

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)  |

**TWELFTH INTERIM APPLICATION OF K&L GATES LLP FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
FOR REIMBURSEMENT OF EXPENSES AS  
SPECIAL INSURANCE COUNSEL TO THE DEBTORS  
FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024**

|   |  |
|---|--|
| Name of Applicant:  | <b>K&amp;L Gates LLP</b>   |
| Authorized to Provide Professional Services to:                             | The above-captioned Debtors and Debtors in Possession                      |
| Date of Order Approving Retention:  | June 19, 2020 (as of the Petition Date),<br>and amended on August 18, 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:          | \$66,667.05  |
| Amount of Expense Reimbursement sought as actual, reasonable and necessary: | \$716.92   |
| Total Compensation Approved by Interim Fee Order to Date:                   | \$3,149,303.39   |
| Total Expenses Approved by Interim Fee Order to Date:                       | \$6,529.91   |

<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.



Total Allowed Compensation Paid to Date: \$3,141,882.73

Total Allowed Expenses Paid to Date: \$6,529.91

Compensation Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed: \$32,651.92

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

This is a(n):  interim  final application

Prior Monthly Fee Statements Submitted:

| <b>Date Submitted</b> | <b>Month Covered</b>     | <b>Fees</b> | <b>Expenses</b> |
|-----------------------|--------------------------|-------------|-----------------|
| April 1, 2024         | Feb. 1 – Feb. 29, 2024   | \$22,702.95 | \$0.00          |
| April 30, 2024        | March 1 – March 31, 2024 | \$11,338.20 | \$0.00          |
| May 30, 2024          | April 1 – April 30, 2024 | \$13,576.95 | \$0.00          |
| July 1, 2024          | May 1 – May 31, 2024     | \$19,048.95 | \$716.92        |

To date, K&L Gates LLP has not received any objections to any prior monthly fee statements, provided that the objection deadline relating to the *Forty-Seventh Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period from May 1, 2024 Through May 31, 2024* has not yet passed.

**SUMMARY OF HOURS AND COMPENSATION**

| <b>Name</b>              | <b>Position - Bar Year</b> | <b>Hourly Billing Rate</b> | <b>Total Hours Billed</b> | <b>Total Compensation</b> |
|--------------------------|----------------------------|----------------------------|---------------------------|---------------------------|
| D. F. McGONIGLE          | PARTNER (1988)             | \$1,165.00                 | 48.6                      | \$56,619.00               |
| D. F. McGONIGLE          | PARTNER (1988)             | \$582.50                   | 7.2                       | \$4,194.00                |
| J. C. SAFAR              | PARTNER (1997)             | \$995.00                   | 5.5                       | \$5,472.50                |
| M. WESTBROOK             | PARTNER (1996)             | \$815.00                   | 0.6                       | \$489.00                  |
| E. STEELE                | ASSOCIATE (2014)           | \$695.00                   | 5.1                       | \$3,544.50                |
| E. D. FLEURY             | ASSOCIATE (2015)           | \$625.00                   | 0.3                       | \$187.50                  |
| K. G. HEGDE              | ASSOCIATE (2021)           | \$530.00                   | 3.9                       | \$2,067.00                |
| L. M. MARTINELLI         | PARALEGAL                  | \$395.00                   | 3.8                       | \$1,501.00                |
| <b>TOTAL</b>             |                            |                            | <b>75</b>                 | <b>\$74,074.50</b>        |
| <b>TOTAL w/ 10% DISC</b> |                            |                            |                           | <b>\$66,667.05</b>        |

**COMPENSATION BY PROJECT CATEGORY**

| <b>Project Category</b>                      | <b>Total Hours</b> | <b>Total Fees</b>  |
|--|--------------------|--------------------|
| Aldrich Asbestos Insurance Advice            | 36.9               | \$33,771.15        |
| Aldrich Chapter 11 Retention & Compensation  | 4.9                | \$3,731.85         |
| Murray Asbestos Insurance Advice             | 29.8               | \$26,539.65        |
| Murray Chapter 11 Retention and Compensation | 3.4                | \$2,624.40         |
| <b>TOTAL</b>                                 |                    | <b>\$66,667.05</b> |

**EXPENSE SUMMARY**

| <b>Expense Category</b>        | <b>Service Provider<br/>(if applicable)</b> | <b>Total Expenses</b> |
|--------------------------------|---|-----------------------|
| Travel – Airfare               | N/A   | \$579.31              |
| Travel – Meals                 | N/A   | \$8.15                |
| Travel – Ground Transportation | Uber  | \$93.46               |
| Travel – Parking & Tolls       | N/A   | \$36.00               |
| <b>TOTAL</b>                   |   | <b>\$716.92</b>       |

**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 APPLICATION OF K&L GATES LLP FOR ALLOWANCE  
OF COMPENSATION FOR SERVICES RENDERED AND FOR  
REIMBURSEMENT OF EXPENSES AS  
SPECIAL INSURANCE COUNSEL TO THE DEBTORS FOR  
THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024**

K&L Gates LLP, special insurance counsel to the above-captioned debtors and debtors in possession (the "Debtors"), makes its twelfth interim application for allowance of compensation of \$66,667.05 and reimbursement of expenses of \$716.92 for the period from February 1, 2024 through May 31, 2024 (the "Compensation Period") in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals*, dated July 15, 2020 [Dkt. 171] (the "Interim Compensation Order").

In support of this Application, K&L Gates LLP respectfully represents as follows:

**Overview**

1. K&L Gates LLP attorneys and paraprofessionals expended a total of 75 hours during the Compensation Period for which compensation is requested.
2. During the Compensation Period, K&L Gates LLP did not receive any payments or promises of payment from any source other than the Debtors for services rendered

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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.

or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. No agreement or understanding exists between K&L Gates LLP 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 partners of K&L Gates LLP.

3. Pursuant to the Interim Compensation Order, included with this Application is: (a) a schedule identifying all K&L Gates LLP professionals and paraprofessionals who have performed services in these chapter 11 cases during the Compensation Period, the capacities in which each individual is employed by K&L Gates LLP, the hourly billing rate charged by K&L Gates LLP 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 paraprofessional, the total fees billed therefor, and the year in which each professional was first licensed to practice law; (b) a summary of services by billing category for services rendered by K&L Gates LLP during the Compensation Period; and (c) a schedule summarizing, by category, the actual and necessary disbursements that K&L Gates LLP incurred during the Compensation Period in connection with the performance of professional services for the Debtors and for which it seeks reimbursement.

4. Attached hereto collectively as part of Exhibit A are K&L Gates LLP's itemized monthly time records for professionals and paraprofessionals performing services for the Debtors during the Compensation Period and K&L Gates LLP's itemized records detailing any 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 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 the *Ex Parte Application of the Debtors for an Order Authorizing Them to Retain and Employ K&L Gates LLP as Special Insurance Counsel as of the Petition Date* [Dkt. 25] (the "Retention Application"), by which the Debtors sought authority to retain and employ K&L Gates LLP as special insurance counsel in the Chapter 11 Cases. On June 19, 2020, the Court entered an order [Dkt. 75] (the "Original Retention Order") authorizing the retention of K&L Gates LLP as the Debtors' special insurance counsel as of the Petition Date.

8. On July 7, 2020, the Court entered an order [Dkt. 147] appointing the official committee of asbestos personal injury claimants (the "Asbestos Committee") in these Chapter 11 Cases.

9. On July 8, 2020, and August 17, 2020, K&L Gates LLP filed its first and second supplemental declarations, respectively, providing additional disclosures related to its role in representation of the predecessor of one of the Debtors and the pre-petition restructuring involving the Debtors [Dkt. 149 and 256]. In addition, the Debtors and the Asbestos Committee agreed on an amendment to the Original Retention Order to reserve certain rights of the Asbestos



Committee. On August 18, 2020, the Court entered the amended retention order agreed upon by the Debtors and the Asbestos Committee [Dkt. 263] (the "K&L Gates Retention Order"), which superseded the Original Retention Order.

10. On November 9, 2020, K&L Gates LLP filed the *First Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 18, 2020 Through September 30, 2020* [Dkt. 425] (the "First Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 18, 2020 through September 30, 2020, in accordance with the Interim Compensation Order.

11. On November 25, 2020, K&L Gates LLP filed its third supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 440].

12. On December 2, 2020, the Court entered an order [Dkt. 453] (the "First Interim Approval Order") granting the First Interim Application.

13. On March 12, 2021, K&L Gates LLP filed the *Second Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2020 Through January 31, 2021* [Dkt. 623] (the "Second Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2020 through January 31, 2021, in accordance with the Interim Compensation Order.

14. On April 5, 2021, the Court entered an order [Dkt. 664] (the "Second Interim Approval Order") granting the Second Interim Application.

15. On July 9, 2021, K&L Gates LLP filed the *Third Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2021 Through May 31, 2021* [Dkt. 768] (the "Third Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2021 through May 31, 2021, in accordance with the Interim Compensation Order.

16. On July 28, 2021, the Court entered an order [Dkt. 791] (the "Third Interim Approval Order") granting the Third Interim Application.

17. On September 30, 2021, K&L Gates LLP filed its fourth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 836].

18. On November 9, 2021, K&L Gates LLP filed its *Fourth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2021 Through September 30, 2021* [Dkt. 878] (the "Fourth Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2021 through September 30, 2021, in accordance with the Interim Compensation Order.

19. On December 8, 2021, the Court entered an order [Dkt. 933] (the "Fourth Interim Approval Order") granting the Fourth Interim Application.

20. On March 11, 2022, K&L Gates LLP filed its *Fifth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2021 Through January 31, 2022* [Dkt. 1039] (the “Fifth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2021 through January 31, 2022, in accordance with the Interim Compensation Order.

21. On April 6, 2022, the Court entered an order [Dkt. 1110] (the “Fifth Interim Approval Order”) granting the Fifth Interim Application.

22. On May 19, 2022, K&L Gates LLP filed its fifth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1181].

23. On June 22, 2022, K&L Gates LLP filed its sixth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1218].

24. On July 11, 2022, K&L Gates LLP filed its *Sixth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2022 Through May 31, 2022* [Dkt. 1267] (the “Sixth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2022 through May 31, 2022, in accordance with the Interim Compensation Order.

25. On July 29, 2022, the Court entered an order [Dkt. 1296] (the “Sixth Interim Approval Order”) granting the Sixth Interim Application.

26. On November 9, 2022, K&L Gates LLP filed its *Seventh Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2022 Through September 30, 2022* [Dkt. 1404] (the “Seventh Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2022 through September 30, 2022, in accordance with the Interim Compensation Order.

27. On December 14, 2022, the Court entered an order [Dkt. 1472] (the “Seventh Interim Approval Order”) granting the Seventh Interim Application.

28. On March 9, 2023, K&L Gates LLP filed its seventh supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1637].

29. On March 13, 2023, K&L Gates LLP filed its *Eighth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2022 Through January 31, 2023* [Dkt. 1644] (the “Eighth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2022 through January 31, 2023, in accordance with the Interim Compensation Order.

30. On March 31, 2023, the Court entered an order [Dkt. 1693] (the “Eighth Interim Approval Order”) granting the Eighth Interim Application.

31. On April 28, 2023, K&L Gates LLP filed its eighth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1727].

32. On July 10, 2023, K&L Gates LLP filed its *Ninth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2023 Through May 31, 2023* [Dkt. 1853] (the “Ninth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2023 through May 31, 2023, in accordance with the Interim Compensation Order.

33. On August 28, 2023, the Court entered an order [Dkt. 1933] (the “Ninth Interim Approval Order”) granting the Ninth Interim Application.

34. On October 10, 2023, K&L Gates LLP filed its ninth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1969].

35. On November 9, 2023, K&L Gates LLP filed its *Tenth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2023 Through September 30, 2023* [Dkt. 1998] (the “Tenth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2023 through September 30, 2023, in accordance with the Interim Compensation Order.

36. On November 29, 2023, the Court entered an order [Dkt. 2022] (the “Tenth Interim Approval Order”) granting the Tenth Interim Application.

37. On March 11, 2024, K&L Gates LLP filed its *Eleventh Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2023 Through January 31, 2024* [Dkt. 2132] (the “Eleventh Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2023 through January 31, 2024, in accordance with the Interim Compensation Order.

38. On March 29, 2024, the Court entered an order [Dkt. 2163] (the “Eleventh Interim Approval Order”) granting the Eleventh Interim Application.

#### **Jurisdiction**

39. This Court has jurisdiction to consider this matter pursuant to 28 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**

40. The professional services performed by K&L Gates LLP 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.

41. 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**

42. Pursuant to the Interim Compensation Order, K&L Gates LLP 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:<sup>2</sup>

| <b>Date Submitted</b> | <b>Period Covered</b>    | <b>Requested Fees</b> | <b>Requested Expenses</b> | <b>Payment Received</b> | <b>Amount Outstanding</b> |
|-----------------------|--------------------------|-----------------------|---------------------------|-------------------------|---------------------------|
| April 1, 2024         | Feb. 1 – Feb. 29, 2024   | \$22,702.95           | \$0.00                    | \$20,432.66             | \$2,270.29                |
| April 30, 2024        | March 1 – March 31, 2024 | \$11,338.20           | \$0.00                    | \$0.00                  | \$11,338.20               |
| May 30, 2024          | April 1 – April 30, 2024 | \$13,576.95           | \$0.00                    | \$12,219.26             | \$1,357.69                |
| July 1, 2024          | May 1 – May 31, 2024     | \$19,048.95           | \$716.92                  | N/A                     | \$19,765.87               |

43. In total, K&L Gates LLP has submitted the Prior Monthly Fee Statements during the Compensation Period for total fees of \$66,667.05 and total expenses of \$716.92. As of the date of this Application, no party has objected to any of K&L Gates LLP's Prior Monthly Fee Statements.<sup>3</sup>

<sup>2</sup> Copies of the Prior Monthly Fee Statements are attached hereto collectively as Exhibit A.

<sup>3</sup> The objection deadline relating to the *Forty-Seventh Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period from May 1, 2024 Through May 31, 2024* has not yet passed.

### **Compensation by Project Category**

The following is a summary of the activities performed by K&L Gates LLP professionals and paraprofessionals during the Compensation Period, organized by project billing category.<sup>4</sup>

**44. Asbestos Insurance Advice (Combined for Both Debtors) — 66.7 hours — \$60,310.80**

During the Compensation Period, K&L Gates LLP professionals and paraprofessionals counseled and represented the Debtors on insurance coverage issues, particularly in relation to the Debtors' asbestos liabilities. The work performed by K&L Gates LLP included the following activities, among others:

- a) Analyzing and reporting on information relating to the Debtors' historical insurance coverage and related agreements, including working with the Debtors' insurance consultants, and generating work product related thereto;
- b) Assisting the Debtors in addressing requests for insurance-related information from various interested parties in relation to the Chapter 11 Cases;
- c) Reporting to and interacting with the Debtors' insurers in connection with matters relating to the Chapter 11 Cases;
- d) Assisting the Debtors in addressing discovery issues in connection with matters relating to the Chapter 11 Cases;
- e) Participating in strategy and update conferences with the Debtors, general bankruptcy counsel, and special asbestos counsel in relation to the forgoing; and
- f) Attending hearings in connection with the Chapter 11 Cases.

**45. Chapter 11 Retention & Compensation (Combined for Both Debtors) — 8.3 — \$6,356.25**

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<sup>4</sup> 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.



During the Compensation Period, K&L Gates LLP professionals and paraprofessionals devoted limited time to (a) reviewing and revising the January 2024, February 2024, March 2024 and April 2024 invoices for privilege, to preserve client confidentiality, and to ensure compliance with the Local Rules, (b) drafting, revising and submitting the Forty-Third, Forty-Fourth, Forty-Fifth and Forty-Sixth Monthly Fee Statements, and (c) drafting, revising and submitting the Eleventh Interim Application and the Eleventh Interim Approval Order. K&L Gates LLP intends to seek compensation in connection with reviewing and revising the May 2024 invoices, drafting, revising and submitting the Forty-Seventh Monthly Fee Statement, and preparing this Application at a later date.

**Expenses Incurred by K&L Gates LLP**

46. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by professionals employed in a chapter 11 case. Accordingly, K&L Gates LLP seeks reimbursement for expenses ("Expenses") incurred in rendering services to the Debtors during the Compensation Period in the amount of \$716.92. Itemized records detailing the Expenses incurred during the Compensation Period are attached to the Prior Monthly Fee Statements.

### **Retainer Disclosure**

47. Prior to the Petition Date, the Debtors paid K&L Gates LLP retainer amounts totaling \$605,000 for professional services and expenses (together, the "Retainer"). Prior to the commencement of the Chapter 11 Cases, \$324,451.40 of the Retainer was applied to actual and estimated fees and expenses incurred prior to June 18, 2020. As of the Petition Date, the Retainer balance was \$280,922.03, subject to reconciliation of prepetition fees and expenses. Following K&L Gates LLP's final reconciliation of its prepetition fees and expenses in connection with the First Interim Application, at the time of entry of the First Interim Approval Order, the Retainer balance was \$30,484.16.

48. Following the entry of the First Interim Approval Order by the Court, and consistent with paragraph 2(f) of the Interim Compensation Order, the remaining Retainer balance has been applied to payments sought in connection with the First Interim Application (collectively, the "Interim Amounts"). Specifically, K&L Gates LLP applied \$30,484.16 of the Retainer balance to the Interim Amount sought in connection with the September 2020 Monthly Fee Statement. Following the application of this amount, the remaining Retainer balance now is \$0.00. Accordingly, K&L Gates LLP did not apply any Retainer amounts to the Prior Monthly Fee Statements that are the subject of this Application.

### **Conclusion**

49. The fees and expenses requested herein by K&L Gates LLP 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 legal market and should be approved on an interim basis pursuant to sections 330 and 331 of the Bankruptcy Code, the Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules.

**Notice**

50. 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. K&L Gates LLP submits that, in light of the nature of the relief requested, no other or further notice need be provided.

**No Prior Request**

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

WHEREFORE, K&L Gates LLP respectfully requests that, pursuant to sections 330 and 331 of the Bankruptcy Code, 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 K&L Gates LLP as the Court may deem just and proper.

Dated: July 10, 2024  
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

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(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR  
DEBTORS AND DEBTORS IN POSSESSION

**EXHIBIT A**

**Prior Monthly Fee Statements**

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)

**FORTY-FOURTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH FEBRUARY 29, 2024**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Forty-Fourth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From February 1, 2024 Through February 29, 2024* (the "Monthly Fee Statement").

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period February 1, 2024 through February 29, 2024 (the "Statement Period").

<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.

**Total Fees and Expenses for the Statement Period**

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

|                |                    |
|----------------|--------------------|
| Total Fees     | \$22,702.95        |
| Total Expenses | \$0.00             |
| <b>TOTAL</b>   | <b>\$22,702.95</b> |

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$20,432.65 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

**Billing Adjustments**

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$1,457.00 in fees will not be charged to the Debtors.

**Notice and Objection Procedures**

5. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy

Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., [feeapplications@ncwba.uscourts.gov](mailto:feeapplications@ncwba.uscourts.gov)); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., [pamoa@mccarter.com](mailto:pamoa@mccarter.com)), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., [abartell@mccarter.com](mailto:abartell@mccarter.com) and Phillip S. Pavlick, Esq., [ppavlick@mccarter.com](mailto:ppavlick@mccarter.com)), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., [gmascitti@mccarter.com](mailto:gmascitti@mccarter.com)) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., [scordes@burtcordeslaw.com](mailto:scordes@burtcordeslaw.com), (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., [nramsey@rc.com](mailto:nramsey@rc.com) and Davis Lee Wright, Esq., [dwright@rc.com](mailto:dwright@rc.com)), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., [kmaclay@capdale.com](mailto:kmaclay@capdale.com), James P. Wehner, Esq., [jwehner@capdale.com](mailto:jwehner@capdale.com) and Todd E. Phillips, Esq., [tphillips@capdale.com](mailto:tphillips@capdale.com)) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., [gthompson@lawhssm.com](mailto:gthompson@lawhssm.com)), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., [jgrier@grierlaw.com](mailto:jgrier@grierlaw.com), A. Cotton Wright, Esq., [cwright@grierlaw.com](mailto:cwright@grierlaw.com)), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., [jguy@orrick.com](mailto:jguy@orrick.com), Debra L. Felder, Esq., [dfelder@orrick.com](mailto:dfelder@orrick.com)).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the



affected Retained Professional, and upon the other Notice Parties no later than April 15, 2024 (the “Objection Deadline”). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

7. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

8. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: April 1, 2024  
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR  
DEBTORS AND DEBTORS IN POSSESSION

**EXHIBIT A**

**Invoices**



K&L GATES LLP  
K&L GATES CENTER  
210 SIXTH AVENUE  
PITTSBURGH, PA 15222-2613  
T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018

Aldrich Pump LLC  
Allan Tananbaum, Esquire  
800-E Beatty Street  
Davidson, North Carolina 28036

Invoice Date: March 1, 2024  
Invoice Number: 10-0001239  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY**

**Total USD \$**

**Asbestos Insurance Advice (00001)**

|                                     |            |           |                  |
|-------------------------------------|------------|-----------|------------------|
| Fees                                | 13,831.50  |           |                  |
| 10% Discount                        | (1,383.15) |           |                  |
| <b>Total Amount Due This Matter</b> |            | <b>\$</b> | <b>12,448.35</b> |

**Chapter 11 Retention and Compensation (00002)**

|                                     |         |           |               |
|-------------------------------------|---------|-----------|---------------|
| Fees                                | 674.50  |           |               |
| 10% Discount                        | (67.45) |           |               |
| <b>Total Amount Due This Matter</b> |         | <b>\$</b> | <b>607.05</b> |

**CURRENT INVOICE DUE - All Matters**

**\$ 13,055.40**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830804, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Aldrich Pump LLC

Invoice Date: March 1, 2024  
 Invoice Number: 10-0001239  
 K&L Ref. Number: 0246802

**Asbestos Insurance Advice - (00001)**

**\$12,448.35**

**Professional Services**

| <u>Date</u> | <u>Name</u>    | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u> |
|-------------|----------------|--------------|-------------|--|---------------|
| 01-FEB-24   | Dave McGonigle | 1.40         | L120        | Conferences with K. Hegde regarding audit inquiry letter (0.4) (0.8/2); emails and conference with K. Stewart regarding audit inquiry letter (0.2) (0.4/2); review and approve audit inquiry packet and correspondence (0.2) (0.4/2); finalize and execute audit inquiry letter (0.2) (0.4/2); review discovery-related hearing transcripts forwarded by J. Miller (0.4) (0.8/2) | 1,631.00      |
| 01-FEB-24   | Krishna Hegde  | 1.10         | L120        | Draft and compile materials for audit response (1.1) (2.2/2)   | 583.00        |
| 01-FEB-24   | Krishna Hegde  | 0.80         | L120        | Correspond with timekeepers and audit personnel to finalize audit response (0.8) (1.6/2)   | 424.00        |
| 02-FEB-24   | Dave McGonigle | 0.90         | L120        | Emails with M. Andrews regarding audit response letter (0.1); review discovery hearing transcripts forwarded by J. Miller (0.2) (0.3/2); review insurance-related work product in preparation for client conference (0.3) (0.5/2); participate in work-in-process call with Debtors and Affiliates (0.3) (0.5/2)   | 1,048.50      |
| 02-FEB-24   | Joe Safar      | 0.30         | L120        | Attend work-in-process call (0.3) (0.6/2)  | 298.50        |
| 02-FEB-24   | Krishna Hegde  | 0.10         | L120        | Correspond with Information Technology and D. McGonigle regarding submission of audit email (0.1)  | 53.00         |
| 06-FEB-24   | Dave McGonigle | 0.90         | L120        | Research and analysis of work product materials in response to A. Tananbaum information request (0.6); conference with and email to A. Tananbaum regarding response to information request (0.3)   | 1,048.50      |

Aldrich Pump LLC

Invoice Date:

March 1, 2024

Invoice Number:

10-0001239

K&amp;L Ref. Number

0246802

| <u>Date</u> | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u> |
|-------------|-----------------|--------------|-------------|--|---------------|
| 07-FEB-24   | Lisa Martinelli | 0.30         | L120        | Review email, documents for case library for use by team attorneys (0.3) (0.6/2)   | 118.50        |
| 08-FEB-24   | Dave McGonigle  | 0.40         | L120        | Review and analysis of draft work product regarding strategy matters from Jones Day (0.4) (0.8/2)  | 466.00        |
| 09-FEB-24   | Dave McGonigle  | 0.80         | L120        | Review and analysis of work product regarding strategy matters (0.5) (0.9/2); emails with team regarding draft work product (0.1) (0.2/2); review case updates from hearing (0.1) (0.2/2); emails with A. Tananbaum regarding status (0.1) | 932.00        |
| 11-FEB-24   | Dave McGonigle  | 0.40         | L120        | Review and analysis of insurance-related work product and background materials (0.4) (0.8/2)   | 466.00        |
| 15-FEB-24   | Dave McGonigle  | 2.60         | L120        | Review and analysis of draft strategy memorandum (0.7) (1.4/2); revise draft strategy memorandum (1.9) (3.8/2)   | 3,029.00      |
| 15-FEB-24   | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)   | 39.50         |
| 16-FEB-24   | Dave McGonigle  | 0.10         | L120        | Conference with insurer representative regarding status (0.1)  | 116.50        |
| 20-FEB-24   | Dave McGonigle  | 0.10         | L120        | Emails with B. Erens and M. Evert regarding status (0.1) (0.2/2)   | 116.50        |
| 22-FEB-24   | Dave McGonigle  | 0.60         | L120        | Emails with/to client and bankruptcy team regarding status and planning regarding insurance and plan matters (0.5) (0.9/2); conference with insurer representative regarding status (0.1)  | 699.00        |

Aldrich Pump LLC

Invoice Date: March 1, 2024  
 Invoice Number: 10-0001239  
 K&L Ref. Number: 0246802

| <u>Date</u> | <u>Name</u>    | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u>      |
|-------------|----------------|--------------|-------------|---|--------------------|
| 23-FEB-24   | Dave McGonigle | 0.70         | L120        | Emails with client and bankruptcy team regarding insurer update call (0.1) (0.2/2); email to insurers regarding update call (0.1); participate in works-in-process call (0.5) (0.9/2)   | 815.50             |
| 26-FEB-24   | Dave McGonigle | 0.40         | L120        | Conference with insurer representative regarding status and planning (0.1); conference with B. Erens regarding status (0.1); emails with M. Evert and team regarding status (0.2) (0.3/2)   | 466.00             |
| 27-FEB-24   | Dave McGonigle | 1.00         | L120        | Conference with B. Erens regarding status and planning (0.2) (0.3/2); conference with B. Erens and M. Evert regarding preparation for insurer update call (0.2) (0.3/2); prepare for insurer update call (0.1) (0.2/2); participate in insurer update call and follow-up (0.3) (0.5/2); review Claro/Stout invoices for confidentiality and privilege (0.1); emails with insurer representative regarding information request (0.1) | 1,165.00           |
| 27-FEB-24   | Joe Safar      | 0.20         | L120        | Attend insurer update (0.2) (0.3/2)   | 199.00             |
| 29-FEB-24   | Dave McGonigle | 0.10         | L120        | Review and comment on draft fee statements (0.1) (0.2/2)  | 116.50             |
|             |                | <b>13.30</b> |             |   | <b>\$13,831.50</b> |

**TIMEKEEPER SUMMARY**

| <u>Name</u>     | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>      |
|-----------------|--------------|-------------|--------------------|
| Dave McGonigle  | 10.40        | 1,165.00    | 12,116.00          |
| Joe Safar       | 0.50         | 995.00      | 497.50             |
| Krishna Hegde   | 2.00         | 530.00      | 1,060.00           |
| Lisa Martinelli | 0.40         | 395.00      | 158.00             |
|                 | <b>13.30</b> |             | <b>\$13,831.50</b> |

Aldrich Pump LLC

Invoice Date: March 1, 2024

Invoice Number: 10-0001239

K&L Ref. Number 0246802

**TASK SUMMARY**

| <b><u>Task Code</u></b> | <b><u>Description</u></b> | <b><u>Hours</u></b> | <b><u>Amount</u></b> |
|-------------------------|---------------------------|---------------------|----------------------|
| L120                    | Analysis/Strategy         | 13.30               | 13,831.50            |
|                         | <b>Total Fees</b>         | <b>13.30</b>        | <b>\$13,831.50</b>   |

Aldrich Pump LLC

Invoice Date: March 1, 2024

Invoice Number: 10-0001239

K&L Ref. Number 0246802

**Chapter 11 Retention and Compensation - (00002) \$607.05**

**Professional Services**

| <u>Date</u> | <u>Name</u>    | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u>   |
|-------------|----------------|--------------|-------------|--|-----------------|
| 19-FEB-24   | Dave McGonigle | 0.40         | B160        | Attention to monthly fee statements (0.2) (0.3/2); attention to disclosure matters (0.2) (0.3/2)                               | 466.00          |
| 26-FEB-24   | Emily Steele   | 0.20         | B160        | Analyze January 2024 invoices for confidentiality and privilege and draft monthly fee statement for January 2024 (0.2) (0.3/2) | 139.00          |
| 29-FEB-24   | Emily Steele   | 0.10         | B160        | Finalize and circulate January 2024 monthly fee statement  | 69.50           |
|             |                | <b>0.70</b>  |             |  | <b>\$674.50</b> |

**TIMEKEEPER SUMMARY**

| <u>Name</u>    | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>   |
|----------------|--------------|-------------|-----------------|
| Dave McGonigle | 0.40         | 1,165.00    | 466.00          |
| Emily Steele   | 0.30         | 695.00      | 208.50          |
|                | <b>0.70</b>  |             | <b>\$674.50</b> |

**TASK SUMMARY**

| <u>Task Code</u> | <u>Description</u>          | <u>Hours</u> | <u>Amount</u>   |
|------------------|-----------------------------|--------------|-----------------|
| B160             | Fee/Employment Applications | 0.70         | 674.50          |
|                  | <b>Total Fees</b>           | <b>0.70</b>  | <b>\$674.50</b> |



**K&L GATES**

**K&L GATES LLP**  
 K&L GATES CENTER  
 210 SIXTH AVENUE  
 PITTSBURGH, PA 15222-2613  
 T +1 412 355 6500 F +1 412 355 6501 klgates.com  
 Tax ID No. 25 0921018

Murray Boiler LLC  
 Allan Tananbaum, Esquire  
 800-E Beaty Street  
 Davidson, NC 28036

Invoice Date: March 1, 2024  
 Invoice Number: 10-0001240  
 K&L Gates Contact: Dave McGonigle

---

**INVOICE SUMMARY**
**Total USD \$****Asbestos Insurance Advice (00001)**

|                                     |            |                    |
|-------------------------------------|------------|--------------------|
| Fees                                | 10,417.00  |                    |
| 10% Discount                        | (1,041.70) |                    |
| <b>Total Amount Due This Matter</b> |            | <b>\$ 9,375.30</b> |

**Chapter 11 Retention and Compensation (00002)**

|                                     |         |                  |
|-------------------------------------|---------|------------------|
| Fees                                | 302.50  |                  |
| 10% Discount                        | (30.25) |                  |
| <b>Total Amount Due This Matter</b> |         | <b>\$ 272.25</b> |

**CURRENT INVOICE DUE - All Matters****\$ 9,647.55**


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 Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830804, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
 500 First Ave 92  
 Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
 Acct No.: 1077692783

Routing/ABA: 043000096  
 Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Murray Boiler LLC

Invoice Date: March 1, 2024  
 Invoice Number: 10-0001240  
 K&L Ref. Number: 0246801

**Asbestos Insurance Advice - (00001)**

**\$9,375.30**

**Professional Services**

| <u>Date</u> | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u> |
|-------------|-----------------|--------------|-------------|--|---------------|
| 01-FEB-24   | Dave McGonigle  | 1.40         | L120        | Conferences with K. Hegde regarding audit inquiry letter (0.4) (0.8/2); emails and conference with K. Stewart regarding audit inquiry letter (0.2) (0.4/2); review and approve audit inquiry packet and correspondence (0.2) (0.4/2); finalize and execute audit inquiry letter (0.2) (0.4/2); review discovery-related hearing transcripts forwarded by J. Miller (0.4) (0.8/2) | 1,631.00      |
| 01-FEB-24   | Krishna Hegde   | 0.80         | L120        | Correspond with timekeepers and audit personnel to finalize audit response (0.8) (1.6/2)   | 424.00        |
| 01-FEB-24   | Krishna Hegde   | 1.10         | L120        | Draft and compile materials for audit response (1.1) (2.2/2)   | 583.00        |
| 02-FEB-24   | Dave McGonigle  | 0.50         | L120        | Review discovery hearing transcripts forwarded by J. Miller (0.1) (0.3/2); review insurance-related work product in preparation for client conference (0.2) (0.5/2); participate in work-in-process call with Debtors and Affiliates (0.2) (0.5/2)   | 582.50        |
| 02-FEB-24   | Joe Safar       | 0.30         | L120        | Attend work-in-process call (0.3) (0.6/2)  | 298.50        |
| 07-FEB-24   | Lisa Martinelli | 0.30         | L120        | Review email, documents for case library for use by team attorneys (0.3) (0.6/2)   | 118.50        |
| 08-FEB-24   | Dave McGonigle  | 0.40         | L120        | Review and analysis of draft work product regarding strategy matters from Jones Day (0.4) (0.8/2)  | 466.00        |

Murray Boiler LLC

Invoice Date:

March 1, 2024

Invoice Number:

10-0001240

K&amp;L Ref. Number

0246801

| <u>Date</u> | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u> |
|-------------|-----------------|--------------|-------------|--|---------------|
| 09-FEB-24   | Dave McGonigle  | 0.60         | L120        | Review and analysis of work product regarding strategy matters (0.4) (0.9/2); emails with team regarding draft work product (0.1) (0.2/2); review case updates from hearing (0.1) (0.2/2)  | 699.00        |
| 11-FEB-24   | Dave McGonigle  | 0.40         | L120        | Review and analysis of insurance-related work product and background materials (0.4) (0.8/2)   | 466.00        |
| 15-FEB-24   | Dave McGonigle  | 2.60         | L120        | Review and analysis of draft strategy memorandum (0.7) (1.4/2); revise draft strategy memorandum (1.9) (3.8/2)   | 3,029.00      |
| 15-FEB-24   | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)   | 39.50         |
| 20-FEB-24   | Dave McGonigle  | 0.10         | L120        | Emails with B. Erens and M. Evert regarding status (0.1) (0.2/2)   | 116.50        |
| 22-FEB-24   | Dave McGonigle  | 0.40         | L120        | Emails with/to client and bankruptcy team regarding status and planning regarding insurance and plan matters (0.4) (0.9/2)   | 466.00        |
| 23-FEB-24   | Dave McGonigle  | 0.50         | L120        | Emails with client and bankruptcy team regarding insurer update call (0.1) (0.2/2); participate in works-in-process call (0.4) (0.9/2)   | 582.50        |
| 26-FEB-24   | Dave McGonigle  | 0.10         | L120        | Emails with M. Evert and team regarding status (0.1) (0.3/2)   | 116.50        |
| 27-FEB-24   | Dave McGonigle  | 0.50         | L120        | Conference with B. Erens regarding status and planning (0.1) (0.3/2); conference with B. Erens and M. Evert regarding preparation for insurer update call (0.1) (0.3/2); prepare for insurer update call (0.1) (0.2/2); participate in insurer update call and follow-up (0.2) (0.5/2) | 582.50        |
| 27-FEB-24   | Joe Safar       | 0.10         | L120        | Attend insurer update (0.1) (0.3/2)  | 99.50         |

Murray Boiler LLC

Invoice Date: March 1, 2024

Invoice Number: 10-0001240

K&L Ref. Number 0246801

| <u>Date</u> | <u>Name</u>    | <u>Hours</u> | <u>Task Description</u>                                       | <u>Amount</u>      |
|-------------|----------------|--------------|---|--------------------|
| 29-FEB-24   | Dave McGonigle | 0.10         | L120 Review and comment on draft fee statements (0.1) (0.2/2) | 116.50             |
|             |                | <b>10.30</b> |   | <b>\$10,417.00</b> |

**TIMEKEEPER SUMMARY**

| <u>Name</u>     | <u>Hours</u> | <u>Rate</u>  | <u>Amount</u>      |
|-----------------|--------------|--------------|--------------------|
| Dave McGonigle  | 7.60         | 1,165.00     | 8,854.00           |
| Joe Safar       | 0.40         | 995.00       | 398.00             |
| Krishna Hegde   | 1.90         | 530.00       | 1,007.00           |
| Lisa Martinelli | 0.40         | 395.00       | 158.00             |
|                 |              | <b>10.30</b> | <b>\$10,417.00</b> |

**TASK SUMMARY**

| <u>Task Code</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u>      |
|------------------|--------------------|--------------|--------------------|
| L120             | Analysis/Strategy  | 10.30        | 10,417.00          |
|                  | <b>Total Fees</b>  | <b>10.30</b> | <b>\$10,417.00</b> |

Murray Boiler LLC

Invoice Date: March 1, 2024

Invoice Number: 10-0001240

K&L Ref. Number 0246801

**Chapter 11 Retention and Compensation - (00002) \$272.25**

**Professional Services**

| <u>Date</u> | <u>Name</u>    | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u>   |
|-------------|----------------|--------------|-------------|--|-----------------|
| 19-FEB-24   | Dave McGonigle | 0.20         | B160        | Attention to monthly fee statements (0.1) (0.3/2); attention to disclosure matters (0.1) (0.3/2)                               | 233.00          |
| 26-FEB-24   | Emily Steele   | 0.10         | B160        | Analyze January 2024 invoices for confidentiality and privilege and draft monthly fee statement for January 2024 (0.1) (0.3/2) | 69.50           |
|             |                | <b>0.30</b>  |             |  | <b>\$302.50</b> |

**TIMEKEEPER SUMMARY**

| <u>Name</u>    | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>   |
|----------------|--------------|-------------|-----------------|
| Dave McGonigle | 0.20         | 1,165.00    | 233.00          |
| Emily Steele   | 0.10         | 695.00      | 69.50           |
|                | <b>0.30</b>  |             | <b>\$302.50</b> |

**TASK SUMMARY**

| <u>Task Code</u> | <u>Description</u>          | <u>Hours</u> | <u>Amount</u>   |
|------------------|-----------------------------|--------------|-----------------|
| B160             | Fee/Employment Applications | 0.30         | 302.50          |
|                  | <b>Total Fees</b>           | <b>0.30</b>  | <b>\$302.50</b> |

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)

**FORTY-FIFTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS FOR  
THE PERIOD FROM MARCH 1, 2024 THROUGH MARCH 31, 2024**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Forty-Fifth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From March 1, 2024 Through March 31, 2024* (the "Monthly Fee Statement").

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period March 1, 2024 through March 31, 2024 (the "Statement Period").

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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.

**Total Fees and Expenses for the Statement Period**

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

|                |                    |
|----------------|--------------------|
| Total Fees     | \$11,338.20        |
| Total Expenses | \$0.00             |
| <b>TOTAL</b>   | <b>\$11,338.20</b> |

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$10,204.38 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

**Billing Adjustments**

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$872.00 in fees will not be charged to the Debtors.

**Notice and Objection Procedures**

5. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beatty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy

Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., [feeapplications@ncwba.uscourts.gov](mailto:feeapplications@ncwba.uscourts.gov)); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., [pamoa@mccarter.com](mailto:pamoa@mccarter.com)), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., [abartell@mccarter.com](mailto:abartell@mccarter.com) and Phillip S. Pavlick, Esq., [ppavlick@mccarter.com](mailto:ppavlick@mccarter.com)), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., [gmascitti@mccarter.com](mailto:gmascitti@mccarter.com)) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., [scordes@burtcordeslaw.com](mailto:scordes@burtcordeslaw.com), (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., [nramsey@rc.com](mailto:nramsey@rc.com) and Davis Lee Wright, Esq., [dwright@rc.com](mailto:dwright@rc.com)), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., [kmaclay@capdale.com](mailto:kmaclay@capdale.com), James P. Wehner, Esq., [jwehner@capdale.com](mailto:jwehner@capdale.com) and Todd E. Phillips, Esq., [tphillips@capdale.com](mailto:tphillips@capdale.com)) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., [gthompson@lawhssm.com](mailto:gthompson@lawhssm.com)), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., [jgrier@grierlaw.com](mailto:jgrier@grierlaw.com), A. Cotton Wright, Esq., [cwright@grierlaw.com](mailto:cwright@grierlaw.com)), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., [jguy@orrick.com](mailto:jguy@orrick.com), Debra L. Felder, Esq., [dfelder@orrick.com](mailto:dfelder@orrick.com)).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the



affected Retained Professional, and upon the other Notice Parties no later than May 14, 2024 (the “Objection Deadline”). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

7. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

8. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: April 30, 2024  
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR  
DEBTORS AND DEBTORS IN POSSESSION

**EXHIBIT A**

**Invoices**



K&L GATES LLP  
K&L GATES CENTER  
210 SIXTH AVENUE  
PITTSBURGH, PA 15222-2613  
T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018

Aldrich Pump LLC  
Allan Tananbaum, Esquire  
800-E Beatty Street  
Davidson, North Carolina 28036

Invoice Date: April 1, 2024  
Invoice Number: 10-0014495  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY**

**Total USD \$**

**Asbestos Insurance Advice (00001)**

|                                     |          |           |                 |
|-------------------------------------|----------|-----------|-----------------|
| Fees                                | 5,151.00 |           |                 |
| 10% Discount                        | (515.10) |           |                 |
| <b>Total Amount Due This Matter</b> |          | <b>\$</b> | <b>4,635.90</b> |

**Chapter 11 Retention and Compensation (00002)**

|                                     |          |           |                 |
|-------------------------------------|----------|-----------|-----------------|
| Fees                                | 2,207.00 |           |                 |
| 10% Discount                        | (220.70) |           |                 |
| <b>Total Amount Due This Matter</b> |          | <b>\$</b> | <b>1,986.30</b> |

**CURRENT INVOICE DUE - All Matters**

**\$ 6,622.20**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Aldrich Pump LLC

Invoice Date: April 1, 2024  
 Invoice Number: 10-0014495  
 K&L Ref. Number: 0246802

**Asbestos Insurance Advice - (00001) \$4,635.90**

**Professional Services**

| <u>Date</u> | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u> |
|-------------|-----------------|--------------|-------------|--|---------------|
| 01-MAR-24   | Dave McGonigle  | 0.30         | L120        | Emails with insurer representative regarding contact changes (0.2); review recent filings and emails to team regarding case list update (0.1)              | 349.50        |
| 02-MAR-24   | Dave McGonigle  | 1.00         | L120        | Review transcript of certification ruling (0.3) (0.5/2); review and analysis of Bestwall jurisdiction ruling (0.7) (1.3/2)                                 | 1,165.00      |
| 08-MAR-24   | Dave McGonigle  | 0.30         | L120        | Participate in work-in-process call with Debtors and Affiliates (0.2) (0.4/2); conference with J. Safar regarding work-in-process call (0.1)               | 349.50        |
| 08-MAR-24   | Joe Safar       | 0.20         | L120        | Attend work-in-process meeting (0.2) (0.4/2)   | 199.00        |
| 08-MAR-24   | Joe Safar       | 0.10         | L120        | Conference with D. McGonigle regarding work-in-process meeting (0.1)   | 99.50         |
| 11-MAR-24   | Lisa Martinelli | 0.20         | L120        | Review email, documents for case library for use by team attorneys (0.2) (0.4/2)   | 79.00         |
| 13-MAR-24   | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)   | 39.50         |
| 15-MAR-24   | Dave McGonigle  | 0.10         | L120        | Emails with M. Evert and M. Hirst regarding status and planning (0.1) (0.2/2)  | 116.50        |
| 18-MAR-24   | Dave McGonigle  | 0.30         | L120        | Conference with M. Evert and M. Hirst regarding status and planning (0.2) (0.3/2); review 4th Circuit notices and emails with M. Cody regarding same (0.1) | 349.50        |
| 19-MAR-24   | Dave McGonigle  | 0.20         | L120        | Conference with insurer representative regarding status and planning (0.1); conference with M. Evert regarding status and planning (0.1)                   | 233.00        |

Aldrich Pump LLC

Invoice Date: April 1, 2024  
 Invoice Number: 10-0014495  
 K&L Ref. Number: 0246802

| <u>Date</u> | <u>Name</u>    | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u>     |
|-------------|----------------|--------------|-------------|---|-------------------|
| 21-MAR-24   | Dave McGonigle | 0.20         | L120        | Attention to Jones Day information request regarding work product (0.2) (0.3/2)   | 233.00            |
| 25-MAR-24   | Dave McGonigle | 0.70         | L120        | Conference and emails with J. Safar regarding Jones Day request regarding work product (0.2) (0.4/2); email to B. Erens regarding response to information request (0.5) (1.0/2) | 815.50            |
| 25-MAR-24   | Joe Safar      | 0.30         | L120        | E-mail with D. McGonigle regarding insurance work product (0.2) (0.4/2); conference with E. Fleury regarding insurance work product (0.1) (0.2/2)                               | 298.50            |
| 26-MAR-24   | Erin Fleury    | 0.20         | L120        | Review work product to respond to inquiry from D. McGonigle regarding insurance coverage advice (0.2) (0.3/2)   | 125.00            |
| 29-MAR-24   | Dave McGonigle | 0.60         | L120        | Telephone conferences with insurer representative regarding status and planning (0.1); email to M. Evert regarding status and planning (0.5) (0.9/2)                            | 699.00            |
| <hr/>       |                |              |             |   |                   |
| <b>4.80</b> |                |              |             |   | <b>\$5,151.00</b> |

**TIMEKEEPER SUMMARY**

| <u>Name</u>     | <u>Title</u> | <u>Rate</u> | <u>Hours</u> | <u>Amount</u>     |
|-----------------|--------------|-------------|--------------|-------------------|
| Dave McGonigle  | Partner      | 1,165.00    | 3.70         | 4,310.50          |
| Joe Safar       | Partner      | 995.00      | 0.60         | 597.00            |
| Erin Fleury     | Counsel      | 625.00      | 0.20         | 125.00            |
| Lisa Martinelli | Paralegal    | 395.00      | 0.30         | 118.50            |
| <hr/>           |              |             |              |                   |
| <b>4.80</b>     |              |             |              | <b>\$5,151.00</b> |

**TASK SUMMARY**

| <u>Task Code</u>  | <u>Description</u> | <u>Hours</u> | <u>Amount</u>     |
|-------------------|--------------------|--------------|-------------------|
| L120              | Analysis/Strategy  | 4.80         | 5,151.00          |
| <b>Total Fees</b> |                    | <b>4.80</b>  | <b>\$5,151.00</b> |

Aldrich Pump LLC

Invoice Date: April 1, 2024  
 Invoice Number: 10-0014495  
 K&L Ref. Number: 0246802

**Chapter 11 Retention and Compensation - (00002) \$1,986.30**

**Professional Services**

| <u>Date</u> | <u>Name</u>        | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u>     |
|-------------|--------------------|--------------|-------------|--|-------------------|
| 01-MAR-24   | Emily Steele       | 0.10         | B160        | Revise January fee statement to include updated notice information and circulate same (0.1) (0.2/2)  | 69.50             |
| 04-MAR-24   | Emily Steele       | 0.60         | B160        | Begin drafting eleventh interim fee application and internal correspondence regarding same (0.6) (1.1/2)   | 417.00            |
| 06-MAR-24   | Emily Steele       | 0.30         | B160        | Further revise eleventh interim fee application and correspondence regarding same (0.3) (0.5/2)  | 208.50            |
| 11-MAR-24   | Dave McGonigle     | 0.50         | B160        | Review and comment on draft interim fee application (0.4) (0.8/2); conference with E. Steele regarding draft interim fee application (0.1)   | 582.50            |
| 11-MAR-24   | Margaret Westbrook | 0.20         | B160        | Review and comment on 11th fee application (0.2) (0.4/2)   | 163.00            |
| 11-MAR-24   | Emily Steele       | 0.40         | B160        | Call with D. McGonigle regarding eleventh interim fee application (0.1) (0.2/2); email correspondence with D. McGonigle and M. Westbrook regarding eleventh interim fee application (0.1) (0.2/2); finalize and circulate eleventh interim fee application (0.2) (0.4/2) | 278.00            |
| 27-MAR-24   | Emily Steele       | 0.10         | B160        | Circulate draft order granting eleventh interim fee application  | 69.50             |
| 28-MAR-24   | Dave McGonigle     | 0.30         | B160        | Prepare monthly fee statements (0.2) (0.4/2); conference with K. Simmons regarding draft monthly fee statements (0.1)  | 349.50            |
| 28-MAR-24   | Emily Steele       | 0.10         | B160        | Draft February 2024 monthly fee statement (0.1) (0.2/2)  | 69.50             |
|             |                    | <b>2.60</b>  |             |  | <b>\$2,207.00</b> |

Aldrich Pump LLC

Invoice Date: April 1, 2024  
 Invoice Number: 10-0014495  
 K&L Ref. Number: 0246802

**TIMEKEEPER SUMMARY**

| <u>Name</u>        | <u>Title</u> | <u>Rate</u> | <u>Hours</u> | <u>Amount</u>     |
|--------------------|--------------|-------------|--------------|-------------------|
| Dave McGonigle     | Partner      | 1,165.00    | 0.80         | 932.00            |
| Margaret Westbrook | Partner      | 815.00      | 0.20         | 163.00            |
| Emily Steele       | Associate    | 695.00      | 1.60         | 1,112.00          |
|                    |              |             | <b>2.60</b>  | <b>\$2,207.00</b> |

**TASK SUMMARY**

| <u>Task Code</u> | <u>Description</u>          | <u>Hours</u> | <u>Amount</u>     |
|------------------|-----------------------------|--------------|-------------------|
| B160             | Fee/Employment Applications | 2.60         | 2,207.00          |
|                  | <b>Total Fees</b>           | <b>2.60</b>  | <b>\$2,207.00</b> |



K&L GATES LLP  
K&L GATES CENTER  
210 SIXTH AVENUE  
PITTSBURGH, PA 15222-2613  
T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018

Murray Boiler LLC  
Allan Tananbaum, Esquire  
800-E Beaty Street  
Davidson, NC 28036

Invoice Date: April 1, 2024  
Invoice Number: 10-0014485  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY**

**Total USD \$**

**Asbestos Insurance Advice (00001)**

|                                     |          |                    |
|-------------------------------------|----------|--------------------|
| Fees                                | 3,474.50 |                    |
| 10% Discount                        | (347.45) |                    |
| <b>Total Amount Due This Matter</b> |          | <b>\$ 3,127.05</b> |

**Chapter 11 Retention and Compensation (00002)**

|                                     |          |                    |
|-------------------------------------|----------|--------------------|
| Fees                                | 1,765.50 |                    |
| 10% Discount                        | (176.55) |                    |
| <b>Total Amount Due This Matter</b> |          | <b>\$ 1,588.95</b> |

**CURRENT INVOICE DUE - All Matters**

**\$ 4,716.00**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.



Murray Boiler LLC

Invoice Date: April 1, 2024  
 Invoice Number: 10-0014485  
 K&L Ref. Number: 0246801

**Asbestos Insurance Advice - (00001)**

**\$3,127.05**

**Professional Services**

| <u>Date</u> | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u> |
|-------------|-----------------|--------------|-------------|---|---------------|
| 02-MAR-24   | Dave McGonigle  | 0.80         | L120        | Review transcript of certification ruling (0.2) (0.5/2); review and analysis of Bestwall jurisdiction ruling (0.6) (1.3/2)  | 932.00        |
| 08-MAR-24   | Dave McGonigle  | 0.20         | L120        | Participate in work-in-process call with Debtors and Affiliates (0.2) (0.4/2)   | 233.00        |
| 08-MAR-24   | Joe Safar       | 0.20         | L120        | Attend work-in-process meeting (0.2) (0.4/2)  | 199.00        |
| 11-MAR-24   | Lisa Martinelli | 0.20         | L120        | Review email, documents for case library for use by team attorneys (0.2) (0.4/2)  | 79.00         |
| 13-MAR-24   | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)  | 39.50         |
| 15-MAR-24   | Dave McGonigle  | 0.10         | L120        | Emails with M. Evert and M. Hirst regarding status and planning (0.1) (0.2/2)   | 116.50        |
| 18-MAR-24   | Dave McGonigle  | 0.10         | L120        | Conference with M. Evert and M. Hirst regarding status and planning (0.1) (0.3/2)   | 116.50        |
| 21-MAR-24   | Dave McGonigle  | 0.10         | L120        | Attention to Jones Day information request regarding work product (0.1) (0.3/2)   | 116.50        |
| 25-MAR-24   | Dave McGonigle  | 0.70         | L120        | Conference and emails with J. Safar regarding Jones Day request regarding work product (0.2) (0.4/2); email to B. Erens regarding response to information request (0.5) (1.0/2) | 815.50        |
| 25-MAR-24   | Joe Safar       | 0.30         | L120        | E-mail with D. McGonigle regarding insurance work product (0.2) (0.4/2); conference with E. Fleury regarding insurance work product (0.1) (0.2/2)                               | 298.50        |
| 26-MAR-24   | Erin Fleury     | 0.10         | L120        | Review work product to respond to inquiry from D. McGonigle regarding insurance coverage advice (0.1) (0.3/2)   | 62.50         |

Murray Boiler LLC

Invoice Date: April 1, 2024

Invoice Number: 10-0014485

K&L Ref. Number 0246801

| <u>Date</u> | <u>Name</u>    | <u>Hours</u> | <u>Task Description</u>  | <u>Amount</u>     |
|-------------|----------------|--------------|--|-------------------|
| 29-MAR-24   | Dave McGonigle | 0.40         | L120 Email to M. Evert regarding status and planning (0.4) (0.9/2) | 466.00            |
|             |                | <b>3.30</b>  |  | <b>\$3,474.50</b> |

**TIMEKEEPER SUMMARY**

| <u>Name</u>     | <u>Title</u> | <u>Rate</u> | <u>Hours</u> | <u>Amount</u>     |
|-----------------|--------------|-------------|--------------|-------------------|
| Dave McGonigle  | Partner      | 1,165.00    | 2.40         | 2,796.00          |
| Joe Safar       | Partner      | 995.00      | 0.50         | 497.50            |
| Erin Fleury     | Counsel      | 625.00      | 0.10         | 62.50             |
| Lisa Martinelli | Paralegal    | 395.00      | 0.30         | 118.50            |
|                 |              |             | <b>3.30</b>  | <b>\$3,474.50</b> |

**TASK SUMMARY**

| <u>Task Code</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u>     |
|------------------|--------------------|--------------|-------------------|
| L120             | Analysis/Strategy  | 3.30         | 3,474.50          |
|                  | <b>Total Fees</b>  | <b>3.30</b>  | <b>\$3,474.50</b> |

Murray Boiler LLC

Invoice Date: April 1, 2024

Invoice Number: 10-0014485

K&L Ref. Number 0246801

**Chapter 11 Retention and Compensation - (00002)**

**\$1,588.95**

**Professional Services**

| <u>Date</u> | <u>Name</u>        | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u>     |
|-------------|--------------------|--------------|-------------|--|-------------------|
| 01-MAR-24   | Emily Steele       | 0.10         | B160        | Revise January fee statement to include updated notice information and circulate same (0.1) (0.2/2)  | 69.50             |
| 04-MAR-24   | Emily Steele       | 0.50         | B160        | Begin drafting eleventh interim fee application and internal correspondence regarding same (0.5) (1.1/2)   | 347.50            |
| 06-MAR-24   | Emily Steele       | 0.20         | B160        | Further revise eleventh interim fee application and correspondence regarding same (0.2) (0.5/2)  | 139.00            |
| 11-MAR-24   | Dave McGonigle     | 0.40         | B160        | Review and comment on draft interim fee application (0.4) (0.8/2)  | 466.00            |
| 11-MAR-24   | Margaret Westbrook | 0.20         | B160        | Review and comment on 11th fee application (0.2) (0.4/2)   | 163.00            |
| 11-MAR-24   | Emily Steele       | 0.40         | B160        | Call with D. McGonigle regarding eleventh interim fee application (0.1) (0.2/2); email correspondence with D. McGonigle and M. Westbrook regarding eleventh interim fee application (0.1) (0.2/2); finalize and circulate eleventh interim fee application (0.2) (0.4/2) | 278.00            |
| 28-MAR-24   | Dave McGonigle     | 0.20         | B160        | Prepare monthly fee statements (0.2) (0.4/2)   | 233.00            |
| 28-MAR-24   | Emily Steele       | 0.10         | B160        | Draft February 2024 monthly fee statement (0.1) (0.2/2)  | 69.50             |
|             |                    | <b>2.10</b>  |             |  | <b>\$1,765.50</b> |

**TIMEKEEPER SUMMARY**

| <u>Name</u>        | <u>Title</u> | <u>Rate</u> | <u>Hours</u> | <u>Amount</u> |
|--------------------|--------------|-------------|--------------|---------------|
| Dave McGonigle     | Partner      | 1,165.00    | 0.60         | 699.00        |
| Margaret Westbrook | Partner      | 815.00      | 0.20         | 163.00        |

Murray Boiler LLC

Invoice Date: April 1, 2024

Invoice Number: 10-0014485

K&L Ref. Number 0246801

| <u>Name</u>  | <u>Title</u> | <u>Rate</u> | <u>Hours</u> | <u>Amount</u>     |
|--------------|--------------|-------------|--------------|-------------------|
| Emily Steele | Associate    | 695.00      | 1.30         | 903.50            |
|              |              |             | <b>2.10</b>  | <b>\$1,765.50</b> |

**TASK SUMMARY**

| <u>Task Code</u> | <u>Description</u>          | <u>Hours</u> | <u>Amount</u>     |
|------------------|-----------------------------|--------------|-------------------|
| B160             | Fee/Employment Applications | 2.10         | 1,765.50          |
|                  | <b>Total Fees</b>           | <b>2.10</b>  | <b>\$1,765.50</b> |

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)

**FORTY SIXTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS FOR  
THE PERIOD FROM APRIL 1, 2024 THROUGH APRIL 30, 2024**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Forty Sixth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From April 1, 2024 Through April 30, 2024* (the "Monthly Fee Statement").

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period April 1, 2024 through April 30, 2024 (the "Statement Period").

<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.

**Total Fees and Expenses for the Statement Period**

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

|                |                    |
|----------------|--------------------|
| Total Fees     | \$13,576.95        |
| Total Expenses | \$0.00             |
| <b>TOTAL</b>   | <b>\$13,576.95</b> |

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$12,219.25 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

**Billing Adjustments**

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$336.50 in fees will not be charged to the Debtors.

**Notice and Objection Procedures**

5. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beatty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy

Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., [feeapplications@ncwba.uscourts.gov](mailto:feeapplications@ncwba.uscourts.gov)); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., [pamoa@mccarter.com](mailto:pamoa@mccarter.com)), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., [abartell@mccarter.com](mailto:abartell@mccarter.com) and Phillip S. Pavlick, Esq., [ppavlick@mccarter.com](mailto:ppavlick@mccarter.com)), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., [gmascitti@mccarter.com](mailto:gmascitti@mccarter.com)) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., [scordes@burtcordeslaw.com](mailto:scordes@burtcordeslaw.com), (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., [nramsey@rc.com](mailto:nramsey@rc.com) and Davis Lee Wright, Esq., [dwright@rc.com](mailto:dwright@rc.com)), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., [kmaclay@capdale.com](mailto:kmaclay@capdale.com), James P. Wehner, Esq., [jwehner@capdale.com](mailto:jwehner@capdale.com) and Todd E. Phillips, Esq., [tphillips@capdale.com](mailto:tphillips@capdale.com)) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., [gthompson@lawhssm.com](mailto:gthompson@lawhssm.com)), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., [jgrier@grierlaw.com](mailto:jgrier@grierlaw.com), A. Cotton Wright, Esq., [cwright@grierlaw.com](mailto:cwright@grierlaw.com)), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., [jguy@orrick.com](mailto:jguy@orrick.com), Debra L. Felder, Esq., [dfelder@orrick.com](mailto:dfelder@orrick.com)).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the

affected Retained Professional, and upon the other Notice Parties no later than June 13, 2024 (the “Objection Deadline”). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

7. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

8. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: May 30, 2024  
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR  
DEBTORS AND DEBTORS IN POSSESSION



**EXHIBIT A**

**Invoices**

**K&L GATES**

**K&L GATES LLP**  
 K&L GATES CENTER  
 210 SIXTH AVENUE  
 PITTSBURGH, PA 15222-2613  
 T +1 412 355 6500 F +1 412 355 6501 klgates.com  
 Tax ID No. 25 0921018

Aldrich Pump LLC  
 Allan Tananbaum, Esquire  
 800-E Beatty Street  
 Davidson, North Carolina 28036

Invoice Date: May 1, 2024  
 Invoice Number: 10-0025610  
 K&L Gates Contact: Dave McGonigle

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**INVOICE SUMMARY**
**Total USD \$****Asbestos Insurance Advice (00001)**

|                                     |          |                    |
|-------------------------------------|----------|--------------------|
| Fees                                | 7,912.00 |                    |
| 10% Discount                        | (791.20) |                    |
| <b>Total Amount Due This Matter</b> |          | <b>\$ 7,120.80</b> |

**Chapter 11 Retention and Compensation (00002)**

|                                     |         |                  |
|-------------------------------------|---------|------------------|
| Fees                                | 347.50  |                  |
| 10% Discount                        | (34.75) |                  |
| <b>Total Amount Due This Matter</b> |         | <b>\$ 312.75</b> |

**CURRENT INVOICE DUE - All Matters**

|  |  |                    |
|--|--|--------------------|
|  |  | <b>\$ 7,433.55</b> |
|--|--|--------------------|

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 Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
 500 First Ave 92  
 Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
 Acct No.: 1077692783

Routing/ABA: 043000096  
 Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Aldrich Pump LLC

Invoice Date: May 1, 2024  
 Invoice Number: 10-0025610  
 K&L Ref. Number: 0246802

**Asbestos Insurance Advice - (00001) \$7,120.80**

**Professional Services**

| <u>Date</u> | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u> |
|-------------|-----------------|--------------|-------------|---|---------------|
| 01-APR-24   | Dave McGonigle  | 0.10         | L120        | Emails with insurer representative and M. Evert regarding status (0.1)  | 116.50        |
| 02-APR-24   | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)  | 39.50         |
| 05-APR-24   | Dave McGonigle  | 0.40         | L120        | Review Maune Raichle motion regarding funding agreements (0.1) (0.2/2); participate in works-in-process call (0.2) (0.3/2); review recent court filings (0.1) (0.2/2) | 466.00        |
| 05-APR-24   | Joe Safar       | 0.20         | L120        | Attend works-in-process call (0.2) (0.4/2)  | 199.00        |
| 11-APR-24   | Dave McGonigle  | 0.10         | L120        | Communications with insurer representative and team regarding status and planning (0.1) (0.2/2)   | 116.50        |
| 12-APR-24   | Dave McGonigle  | 0.10         | L120        | Conference with B. Erens regarding status and planning (0.1) (0.2/2)  | 116.50        |
| 16-APR-24   | Dave McGonigle  | 0.10         | L120        | Review docket updates and emails with J. Miller regarding hearing (0.1) (0.2/2)   | 116.50        |
| 16-APR-24   | Dave McGonigle  | 0.40         | L120        | Conference with M. Evert regarding status and planning (0.4) (0.8/2)  | 466.00        |
| 16-APR-24   | Dave McGonigle  | 0.10         | L120        | Communications with B. Erens and M. Evert regarding status and planning (0.1) (0.2/2)   | 116.50        |
| 17-APR-24   | Dave McGonigle  | 0.80         | L120        | Telephonic attendance at motion to quash hearing (0.8) (1.6/2)  | 932.00        |
| 17-APR-24   | Dave McGonigle  | 0.10         | L120        | Email to A. Tananbaum regarding status and planning (0.1)   | 116.50        |
| 17-APR-24   | Dave McGonigle  | 0.70         | L120        | Review proceedings in pending case in response to client inquiry (0.7) (1.4/2)  | 815.50        |

Aldrich Pump LLC

Invoice Date: May 1, 2024  
 Invoice Number: 10-0025610  
 K&L Ref. Number: 0246802

| <u>Date</u> | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u> |
|-------------|-----------------|--------------|-------------|---|---------------|
| 18-APR-24   | Dave McGonigle  | 0.30         | L120        | Emails with A. Tananbaum, B. Erens and M. Evert regarding status and planning (0.2) (0.4/2); email to insurer representatives regarding status and update call (0.1) (0.2/2)  | 349.50        |
| 19-APR-24   | Dave McGonigle  | 0.40         | L120        | Participate in works-in-process call with Debtors and Affiliates (0.3) (0.5/2); conference with A. Tananbaum regarding planning (0.1)   | 466.00        |
| 19-APR-24   | Joe Safar       | 0.30         | L120        | Attend works-in-process call (0.3) (0.5/2)  | 298.50        |
| 19-APR-24   | Lisa Martinelli | 0.20         | L120        | Review email, documents for case library for use by team attorneys (0.2) (0.4/2)  | 79.00         |
| 23-APR-24   | Dave McGonigle  | 0.10         | L120        | Emails with A. Tananbaum, B. Erens and M. Evert regarding planning (0.1) (0.2/2)  | 116.50        |
| 23-APR-24   | Dave McGonigle  | 0.10         | L120        | Communications with insurer representative regarding status (0.1) (0.2/2)   | 116.50        |
| 23-APR-24   | Lisa Martinelli | 0.20         | L120        | Review email, documents for case library for use by team attorneys (0.2) (0.4/2)  | 79.00         |
| 24-APR-24   | Dave McGonigle  | 0.10         | L120        | Emails with M. Evert regarding status and planning (0.1)  | 116.50        |
| 24-APR-24   | Joe Safar       | 0.10         | L120        | Prepare for insurer update call (0.1) (0.2/2)   | 99.50         |
| 25-APR-24   | Dave McGonigle  | 1.00         | L120        | Telephonic hearing attendance (0.7) (1.4/2); attention to discovery-related inquiry from M. Evert (0.1); emails and conference with A. Tananbaum regarding status and planning (0.1) (0.2/2); emails with B. Erens regarding status (0.1) | 1,165.00      |
| 25-APR-24   | Lisa Martinelli | 0.20         | L120        | Review email, documents for case library for use by team attorneys (0.2) (0.4/2)  | 79.00         |
| 26-APR-24   | Dave McGonigle  | 0.10         | L120        | Conference with M. Evert regarding status (0.1) (0.2/2)   | 116.50        |

Aldrich Pump LLC

Invoice Date: May 1, 2024

Invoice Number: 10-0025610

K&L Ref. Number 0246802

| <u>Date</u> | <u>Name</u>    | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u>     |
|-------------|----------------|--------------|-------------|---|-------------------|
| 29-APR-24   | Dave McGonigle | 0.70         | L120        | Conference with A. Tananbaum, B. Erens and M. Evert regarding status and planning (0.3) (0.5/2); follow-up conference with A. Tananbaum after team call (0.1); prepare for and attend insurer update call (0.3) (0.5/2) | 815.50            |
| 29-APR-24   | Joe Safar      | 0.40         | L120        | Attend insurer update call (0.3) (0.5/2); review Bestwall decision (0.1) (0.2/2)  | 398.00            |
|             |                | <b>7.40</b>  |             |   | <b>\$7,912.00</b> |

**TIMEKEEPER SUMMARY**

| <u>Name</u>     | <u>Title</u> | <u>Rate</u> | <u>Hours</u> | <u>Amount</u>     |
|-----------------|--------------|-------------|--------------|-------------------|
| Dave McGonigle  | Partner      | 1,165.00    | 5.70         | 6,640.50          |
| Joe Safar       | Partner      | 995.00      | 1.00         | 995.00            |
| Lisa Martinelli | Paralegal    | 395.00      | 0.70         | 276.50            |
|                 |              |             | <b>7.40</b>  | <b>\$7,912.00</b> |

**TASK SUMMARY**

| <u>Task Code</u>  | <u>Description</u> | <u>Hours</u> | <u>Amount</u>     |
|-------------------|--------------------|--------------|-------------------|
| L120              | Analysis/Strategy  | 7.40         | 7,912.00          |
| <b>Total Fees</b> |                    | <b>7.40</b>  | <b>\$7,912.00</b> |

Aldrich Pump LLC

Invoice Date: May 1, 2024

Invoice Number: 10-0025610

K&L Ref. Number 0246802

**Chapter 11 Retention and Compensation - (00002) \$312.75**

**Professional Services**

| <u>Date</u> | <u>Name</u>  | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u>   |
|-------------|--------------|--------------|-------------|--|-----------------|
| 01-APR-24   | Emily Steele | 0.10         | B160        | Finalize and circulate monthly fee statement for February 2024 (0.1) (0.2/2) | 69.50           |
| 29-APR-24   | Emily Steele | 0.20         | B160        | Draft monthly fee statement (March 2024) (0.2) (0.3/2)                       | 139.00          |
| 29-APR-24   | Emily Steele | 0.10         | B160        | Analyze March 2024 invoice for confidentiality and privilege (0.1) (0.2/2)   | 69.50           |
| 30-APR-24   | Emily Steele | 0.10         | B160        | Finalize and circulate monthly fee statement for March 2024 (0.1) (0.2/2)    | 69.50           |
|             |              | <b>0.50</b>  |             |  | <b>\$347.50</b> |

**TIMEKEEPER SUMMARY**

| <u>Name</u>  | <u>Title</u> | <u>Rate</u> | <u>Hours</u> | <u>Amount</u>   |
|--------------|--------------|-------------|--------------|-----------------|
| Emily Steele | Associate    | 695.00      | 0.50         | 347.50          |
|              |              |             | <b>0.50</b>  | <b>\$347.50</b> |

**TASK SUMMARY**

| <u>Task Code</u> | <u>Description</u>          | <u>Hours</u> | <u>Amount</u>   |
|------------------|-----------------------------|--------------|-----------------|
| B160             | Fee/Employment Applications | 0.50         | 347.50          |
|                  | <b>Total Fees</b>           | <b>0.50</b>  | <b>\$347.50</b> |



K&L GATES LLP  
K&L GATES CENTER  
210 SIXTH AVENUE  
PITTSBURGH, PA 15222-2613  
T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018

Murray Boiler LLC  
Allan Tananbaum, Esquire  
800-E Beaty Street  
Davidson, NC 28036

Invoice Date: May 1, 2024  
Invoice Number: 10-0025604  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY**

**Total USD \$**

**Asbestos Insurance Advice (00001)**

|                                     |          |           |                 |
|-------------------------------------|----------|-----------|-----------------|
| Fees                                | 6,548.00 |           |                 |
| 10% Discount                        | (654.80) |           |                 |
| <b>Total Amount Due This Matter</b> |          | <b>\$</b> | <b>5,893.20</b> |

**Chapter 11 Retention and Compensation (00002)**

|                                     |         |           |               |
|-------------------------------------|---------|-----------|---------------|
| Fees                                | 278.00  |           |               |
| 10% Discount                        | (27.80) |           |               |
| <b>Total Amount Due This Matter</b> |         | <b>\$</b> | <b>250.20</b> |

**CURRENT INVOICE DUE - All Matters**

**\$ 6,143.40**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Murray Boiler LLC

Invoice Date:

May 1, 2024

Invoice Number:

10-0025604

K&amp;L Ref. Number

0246801

**Asbestos Insurance Advice - (00001)****\$5,893.20****Professional Services**

| <u>Date</u> | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u> |
|-------------|-----------------|--------------|-------------|--|---------------|
| 02-APR-24   | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)   | 39.50         |
| 05-APR-24   | Dave McGonigle  | 0.30         | L120        | Review Maune Raichle motion regarding funding agreements (0.1) (0.2/2); participate in works-in-process call (0.1) (0.3/2); review recent court filings (0.1) (0.2/2)        | 349.50        |
| 05-APR-24   | Joe Safar       | 0.20         | L120        | Attend works-in-process call (0.2) (0.4/2)   | 199.00        |
| 11-APR-24   | Dave McGonigle  | 0.10         | L120        | Communications with insurer representative and team regarding status and planning (0.1) (0.2/2)  | 116.50        |
| 12-APR-24   | Dave McGonigle  | 0.10         | L120        | Conference with B. Erens regarding status and planning (0.1) (0.2/2)   | 116.50        |
| 16-APR-24   | Dave McGonigle  | 0.10         | L120        | Communications with B. Erens and M. Evert regarding status and planning (0.1) (0.2/2)  | 116.50        |
| 16-APR-24   | Dave McGonigle  | 0.10         | L120        | Review docket updates and emails with J. Miller regarding hearing (0.1) (0.2/2)  | 116.50        |
| 16-APR-24   | Dave McGonigle  | 0.40         | L120        | Conference with M. Evert regarding status and planning (0.4) (0.8/2)   | 466.00        |
| 17-APR-24   | Dave McGonigle  | 0.80         | L120        | Telephonic attendance at motion to quash hearing (0.8) (1.6/2)   | 932.00        |
| 17-APR-24   | Dave McGonigle  | 0.70         | L120        | Review proceedings in pending case in response to client inquiry (0.7) (1.4/2)   | 815.50        |
| 18-APR-24   | Dave McGonigle  | 0.30         | L120        | Emails with A. Tananbaum, B. Erens and M. Evert regarding status and planning (0.2) (0.4/2); email to insurer representatives regarding status and update call (0.1) (0.2/2) | 349.50        |



Murray Boiler LLC

Invoice Date:

May 1, 2024

Invoice Number:

10-0025604

K&amp;L Ref. Number

0246801

| <u>Date</u> | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u>     |
|-------------|-----------------|--------------|-------------|---|-------------------|
| 19-APR-24   | Dave McGonigle  | 0.20         | L120        | Participate in works-in-process call with Debtors and Affiliates (0.2) (0.5/2)  | 233.00            |
| 19-APR-24   | Joe Safar       | 0.20         | L120        | Attend works-in-process call (0.2) (0.5/2)  | 199.00            |
| 19-APR-24   | Lisa Martinelli | 0.20         | L120        | Review email, documents for case library for use by team attorneys (0.2) (0.4/2)  | 79.00             |
| 23-APR-24   | Dave McGonigle  | 0.20         | L120        | Emails with A. Tananbaum, B. Erens and M. Evert regarding planning (0.1) (0.2/2)  | 233.00            |
| 23-APR-24   | Dave McGonigle  | 0.10         | L120        | Communications with insurer representative regarding status (0.1) (0.2/2)   | 116.50            |
| 23-APR-24   | Lisa Martinelli | 0.20         | L120        | Review email, documents for case library for use by team attorneys (0.2) (0.4/2)  | 79.00             |
| 24-APR-24   | Joe Safar       | 0.10         | L120        | Prepare for insurer update call (0.1) (0.2/2)   | 99.50             |
| 25-APR-24   | Dave McGonigle  | 0.80         | L120        | Telephonic hearing attendance (0.7) (1.4/2); emails and conference with A. Tananbaum regarding status and planning (0.1) (0.2/2)                          | 932.00            |
| 25-APR-24   | Lisa Martinelli | 0.20         | L120        | Review email, documents for case library for use by team attorneys (0.2) (0.4/2)  | 79.00             |
| 26-APR-24   | Dave McGonigle  | 0.10         | L120        | Conference with M. Evert regarding status (0.1) (0.2/2)   | 116.50            |
| 29-APR-24   | Dave McGonigle  | 0.40         | L120        | Conference with A. Tananbaum, B. Erens and M. Evert regarding status and planning (0.2) (0.5/2); prepare for and attend insurer update call (0.2) (0.5/2) | 466.00            |
| 29-APR-24   | Joe Safar       | 0.30         | L120        | Attend insurer update call (0.2) (0.5/2); review Bestwall decision (0.1) (0.2/2)  | 298.50            |
|             |                 | <b>6.20</b>  |             |   | <b>\$6,548.00</b> |

Murray Boiler LLC

Invoice Date: May 1, 2024

Invoice Number: 10-0025604

K&L Ref. Number 0246801

**TIMEKEEPER SUMMARY**

| <b><u>Name</u></b> | <b><u>Title</u></b> | <b><u>Rate</u></b> | <b><u>Hours</u></b> | <b><u>Amount</u></b> |
|--------------------|---------------------|--------------------|---------------------|----------------------|
| Dave McGonigle     | Partner             | 1,165.00           | 4.70                | 5,475.50             |
| Joe Safar          | Partner             | 995.00             | 0.80                | 796.00               |
| Lisa Martinelli    | Paralegal           | 395.00             | 0.70                | 276.50               |
|                    |                     |                    | <b>6.20</b>         | <b>\$6,548.00</b>    |

**TASK SUMMARY**

| <b><u>Task Code</u></b> | <b><u>Description</u></b> | <b><u>Hours</u></b> | <b><u>Amount</u></b> |
|-------------------------|---------------------------|---------------------|----------------------|
| L120                    | Analysis/Strategy         | 6.20                | 6,548.00             |
|                         | <b>Total Fees</b>         | <b>6.20</b>         | <b>\$6,548.00</b>    |

Murray Boiler LLC

Invoice Date: May 1, 2024  
 Invoice Number: 10-0025604  
 K&L Ref. Number: 0246801

**Chapter 11 Retention and Compensation - (00002) \$250.20**

**Professional Services**

| <u>Date</u> | <u>Name</u>  | <u>Hours</u> | <u>Task</u> | <u>Description</u>   | <u>Amount</u>   |
|-------------|--------------|--------------|-------------|--|-----------------|
| 01-APR-24   | Emily Steele | 0.10         | B160        | Finalize and circulate monthly fee statement for February 2024 (0.1) (0.2/2) | 69.50           |
| 29-APR-24   | Emily Steele | 0.10         | B160        | Draft monthly fee statement (March 2024) (0.1) (0.3/2)                       | 69.50           |
| 29-APR-24   | Emily Steele | 0.10         | B160        | Analyze March 2024 invoice for confidentiality and privilege (0.1) (0.2/2)   | 69.50           |
| 30-APR-24   | Emily Steele | 0.10         | B160        | Finalize and circulate monthly fee statement for March 2024 (0.1) (0.2/2)    | 69.50           |
|             |              | <b>0.40</b>  |             |  | <b>\$278.00</b> |

**TIMEKEEPER SUMMARY**

| <u>Name</u>  | <u>Title</u> | <u>Rate</u> | <u>Hours</u> | <u>Amount</u>   |
|--------------|--------------|-------------|--------------|-----------------|
| Emily Steele | Associate    | 695.00      | 0.40         | 278.00          |
|              |              |             | <b>0.40</b>  | <b>\$278.00</b> |

**TASK SUMMARY**

| <u>Task Code</u> | <u>Description</u>          | <u>Hours</u> | <u>Amount</u>   |
|------------------|-----------------------------|--------------|-----------------|
| B160             | Fee/Employment Applications | 0.40         | 278.00          |
|                  | <b>Total Fees</b>           | <b>0.40</b>  | <b>\$278.00</b> |

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)

**FORTY-SEVENTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED  
BY K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS  
FOR THE PERIOD FROM MAY 1, 2024 THROUGH MAY 31, 2024**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Forty-Seventh Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From May 1, 2024 Through May 31, 2024* (the "Monthly Fee Statement").

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period May 1, 2024 through May 31, 2024 (the "Statement Period").

<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.

**Total Fees and Expenses for the Statement Period**

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

|                |                    |
|----------------|--------------------|
| Total Fees     | \$19,048.95        |
| Total Expenses | \$716.92           |
| <b>TOTAL</b>   | <b>\$19,765.87</b> |

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$17,860.97 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

**Billing Adjustments**

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$237.00 in fees will not be charged to the Debtors.

**Notice and Objection Procedures**

5. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy

Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., [feeapplications@ncwba.uscourts.gov](mailto:feeapplications@ncwba.uscourts.gov)); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., [pamoa@mccarter.com](mailto:pamoa@mccarter.com)), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., [abartell@mccarter.com](mailto:abartell@mccarter.com) and Phillip S. Pavlick, Esq., [ppavlick@mccarter.com](mailto:ppavlick@mccarter.com)), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., [gmascitti@mccarter.com](mailto:gmascitti@mccarter.com)) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., [scordes@burtcordeslaw.com](mailto:scordes@burtcordeslaw.com), (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., [nramsey@rc.com](mailto:nramsey@rc.com) and Davis Lee Wright, Esq., [dwright@rc.com](mailto:dwright@rc.com)), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., [kmaclay@capdale.com](mailto:kmaclay@capdale.com), James P. Wehner, Esq., [jwehner@capdale.com](mailto:jwehner@capdale.com) and Todd E. Phillips, Esq., [tphillips@capdale.com](mailto:tphillips@capdale.com)) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., [gthompson@lawhssm.com](mailto:gthompson@lawhssm.com)), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., [jgrier@grierlaw.com](mailto:jgrier@grierlaw.com), A. Cotton Wright, Esq., [cwright@grierlaw.com](mailto:cwright@grierlaw.com)), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., [jguy@orrick.com](mailto:jguy@orrick.com), Debra L. Felder, Esq., [dfelder@orrick.com](mailto:dfelder@orrick.com)).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the

affected Retained Professional, and upon the other Notice Parties no later than July 15, 2024 (the “Objection Deadline”). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

7. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

8. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: July 1, 2024  
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR  
DEBTORS AND DEBTORS IN POSSESSION

**EXHIBIT A**

**Invoices**





K&L GATES CENTER  
210 SIXTH AVENUE  
PITTSBURGH, PA 15222-2613  
T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018

Aldrich Pump LLC  
Allan Tananbaum, Esquire  
800-E Beatty Street  
Davidson, North Carolina 28036

Invoice Date: June 1, 2024  
Invoice Number: 10-0042154  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY**

**Total USD \$**

**Asbestos Insurance Advice (00001)**

|                                     |            |           |                 |
|-------------------------------------|------------|-----------|-----------------|
| Fees                                | 10,629.00  |           |                 |
| 10% Discount                        | (1,062.90) |           |                 |
| Disbursements and Other Charges     | 358.48     |           |                 |
| <b>Total Amount Due This Matter</b> |            | <b>\$</b> | <b>9,924.58</b> |

**Chapter 11 Retention and Compensation (00002)**

|                                     |         |           |               |
|-------------------------------------|---------|-----------|---------------|
| Fees                                | 917.50  |           |               |
| 10% Discount                        | (91.75) |           |               |
| <b>Total Amount Due This Matter</b> |         | <b>\$</b> | <b>825.75</b> |

**CURRENT INVOICE DUE - All Matters**

**\$ 10,750.33**

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Aldrich Pump LLC

Invoice Date:

June 1, 2024

Invoice Number:

10-0042154

K&amp;L Ref. Number:

0246802

**Asbestos Insurance Advice - (00001)****\$9,924.58****Professional Services**

| <u>Date</u> | <u>Name</u>    | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u> |
|-------------|----------------|--------------|-------------|---|---------------|
| 02-MAY-24   | Dave McGonigle | 0.70         | L120        | Planning for insurer meeting (0.1) (0.2/2); conferences with A. Tananbaum regarding status and planning (0.3) (0.5/2); communications with B. Erens regarding planning for insurer meeting (0.1); conference with insurer representative regarding meeting (0.1); email to team regarding meeting planning (0.1)  | 815.50        |
| 03-MAY-24   | Dave McGonigle | 1.10         | L120        | Participate in works in process call with Debtors and Affiliates (0.3) (0.5/2); prepare for team call regarding insurer meeting (0.2) (0.4/2); conference with A. Tananbaum, M. Evert, B. Erens, M. Cody and M. Hirst regarding discovery and insurance matters (0.4) (0.7/2); email to insurer representative regarding meeting planning (0.1); prepare call report regarding 4/29 insurer update call (0.1) (0.2/2) | 1,281.50      |
| 03-MAY-24   | Joe Safar      | 0.30         | L120        | Attend works-in-process call with Debtors and Affiliates (0.3) (0.5/2)  | 298.50        |
| 06-MAY-24   | Dave McGonigle | 1.20         | L120        | Conference with J. Safar regarding insurance matters (0.3) (0.5/2); emails with M. Cody regarding planning for insurer meeting (0.1); communications with insurer representative regarding discovery matters and meeting (0.1) (0.2/2); review work product in preparation for insurer meeting (0.7) (1.4/2)  | 1,398.00      |
| 06-MAY-24   | Joe Safar      | 0.30         | L120        | Conference with D. McGonigle regarding preparation for insurer meeting (0.3) (0.5/2)  | 298.50        |

Aldrich Pump LLC

Invoice Date: June 1, 2024

Invoice Number: 10-0042154

K&L Ref. Number: 0246802

| <u>Date</u>  | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u>      |
|--------------|-----------------|--------------|-------------|---|--------------------|
| 06-MAY-24    | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)  | 39.50              |
| 07-MAY-24    | Dave McGonigle  | 3.60         | B195        | Travel to/from Pittsburgh for insurer meeting (3.6) (7.2/2)   | 2,097.00           |
| 07-MAY-24    | Dave McGonigle  | 2.80         | L120        | Review work product files in preparation for meeting with insurer representatives (0.6) (1.2/2); communications with insurer representative regarding meeting preparation (0.1) (0.2/2); conference with team regarding status and preparation for meeting with insurer representatives (0.5) (1.0/2); conference with insurer representatives regarding status of case and strategy (1.1) (2.2/2); follow-up conference with A. Tananbaum and team regarding meeting (0.5) (1.0/2) | 3,262.00           |
| 09-MAY-24    | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)  | 39.50              |
| 10-MAY-24    | Dave McGonigle  | 0.20         | L120        | Conference with J. Safar regarding status and discovery matters (0.2) (0.3/2)   | 233.00             |
| 10-MAY-24    | Joe Safar       | 0.20         | L120        | Conference with D. McGonigle regarding insurance strategy (0.2) (0.3/2)   | 199.00             |
| 17-MAY-24    | Dave McGonigle  | 0.30         | L120        | Participate in works-in-process call with Debtors and Affiliates (0.2) (0.4/2); conference with J. Safar regarding status (0.1)   | 349.50             |
| 17-MAY-24    | Joe Safar       | 0.20         | L120        | Attend works-in-process call with Debtors and Affiliates (0.2) (0.4/2)  | 199.00             |
| 22-MAY-24    | Lisa Martinelli | 0.20         | L120        | Review email, documents for case library for use by team attorneys (0.2) (0.4/2)  | 79.00              |
| 30-MAY-24    | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)  | 39.50              |
| <b>11.40</b> |                 |              |             |   | <b>\$10,629.00</b> |

Aldrich Pump LLC

Invoice Date: June 1, 2024

Invoice Number: 10-0042154

K&L Ref. Number: 0246802

**TIMEKEEPER SUMMARY**

|                  | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>      |
|------------------|--------------|-------------|--------------------|
| <b>Partner</b>   |              |             |                    |
| Joe Safar        | 1.00         | 995.00      | 995.00             |
| Dave McGonigle   | 3.60         | 582.50      | 2,097.00           |
| Dave McGonigle   | 6.30         | 1,165.00    | 7,339.50           |
| <b>Paralegal</b> |              |             |                    |
| Lisa Martinelli  | 0.50         | 395.00      | 197.50             |
|                  | <u>11.40</u> |             | <u>\$10,629.00</u> |

**TASK SUMMARY**

| <u>Task Code</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u>      |
|------------------|--------------------|--------------|--------------------|
| B195             | Non-Working Travel | 3.60         | 2,097.00           |
| L120             | Analysis/Strategy  | 7.80         | 8,532.00           |
|                  | <b>Total Fees</b>  | <u>11.40</u> | <u>\$10,629.00</u> |

| <u>Description</u>                | <u>Amount</u>   |
|-----------------------------------|-----------------|
| Travel - Airfare and Airline fees | 289.66          |
| Travel - Ground Transportation    | 46.74           |
| Travel - Meals                    | 4.08            |
| Travel - Parking & Tolls          | 18.00           |
|                                   | <u>\$358.48</u> |

Aldrich Pump LLC

Invoice Date: June 1, 2024

Invoice Number: 10-0042154

K&L Ref. Number: 0246802

**Chapter 11 Retention and Compensation - (00002) \$825.75**

**Professional Services**

| <u>Date</u> | <u>Name</u>        | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u>   |
|-------------|--------------------|--------------|-------------|---|-----------------|
| 16-MAY-24   | Emily Steele       | 0.20         | B160        | Correspondence with debtor's counsel regarding upcoming monthly fee statement and interim fee application (0.2)                   | 139.00          |
| 21-MAY-24   | Dave McGonigle     | 0.20         | B160        | Prepare monthly fee statements (0.2) (0.4/2)  | 233.00          |
| 22-MAY-24   | Emily Steele       | 0.10         | B160        | Internal correspondence regarding privilege and confidentiality matters relating to April invoices (0.1)                          | 69.50           |
| 23-MAY-24   | Emily Steele       | 0.10         | B160        | Analyze April 2024 invoices for confidentiality and privilege (0.1)   | 69.50           |
| 23-MAY-24   | Emily Steele       | 0.10         | B160        | Draft monthly fee statement (April 2024) (0.1) (0.2/2)  | 69.50           |
| 28-MAY-24   | Dave McGonigle     | 0.10         | B160        | Review and finalize fee statement (0.1) (0.2/2)   | 116.50          |
| 28-MAY-24   | Margaret Westbrook | 0.10         | B160        | Review monthly invoices for privilege (0.1) (0.2/2)   | 81.50           |
| 28-MAY-24   | Emily Steele       | 0.10         | B160        | Attention to matters regarding new representation of debtor affiliate and related bankruptcy disclosure obligations (0.1) (0.2/2) | 69.50           |
| 29-MAY-24   | Emily Steele       | 0.10         | B160        | Finalize, compile and circulate monthly fee statement to debtor's counsel (April 2024)  | 69.50           |
|             |                    | <b>1.10</b>  |             |   | <b>\$917.50</b> |

**TIMEKEEPER SUMMARY**

|                    | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>   |
|--------------------|--------------|-------------|-----------------|
| <b>Partner</b>     |              |             |                 |
| Margaret Westbrook | 0.10         | 815.00      | 81.50           |
| Dave McGonigle     | 0.30         | 1,165.00    | 349.50          |
| <b>Associate</b>   |              |             |                 |
| Emily Steele       | 0.70         | 695.00      | 486.50          |
|                    | <b>1.10</b>  |             | <b>\$917.50</b> |

Aldrich Pump LLC

Invoice Date: June 1, 2024

Invoice Number: 10-0042154

K&L Ref. Number: 0246802

**TASK SUMMARY**

| <b><u>Task Code</u></b> | <b><u>Description</u></b>   | <b><u>Hours</u></b> | <b><u>Amount</u></b> |
|-------------------------|-----------------------------|---------------------|----------------------|
| B160                    | Fee/Employment Applications | 1.10                | 917.50               |
|                         | <b>Total Fees</b>           | <b>1.10</b>         | <b>\$917.50</b>      |



K&L GATES LLP  
K&L GATES CENTER  
210 SIXTH AVENUE  
PITTSBURGH, PA 15222-2613  
T +1 412 355 6500 F +1 412 355 6501 klgates.com  
Tax ID No. 25 0921018

Murray Boiler LLC  
Allan Tananbaum, Esquire  
800-E Beaty Street  
Davidson, NC 28036

Invoice Date: June 1, 2024  
Invoice Number: 10-0042161  
K&L Gates Contact: Dave McGonigle

**INVOICE SUMMARY**

**Total USD \$**

**Asbestos Insurance Advice (00001)**

|                                     |          |           |                 |
|-------------------------------------|----------|-----------|-----------------|
| Fees                                | 9,049.00 |           |                 |
| 10% Discount                        | (904.90) |           |                 |
| Disbursements and Other Charges     | 358.44   |           |                 |
| <b>Total Amount Due This Matter</b> |          | <b>\$</b> | <b>8,502.54</b> |

**Chapter 11 Retention and Compensation (00002)**

|                                     |         |           |               |
|-------------------------------------|---------|-----------|---------------|
| Fees                                | 570.00  |           |               |
| 10% Discount                        | (57.00) |           |               |
| <b>Total Amount Due This Matter</b> |         | <b>\$</b> | <b>513.00</b> |

**CURRENT INVOICE DUE - All Matters**

**\$ 9,015.54**

**Due and Payable upon Receipt**

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Murray Boiler LLC

Invoice Date: June 1, 2024  
 Invoice Number: 10-0042161  
 K&L Ref. Number: 0246801

**Asbestos Insurance Advice - (00001) \$8,502.54**

**Professional Services**

| <u>Date</u> | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u> |
|-------------|-----------------|--------------|-------------|---|---------------|
| 02-MAY-24   | Dave McGonigle  | 0.30         | L120        | Planning for insurer meeting (0.1) (0.2/2); conferences with A. Tananbaum regarding status and planning (0.2) (0.5/2)   | 349.50        |
| 03-MAY-24   | Dave McGonigle  | 0.80         | L120        | Participate in works in process call with Debtors and Affiliates (0.2) (0.5/2); prepare for team call regarding insurer meeting (0.2) (0.4/2); conference with A. Tananbaum, M. Evert, B. Erens, M. Cody and M. Hirst regarding discovery and insurance matters (0.3) (0.7/2); prepare call report regarding 4/29 insurer update call (0.1) (0.2/2) | 932.00        |
| 03-MAY-24   | Joe Safar       | 0.20         | L120        | Attend works-in-process call with Debtors and Affiliates (0.2) (0.5/2)  | 199.00        |
| 06-MAY-24   | Dave McGonigle  | 1.00         | L120        | Conference with J. Safar regarding insurance matters (0.2) (0.5/2); communications with insurer representative regarding discovery matters and meeting (0.1) (0.2/2); review work product in preparation for insurer meeting (0.7) (1.4/2)  | 1,165.00      |
| 06-MAY-24   | Joe Safar       | 0.20         | L120        | Conference with D. McGonigle regarding preparation for insurer meeting (0.2) (0.5/2)  | 199.00        |
| 06-MAY-24   | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)  | 39.50         |



Murray Boiler LLC

Invoice Date:

June 1, 2024

Invoice Number:

10-0042161

K&amp;L Ref. Number:

0246801

| <u>Date</u> | <u>Name</u>     | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u>     |
|-------------|-----------------|--------------|-------------|---|-------------------|
| 07-MAY-24   | Dave McGonigle  | 2.80         | L120        | Review work product files in preparation for meeting with insurer representatives (0.6) (1.2/2); communications with insurer representative regarding meeting preparation (0.1) (0.2/2); conference with team regarding status and preparation for meeting with insurer representatives (0.5) (1.0/2); conference with insurer representatives regarding status of case and strategy (1.1) (2.2/2); follow-up conference with A. Tananbaum and team regarding meeting (0.5) (1.0/2) | 3,262.00          |
| 07-MAY-24   | Dave McGonigle  | 3.60         | B195        | Travel to/from Pittsburgh for insurer meeting (3.6) (7.2/2)   | 2,097.00          |
| 09-MAY-24   | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)  | 39.50             |
| 10-MAY-24   | Dave McGonigle  | 0.10         | L120        | Conference with J. Safar regarding status and discovery matters (0.1) (0.3/2)   | 116.50            |
| 10-MAY-24   | Joe Safar       | 0.10         | L120        | Conference with D. McGonigle regarding insurance strategy (0.1) (0.3/2)   | 99.50             |
| 17-MAY-24   | Dave McGonigle  | 0.20         | L120        | Participate in works-in-process call with Debtors and Affiliates (0.2) (0.4/2)  | 233.00            |
| 17-MAY-24   | Joe Safar       | 0.20         | L120        | Attend works-in-process call with Debtors and Affiliates (0.2) (0.4/2)  | 199.00            |
| 22-MAY-24   | Lisa Martinelli | 0.20         | L120        | Review email, documents for case library for use by team attorneys (0.2) (0.4/2)  | 79.00             |
| 30-MAY-24   | Lisa Martinelli | 0.10         | L120        | Review email, documents for case library for use by team attorneys (0.1) (0.2/2)  | 39.50             |
|             |                 | <b>10.00</b> |             |   | <b>\$9,049.00</b> |

Murray Boiler LLC

Invoice Date: June 1, 2024

Invoice Number: 10-0042161

K&L Ref. Number: 0246801

**TIMEKEEPER SUMMARY**

|                  | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>     |
|------------------|--------------|-------------|-------------------|
| <b>Partner</b>   |              |             |                   |
| Joe Safar        | 0.70         | 995.00      | 696.50            |
| Dave McGonigle   | 3.60         | 582.50      | 2,097.00          |
| Dave McGonigle   | 5.20         | 1,165.00    | 6,058.00          |
| <b>Paralegal</b> |              |             |                   |
| Lisa Martinelli  | 0.50         | 395.00      | 197.50            |
|                  | <u>10.00</u> |             | <u>\$9,049.00</u> |

**TASK SUMMARY**

| <u>Task Code</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u>     |
|------------------|--------------------|--------------|-------------------|
| B195             | Non-Working Travel | 3.60         | 2,097.00          |
| L120             | Analysis/Strategy  | 6.40         | 6,952.00          |
|                  | <b>Total Fees</b>  | <u>10.00</u> | <u>\$9,049.00</u> |

| <u>Description</u>                | <u>Amount</u>   |
|-----------------------------------|-----------------|
| Travel - Airfare and Airline fees | 289.65          |
| Travel - Ground Transportation    | 46.72           |
| Travel - Meals                    | 4.07            |
| Travel - Parking & Tolls          | 18.00           |
|                                   | <u>\$358.44</u> |

Murray Boiler LLC

Invoice Date: June 1, 2024

Invoice Number: 10-0042161

K&L Ref. Number: 0246801

**Chapter 11 Retention and Compensation - (00002) \$513.00**

**Professional Services**

| <u>Date</u> | <u>Name</u>           | <u>Hours</u> | <u>Task</u> | <u>Description</u>  | <u>Amount</u>   |
|-------------|-----------------------|--------------|-------------|---|-----------------|
| 21-MAY-24   | Dave McGonigle        | 0.20         | B160        | Prepare monthly fee statements<br>(0.2) (0.4/2)   | 233.00          |
| 23-MAY-24   | Emily Steele          | 0.10         | B160        | Draft monthly fee statement<br>(April 2024) (0.1) (0.2/2)   | 69.50           |
| 28-MAY-24   | Dave McGonigle        | 0.10         | B160        | Review and finalize fee<br>statement (0.1) (0.2/2)  | 116.50          |
| 28-MAY-24   | Margaret<br>Westbrook | 0.10         | B160        | Review monthly invoices for<br>privilege (0.1) (0.2/2)  | 81.50           |
| 28-MAY-24   | Emily Steele          | 0.10         | B160        | Attention to matters regarding<br>new representation of debtor<br>affiliate and related bankruptcy<br>disclosure obligations (0.1)<br>(0.2/2) | 69.50           |
|             |                       | <b>0.60</b>  |             |   | <b>\$570.00</b> |

**TIMEKEEPER SUMMARY**

|                    | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>   |
|--------------------|--------------|-------------|-----------------|
| <b>Partner</b>     |              |             |                 |
| Margaret Westbrook | 0.10         | 815.00      | 81.50           |
| Dave McGonigle     | 0.30         | 1,165.00    | 349.50          |
| <b>Associate</b>   |              |             |                 |
| Emily Steele       | 0.20         | 695.00      | 139.00          |
|                    | <b>0.60</b>  |             | <b>\$570.00</b> |

**TASK SUMMARY**

| <u>Task Code</u> | <u>Description</u>          | <u>Hours</u> | <u>Amount</u>   |
|------------------|-----------------------------|--------------|-----------------|
| B160             | Fee/Employment Applications | 0.60         | 570.00          |
|                  | <b>Total Fees</b>           | <b>0.60</b>  | <b>\$570.00</b> |

**EXHIBIT B**

**Proposed Order**

**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)

**ORDER GRANTING THE TWELFTH INTERIM APPLICATION OF K&L GATES  
LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES  
AS SPECIAL INSURANCE COUNSEL TO THE DEBTORS  
FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024**

This matter coming before the Court on the *Twelfth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period From February 1, 2024 Through May 31, 2024* (the "Interim Fee Application")<sup>2</sup> filed by K&L Gates LLP as

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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.

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

special insurance counsel 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 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 K&L Gates LLP 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 K&L Gates LLP 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. K&L Gates LLP is awarded, on an interim basis, compensation for professional services rendered during the Compensation Period in the amount of \$66,667.05 and reimbursement for actual and necessary expenses incurred by K&L Gates LLP during the Compensation Period in the amount of \$716.92.

3. The Debtors are authorized and directed to pay promptly to K&L Gates LLP 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 K&L Gates LLP are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

5. This Court shall retain exclusive jurisdiction over 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