

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

In re:  ALDRICH PUMP LLC, et al., <sup>1</sup>  Debtors.	Chapter 11  Case No. 20-30608 (JCW)  (Jointly Administered)
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**TWELFTH INTERIM APPLICATION OF ALIXPARTNERS, LLP,  
FINANCIAL ADVISOR TO THE CHAPTER 11 DEBTORS, FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED  
FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024**

<b>Name of Applicant</b>	<b>ALIXPARTNERS, LLP</b>	
<b>Applicant’s Role in Case</b>	<b>Financial Advisor to the Chapter 11 Debtors</b>	
<b>Date of Retention</b>	<b>June 18, 2020, effective as of June 18, 2020 [Docket No. 63]</b>	
<b>Time period covered during this Twelfth Interim Period</b>	<b>Beginning of Period</b>	<b>End of Period</b>
	February 1, 2024	May 31, 2024
<b>Summary of Total Fees and Expenses Requested:</b>		
<b>Total fees requested during this Twelfth Interim Period</b>	<b>\$15,660.00</b>	
<b>Total expenses requested during this Twelfth Interim Period</b>	<b>\$0.00</b>	
<b>Total fees and expenses requested during this Twelfth Interim Period</b>	<b>\$15,660.00</b>	
<b>Blended hourly rate for fees incurred during the Twelfth Interim Period</b>	<b>\$910.47</b>	

<sup>1</sup> 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 Beauty Street, Davidson, North Carolina 28036.



<b>Summary of Payments During the Twelfth Interim Period:</b>	
<b>Total allowed compensation paid to date</b>	<b>\$0.00</b>
<b>Total allowed expenses to date</b>	<b>\$0.00</b>
<b>Total amount due and owing AlixPartners</b>	<b>\$15,660.00</b>
<b>This is a(n): <input type="checkbox"/> Monthly Application <input checked="" type="checkbox"/> Interim Application <input type="checkbox"/> Final Application</b>	

**ALIXPARTNERS, LLP**

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL  
DURING THE TWELFTH INTERIM PERIOD**

<b>Professional</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Fees</b>
Jarod E Clarrey	Director	\$1,100	11.2	12,320.00
Kaitlyn A Sundt	Senior Vice President	\$650	0.3	195.00
Brooke F Filler	Senior Vice President	\$575	0.4	230.00
Lisa Marie Bonito	Vice President	\$550	5.3	2,915.00
<b>Total Hours and Fees for Professionals</b>			<b>17.2</b>	<b>\$ 15,660.00</b>

**Average Billing Rate \$ 910.47**

**ALIXPARTNERS, LLP**

**SUMMARY OF HOURS AND FEES BY MATTER CATEGORY  
DURING THE TWELFTH INTERIM PERIOD**

<b>Matter Code / Description</b>		<b>Hours</b>	<b>Fees</b>
1.3	U. S. Trustee / Court Reporting Requirements	10.6	\$ 11,660.00
1.9	Retention Applications & Disclosure Reports	0.4	230.00
1.10	Fee Statements and Fee Applications	6.2	3,770.00
<b>Total Hours and Professional Fees by Matter Category</b>		<b>17.2</b>	<b>\$ 15,660.00</b>

**Average Billing Rate \$ 910.47**

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

In re:

ALDRICH PUMP LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

**TWELFTH INTERIM FEE APPLICATION OF ALIXPARTNERS, LLP,  
FINANCIAL ADVISOR TO THE CHAPTER 11 DEBTORS, FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED  
FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024**

AlixPartners, LLP (“AlixPartners”), as financial advisor to the above-captioned debtors (the “Debtors”), hereby submits its application (the “Application”) for an interim allowance of compensation for professional services rendered for the period from February 1, 2024 through May 31, 2024 (the “Twelfth Interim Period”). AlixPartners respectfully states as follows:

**Jurisdiction and Venue**

1. The United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

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<sup>1</sup> 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.

### **Basis for Relief**

3. The bases for relief requested herein are Sections 330 and 331 of Title 11 of the United States Bankruptcy Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted June 11, 2013 (the “U.S. Trustee Guidelines”) and the *Order Establishing Procedures For Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 171] (the “Interim Compensation Order”).

### **Background**

4. On June 18, 2020 (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, thereby commencing the above-captioned chapter 11 cases (the “Chapter 11 Cases”) in this Court.

5. The Debtors are authorized to continue operating their businesses and managing their properties as debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

6. No trustee or examiner has been appointed in these Chapter 11 Cases.

### **Retention of AlixPartners**

7. On June 18, 2020, the Debtors filed their *Ex Parte Application of Debtors for Entry of an Order Authorizing the Employment and Retention of AlixPartners, LLP as Financial Advisor Effective as of the Petition Date* [Docket No. 23].

8. On June 18, 2020, the Court entered the *Order Authorizing the Employment and Retention of AlixPartners, LLP as Financial Advisor Effective as of the Petition Date* [Docket No. 63] (the “Retention Order”). A copy of the Retention Order is attached hereto as **Exhibit A**.

9. The Retention Order approved the terms of AlixPartners’ fee and expense structure set forth in the engagement letter by and between AlixPartners and the Debtors (the “Engagement Letter”) and authorized AlixPartners to be compensated pursuant to the terms of the Engagement Letter and the procedures set forth in the Bankruptcy Code, the Bankruptcy Rules, the Interim Compensation Order, and any other applicable orders of this Court.

**Summary of Compensation During the Twelfth Interim Period**

10. AlixPartners served one (1) monthly fee statement (the “Monthly Fee Statement”) during the Twelfth Interim Period pursuant to the Interim Compensation Order. The Monthly Fee Statement contains detailed descriptions of the services rendered in the amount of \$15,660.00 and is noted below:

Date Served	Period Covered	Requested		Paid		Amount Outstanding
		Fees	Expenses	Fees	Expenses	
6/25/2024	02/01/2024 - 05/31/2024	\$ 15,660.00	\$ -	\$ -	\$ -	\$ 15,660.00
	<b>Total</b>	<b>\$ 15,660.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 15,660.00</b>

11. Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Twelfth Interim Period are attached hereto as **Exhibit B**.

12. AlixPartners has not received any payments from the Debtors during the Twelfth Interim Period. The total amount of \$15,660.00 remains outstanding as of the filing of this Application.

**Summary of Services Rendered During the Twelfth Interim Period**

13. During the Twelfth Interim Period, AlixPartners advised and assisted the Debtors with the preparation of monthly status reports and associated Bankruptcy Administrator fee calculations and payments.

**Summary of Services By Category During the Twelfth Interim Period**

14. AlixPartners classified the services performed into separate categories. The descriptions below summarize the services provided by AlixPartners to the Debtors during the Twelfth Interim Period.

- **Matter Code 1.3 – U.S. Trustee/Court Reporting Requirements**

**10.6 hours - \$11,660.00**

This category includes assisting the Debtors with the preparation of financial and operating information required by such parties as the U.S. Trustee and/or the Court, including the Monthly Status Reports, and orders and stipulations related thereto.

- **Matter Code 1.10: Retention Application and Disclosure Reports**

**0.4 hours - \$230.00**

This category includes reviewing the parties-in-interest list for disclosure purposes.

- **Matter Code 1.10: Fee Statements and Fee Applications**

**6.2 hours - \$3,770.00**

This category includes managing the fee application process, including preparing and reviewing the Eleventh Interim Fee Application and all required supporting documentation in accordance with requirements of the U.S. Trustee and/or the Court.

15. AlixPartners believes that the professional fees requested are reasonable, actual and for necessary services rendered on behalf of the Debtors during the Twelfth Interim Period.

16. AlixPartners has not entered into any agreement, express or implied, with any other party for the purpose of fixing or sharing fees or other compensation to be paid for professional services rendered in these Chapter 11 Cases. No promises have been received by AlixPartners or any member thereof as to compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code.

**Certification**

17. A Certification of Carrienne J. M. Basler is attached hereto as **Exhibit C** and incorporated herein.



**No Prior Request**

18. No prior request for the relief sought in this Application has been made to this or any other court. This Application is made without prejudice to further or final applications based upon all relevant criteria, including the results achieved in the case as a whole.

**Notice**

19. Notice of this Application has been or will be provided to those parties entitled to receive notice hereof in accordance with any applicable order of this Court.

*[Remainder of page intentionally left blank.]*

**Conclusion**

**WHEREFORE**, AlixPartners, as financial advisor to the Debtors, respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit D**, providing: (i) an interim allowance in the amount of \$15,660.00 as compensation for services rendered for the Twelfth Interim Period; (ii) that the Debtors are authorized and directed to pay AlixPartners the amount of \$15,660.00; and (iii) such other and further relief as this Court deems proper.

Dated: July 10, 2024

ALIXPARTNERS, LLP  
300 N. LaSalle Street  
Suite 1900  
Chicago, IL 60654

*/s/ Carrienne J. M. Basler*

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By: Carrienne J. M. Basler  
Partner & Managing Director

**Exhibit A**

**AlixPartners' Retention Order**

FILED & JUDGMENT ENTERED  
Steven T. Salata  
  
June 18 2020  
  
Clerk, U.S. Bankruptcy Court  
Western District of North Carolina



*J. Craig Whitley*  
J. Craig Whitley  
United States Bankruptcy Judge

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

In re  
  
ALDRICH PUMP LLC, *et al.*,<sup>1</sup>  
  
Debtors.

Chapter 11  
  
Case No. 20-30608 ( )  
  
(Joint Administration Requested)

**EX PARTE ORDER AUTHORIZING THE EMPLOYMENT AND  
RETENTION OF ALIXPARTNERS, LLP AS FINANCIAL ADVISOR  
EFFECTIVE AS OF THE PETITION DATE**

This matter coming before the Court on the *Ex Parte Application of the Debtors for an Order Authorizing the Employment and Retention of AlixPartners, LLP as Financial Advisor Effective as of the Petition Date* (the "Application"),<sup>2</sup> filed by the above-captioned debtors and debtors in possession (together, the "Debtors"); the Court having reviewed the Application, the

<sup>1</sup> 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.

<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Application.



Basler Declaration, and the Engagement Letter; and the Court having found that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409, (c) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (d) notice of the Application was sufficient under the circumstances, (e) AlixPartners does not hold nor represent any interest materially adverse to the Debtors or their estates with respect to the matters on which AlixPartners is to be employed, as required by section 327(e) of the Bankruptcy Code, (f) the Debtor's retention and employment of AlixPartners is in the best interest of the estate as required by section 327(e) of the Bankruptcy Code, (g) the Application and all related schedules and exhibits fully comply with the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, and the Compensation Guidelines; and the Court having determined that the legal and factual bases set forth in the Application and the Basler Declaration establish just cause for the *ex parte* relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED.
2. Pursuant to section 327(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016 and Bankruptcy Local Rules 2014-1 and 2016-1, the Debtors are authorized to employ and retain AlixPartners as their financial advisor in these chapter 11 cases effective as of the Petition Date, in accordance with the terms and conditions set forth in the Application and Engagement Letter, except as provided by this Order.
3. The terms of the Engagement Letter, including without limitation, the Indemnification Provisions and the Fee and Expense Structure, are reasonable terms and conditions of employment and are approved in all respects, as modified by this Order.

4. AlixPartners shall file monthly, interim and final fee requests for allowance of compensation and reimbursement of expenses pursuant to the procedures set forth in sections 330 and 331 of the Bankruptcy Code, applicable Bankruptcy Rules and the Local Rules, the Compensation Guidelines and any other such procedures as may be fixed by order of this Court. For billing purposes, AlixPartners shall keep its time in one-tenth (1/10) hour increments in accordance with the Compensation Guidelines.

5. The relief granted herein shall be binding upon any chapter 11 trustee appointed in these chapter 11 cases, or upon any chapter 7 trustee appointed in the event of a subsequent conversion of these chapter 11 cases to cases under chapter 7.

6. AlixPartners shall use its reasonable best efforts to avoid duplication of services provided by any of the Debtors' other retained professionals in these chapter 11 cases.

7. To the extent that there is any inconsistency between this Order and the Engagement Letter, Application or the Basler Declaration, the provisions of this Order shall govern.

8. The indemnification provisions included in the Engagement Letter and its attachments are approved, subject during the pendency of these chapter 11 cases to the following:

- (a) AlixPartners shall not be entitled to indemnification, contribution or reimbursement pursuant to the Engagement Letter for services, unless such services and the indemnification, contribution or reimbursement thereof are approved by this Court;
- (b) The Debtors shall have no obligation to indemnify AlixPartners, or provide contribution or reimbursement to AlixPartners, for any claim or expense that is either: (i) judicially determined (the determination having become final) to have arisen from AlixPartners' gross negligence, bad faith, or willful misconduct; or (ii) settled prior to a judicial determination as to AlixPartners gross negligence, willful misconduct, breach of fiduciary duty, or bad faith or self-dealing but determined by this Court after notice and hearing to be a claim or expense for which AlixPartners should not

receive indemnity, contribution or reimbursement under the terms of the Engagement Letter, as modified by this Order; and

- (c) If, before the earlier of (i) the entry of an order confirming a chapter 11 plan in the chapter 11 cases (that order having become a final order no longer subject to appeal) and (ii) the entry of an order closing these chapter 11 cases, AlixPartners believes that it is entitled to the payment of any amounts by the Debtors on account of the Debtors' indemnification, contribution and/or reimbursement obligations under the Engagement Letter (as modified by this Order), including without limitation, the advancement of defense costs, AlixPartners must file an application therefor in this Court, and the Debtors may not pay any such amounts to AlixPartners before the entry of an order by this Court approving the payment. This subparagraph (c) is intended only to specify the period of time under which this Court shall have jurisdiction over any request for fees and expenses by AlixPartners for indemnification, contribution and/or reimbursement, and not a provision limiting the duration of the Debtors' obligation to indemnify, or make contributions or reimbursements to, AlixPartners. All parties in interest shall retain the right to object to any demand by AlixPartners for indemnification, contribution and/or reimbursement.

9. In the event that, during the pendency of these cases, AlixPartners seeks reimbursement for any attorneys' fees and/or expenses, the invoices and supporting time records from such attorneys shall be included in AlixPartners' fee applications and such invoices and time records shall be in compliance with the Bankruptcy Local Rules, and shall be subject to the Compensation Guidelines and approval of the Court under the standards of Bankruptcy Code sections 330 and 331, without regard to whether such attorney has been retained under Bankruptcy Code section 327; provided, however, that AlixPartners shall not seek reimbursement from the Debtors' estates for any fees incurred in defending any of AlixPartners' fee applications in these bankruptcy cases.

10. To the extent AlixPartners uses the services of independent contractors (the "Contractors") in these Chapter 11 Cases, AlixPartners shall: (a) pass through the cost of such Contractors to the Debtors at the same rate that AlixPartners pays the Contractors; (b) seek

reimbursement for actual costs incurred; (c) ensure that the Contractors are subject to the same conflict checks as required for AlixPartners; and (d) file with the Court such disclosures required by Bankruptcy Rule 2014.

11. This Order shall immediately be effective and enforceable upon its entry.

12. Pursuant to Local Rule 9013-1(f), any party shall be entitled to a hearing or request that the Court reconsider the entry of this Order by filing a motion for reconsideration within 14 days of service of this Order.

13. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order in accordance with the Application.

14. This Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation, interpretation, or enforcement 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



**Exhibit B**

**Detailed Description of Fees, Hours and Descriptions by Matter Category**



Allan Tananbaum  
 Chief Legal Officer  
 Aldrich Pump LLC  
 Murray Boiler LLC  
 800-E Beaty Street  
 Davidson, NC 28036

Re: U. S. Trustee / Court Reporting Requirements  
 Code: 20000212P00001.1.3

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>DESCRIPTION OF SERVICES</u>	<u>HOURS</u>
2/26/2024	JEC	Compile draft Aldrich MSR materials for January 2024	0.8
2/26/2024	JEC	Compile draft Murray MSR materials for January 2024	0.9
2/28/2024	JEC	Revise draft MSR documents for company review	1.2
3/25/2024	JEC	Prepare draft Aldrich MSR materials for February 2024	0.6
3/25/2024	JEC	Prepare draft Murray MSR materials for February 2024	0.5
3/28/2024	JEC	Compile final MSR reports for counsel and company review	0.6
4/25/2024	JEC	Develop drafts of MSR documents for company review	1.4
4/25/2024	JEC	Develop drafts of quarterly fee statements for company review	0.4
4/29/2024	JEC	Compile final MSR documents to prepare for filing	0.7
5/28/2024	JEC	Compile updated drafts of MSR documents and support	1.1
5/28/2024	JEC	Develop drafts of MSR documents for company review	1.5
5/29/2024	JEC	Coordinate with Aldrich and Jones Day teams on MSR finalization and filing	0.2
5/29/2024	JEC	Compile updated drafts of MSR documents and support	0.5
5/30/2024	JEC	Coordinate with Company and Jones Day teams on MSR finalization	0.2
<b>Total Professional Hours</b>			<b><u>10.6</u></b>

# AlixPartners

Allan Tananbaum  
Chief Legal Officer  
Aldrich Pump LLC  
Murray Boiler LLC  
800-E Beaty Street  
Davidson, NC 28036

Re: U. S. Trustee / Court Reporting Requirements  
Code: 20000212P00001.1.3

<b>PROFESSIONAL</b>	<b>TITLE</b>	<b>RATE</b>	<b>HOURS</b>	<b>FEES</b>
Jarod E Clarrey	Director	\$1,100	10.6	11,660.00
<b>Total Professional Hours and Fees</b>			<b>10.6</b>	<b>\$ 11,660.00</b>



Allan Tananbaum  
Chief Legal Officer  
Aldrich Pump LLC  
Murray Boiler LLC  
800-E Beaty Street  
Davidson, NC 28036

Re: Retention Applications & Disclosure Reports  
Code: 20000212P00001.1.9

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>DESCRIPTION OF SERVICES</u>	<u>HOURS</u>
2/28/2024	BFF	Emails with counsel re: updated parties in interest list	0.2
2/28/2024	BFF	Follow-up emails with counsel re: updated parties in interest list	0.2
<b>Total Professional Hours</b>			<b>0.4</b>



Allan Tananbaum  
Chief Legal Officer  
Aldrich Pump LLC  
Murray Boiler LLC  
800-E Beaty Street  
Davidson, NC 28036

Re: Retention Applications & Disclosure Reports  
Code: 20000212P00001.1.9

<b>PROFESSIONAL</b>	<b>TITLE</b>	<b>RATE</b>	<b>HOURS</b>	<b>FEES</b>
Brooke F Filler	Senior Vice President	\$575	0.4	230.00
<b>Total Professional Hours and Fees</b>			<b>0.4</b>	<b>\$ 230.00</b>



Allan Tananbaum  
 Chief Legal Officer  
 Aldrich Pump LLC  
 Murray Boiler LLC  
 800-E Beaty Street  
 Davidson, NC 28036

Re: Fee Statements and Fee Applications  
 Code: 20000212P00001.1.10

<b>DATE</b>	<b>PROFESSIONAL</b>	<b>DESCRIPTION OF SERVICES</b>	<b>HOURS</b>
2/5/2024	JEC	Review information to support interim fee application preparation	0.3
2/5/2024	LMB	Prepare professional fees for Eleventh Interim Fee Application	0.4
2/5/2024	LMB	Prepare schedule/exhibit workbook for 11th Interim Fee Application	1.5
2/6/2024	JEC	Review draft interim fee application	0.3
2/6/2024	LMB	Prepare 11th Interim Fee Application, supporting schedules and exhibits	2.3
2/12/2024	KAS	Review draft fee application	0.3
2/15/2024	LMB	Revise 11th Interim Fee Application, supporting schedules and exhibits for the period October 1, 2023 through January 31, 2024	0.6
3/11/2024	LMB	Email to A. Johnson (Jones Day) attaching 11th Interim Fee Application	0.2
3/11/2024	LMB	Finalize 11th Interim Fee Application	0.3
<b>Total Professional Hours</b>			<b>6.2</b>



Allan Tananbaum  
Chief Legal Officer  
Aldrich Pump LLC  
Murray Boiler LLC  
800-E Beaty Street  
Davidson, NC 28036

Re: Fee Statements and Fee Applications  
Code: 20000212P00001.1.10

<b>PROFESSIONAL</b>	<b>TITLE</b>	<b>RATE</b>	<b>HOURS</b>	<b>FEES</b>
Jarod E Clarrey	Director	\$1,100	0.6	660.00
Kaitlyn A Sundt	Senior Vice President	\$650	0.3	195.00
Lisa Marie Bonito	Vice President	\$550	5.3	2,915.00
<b>Total Professional Hours and Fees</b>			<b>6.2</b>	<b>\$ 3,770.00</b>

**Exhibit C**

**Certification of Carrienne J M Basler**



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

In re:

ALDRICH PUMP LLC, et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

**CERTIFICATION OF CARRIANNE J. M. BASLER**

I, Carrienne J. M. Basler, declare under the penalty of perjury as follows:

1. I am a Partner and Managing Director in the firm of AlixPartners, LLP (“AlixPartners”), with offices at 300 N. LaSalle Street, Suite 1900, Chicago, Illinois 60654. AlixPartners serves as financial advisor to the above-captioned debtors (the “Debtors”). In compliance with the the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted June 11, 2013 (the “U.S. Trustee Guidelines”), I hereby certify as follows:

2. I have reviewed the *Twelfth Interim Application of AlixPartners, LLP, Financial Advisor to the Chapter 11 Debtors, for Allowance of Compensation for Services Rendered for the Period from February 1, 2024 through May 31, 2024* (the “Application”).

3. I certify that:

- a) I have read the Application;
- b) To the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought in the Application fall within the U.S. Trustee

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<sup>1</sup> 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.

Guidelines;

- c) The fees and disbursements sought are billed at rates and in accordance with practices customarily employed by AlixPartners and are generally accepted by AlixPartners' clients; and
- d) In providing reimbursable services, AlixPartners does not make a profit on such service, whether the service is performed by AlixPartners in-house or through a third party.

4. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application complies with the U.S. Trustee Guidelines.

5. I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information and belief.

Dated: June 25, 2024

*/s/ Carrienne J. M. Basler*

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Carrienne J. M. Basler  
Partner & Managing Director

**Exhibit D**

**Proposed Order Awarding AlixPartners' Professional Fees**

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

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

**ORDER GRANTING TWELFTH INTERIM APPLICATION OF  
ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE CHAPTER 11  
DEBTORS, FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED  
FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024**

Upon the fee application (the “Application”)<sup>2</sup> of AlixPartners, LLP (“AlixPartners”), as financial advisor to the above-captioned debtors (the “Debtors”), for entry of an order (this “Order”): (i) awarding AlixPartners compensation for professional services rendered in the amount of \$22,602.00 for the period from February 1, 2024 through May 31, 2024 (the “Twelfth Interim Period”); and (ii) granting such other relief as is appropriate under the circumstances, all as more

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<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Application.

fully set forth in the Application; and the Court having jurisdiction over the Application; and due and adequate notice of the Application having been given pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules; and the Court having read and considered the Application; objections to the Application, if any, and arguments of counsel, if any; and any objections to the Application having been resolved or overruled; and after due deliberation and for good cause shown, it is HEREBY ORDERED THAT:

1. The Application is granted as set forth herein.
2. AlixPartners is hereby awarded an allowance of \$15,660.00 for compensation for professional services rendered during the Twelfth Interim Period.
3. The Debtors are authorized and directed to make payment of the outstanding amount of \$15,660.00 to AlixPartners within ten (10) days of the entry of this Order.
4. AlixPartners is authorized and empowered to take all actions necessary to implement the relief granted in this Order in accordance with the Application.
5. This Court shall retain exclusive jurisdiction over any and all matter arising from or related to the implementation, interpretation, or enforcement of this Order.

UNITED STATES BANKRUPTCY COURT

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