorganization cases (the “Chapter 11 Cases”) by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. These Chapter 11 Cases have been consolidated for procedural purposes only and are being administered jointly.

7. On June 18, 2020, the Debtors filed (i) the *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the “OCP Motion”)³ and (ii) the *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the “Interim Compensation Motion”), each with the Bankruptcy Court. On July 15, 2020, the Bankruptcy Court entered the OCP Order [Dkt. 170] granting the relief requested in the OCP Motion. Also on July 15, 2020, the Bankruptcy Court entered the Interim Compensation Order [Dkt. 171] granting the relief requested in the Interim Compensation Motion.

8. Pursuant to paragraph 3(g) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (i.e., greater than \$500,000 during the pendency of these Chapter 11 Cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance

³ Capitalized terms not otherwise defined herein shall have the meanings given to them in the OCP Motion.

with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the Compensation Guidelines, and any and all applicable orders of the Court.

9. Claro is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on July 31, 2020 [Dkt. 199]. Claro also filed a Supplemental Declaration of Ordinary Course Professional on August 7, 2020 [Dkt. 223]. On or about November 23, 2020, Claro's aggregate fees in the Chapter 11 Cases reached and exceeded the \$500,000 aggregate OCP Fee Limit established in the OCP Order, and as a result, is required to file this Application for amounts in excess of such aggregate OCP Fee Limit.

Jurisdiction

10. This Court has jurisdiction to consider this matter pursuant to 278 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for this matter is proper in this district pursuant to 28 U.S.C. § 1409.

Summary of Services

11. The professional services performed by Claro were necessary and appropriate to the administration of the Debtors' Chapter 11 Cases, as described in detail below and in Exhibit A. These services were in the best interests of the Debtors and other parties in interest. The compensation requested is commensurate with the complexity and nature of the issues and tasks involved.

12. All of the services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Debtors, and not on behalf of any other entity.

Prior Monthly Fee Statements

13. Pursuant to both the OCP Order and the Interim Compensation Order, Claro has submitted the following monthly fee statements (collectively, the "Prior Monthly Fee

Statements”) to the Debtors for the four months comprising the Compensation Period, each of which is incorporated herein by reference in its entirety.⁴

Date Submitted	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
4/26/2024	February 1, 2024 – February 29, 2024	\$35,323.00	\$150.00	\$0	\$35,473.00
4/26/2024	March 1, 2024 – March 31, 2024	\$37,101.00	\$150.00	\$0	\$37,251.00
5/28/2024	April 1, 2024 – April 30, 2024	\$32,740.50	\$150.00	\$0	\$32,891.50
7/2/2024	May 1, 2024 – May 31, 2024	\$38,030.50	\$150.00	\$0	\$38,181.50

14. In all, Claro has submitted the Prior Monthly Fee Statements during the Compensation Period for total fees of \$143,195.00 and total expenses of \$600.00. As of the date of this Application, no party has objected to any of Claro’s Prior Monthly Fee Statements.⁵

Compensation by Project Category

The following is a summary of the activities performed by Claro professionals during the Compensation Period, organized by project billing category.⁶

15. Asbestos Administrative Insurance Support (Combined for both Debtors) – 18.3 hours -- \$7,407.50

During the Compensation Period, Claro professionals consulted with the Debtors in relation to the Debtors’ asbestos liabilities. The work performed by Claro included the following activities among others:

- a) Preparing insurance carrier billings in accordance with the Debtors’ historical insurance coverage and related agreements;

⁴ Copies of the Prior Monthly Fee Statements are attached hereto collectively as Exhibit A.

⁵ The objection deadlines relating to the Monthly Fee Statements covering the periods (i) May1, 2024 – May 31, 2024, has not yet passed.

⁶ The summary set forth below is qualified in its entirety by reference to the time and services detail attached to each Prior Monthly Fee Statement. Project billing categories for which no time was charged during the Compensation Period are not listed below.

- b) Gathering and analyzing data to assist Debtors' quarterly financial reporting;
- c) Addressing the Debtors' and insurers' requests for information as they relate to historical asbestos product spending and claims activity;
- d) Assisting the Debtors by maintaining, tracking, and analyzing historical defense costs; and
- e) Assisting the Debtors' recovery efforts of outstanding asbestos product insurer reimbursements.

16. Insurance Strategy Support (Combined for both Debtors) – 324.7

hours -- \$125,551.00

During the Compensation Period, Claro professionals devoted time consulting with the Debtors' outside counsel and National Coordinating Counsel in relation to the Debtors' asbestos product liabilities. The work performed included (a) gathering and analyzing defense spending data from the Debtors' legal billing software, (b) preparing insurer reimbursement financial analyses, and (c) analyzing insurer coverage in place agreements for reimbursement responsibilities.

17. Clark - Administrative Insurance Support – 5.0 hours -- \$2,450.00

During the Compensation Period, at the Debtors' request, Claro professionals performed services for Clark on behalf of the Debtors similar to the services described in paragraph 15 above. The work performed by Claro included the following activities among others:

- a) Preparing insurance carrier billings in accordance with historical insurance coverage and related agreements;
- b) Gathering and analyzing data to assist with quarterly financial reporting;
- c) Addressing the Debtors' and insurers' requests for information as they relate to historical asbestos product spending and claims activity;

- d) Assisting the Debtors' recovery efforts of outstanding asbestos product insurer reimbursements.

18. **Chapter 11 Compensation (Combined for both Debtors) – 22.7 hours - \$7,786.50**

During the Compensation Period, Claro professionals devoted limited time to (a) reviewing and revising the February through May 2024 invoices for privilege, to preserve client confidentiality, and to ensure compliance with the Local Rules, (b) drafting, revising, and submitting the Monthly Fee Statements for each such month, and (c) preparing the previous interim fee application. Claro is not seeking compensation from the Debtors for time spent by its in-house counsel in support of these activities. Claro intends to seek compensation in connection with preparing this application at a later date.

Expenses Incurred by Claro

19. Section 330 of the Bankruptcy Code authorizes “reimbursement for actual, necessary expenses” incurred by professionals employed in a chapter 11 case. Accordingly, Claro seeks reimbursement for expenses (“Expenses”) incurred in rendering services to the Debtors during the Compensation Period in the amount of \$600.00. Itemized records detailing the Expenses incurred during the Compensation Period are attached to the Prior Monthly Fee Statements.

Conclusion

20. The fees and expenses requested herein by Claro are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable nonbankruptcy cases in a competitive national market and should be

approved on an interim basis pursuant to sections 330 and 331 of the Bankruptcy Code, the OCP Order, the Interim Compensation Order, and the applicable Bankruptcy Rules and Local Rules.

Notice

21. This Application has been served in accordance with the Interim Compensation Order on the Notice Parties, as defined therein. In accordance with the Interim Compensation Order, a notice of opportunity for hearing on this Application in accordance with Local Rule 9013-1(e)(7) has been served on the Notice Parties and all parties that have filed a notice of appearance with the Clerk of this Court and requested such notice. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be provided.

No Prior Request

22. No prior request for the relief sought in this Application has been made to this or any other court.

WHEREFORE, The Claro Group, LLC respectfully requests that, pursuant to sections 330 and 331 of the Bankruptcy Code, the Ordinary Course Professional Order, the Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules, the Court (a) enter an order substantially in the form attached hereto as Exhibit B granting the relief requested herein and (b) grant such other and further relief to The Claro Group, LLC as the Court may deem just and proper.

Dated: July 10, 2024
Chicago, IL

Respectfully, submitted,

/s/ Brian Fern

Brian Fern
THE CLARO GROUP, LLC
123 North Wacker Drive
Chicago, Illinois 60606
(312) 546-3400
bfern@thecларogroup.com

EXHIBIT A

Prior Monthly Statements

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)

**NOTICE OF ORDINARY COURSE PROFESSIONAL FEES
OF THE CLARO GROUP, LLC IN EXCESS OF
MONTHLY OCP FEE LIMIT AND AGGREGATE OCP FEE LIMIT**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On June 18, 2020, Aldrich Pump LLC and Murray Boiler LLC, as debtors and debtors in possession (together, the "Debtors"), filed (i) the *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion")² and (ii) the *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") granting the relief requested in the OCP Motion. Also on July 15, 2020,

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.

² Capitalized terms not otherwise defined herein shall have the meanings given to them in the OCP Motion.

the Bankruptcy Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the “Interim Compensation Order”) granting the relief requested in the Interim Compensation Motion.

2. Pursuant to paragraph 3(g) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (*i.e.*, greater than \$500,000 during the pendency of these chapter 11 cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the *Guidelines for Compensation and Expense Reimbursement of Professionals* promulgated by the Court, and any and all applicable orders of the Court.

3. Pursuant to paragraph 2 of the Interim Compensation Order, the party seeking compensation under such order shall serve a "Monthly Statement" on the Notice Parties setting forth the full amount of fees sought in such month. If any Notice Party has an objection to the fees sought in a particular Monthly Statement, such party shall, no later than the 14th day following the service of such Monthly Statement, serve upon the Debtors, the relevant party seeking compensation, and the other Notice Parties a written objection setting forth the nature of the objection (a "Fee Objection"). Under this procedure, the Fee Objection is served on the Notice Parties, but is not filed with the Bankruptcy Court. If no timely Fee Objection is served, the Debtors shall promptly pay an amount (the “Authorized Payment”) equal to the lesser of (i) 90% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the “Maximum Payment”) and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 2(g) of the Interim Compensation Order.

3. The Claro Group, LLC ("Claro") is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on July 31, 2020 [Dkt. 199]. Claro also filed a Supplemental Declaration of Ordinary Course Professional on August 7, 2020 [Dkt. 223]. As of November 2020, Claro exceeded the OCP Fee Limit in fees in connection with the services provided to the Debtors in these chapter 11 cases.

4. In accordance with the procedures established by both the OCP Order and the Interim Compensation Order, Claro's Monthly Statement for February 2024 is attached hereto as Exhibit 1. This Monthly Statement details the full amount of fees sought by Claro for the month of February 2024. For services provided in February 2024, Claro has incurred fees totaling \$35,323.00, as well as \$150.00 in requested expense reimbursements.

5. If no Fee Objections are received by the Debtors, Claro, and the other Notice Parties prior to April 10, 2024, the Monthly Statement shall be deemed approved and the OCP Firm may be paid the Authorized Payment under the Interim Compensation Order, which if no objection is served, would be 90% of the fees (\$31,790.70) and 100% of the expenses (\$150.00) for February 2024. Claro will file Interim Fee Applications with the Bankruptcy Court in accordance with the terms of the Interim Compensation Order.

6. If a timely Fee Objection is received, any disputed portion of Claro's fees shall be paid only upon resolution by the parties or determination by the Bankruptcy Court as described in both the OCP Order and the Interim Compensation Order.

Dated: April 26, 2024
Chicago, Illinois

/s/ Brian Fern
Brian Fern
THE CLARO GROUP, LLC
123 North Wacker Drive
Chicago, Illinois 60606
(312) 546-3400
bfern@theclarogroup.com

EXHIBIT 1

Monthly Statements



A  **STOUT BUSINESS**

April 12, 2024

Aldrich Pump LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Bankruptcy Billing
Project #: 2355165
Invoice #: CINV-058500

	<u>Amount</u>
For Professional Services Rendered	\$2,290.50
Out-Of-Pocket Expenses	<u>\$0.00</u>
Invoice Total	<u><u>\$2,290.50</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 04/12/2024

Invoice #: CINV-058500

Project #: 2355165

Professional Charges

In Reference To: Bankruptcy Billing

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/07/24	Danny Ramljak	Review of time entries for tenth fee application	0.50	345.00	172.50
02/07/24	Abigail Mulvey	Review of time entries for tenth fee application	0.50	345.00	172.50
02/14/24	Abigail Mulvey	Review of time entries for tenth fee application	0.30	345.00	103.50
02/23/24	Abigail Mulvey	Internal meeting re: tenth fee application	0.50	345.00	172.50
02/27/24	Morgan Cortens	Internal meeting re: tenth fee application	0.50	300.00	150.00
02/28/24	Morgan Cortens	Prepare tenth fee application	1.60	300.00	480.00
02/28/24	Matt Mazek	Prepare tenth fee application	1.70	300.00	510.00
02/28/24	Danny Ramljak	Review tenth fee application	0.60	345.00	207.00
02/29/24	Morgan Cortens	Prepare tenth fee application	0.50	300.00	150.00
02/29/24	Danny Ramljak	Review tenth fee application	0.50	345.00	172.50
Total			7.20		\$2,290.50



April 18, 2024

Aldrich Pump LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Aldrich Pump Insurance Recovery
Project #: 2355139
Invoice #: CINV-058914

	<u>Amount</u>
For Professional Services Rendered	\$15,293.00
Out-Of-Pocket Expenses	<u>150.00</u>
Invoice Total	<u><u>\$15,443.00</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

**The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.**



Invoice Date: 04/18/2024

Invoice #: CINV-058914

Project #: 2355139

Professional Charges

In Reference To: Aldrich Pump Insurance Recovery

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/02/24	Abigail Mulvey	Review of insurer work product analysis	0.70	345.00	241.50
02/02/24	Abigail Mulvey	Review of insurer work product analysis	0.30	345.00	103.50
02/05/24	Matt Mazek	Internal meeting re: insurer work product	0.40	300.00	120.00
02/05/24	Matt Mazek	Analysis for insurer work product	1.60	300.00	480.00
02/05/24	Abigail Mulvey	Internal meeting re: insurer work product	0.50	345.00	172.50
02/08/24	Matt Mazek	Internal meeting re: insurer work product	0.40	300.00	120.00
02/08/24	Jill Rothschild	Internal meeting re: insurer work product	0.40	425.00	170.00
02/08/24	Matt Mazek	Internal meeting re: insurer work product	0.20	300.00	60.00
02/08/24	Jill Rothschild	Internal meeting re: insurer work product	0.20	425.00	85.00
02/08/24	Abigail Mulvey	Internal meeting re: insurer work product	0.50	345.00	172.50
02/08/24	Abigail Mulvey	Internal meeting re: insurer work product	0.50	345.00	172.50
02/08/24	Michelle Uddin	Internal meeting re: insurer work product	0.50	750.00	375.00
02/12/24	Abigail Mulvey	Internal meeting re: insurer work product	0.30	345.00	103.50
02/13/24	Matt Mazek	Analysis for insurer work product	3.00	300.00	900.00
02/13/24	Matt Mazek	Analysis for insurer work product	0.60	300.00	180.00
02/14/24	Matt Mazek	Analysis for insurer work product	3.00	300.00	900.00
02/14/24	Matt Mazek	Review of insurer work product analysis	0.40	300.00	120.00
02/14/24	Abigail Mulvey	Review of insurer work product analysis	0.50	345.00	172.50
02/14/24	Matt Mazek	Analysis for insurer work product	0.90	300.00	270.00
02/15/24	Abigail Mulvey	Review of insurer work product analysis	3.00	345.00	1,035.00
02/19/24	Matt Mazek	Analysis for insurer work product	2.10	300.00	630.00
02/19/24	Matt Mazek	Analysis for insurer work product	2.90	300.00	870.00
02/19/24	Abigail Mulvey	Review of insurer work product analysis	1.00	345.00	345.00
02/21/24	Abigail Mulvey	Review of insurer work product analysis	2.00	345.00	690.00
02/22/24	Jill Rothschild	Internal meeting re: insurer work product	0.50	425.00	212.50
02/22/24	Abigail Mulvey	Review of insurer work product analysis	1.20	345.00	414.00
02/22/24	Abigail Mulvey	Review of insurer work product analysis	0.90	345.00	310.50
02/22/24	Matt Mazek	Review of insurer work product analysis	0.70	300.00	210.00
02/22/24	Michelle Uddin	Review of insurer work product analysis	1.50	750.00	1,125.00
02/23/24	Abigail Mulvey	Analysis for insurer work product	0.50	345.00	172.50



A STOUT BUSINESS

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/23/24	Abigail Mulvey	Internal meeting re: insurer work product	0.40	345.00	138.00
02/26/24	Abigail Mulvey	Review of insurer work product analysis	0.80	345.00	276.00
02/26/24	Abigail Mulvey	Review of insurer work product analysis	1.00	345.00	345.00
02/26/24	Matt Mazek	Analysis for insurer work product	3.00	300.00	900.00
02/26/24	Matt Mazek	Analysis for insurer work product	0.30	300.00	90.00
02/27/24	Jill Rothschild	Internal meeting re: insurer work product	0.80	425.00	340.00
02/27/24	Abigail Mulvey	Internal meeting re: insurer work product	0.40	345.00	138.00
02/27/24	Abigail Mulvey	Internal meeting re: insurer work product	0.60	345.00	207.00
02/27/24	Abigail Mulvey	Internal meeting re: insurer work product	0.30	345.00	103.50
02/27/24	Michelle Uddin	Internal meeting re: insurer work product	1.10	750.00	825.00
02/27/24	Matt Mazek	Internal meeting re: insurer work product	0.50	300.00	150.00
02/28/24	Abigail Mulvey	Analysis for insurer work product	0.50	345.00	172.50
02/28/24	Michelle Uddin	Review of insurer work product analysis	0.70	750.00	525.00
02/29/24	Matt Mazek	Review of insurer work product analysis	0.50	300.00	150.00
Total			42.10		\$15,293.00



A **STOUT BUSINESS**

April 18, 2024

Murray Boiler LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Murray Boiler Insurance Recovery
Project #: 2355138
Invoice #: CINV-058915

	<u>Amount</u>
For Professional Services Rendered	\$17,739.50
Out-Of-Pocket Expenses	<u>\$0.00</u>
Invoice Total	<u><u>\$17,739.50</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 04/18/2024

Invoice #: CINV-058915

Project #: 2355138

Professional Charges

In Reference To: Murray Boiler Insurance Recovery

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/01/24	Danny Ramljak	Internal Meeting & follow-up re: Insurer Work Product Status	0.90	345.00	310.50
02/01/24	Brett Blum	Internal Meeting & follow-up re: Insurer Work Product Status	0.90	425.00	382.50
02/01/24	Michelle Uddin	Review of Insurer Work Product	1.00	750.00	750.00
02/05/24	Brett Blum	Work on Insurer Work Product	2.20	425.00	935.00
02/06/24	Danny Ramljak	Meet with B.Blum re: Insurer Work Product	0.30	345.00	103.50
02/06/24	Danny Ramljak	Download and review PACE database	0.30	345.00	103.50
02/06/24	Brett Blum	Work on Insurer Work Product	3.00	425.00	1,275.00
02/06/24	Brett Blum	Work on Insurer Work Product	0.50	425.00	212.50
02/07/24	Brett Blum	Work on Insurer Work Product	2.80	425.00	1,190.00
02/08/24	Danny Ramljak	Internal discussions re: Insurer work product	0.60	345.00	207.00
02/08/24	Brett Blum	Work on Insurer Work Product	2.20	425.00	935.00
02/09/24	Danny Ramljak	Internal discussions re: Insurer work product	0.20	345.00	69.00
02/09/24	Brett Blum	Work on Insurer Work Product	2.40	425.00	1,020.00
02/14/24	Danny Ramljak	Work on Insurer Work Product	1.70	345.00	586.50
02/14/24	Danny Ramljak	Internal discussions re: Insurer work product	0.50	345.00	172.50
02/14/24	Brett Blum	Internal discussions re: Insurer work product	0.50	425.00	212.50
02/15/24	Brett Blum	Internal discussions re: Insurer work product	0.30	425.00	127.50
02/19/24	Morgan Cortens	Work on Insurer Work Product	0.80	300.00	240.00
02/19/24	Danny Ramljak	Meet re: Insurer Work Product	0.40	345.00	138.00
02/19/24	Danny Ramljak	Work on Insurer Work Product	2.20	345.00	759.00
02/19/24	Eric Unverzagt	Meet re: Insurer Work Product	0.40	425.00	170.00
02/20/24	Morgan Cortens	Work on Insurer Work Product	3.00	300.00	900.00
02/20/24	Danny Ramljak	Work on Insurer Work Product	0.80	345.00	276.00
02/20/24	Brett Blum	Meeting with M.Cortens re: insurer work product	0.30	425.00	127.50
02/20/24	Morgan Cortens	Work on Insurer Work Product	2.40	300.00	720.00
02/21/24	Danny Ramljak	Work on Insurer Work Product	0.20	345.00	69.00
02/23/24	Danny Ramljak	Work on Insurer Work Product	2.30	345.00	793.50
02/27/24	Morgan Cortens	Work on Insurer Work Product	3.00	300.00	900.00

Invoice #: CINV-058915

Project #: 2355138

Page 2



A STOUT BUSINESS

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/27/24	Eric Unverzagt	Meet re: Insurer Work Product	1.10	425.00	467.50
02/27/24	Eric Unverzagt	Follow-up on re: Insurer Work Product	0.70	425.00	297.50
02/27/24	Danny Ramljak	Internal discussions re: Insurer work product	0.60	345.00	207.00
02/27/24	Danny Ramljak	Meet re: Insurer Work Product	1.20	345.00	414.00
02/27/24	Matt Mazek	Review of insurer work product analysis	0.50	300.00	150.00
02/27/24	Brett Blum	Meet with D.Ramljak & E.Unverzagt re: Insurer Work Product	1.30	425.00	552.50
02/27/24	Brett Blum	Work on Insurer Work Product	1.60	425.00	680.00
02/27/24	Morgan Cortens	Work on Insurer Work Product	1.10	300.00	330.00
02/28/24	Morgan Cortens	Work on Insurer Work Product	1.00	300.00	300.00
02/28/24	Danny Ramljak	Work on Insurer Work Product	1.90	345.00	655.50
Total			47.10		\$17,739.50

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)

**NOTICE OF ORDINARY COURSE PROFESSIONAL FEES
OF THE CLARO GROUP, LLC IN EXCESS OF
MONTHLY OCP FEE LIMIT AND AGGREGATE OCP FEE LIMIT**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On June 18, 2020, Aldrich Pump LLC and Murray Boiler LLC, as debtors and debtors in possession (together, the "Debtors"), filed (i) the *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion")² and (ii) the *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") granting the relief requested in the OCP Motion. Also on July 15, 2020,

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.

² Capitalized terms not otherwise defined herein shall have the meanings given to them in the OCP Motion.

the Bankruptcy Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the “Interim Compensation Order”) granting the relief requested in the Interim Compensation Motion.

2. Pursuant to paragraph 3(g) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (*i.e.*, greater than \$500,000 during the pendency of these chapter 11 cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the *Guidelines for Compensation and Expense Reimbursement of Professionals* promulgated by the Court, and any and all applicable orders of the Court.

3. Pursuant to paragraph 2 of the Interim Compensation Order, the party seeking compensation under such order shall serve a "Monthly Statement" on the Notice Parties setting forth the full amount of fees sought in such month. If any Notice Party has an objection to the fees sought in a particular Monthly Statement, such party shall, no later than the 14th day following the service of such Monthly Statement, serve upon the Debtors, the relevant party seeking compensation, and the other Notice Parties a written objection setting forth the nature of the objection (a "Fee Objection"). Under this procedure, the Fee Objection is served on the Notice Parties, but is not filed with the Bankruptcy Court. If no timely Fee Objection is served, the Debtors shall promptly pay an amount (the “Authorized Payment”) equal to the lesser of (i) 90% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the “Maximum Payment”) and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 2(g) of the Interim Compensation Order.

3. The Claro Group, LLC ("Claro") is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on July 31, 2020 [Dkt. 199]. Claro also filed a Supplemental Declaration of Ordinary Course Professional on August 7, 2020 [Dkt. 223]. As of November 2020, Claro exceeded the OCP Fee Limit in fees in connection with the services provided to the Debtors in these chapter 11 cases.

4. In accordance with the procedures established by both the OCP Order and the Interim Compensation Order, Claro's Monthly Statement for March 2024 is attached hereto as Exhibit 1. This Monthly Statement details the full amount of fees sought by Claro for the month of March 2024. For services provided in March 2024, Claro has incurred fees totaling \$37,101.00, as well as \$150.00 in requested expense reimbursements.

5. If no Fee Objections are received by the Debtors, Claro, and the other Notice Parties prior to April 10, 2024, the Monthly Statement shall be deemed approved and the OCP Firm may be paid the Authorized Payment under the Interim Compensation Order, which if no objection is served, would be 90% of the fees (\$33,390.90) and 100% of the expenses (\$150.00) for March 2024. Claro will file Interim Fee Applications with the Bankruptcy Court in accordance with the terms of the Interim Compensation Order.

6. If a timely Fee Objection is received, any disputed portion of Claro's fees shall be paid only upon resolution by the parties or determination by the Bankruptcy Court as described in both the OCP Order and the Interim Compensation Order.

Dated: April 26, 2024
Chicago, Illinois

/s/ Brian Fern
Brian Fern
THE CLARO GROUP, LLC
123 North Wacker Drive
Chicago, Illinois 60606
(312) 546-3400
bfern@thecларogroup.com

EXHIBIT 1

Monthly Statements



A **STOUT BUSINESS**

April 12, 2024

Aldrich Pump LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Bankruptcy Billing
Project #: 2355165
Invoice #: CINV-058503

	<u>Amount</u>
For Professional Services Rendered	\$3,978.00
Out-Of-Pocket Expenses	<u>\$0.00</u>
Invoice Total	<u><u>\$3,978.00</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 04/12/2024

Invoice #: CINV-058503

Project #: 2355165

Professional Charges

In Reference To: Bankruptcy Billing

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/01/24	Morgan Cortens	Work on tenth fee application	2.50	300.00	750.00
03/01/24	Matt Mazek	Work on tenth fee application	2.70	300.00	810.00
03/01/24	Danny Ramljak	Review of tenth fee application	1.30	345.00	448.50
03/01/24	Michelle Uddin	Review of tenth fee application	0.50	750.00	375.00
03/04/24	Abigail Mulvey	Review February time entries	0.30	345.00	103.50
03/04/24	Abigail Mulvey	Review of tenth fee application	1.00	345.00	345.00
03/04/24	Abigail Mulvey	Internal correspondence re: tenth fee application	0.40	345.00	138.00
03/05/24	Matt Mazek	Work on tenth fee application	0.50	300.00	150.00
03/06/24	Abigail Mulvey	Internal correspondence re: tenth fee application	0.40	345.00	138.00
03/06/24	Danny Ramljak	Internal correspondence re: tenth fee application	0.20	345.00	69.00
03/06/24	Michelle Uddin	Review of tenth fee application	0.50	750.00	375.00
03/08/24	Danny Ramljak	Review February time entries	0.30	345.00	103.50
03/29/24	Abigail Mulvey	External correspondence re: tenth fee application	0.50	345.00	172.50
Total			11.10		\$3,978.00



A  **STOUT BUSINESS**

April 12, 2024

Ingersoll Rand
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: General Clark Equipment
Project #: 2355164
Invoice #: CINV-058505

	<u>Amount</u>
For Professional Services Rendered	\$2,450.00
Out-Of-Pocket Expenses	<u>\$0.00</u>
Invoice Total	<u><u>\$2,450.00</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

**The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.**



Invoice Date: 04/12/2024

Invoice #: CINV-058505

Project #: 2355164

Professional Charges

In Reference To: General Clark Equipment

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/25/24	Brett Blum	Preparation of Q1 2024 quarterly calculation	2.20	425.00	935.00
03/26/24	Brett Blum	Internal discussions re: Q1 2024 quarterly calculation	1.80	425.00	765.00
03/26/24	Michelle Uddin	Review of Q1 2024 quarterly calculation	1.00	750.00	750.00
Total			5.00		\$2,450.00



A **STOUT BUSINESS**

April 12, 2024

Aldrich Pump LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Aldrich/Murray Reserve Work
Project #: 2355137
Invoice #: CINV-058524

	<u>Amount</u>
For Professional Services Rendered	\$5,208.50
Out-Of-Pocket Expenses	<u>\$0.00</u>
Invoice Total	<u><u>\$5,208.50</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 04/12/2024

Invoice #: CINV-058524

Project #: 2355137

Professional Charges

In Reference To: Aldrich/Murray Reserve Work

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/07/24	Abigail Mulvey	Internal correspondence re: Q1 2024 quarterly calculation	0.40	345.00	138.00
03/08/24	Matt Mazek	Work on Q1 2024 quarterly calculation	0.80	300.00	240.00
03/11/24	Abigail Mulvey	Internal correspondence re: Q1 2024 quarterly calculation	0.20	345.00	69.00
03/11/24	Matt Mazek	Work on Q1 2024 quarterly calculation	0.60	300.00	180.00
03/12/24	Matt Mazek	Work on Q1 2024 quarterly calculation	2.30	300.00	690.00
03/13/24	Abigail Mulvey	Review of Q1 2024 quarterly calculation	1.30	345.00	448.50
03/13/24	Abigail Mulvey	Work on Q1 2024 quarterly calculation	0.30	345.00	103.50
03/13/24	Abigail Mulvey	Internal correspondence re: Q1 2024 quarterly calculation	0.30	345.00	103.50
03/16/24	Jill Rothschild	Review of Q1 2024 quarterly calculation	0.80	425.00	340.00
03/18/24	Abigail Mulvey	Review of Q1 2024 quarterly calculation	0.30	345.00	103.50
03/18/24	Matt Mazek	Work on Q1 2024 quarterly calculation	0.40	300.00	120.00
03/18/24	Michelle Uddin	Review of Q1 2024 quarterly calculation	0.80	750.00	600.00
03/21/24	Michelle Uddin	Review of Q1 2024 quarterly calculation	1.10	750.00	825.00
03/22/24	Danny Ramljak	Meeting with E.Unverzagt re: Q1 2024 quarterly calculation	0.90	345.00	310.50
03/26/24	Eric Unverzagt	Meeting with D.Ramljak re: insurer work product	0.50	425.00	212.50
03/26/24	Danny Ramljak	Work on Q1 2024 quarterly calculation	0.80	345.00	276.00
03/26/24	Danny Ramljak	Meeting with M.Cortens re: Q1 2024 quarterly calculation	0.50	345.00	172.50
03/26/24	Danny Ramljak	Meeting with E.Unverzagt re: Q1 2024 quarterly calculation	0.50	345.00	172.50
03/28/24	Danny Ramljak	Package and transmit Q1 2024 quarterly calculation	0.30	345.00	103.50
Total			13.10		\$5,208.50



A **STOUT** BUSINESS

April 18, 2024

Murray Boiler LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Murray Boiler Insurance Recovery
Project #: 2355138
Invoice #: CINV-058922

	<u>Amount</u>
For Professional Services Rendered	\$21,207.00
Out-Of-Pocket Expenses	<u>\$0.00</u>
Invoice Total	<u><u>\$21,207.00</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 04/18/2024

Invoice #: CINV-058922

Project #: 2355138

Professional Charges

In Reference To: Murray Boiler Insurance Recovery

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/04/24	Brett Blum	Review of insurer work product	2.90	425.00	1,232.50
03/06/24	Eric Unverzagt	Work on insurer work product	1.20	425.00	510.00
03/06/24	Eric Unverzagt	Meeting with B.Blum re: insurer work product	0.30	425.00	127.50
03/06/24	Danny Ramljak	Work on insurer work product	0.40	345.00	138.00
03/06/24	Danny Ramljak	Download and review PACE database	0.30	345.00	103.50
03/06/24	Brett Blum	Work on insurer work product	2.60	425.00	1,105.00
03/06/24	Brett Blum	Work on insurer work product	2.20	425.00	935.00
03/06/24	Brett Blum	Work on insurer work product	3.00	425.00	1,275.00
03/07/24	Morgan Cortens	Internal team meeting re: insurer work product	0.50	300.00	150.00
03/07/24	Danny Ramljak	Work on insurer work product	2.70	345.00	931.50
03/07/24	Danny Ramljak	Work on insurer work product	0.50	345.00	172.50
03/07/24	Danny Ramljak	Meeting with B.Blum re: insurer work product	0.50	345.00	172.50
03/07/24	Danny Ramljak	Monthly MB internal team meeting re: insurer work product	0.70	345.00	241.50
03/07/24	Danny Ramljak	Work on insurer work product	0.60	345.00	207.00
03/07/24	Danny Ramljak	Work on insurer work product	0.50	345.00	172.50
03/07/24	Brett Blum	Review of insurer work product	2.50	425.00	1,062.50
03/07/24	Brett Blum	Internal team meeting re: insurer work product	1.30	425.00	552.50
03/07/24	Brett Blum	Review of insurer work product	3.00	425.00	1,275.00
03/07/24	Brett Blum	Review of insurer work product	1.80	425.00	765.00
03/07/24	Michelle Uddin	Review of insurer work product	2.20	750.00	1,650.00
03/08/24	Michelle Uddin	Review of insurer work product	1.30	750.00	975.00
03/12/24	Danny Ramljak	Work on insurer work product	0.50	345.00	172.50
03/12/24	Danny Ramljak	Work on insurer work product	0.70	345.00	241.50
03/15/24	Danny Ramljak	Work on insurer work product	0.40	345.00	138.00
03/19/24	Danny Ramljak	Meeting with B.Blum re: insurer work product	0.20	345.00	69.00
03/19/24	Danny Ramljak	Work on insurer work product	1.10	345.00	379.50

Invoice #: CINV-058922

Project #: 2355138

Page 2



A STOUT BUSINESS

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/19/24	Brett Blum	Review of insurer work product	1.10	425.00	467.50
03/20/24	Morgan Cortens	Meeting with D.Ramljak & B.Blum re: insurer work product	0.50	300.00	150.00
03/20/24	Danny Ramljak	Meeting with B.Blum & M.Cortens re: insurer work product	0.50	345.00	172.50
03/20/24	Danny Ramljak	Review of insurer work product	1.60	345.00	552.00
03/20/24	Brett Blum	Internal team meeting re: insurer work product	0.50	425.00	212.50
03/22/24	Eric Unverzagt	Meeting with D.Ramljak re: insurer work product	0.90	425.00	382.50
03/25/24	Morgan Cortens	Meeting with D.Ramljak re: insurer work product	0.50	300.00	150.00
03/25/24	Morgan Cortens	Work on insurer work product	2.50	300.00	750.00
03/25/24	Danny Ramljak	Meeting with M.Cortens re: insurer work product	0.40	345.00	138.00
03/26/24	Morgan Cortens	Work on insurer work product	2.00	300.00	600.00
03/26/24	Morgan Cortens	Work on insurer work product	2.10	300.00	630.00
03/26/24	Morgan Cortens	Work on insurer work product	2.00	300.00	600.00
03/27/24	Morgan Cortens	Meeting with D.Ramljak & B.Blum re: insurer work product	0.70	300.00	210.00
03/27/24	Danny Ramljak	Review of insurer work product	0.20	345.00	69.00
03/27/24	Danny Ramljak	Meeting with B.Blum & M.Cortens re: insurer work product	0.80	345.00	276.00
03/27/24	Brett Blum	Prep for and have internal call re: insurer work product	1.30	425.00	552.50
03/28/24	Morgan Cortens	Work on insurer work product	0.80	300.00	240.00
03/29/24	Morgan Cortens	Work on insurer work product	1.00	300.00	300.00
Total			53.30		\$21,207.00



A  **STOUT BUSINESS**

April 18, 2024

Aldrich Pump LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Aldrich Pump Insurance Recovery
Project #: 2355139
Invoice #: CINV-058925

	<u>Amount</u>
For Professional Services Rendered	\$4,257.50
Out-Of-Pocket Expenses	<u>150.00</u>
Invoice Total	<u><u>\$4,407.50</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 04/18/2024

Invoice #: CINV-058925

Project #: 2355139

Professional Charges

In Reference To: Aldrich Pump Insurance Recovery

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/04/24	Abigail Mulvey	Download and review monthly database	0.30	345.00	103.50
03/08/24	Michelle Uddin	Review of insurer work product analysis	1.20	750.00	900.00
03/12/24	Jill Rothschild	Internal meeting re: insurer work product	0.50	425.00	212.50
03/12/24	Abigail Mulvey	Review of insurer work product analysis	0.30	345.00	103.50
03/12/24	Abigail Mulvey	Internal meeting re: insurer work product	0.50	345.00	172.50
03/12/24	Abigail Mulvey	Analysis for insurer work product	0.30	345.00	103.50
03/14/24	Abigail Mulvey	Analysis for insurer work product	0.30	345.00	103.50
03/18/24	Abigail Mulvey	Internal meeting re: insurer work product	0.30	345.00	103.50
03/18/24	Matt Mazek	Internal meeting re: insurer work product	0.50	300.00	150.00
03/19/24	Abigail Mulvey	Internal meeting re: insurer work product	0.50	345.00	172.50
03/19/24	Jill Rothschild	Internal meeting re: insurer work product	0.50	425.00	212.50
03/19/24	Matt Mazek	Internal meeting re: insurer work product	0.50	300.00	150.00
03/19/24	Michelle Uddin	Review of insurer work product analysis	1.10	750.00	825.00
03/22/24	Matt Mazek	Analysis for insurer work product	1.10	300.00	330.00
03/27/24	Abigail Mulvey	Review of insurer work product analysis	1.00	345.00	345.00
03/29/24	Matt Mazek	Analysis for insurer work product	0.90	300.00	270.00
Total			9.80		\$4,257.50

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)

**NOTICE OF ORDINARY COURSE PROFESSIONAL FEES
OF THE CLARO GROUP, LLC IN EXCESS OF
MONTHLY OCP FEE LIMIT AND AGGREGATE OCP FEE LIMIT**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On June 18, 2020, Aldrich Pump LLC and Murray Boiler LLC, as debtors and debtors in possession (together, the "Debtors"), filed (i) the *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion")² and (ii) the *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") granting the relief requested in the OCP Motion. Also on July 15, 2020,

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.

² Capitalized terms not otherwise defined herein shall have the meanings given to them in the OCP Motion.

the Bankruptcy Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the “Interim Compensation Order”) granting the relief requested in the Interim Compensation Motion.

2. Pursuant to paragraph 3(g) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (i.e., greater than \$500,000 during the pendency of these chapter 11 cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the *Guidelines for Compensation and Expense Reimbursement of Professionals* promulgated by the Court, and any and all applicable orders of the Court.

3. Pursuant to paragraph 2 of the Interim Compensation Order, the party seeking compensation under such order shall serve a "Monthly Statement" on the Notice Parties setting forth the full amount of fees sought in such month. If any Notice Party has an objection to the fees sought in a particular Monthly Statement, such party shall, no later than the 14th day following the service of such Monthly Statement, serve upon the Debtors, the relevant party seeking compensation, and the other Notice Parties a written objection setting forth the nature of the objection (a "Fee Objection"). Under this procedure, the Fee Objection is served on the Notice Parties, but is not filed with the Bankruptcy Court. If no timely Fee Objection is served, the Debtors shall promptly pay an amount (the “Authorized Payment”) equal to the lesser of (i) 90% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the “Maximum Payment”) and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 2(g) of the Interim Compensation Order.

3. The Claro Group, LLC ("Claro") is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on July 31, 2020 [Dkt. 199]. Claro also filed a Supplemental Declaration of Ordinary Course Professional on August 7, 2020 [Dkt. 223]. As of November 2020, Claro exceeded the OCP Fee Limit in fees in connection with the services provided to the Debtors in these chapter 11 cases.

4. In accordance with the procedures established by both the OCP Order and the Interim Compensation Order, Claro's Monthly Statement for April 2024 is attached hereto as Exhibit 1. This Monthly Statement details the full amount of fees sought by Claro for the month of April 2024. For services provided in April 2024, Claro has incurred fees totaling \$32,740.50, as well as \$150.00 in requested expense reimbursements.

5. If no Fee Objections are received by the Debtors, Claro, and the other Notice Parties prior to June 11, 2024, the Monthly Statement shall be deemed approved and the OCP Firm may be paid the Authorized Payment under the Interim Compensation Order, which if no objection is served, would be 90% of the fees (\$29,466.45) and 100% of the expenses (\$150.00) for April 2024. Claro will file Interim Fee Applications with the Bankruptcy Court in accordance with the terms of the Interim Compensation Order.

6. If a timely Fee Objection is received, any disputed portion of Claro's fees shall be paid only upon resolution by the parties or determination by the Bankruptcy Court as described in both the OCP Order and the Interim Compensation Order.

Dated: May 28, 2024
Chicago, Illinois

/s/ Brian Fern
Brian Fern
THE CLARO GROUP, LLC
123 North Wacker Drive
Chicago, Illinois 60606
(312) 546-3400
bfern@thecларogroup.com

EXHIBIT 1

Monthly Statements



A **STOUT BUSINESS**

May 16, 2024

Aldrich Pump LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Bankruptcy Billing
Project #: 2355165
Invoice #: CINV-060546

	<u>Amount</u>
For Professional Services Rendered	\$1,138.50
Out-Of-Pocket Expenses	<u>\$0.00</u>
Invoice Total	<u><u>\$1,138.50</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 05/16/2024

Invoice #: CINV-060546

Project #: 2355165

Professional Charges

In Reference To: Bankruptcy Billing

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/03/24	Abigail Mulvey	Review March time entries	0.50	345.00	172.50
04/03/24	Danny Ramljak	Review March time entries	0.50	345.00	172.50
04/04/24	Danny Ramljak	Review March time entries	0.30	345.00	103.50
04/15/24	Abigail Mulvey	Review March time entries	0.50	345.00	172.50
04/15/24	Danny Ramljak	Review of invoices for eleventh fee application	0.50	345.00	172.50
04/18/24	Danny Ramljak	Review of invoices for eleventh fee application	1.00	345.00	345.00
Total			3.30		\$1,138.50



A **STOUT BUSINESS**
May 16, 2024

Aldrich Pump LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Aldrich Pump Insurance Recovery
Project #: 2355139
Invoice #: CINV-060547

	<u>Amount</u>
For Professional Services Rendered	\$9,680.00
Out-Of-Pocket Expenses	<u>150.00</u>
Invoice Total	<u><u>\$9,830.00</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 05/16/2024

Invoice #: CINV-060547

Project #: 2355139

Professional Charges

In Reference To: Aldrich Pump Insurance Recovery

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/24	Abigail Mulvey	Internal meeting re: insurer work product	0.30	345.00	103.50
04/02/24	Abigail Mulvey	Review of insurer work product analysis	1.00	345.00	345.00
04/02/24	Matt Mazek	Work on insurer work product	2.90	300.00	870.00
04/03/24	Abigail Mulvey	Review of insurer work product analysis	1.00	345.00	345.00
04/03/24	Abigail Mulvey	Download and review monthly database	0.30	345.00	103.50
04/03/24	Matt Mazek	Work on insurer work product	0.30	300.00	90.00
04/04/24	Abigail Mulvey	Internal meeting re: insurer work product	0.50	345.00	172.50
04/05/24	Abigail Mulvey	Internal meeting re: insurer work product	0.30	345.00	103.50
04/09/24	Abigail Mulvey	Prepare for internal meeting re: insurer work product	0.20	345.00	69.00
04/09/24	Abigail Mulvey	Review of insurer work product analysis	0.40	345.00	138.00
04/10/24	Matt Mazek	Work on insurer work product	2.90	300.00	870.00
04/11/24	Abigail Mulvey	Review of insurer work product analysis	0.80	345.00	276.00
04/11/24	Abigail Mulvey	Review of insurer work product analysis	0.90	345.00	310.50
04/11/24	Michelle Uddin	Review of insurer work product analysis	0.90	750.00	675.00
04/15/24	Matt Mazek	Work on insurer work product	0.60	300.00	180.00
04/16/24	Matt Mazek	Internal meeting re: insurer work product	1.10	300.00	330.00
04/16/24	Jill Rothschild	Internal meeting re: insurer work product	1.00	425.00	425.00
04/16/24	Abigail Mulvey	Review of insurer work product analysis	1.00	345.00	345.00
04/16/24	Abigail Mulvey	Internal meeting re: insurer work product	1.00	345.00	345.00
04/16/24	Abigail Mulvey	Internal meeting re: insurer work product	0.30	345.00	103.50
04/16/24	Matt Mazek	Work on insurer work product	1.50	300.00	450.00
04/16/24	Michelle Uddin	Review of insurer work product analysis	1.00	750.00	750.00
04/16/24	Matt Mazek	Work on insurer work product	2.10	300.00	630.00
04/17/24	Michelle Uddin	Review of insurer work product analysis	2.20	750.00	1,650.00
Total			24.50		\$9,680.00



A  **STOUT BUSINESS**

May 16, 2024

Murray Boiler LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Murray Boiler Insurance Recovery
Project #: 2355138
Invoice #: CINV-060548

	<u>Amount</u>
For Professional Services Rendered	\$21,922.00
Out-Of-Pocket Expenses	<u>\$0.00</u>
Invoice Total	<u><u>\$21,922.00</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 05/16/2024

Invoice #: CINV-060548

Project #: 2355138

Professional Charges

In Reference To: Murray Boiler Insurance Recovery

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/24	Morgan Cortens	Work on insurer work product	2.20	300.00	660.00
04/02/24	Morgan Cortens	Internal meeting re: insurer work product	0.50	300.00	150.00
04/02/24	Morgan Cortens	Work on insurer work product	2.30	300.00	690.00
04/02/24	Danny Ramljak	Work on insurer work product	1.40	345.00	483.00
04/02/24	Danny Ramljak	Internal meeting re: insurer work product	0.50	345.00	172.50
04/02/24	Danny Ramljak	Work on insurer work product	0.80	345.00	276.00
04/02/24	Brett Blum	Work on insurer work product	1.20	425.00	510.00
04/02/24	Morgan Cortens	Work on insurer work product	0.90	300.00	270.00
04/03/24	Morgan Cortens	Work on insurer work product	0.50	300.00	150.00
04/03/24	Morgan Cortens	Work on insurer work product	2.40	300.00	720.00
04/03/24	Danny Ramljak	Internal meeting re: insurer work product	0.70	345.00	241.50
04/03/24	Danny Ramljak	Work on insurer work product	0.40	345.00	138.00
04/03/24	Danny Ramljak	Download and review PACE database	0.30	345.00	103.50
04/03/24	Danny Ramljak	Internal meeting re: insurer work product	0.20	345.00	69.00
04/03/24	Danny Ramljak	Work on insurer work product	2.70	345.00	931.50
04/03/24	Brett Blum	Work on insurer work product	2.30	425.00	977.50
04/03/24	Michelle Uddin	Review of insurer work product	1.30	750.00	975.00
04/04/24	Morgan Cortens	Work on insurer work product	2.00	300.00	600.00
04/04/24	Danny Ramljak	Work on insurer work product	1.30	345.00	448.50
04/04/24	Danny Ramljak	Work on insurer work product	1.80	345.00	621.00
04/05/24	Danny Ramljak	Work on insurer work product	0.30	345.00	103.50
04/05/24	Danny Ramljak	Work on insurer work product	1.00	345.00	345.00
04/08/24	Danny Ramljak	Work on insurer work product	2.20	345.00	759.00
04/09/24	Morgan Cortens	Internal meeting re: insurer work product	0.50	300.00	150.00
04/09/24	Eric Unverzagt	Internal meeting re: insurer work product	0.50	425.00	212.50
04/09/24	Danny Ramljak	Internal meeting re: insurer work product	0.50	345.00	172.50
04/09/24	Danny Ramljak	Work on insurer work product	1.20	345.00	414.00
04/09/24	Danny Ramljak	Work on insurer work product	2.60	345.00	897.00
04/09/24	Danny Ramljak	Internal meeting re: insurer work product	0.80	345.00	276.00
04/09/24	Brett Blum	Work on insurer work product	1.80	425.00	765.00

Invoice #: CINV-060548

Project #: 2355138

Page 2



A STOUT BUSINESS

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/09/24	Brett Blum	Work on insurer work product	3.00	425.00	1,275.00
04/09/24	Michelle Uddin	Review of insurer work product	1.20	750.00	900.00
04/10/24	Morgan Cortens	Work on insurer work product	0.90	300.00	270.00
04/10/24	Danny Ramljak	Work on insurer work product	0.60	345.00	207.00
04/19/24	Morgan Cortens	Work on insurer work product	1.50	300.00	450.00
04/23/24	Danny Ramljak	Work on insurer work product	1.10	345.00	379.50
04/23/24	Danny Ramljak	Work on insurer work product	1.90	345.00	655.50
04/25/24	Danny Ramljak	Work on insurer work product	1.20	345.00	414.00
04/25/24	Danny Ramljak	Work on insurer work product	0.50	345.00	172.50
04/25/24	Brett Blum	Internal meeting re: insurer work product	0.20	425.00	85.00
04/25/24	Brett Blum	Work on insurer work product	1.40	425.00	595.00
04/26/24	Brett Blum	Work on insurer work product	1.90	425.00	807.50
04/29/24	Morgan Cortens	Work on insurer work product	1.00	300.00	300.00
04/29/24	Danny Ramljak	Internal communication re: insurer work product	0.20	345.00	69.00
04/29/24	Brett Blum	Work on insurer work product	1.40	425.00	595.00
04/30/24	Morgan Cortens	Work on insurer work product	2.60	300.00	780.00
04/30/24	Danny Ramljak	Work on insurer work product	0.40	345.00	138.00
04/30/24	Danny Ramljak	Work on insurer work product	0.50	345.00	172.50
04/30/24	Michelle Uddin	Review of insurer work product	0.50	750.00	375.00
Total			59.10		\$21,922.00

**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)

**NOTICE OF ORDINARY COURSE PROFESSIONAL FEES
OF THE CLARO GROUP, LLC IN EXCESS OF
MONTHLY OCP FEE LIMIT AND AGGREGATE OCP FEE LIMIT**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On June 18, 2020, Aldrich Pump LLC and Murray Boiler LLC, as debtors and debtors in possession (together, the "Debtors"), filed (i) the *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17] (the "OCP Motion")² and (ii) the *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18] (the "Interim Compensation Motion"), each with the United States Bankruptcy Court for the Western District of North Carolina (the "Bankruptcy Court"). On July 15, 2020, the Bankruptcy Court entered the *Order Authorizing the Retention and Compensation of Professionals Utilized By the Debtors in the Ordinary Course of Business* [Dkt. 170] (the "OCP Order") granting the relief requested in the OCP Motion. Also on July 15, 2020,

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.

² Capitalized terms not otherwise defined herein shall have the meanings given to them in the OCP Motion.

the Bankruptcy Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the “Interim Compensation Order”) granting the relief requested in the Interim Compensation Motion.

2. Pursuant to paragraph 3(g) of the OCP Order, to the extent that an Ordinary Course Professional seeks compensation in excess of the aggregate OCP Fee Limit (i.e., greater than \$500,000 during the pendency of these chapter 11 cases), then such Ordinary Course Professional shall file a fee application with the Court for any such excess amount in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Rules of Practice and Procedure of the Bankruptcy Court, the *Guidelines for Compensation and Expense Reimbursement of Professionals* promulgated by the Court, and any and all applicable orders of the Court.

3. Pursuant to paragraph 2 of the Interim Compensation Order, the party seeking compensation under such order shall serve a "Monthly Statement" on the Notice Parties setting forth the full amount of fees sought in such month. If any Notice Party has an objection to the fees sought in a particular Monthly Statement, such party shall, no later than the 14th day following the service of such Monthly Statement, serve upon the Debtors, the relevant party seeking compensation, and the other Notice Parties a written objection setting forth the nature of the objection (a "Fee Objection"). Under this procedure, the Fee Objection is served on the Notice Parties, but is not filed with the Bankruptcy Court. If no timely Fee Objection is served, the Debtors shall promptly pay an amount (the “Authorized Payment”) equal to the lesser of (i) 90% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the “Maximum Payment”) and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 2(g) of the Interim Compensation Order.

3. The Claro Group, LLC ("Claro") is an Ordinary Course Professional that filed its Declaration of Ordinary Course Professional on July 31, 2020 [Dkt. 199]. Claro also filed a Supplemental Declaration of Ordinary Course Professional on August 7, 2020 [Dkt. 223]. As of November 2020, Claro exceeded the OCP Fee Limit in fees in connection with the services provided to the Debtors in these chapter 11 cases.

4. In accordance with the procedures established by both the OCP Order and the Interim Compensation Order, Claro's Monthly Statement for May 2024 is attached hereto as Exhibit 1. This Monthly Statement details the full amount of fees sought by Claro for the month of May 2024. For services provided in May 2024, Claro has incurred fees totaling \$38,030.50, as well as \$150.00 in requested expense reimbursements.

5. If no Fee Objections are received by the Debtors, Claro, and the other Notice Parties prior to July 16, 2024, the Monthly Statement shall be deemed approved and the OCP Firm may be paid the Authorized Payment under the Interim Compensation Order, which if no objection is served, would be 90% of the fees (\$34,227.50) and 100% of the expenses (\$150.00) for May 2024. Claro will file Interim Fee Applications with the Bankruptcy Court in accordance with the terms of the Interim Compensation Order.

6. If a timely Fee Objection is received, any disputed portion of Claro's fees shall be paid only upon resolution by the parties or determination by the Bankruptcy Court as described in both the OCP Order and the Interim Compensation Order.

Dated: July 2, 2024
Chicago, Illinois

/s/ Brian Fern
Brian Fern
THE CLARO GROUP, LLC
One South Wacker Drive, Suite 3800
Chicago, IL 60606
(312) 546-3400
bfern@thecларogroup.com

EXHIBIT 1

Monthly Statements



A **STOUT BUSINESS**

June 26, 2024

Aldrich Pump LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Aldrich Pump Insurance Recovery
Project #: 2355139
Invoice #: CINV-062662

	<u>Amount</u>
For Professional Services Rendered	\$1,095.00
Out-Of-Pocket Expenses	<u>150.00</u>
Invoice Total	<u><u>\$1,245.00</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 06/26/2024

Invoice #: CINV-062662

Project #: 2355139

Professional Charges

In Reference To: Aldrich Pump Insurance Recovery

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/23/24	Michelle Uddin	Review of historical records in response to client info request	0.50	750.00	375.00
05/29/24	Michelle Uddin	Review of historical records in response to client info request	0.50	750.00	375.00
05/29/24	Abigail Mulvey	Review Pace data base and historical data	0.80	345.00	276.00
05/29/24	Abigail Mulvey	Review Pace data base and historical data	0.20	345.00	69.00
Total			2.00		\$1,095.00



A  **STOUT BUSINESS**

June 26, 2024

Aldrich Pump LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Bankruptcy Billing
Project #: 2355165
Invoice #: CINV-062663

	<u>Amount</u>
For Professional Services Rendered	\$379.50
Out-Of-Pocket Expenses	<u>\$0.00</u>
Invoice Total	<u><u>\$379.50</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 06/26/2024

Invoice #: CINV-062663

Project #: 2355165

Professional Charges

In Reference To: Bankruptcy Billing

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/08/24	Abigail Mulvey	Review of April time entries for eleventh fee application	0.30	345.00	103.50
05/09/24	Danny Ramljak	Review of April time entries for eleventh fee application	0.50	345.00	172.50
05/28/24	Abigail Mulvey	Internal correspondence re: eleventh fee application	0.30	345.00	103.50
Total			1.10		\$379.50



A **STOUT BUSINESS**

June 26, 2024

Murray Boiler LLC
c/o Allan Tananbaum
One Centennial Avenue
Piscataway, NJ 08854

In Reference To: Murray Boiler Insurance Recovery
Project #: 2355138
Invoice #: CINV-062664

	<u>Amount</u>
For Professional Services Rendered	\$36,556.00
Out-Of-Pocket Expenses	<u>\$0.00</u>
Invoice Total	<u><u>\$36,556.00</u></u>

Please include the project number and invoice number with your payment. If you have any questions, contact Accounts Receivable at 248-208-8800.

Please remit check and invoice copy to:

The Claro Group, LLC
P O Box 6715
Carol Stream, IL 60197-6715.



Invoice Date: 06/26/2024

Invoice #: CINV-062664

Project #: 2355138

Professional Charges

In Reference To: Murray Boiler Insurance Recovery

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/24	Brett Blum	Work on insurer work product	1.90	425.00	807.50
05/02/24	Danny Ramljak	Download and review PACE database	0.30	345.00	103.50
05/02/24	Brett Blum	Work on insurer work product	2.10	425.00	892.50
05/06/24	Danny Ramljak	Work on insurer work product	1.40	345.00	483.00
05/06/24	Danny Ramljak	Prep for and have Internal meeting re: insurer work product	0.50	345.00	172.50
05/06/24	Brett Blum	Internal discussion re: insurer work product	0.40	425.00	170.00
05/06/24	Michelle Uddin	Review of insurer work product	1.10	750.00	825.00
05/07/24	Morgan Cortens	Internal meeting re: insurer work product	0.50	300.00	150.00
05/07/24	Morgan Cortens	Internal meeting re: insurer work product	0.70	300.00	210.00
05/07/24	Morgan Cortens	Work on insurer work product	2.00	300.00	600.00
05/07/24	Danny Ramljak	Work on insurer work product	1.40	345.00	483.00
05/07/24	Danny Ramljak	Internal meeting re: insurer work product	0.20	345.00	69.00
05/07/24	Danny Ramljak	Work on insurer work product	2.70	345.00	931.50
05/07/24	Danny Ramljak	Internal meeting re: insurer work product and follow-up regarding the same	1.00	345.00	345.00
05/07/24	Brett Blum	Review of insurer work product and internal meeting regarding the same	1.10	425.00	467.50
05/07/24	Brett Blum	Work on insurer work product	2.30	425.00	977.50
05/07/24	Brett Blum	Internal meeting re: insurer work product	1.20	425.00	510.00
05/08/24	Morgan Cortens	Work on insurer work product	1.00	300.00	300.00
05/08/24	Danny Ramljak	Work on insurer work product	1.00	345.00	345.00
05/09/24	Morgan Cortens	Work on insurer work product	3.00	300.00	900.00
05/09/24	Morgan Cortens	Work on insurer work product	1.00	300.00	300.00
05/09/24	Danny Ramljak	Internal discussion re: insurer work product	0.30	345.00	103.50
05/09/24	Brett Blum	Work on insurer work product	2.80	425.00	1,190.00
05/10/24	Morgan Cortens	Internal meeting re: insurer work product	0.80	300.00	240.00
05/10/24	Morgan Cortens	Work on insurer work product	0.50	300.00	150.00
05/10/24	Danny Ramljak	Internal meeting re: insurer work product	0.80	345.00	276.00
05/10/24	Danny Ramljak	Work on insurer work product	2.20	345.00	759.00
05/10/24	Brett Blum	Internal discussion re: insurer work product	0.60	425.00	255.00

Invoice #: CINV-062664

Project #: 2355138

Page 2



A STOUT BUSINESS

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/10/24	Brett Blum	Work on insurer work product	2.60	425.00	1,105.00
05/13/24	Danny Ramljak	Work on insurer work product	1.80	345.00	621.00
05/13/24	Danny Ramljak	Internal meeting re: insurer work product	0.80	345.00	276.00
05/13/24	Danny Ramljak	Work on insurer work product	1.90	345.00	655.50
05/13/24	Danny Ramljak	Work on insurer work product	1.60	345.00	552.00
05/13/24	Brett Blum	Work on insurer work product	2.70	425.00	1,147.50
05/13/24	Michelle Uddin	Review of insurer work product	1.10	750.00	825.00
05/14/24	Morgan Cortens	Work on insurer work product	1.60	300.00	480.00
05/14/24	Danny Ramljak	Work on insurer work product	2.60	345.00	897.00
05/14/24	Michelle Uddin	Review of insurer work product	1.30	750.00	975.00
05/21/24	Morgan Cortens	Internal meeting re: insurer work product	1.80	300.00	540.00
05/21/24	Brett Blum	Internal meeting re: insurer work product	1.50	425.00	637.50
05/21/24	Danny Ramljak	Internal meeting re: insurer work product and follow-up regarding the same	2.10	345.00	724.50
05/21/24	Danny Ramljak	Internal meeting re: insurer work product	0.50	345.00	172.50
05/21/24	Michelle Uddin	Review of insurer work product	1.80	750.00	1,350.00
05/22/24	Morgan Cortens	Internal meeting re: insurer work product	0.30	300.00	90.00
05/22/24	Danny Ramljak	Internal meeting re: insurer work product	0.20	345.00	69.00
05/22/24	Danny Ramljak	Work on insurer work product	0.30	345.00	103.50
05/22/24	Danny Ramljak	Work on insurer work product	0.70	345.00	241.50
05/23/24	Danny Ramljak	Internal meeting re: insurer work product	0.50	345.00	172.50
05/23/24	Danny Ramljak	Work on insurer work product	1.40	345.00	483.00
05/24/24	Danny Ramljak	Work on insurer work product	0.30	345.00	103.50
05/28/24	Morgan Cortens	Work on insurer work product	2.00	300.00	600.00
05/28/24	Morgan Cortens	Internal meeting re: insurer work product	2.30	300.00	690.00
05/28/24	Danny Ramljak	Internal discussion re: insurer work product	0.50	345.00	172.50
05/28/24	Danny Ramljak	Internal meeting re: insurer work product and follow-up regarding the same	2.50	345.00	862.50
05/28/24	Michelle Uddin	Review of insurer work product	2.00	750.00	1,500.00
05/28/24	Brett Blum	Review of insurer work product	2.80	425.00	1,190.00
05/28/24	Brett Blum	Internal discussion re: insurer work product	2.60	425.00	1,105.00
05/28/24	Brett Blum	Internal discussion re: insurer work product	0.80	425.00	340.00
05/29/24	Danny Ramljak	Review of historical records in response to client info request	1.40	345.00	483.00
05/29/24	Danny Ramljak	Work on insurer work product	1.10	345.00	379.50
05/29/24	Danny Ramljak	Work on insurer work product	2.00	345.00	690.00
05/30/24	Danny Ramljak	Work on insurer work product	1.80	345.00	621.00
05/30/24	Michelle Uddin	Review of insurer work product	1.50	750.00	1,125.00



A  **STOUT BUSINESS**

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/31/24	Danny Ramljak	Internal meeting re: insurer work product	0.50	345.00	172.50
05/31/24	Morgan Cortens	Internal meeting re: insurer work product	0.50	300.00	150.00
05/31/24	Morgan Cortens	Work on insurer work product	2.00	300.00	600.00
05/31/24	Brett Blum	Internal meeting re: insurer work product	0.50	425.00	212.50
05/31/24	Brett Blum	Work on insurer work product	1.00	425.00	425.00
Total			92.00		\$36,556.00

EXHIBIT B

Proposed

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)

**ORDER GRANTING ELEVENTH INTERIM FEE APPLICATION OF
THE CLARO GROUP, LLC FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS
ORDINARY COURSE PROFESSIONAL TO THE DEBTORS
FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024**

This matter coming before the Court on the *Eleventh Interim Fee Application of The Claro Group, LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Ordinary Course Professional to the Debtors for the Period from February 1, 2024 through May 31, 2024* (the “Interim Fee Application”)² filed by The Claro Group, LLC as an ordinary course professional to the above-captioned debtors and debtor in possession (the “Debtors”); the Court having reviewed the Interim Fee Application; the Court having found that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and

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.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Interim Fee Application.

1334, (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (iii) notice of the Interim Fee Application and the notice of an opportunity for hearing were served upon the parties required by Local Rule 2002-1(g) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the “Interim Compensation Order”) and no other or further notice is required, (iv) the compensation requested in the Interim Fee Application is reasonable and for actual and necessary services rendered by The Claro Group, LLC on behalf of the Debtors during the period from February 1, 2024 through May 31, 2024 (the “Compensation Period”), (v) the expenses for which reimbursement is sought in the Interim Fee Application are actual and necessary expenses incurred by The Claro Group, LLC during the Compensation Period on behalf of the Debtors, and (vi) the Interim Fee Application fully complies with the Interim Compensation Order, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Compensation Guidelines; and the Court having determined that the legal and factual bases set forth in the Interim Fee Application establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Interim Fee Application is GRANTED.
2. The Claro Group, LLC is awarded, on an interim basis, compensation for professional services rendered during the Compensation Period in the amount of \$143,195.00 and reimbursement for actual and necessary expenses incurred by The Claro Group, LLC during the Compensation Period in the amount of \$600.00.
3. The Debtors are authorized and directed to pay promptly to The Claro Group, LLC the amount of fees and expenses approved by this Order, to the extent that such amounts have not previously been paid by the Debtors.

4. The Debtors and The Claro Group, LLC are authorized and empowered to take any and all matters arising from or related to the implementation, enforcement, or interpretation of this Order.

This Order has been signed electronically.
The Judge's signature and court's seal appear
at the top of the Order.

United States Bankruptcy Court