

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

<p>In re:</p> <p>ALDRICH PUMP LLC, <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>CASE NO. 20-30608</p> <p>CHAPTER 11</p> <p>Jointly Administered</p>
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**SUMMARY OF TWELFTH INTERIM APPLICATION FOR COMPENSATION OF
GRIER WRIGHT MARTINEZ, PA FOR SERVICES RENDERED TO AND FOR
REIMBURSEMENT OF EXPENSES AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024**

Name of Applicant:	Grier Wright Martinez, PA
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Appointment:	October 14, 2020
Period for which compensation and reimbursement is sought:	February 1, 2024 through May 31, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$9,135.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$612.00
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$9,747.00

This is a(n) x interim final application.

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.



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

In re:

ALDRICH PUMP LLC, et al.,¹

Debtors.

CASE NO. 20-30608

CHAPTER 11

Jointly Administered

**TWELFTH INTERIM APPLICATION FOR COMPENSATION OF GRIER WRIGHT
MARTINEZ, PA FOR SERVICES RENDERED TO AND FOR REIMBURSEMENT OF
EXPENSES AS COUNSEL TO JOSEPH W. GRIER, III,
THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024**

Grier Wright Martinez, PA (“GWM”), counsel to Joseph W. Grier, III, the Future Claimants’ Representative in this case (the “FCR”), through counsel, hereby brings its twelfth interim application for allowance of compensation of \$9,135.00 and reimbursement of expenses of \$612.00 for the period of 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* (Doc. No. 171) (the “Fee Procedure Order”), and in support, respectfully represents as follows:

BACKGROUND

1. On June 18, 2020 (the “Petition Date”), the Debtors commenced their bankruptcy cases (together, the “Chapter 11 Case”) by filing a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code. On June 25, 2020, the Court entered an Order directing that the Debtors’ cases be jointly administered (Doc. No. 114). The Debtors are authorized to continue to

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

manage their property and operate their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On July 7, 2020, the Court entered its *Order Appointing the Official Committee of Asbestos Personal Injury Claimants* (Doc. No. 147), appointing a committee (the “ACC”) to represent personal injury claimants in this case.

3. On October 14, 2020, the Court entered its *Order Appointing Joseph W. Grier, III as Legal Representative for Future Asbestos Claimants* (Doc. No. 389), appointing the FCR. On October 15, 2020, the Court entered Orders authorizing the FCR to retain Orrick, Herrington & Sutcliffe, LLP (“Orrick”) and Grier Wright Martinez, PA (“GWM”) to represent him in this case. (Doc. Nos. 393 & 394).

4. Pursuant to the Fee Procedure Order, professionals may request monthly compensation and reimbursement. Such requests are to be served on certain identified interested parties for review. If no objection to a professional’s request is received within fourteen (14) days of such request, the Debtors are authorized to pay 90% of the fees and 100% of the expenses requested. The Fee Procedure Order also requires each retained professional to file, approximately every four months, an application for interim Court approval and allowance pursuant to section 331 of the Bankruptcy Code of 100% of the compensation and reimbursement of expenses for the prior four-month period.

COMPENSATION RECEIVED DURING THE INTERIM PERIOD

5. Pursuant to the Fee Procedure Order, GWM has submitted fee statements to the Debtors for the Interim Period. Copies of the relevant invoices are attached as **Exhibit A**. Summarized below are the requested professional fees and expenses and payments that GWM has received on the same.

Date of Request	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
3/22/2024	2/1/2024-2/29/2024	\$480.00	\$0.00	\$432.00	\$48.00
4/11/2024	3/1/2024-3/31/2024	\$5,145.00	\$0.00	\$4,631.51	\$514.49
5/30/2024	4/1/2024-4/30/2024	\$1,640.00	\$6.20	\$0.00	\$1,646.20
6/14/2024	5/1/2024-5/31/2024	\$1,870.00	\$605.80	\$0.00	\$2,475.80

6. In total, GWM has submitted fee statements during the Interim Period for total fees of \$9,135.00 and total expenses of \$612.00. As of the date of this Application, no party has objected to the fee statements circulated by GWM.

SUMMARY OF SERVICES RENDERED

7. Attached here as **Exhibit A** are GWM’s monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by GWM during the Interim Period. In summary, GWM expended a total of 20.3 hours rendering necessary services in this Chapter 11 proceeding during the Interim Period. GWM’s fees total \$9,135.00 for the Interim Period.

8. As attorneys for the FCR, GWM has provided a variety of services in the Debtors’ bankruptcy case as set forth in the summary description below and in detail in **Exhibit A**.

9. GWM believes that the services the firm has provided to the FCR in the context of the Debtors’ bankruptcy case during the Interim Period were necessary and beneficial to the administration of this case. GWM further believes that its services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the tasks addressed.

10. GWM has attempted to assign time entries for its professionals to the categories that best relate to those services. The following is a summary of the services provided to the FCR during the Interim Period, organized by project billing category:

A. **Case Administration and Business Operations** – 0.8 hours, \$384.00. During the Interim Period, GWM kept the FCR and his professionals abreast of case issues and reviewed and responded to emails from attorneys for the parties.

B. **Professional Retention/Fee Issues** – 1.9 hours, \$622.00. GWM reviewed and signed off on fee requests for the FCR’s professionals.

C. **Litigation** – 15.0 hours, \$7,200.00. GWM reviewed draft pleadings and filed the same on behalf of the FCR. GWM also reviewed pleadings filed by other parties.

D. **Fee Application Preparation** – 1.1 hours, \$209.00. GWM prepared applications for compensation for the FCR and GWM.

E. **Asbestos Matters** – 1.2 hours, \$576.00. GWM reviewed pleadings filed in other asbestos cases.

F. **Court Hearings**. – 0.3 hours, \$144.00. GWM reviewed emails regarding court hearings and kept FCR abreast of the same.

11. In **Exhibit B**, GWM has categorized the firm’s time by project categories recommended by the Guidelines for Compensation and Expense Reimbursement of Professionals referenced in Rule 2016-1 of this Court’s Local Rules of Practice and Procedure (the “Local Rules”).

12. **Exhibit C** reflects a summary by category of the expenses that GWM incurred during the Interim Period, which totaled \$612.00.

13. **Exhibit D** provides information as to GWM's professionals, including years of practice, billing rates, and the total number of hours billed during the Interim Period. GWM maintains that its billing rates for the Interim Period should be deemed reasonable for purposes of this Court's determination of the "reasonableness" of the fees for the services that GWM has rendered.

14. Attached as **Exhibit E** is a summary of GWM's prior applications for compensation in this case.

DISBURSEMENTS

15. GWM must incur certain expenses in the course of rendering services to the FCR. Those expenses may include items such as court fees, copying charges, regular and express mail charges, special or hand delivery charges, photocopying charges, travel expenses, expenses for working meals, computerized research charges, transcription charges, and the like.

16. GWM requests reimbursement for the firm's actual and necessary expenses incurred during the Interim Period in the amount of \$612.00. A detailed breakdown of such expenses is provided in GWM's invoices included in **Exhibit A**, and those expenses are summarized in **Exhibit C**. GWM's expenses during the Interim Period were necessary and reasonable under the circumstances of this case.

NOTICE

17. Notice of this Application has been provided to: (a) the office of the United States Bankruptcy Administrator for the Western District of North Carolina; (b) counsel for the Debtors; (c) counsel for the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.; (d) counsel to the ACC; and (e) the other parties on the Service List established by the Case Management Order entered in this case. GWM submits that, given the nature of the relief requested, no other or further notice need be provided.

NO PRIOR REQUEST

18. GWM has not made a prior request for the relief sought in this Application to this or any other Court.

CONCLUSION

19. Based on the foregoing, GWM makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred representing the Court-appointed FCR.

WHEREFORE, Grier Wright Martinez, PA respectfully requests that the Court enter an Order:

1) Allowing interim compensation to GWM in the amount of \$9,135.00 as reasonable, actual and necessary for professional services rendered by it on behalf of the FCR during the Interim Period and interim reimbursement of expenses incurred during the Interim Period of \$612.00 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay GWM the amount of \$9,747.00, which is equal to 100% of GWM's requested compensation for the Interim Period and 100% of GWM's

requested expense reimbursement for the Interim Period, less all previous payments made to GWM pursuant to the Fee Procedure Order; and

- 3) Granting such further relief as is just and proper.

This is the 11th day of July, 2024.

/s/ A. Cotten Wright
A. Cotten Wright (State Bar No. 28162)
Grier Wright Martinez, PA
521 E Morehead Street, Suite 440
Charlotte, NC 28202
704-332-0207
cwright@grierlaw.com
*Attorneys for Joseph W. Grier, III,
Future Claimants' Representative*

EXHIBIT A



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1126
Date: 03/22/2024
Due On: 04/15/2024

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
02/05/2024	Litigation and Adversary Proceedings: Reviewed email from J.Guy re: responses to FCR opposition in reply briefs filed by ACC & Semian.	ACW	0.10	\$480.00	\$48.00
02/07/2024	Court Hearings: Reviewed email from J.Guy re: plans for hearing on February 9.	ACW	0.10	\$480.00	\$48.00
02/09/2024	Court Hearings: Reviewed email from A.Johnson re: debtor's presentation for hearing on February 9.	ACW	0.10	\$480.00	\$48.00
02/12/2024	Asbestos Matters: Reviewed email from D.Felder and attached pleadings regarding from Bestwall case.	ACW	0.40	\$480.00	\$192.00
02/16/2024	Professional Retention/Fee Issues: Reviewed monthly fee request for Orrick & approved same.	ACW	0.10	\$480.00	\$48.00
02/20/2024	Court Hearings: Reviewed email from J.Miller re: proposed continuance of hearing set for February 29; reviewed responses to same. Reviewed J.Miller's email to chambers and response re: cancelation of hearing.	ACW	0.10	\$480.00	\$48.00
02/22/2024	Case Administration and Business Operations: Reviewed and responded to email from D. Felder re: Orrick's change of address & notice of same.	ACW	0.10	\$480.00	\$48.00
Quantity Subtotal					1.0

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	1.0	\$480.00	\$480.00
Quantity Total			1.0
Subtotal			\$480.00
Total			\$480.00
Payment (04/18/2024)			-\$280.80
Payment (04/22/2024)			-\$151.20
Balance Owing			\$48.00

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1017	11/08/2023	\$812.70	\$731.71	\$80.99
1050	12/05/2023	\$1,447.00	\$1,303.00	\$144.00
1080	01/09/2024	\$1,287.10	\$1,161.11	\$125.99
1105	03/04/2024	\$2,930.20	\$2,637.40	\$292.80
1135	04/29/2024	\$5,145.00	\$4,630.51	\$514.49
1167	06/17/2024	\$1,646.20	\$0.00	\$1,646.20
1175	07/01/2024	\$2,475.80	\$0.00	\$2,475.80

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1126	04/15/2024	\$480.00	\$432.00	\$48.00
Outstanding Balance				\$5,328.27
Total Amount Outstanding				\$5,328.27

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1135
Date: 04/11/2024
Due On: 04/29/2024

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
03/04/2024	Asbestos Matters: Brief review of referee report in DBMP.	ACW	0.60	\$480.00	\$288.00
03/12/2024	Case Administration and Business Operations: Reviewed email from J.Miller re: proposal to cancel 3/21/2024 hearing; reviewed responses.	ACW	0.20	\$480.00	\$96.00
03/13/2024	Litigation and Adversary Proceedings: Reviewed email from S.Whitney re: J.Guy's notice of appearance in Fourth Circuit matter.	ACW	0.10	\$480.00	\$48.00
03/14/2024	Case Administration and Business Operations: Reviewed email from J.Miller to chambers re: cancelation of hearing set for 3/21/2024; reviewed response from A.Hovanic.	ACW	0.10	\$480.00	\$48.00
03/14/2024	Litigation and Adversary Proceedings: Reviewed email from J.Guy re: consolidated responses for Fourth Circuit; reviewed response from B.Erens.	ACW	0.20	\$480.00	\$96.00
03/18/2024	Litigation and Adversary Proceedings: Reviewed email exchange between JWG and J.Guy re: briefing for Fourth Circuit matter.	ACW	0.10	\$480.00	\$48.00
03/18/2024	Litigation and Adversary Proceedings: Reviewed J.Guy's rough draft for Fourth Circuit brief.	ACW	0.50	\$480.00	\$240.00

Statement # 1135 - 04/11/2024

03/18/2024	Litigation and Adversary Proceedings: Reviewed email from D.Felder re: Fourth Circuit's rules applicable to appellate briefs.	ACW	0.10	\$480.00	\$48.00
03/18/2024	Litigation and Adversary Proceedings: Reviewed email from S.Whitney re: disclosure to be filed with Fourth Circuit.	ACW	0.10	\$480.00	\$48.00
03/18/2024	Litigation and Adversary Proceedings: Reviewed draft motion for permission to file a separate brief in Fourth Circuit matter.	ACW	0.30	\$480.00	\$144.00
03/19/2024	Litigation and Adversary Proceedings: Reviewed email from D.Wright responding to debtors' motion filed in Fourth Circuit.	ACW	0.10	\$480.00	\$48.00
03/19/2024	Litigation and Adversary Proceedings: Reviewed email from C.Redmond re: debtors' plan to withdraw motion filed with Fourth Circuit; reviewed email from T.Waldrep objecting to motion.	ACW	0.20	\$480.00	\$96.00
03/20/2024	Litigation and Adversary Proceedings: Reviewed email from J.Guy attaching Fourth Circuit Order allowing separate briefs.	ACW	0.10	\$480.00	\$48.00
03/22/2024	Litigation and Adversary Proceedings: Reviewed and edited brief for Fourth Circuit; emailed suggested changes to JWG and Orrick team.	ACW	5.30	\$480.00	\$2,544.00
03/22/2024	Fee Application Preparation: Draft and serve February Monthly Fee Statements for GWM and FCR.	BLF	0.30	\$190.00	\$57.00
03/23/2024	Litigation and Adversary Proceedings: Reviewed second version of Fourth Circuit brief and noted edits; emailed same to Orrick team.	ACW	0.90	\$480.00	\$432.00
03/25/2024	Litigation and Adversary Proceedings: Reviewed most recent version of Fourth Circuit brief and prepared redline edits; forwarded redlined document to Orrick team.	ACW	1.50	\$480.00	\$720.00
03/29/2024	Litigation and Adversary Proceedings: Reviewed email from J.Ellman to chambers re: consolidating hearings in DBMP and Aldrich cases regarding subpoenas for claims information and response from chambers.	ACW	0.20	\$480.00	\$96.00

Quantity Subtotal 10.9

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	10.6	\$480.00	\$5,088.00
Brittany L. Franklin	0.3	\$190.00	\$57.00
	Quantity Total		10.9
		Subtotal	\$5,145.00

Statement # 1135 - 04/11/2024

Total	\$5,145.00
Payment (05/24/2024)	-\$3,009.83
Payment (05/28/2024)	-\$1,620.68
Balance Owing	\$514.49

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1017	11/08/2023	\$812.70	\$731.71	\$80.99
1050	12/05/2023	\$1,447.00	\$1,303.00	\$144.00
1080	01/09/2024	\$1,287.10	\$1,161.11	\$125.99
1105	03/04/2024	\$2,930.20	\$2,637.40	\$292.80
1126	04/15/2024	\$480.00	\$432.00	\$48.00
1167	06/17/2024	\$1,646.20	\$0.00	\$1,646.20
1175	07/01/2024	\$2,475.80	\$0.00	\$2,475.80

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1135	04/29/2024	\$5,145.00	\$4,630.51	\$514.49
			Outstanding Balance	\$5,328.27
			Total Amount Outstanding	\$5,328.27

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255



Grier Wright Martinez, PA

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Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1167
Date: 05/30/2024
Due On: 06/17/2024

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
04/03/2024	Litigation and Adversary Proceedings: Reviewed and edited FCR's response to ACC's motion to quash subpoenas to the debtors; exchanged emails with J.Guy re: same.	ACW	1.60	\$480.00	\$768.00
04/05/2024	Professional Retention/Fee Issues: Reviewed and responded to email from D.Felder re: application to employ TetraRo.	ACW	0.20	\$480.00	\$96.00
04/05/2024	Fee Application Preparation: Draft monthly fee requests for GWM and FCR. Send to D. Felder.	BLF	0.40	\$190.00	\$76.00
04/09/2024	Professional Retention/Fee Issues: Reviewed and responded to email from D.Felder re: Orrick's monthly invoice.	ACW	0.10	\$480.00	\$48.00
04/09/2024	Professional Retention/Fee Issues: Reviewed Orrick's fee request for March and sent response to D.Felder.	ACW	0.20	\$480.00	\$96.00
04/11/2024	Fee Application Preparation: Draft proposed order for applications for compensation for FCR and professionals. Upload the same.	BLF	0.30	\$190.00	\$57.00

Statement # 1167 - 05/30/2024

04/11/2024	Fee Application Preparation: Circulate March fee requests for GWM and FCR to service list.	BLF	0.10	\$190.00	\$19.00
04/16/2024	Litigation and Adversary Proceedings: Reviewed email from S.Whitney summarizing Seiman motion to require debtors to make admissions re: funding agreements.	ACW	0.20	\$480.00	\$96.00
04/17/2024	Litigation and Adversary Proceedings: Reviewed Fourth Circuit Order denying ACC/Seiman petitions for direct appeal.	ACW	0.20	\$480.00	\$96.00
04/24/2024	Case Administration and Business Operations: Reviewed update on multiple asbestos cases circulated by S.Whitney.	ACW	0.30	\$480.00	\$144.00
04/24/2024	Litigation and Adversary Proceedings: Reviewed email from D.Carnie re: matters scheduled for consolidated hearing for Aldrich Pump & DBMP cases.	ACW	0.30	\$480.00	\$144.00
				Quantity Subtotal	3.9
				Services Subtotal	\$1,640.00

Expenses

Date	Notes	Quantity	Rate	Total	
04/19/2024	Online Research - Pacer: Online Research - Pacer - April 2024	1.00	\$6.20	\$6.20	
				Expenses Subtotal	\$6.20

Time Keeper	Quantity	Rate	Total	
A. Cotten Wright	3.1	\$480.00	\$1,488.00	
Brittany L. Franklin	0.8	\$190.00	\$152.00	
			Quantity Total	3.9
			Subtotal	\$1,646.20
			Total	\$1,646.20

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
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Statement # 1167 - 05/30/2024

1017	11/08/2023	\$812.70	\$731.71	\$80.99
1050	12/05/2023	\$1,447.00	\$1,303.00	\$144.00
1080	01/09/2024	\$1,287.10	\$1,161.11	\$125.99
1105	03/04/2024	\$2,930.20	\$2,637.40	\$292.80
1126	04/15/2024	\$480.00	\$432.00	\$48.00
1135	04/29/2024	\$5,145.00	\$4,630.51	\$514.49
1175	07/01/2024	\$2,475.80	\$0.00	\$2,475.80

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1167	06/17/2024	\$1,646.20	\$0.00	\$1,646.20
Outstanding Balance				\$5,328.27
Total Amount Outstanding				\$5,328.27

Please make all amounts payable to: Grier Wright Martinez, PA
 Our tax ID is 56-1643255



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1175
Date: 06/14/2024
Due On: 07/01/2024

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
05/02/2024	Asbestos Matters: Reviewed case updates circulated by S.Whitney.	ACW	0.20	\$480.00	\$96.00
05/02/2024	Case Administration and Business Operations: Reviewed email from D.Carnie noting issue regarding case updates.	ACW	0.10	\$480.00	\$48.00
05/09/2024	Litigation and Adversary Proceedings: Reviewed and responded to email from S.Whitney re: draft response for Fourth Circuit to ACC motions	ACW	0.20	\$480.00	\$96.00
05/15/2024	Professional Retention/Fee Issues: Reviewed email from S.Abel re: questions regarding fee application from TetraRho and sent response. Exchanged emails with J.Guy re: same.	ACW	0.30	\$480.00	\$144.00
05/28/2024	Litigation and Adversary Proceedings: Reviewed and edited response to motions for leave to appeal order denying dismissal filed by Semian & ACC.	ACW	1.50	\$480.00	\$720.00
05/28/2024	Litigation and Adversary Proceedings: Exchanged multiple emails with Orrick team and JWG re: final	ACW	0.50	\$480.00	\$240.00

	response to motion for leave to appeal. Filed response electronically.				
05/28/2024	Professional Retention/Fee Issues: Draft Pro Hac Vice Applications for J. Guy in District Court cases. Emails with J. Guy re same.	BLF	1.00	\$190.00	\$190.00
05/29/2024	Litigation and Adversary Proceedings: Sent emails to all counsel in appeals pending before District Court seeking consent to pro hac vice admission for J.Guy; reviewed responses and followed up on requests for consent.	ACW	0.30	\$480.00	\$144.00
05/29/2024	Litigation and Adversary Proceedings: Prepared final edits to FCR's response to motion for leave to appeal in the Semian matter and filed same; circulated filing receipt to FCR and Orrick team.	ACW	0.40	\$480.00	\$192.00
				Quantity Subtotal	4.5
				Services Subtotal	\$1,870.00

Expenses

Date	Notes	Quantity	Rate	Total	
05/30/2024	U.S.D.C Filing Fee: Two Pro Hac Vice Application Fees - J. Guy	1.00	\$600.00	\$600.00	
05/31/2024	Online Research - Pacer: May Pacer	1.00	\$5.80	\$5.80	
				Expenses Subtotal	\$605.80

Time Keeper	Quantity	Rate	Total	
A. Cotten Wright	3.5	\$480.00	\$1,680.00	
Brittany L. Franklin	1.0	\$190.00	\$190.00	
			Quantity Total	4.5
			Subtotal	\$2,475.80
			Total	\$2,475.80

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
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Statement # 1175 - 06/14/2024

1017	11/08/2023	\$812.70	\$731.71	\$80.99
1050	12/05/2023	\$1,447.00	\$1,303.00	\$144.00
1080	01/09/2024	\$1,287.10	\$1,161.11	\$125.99
1105	03/04/2024	\$2,930.20	\$2,637.40	\$292.80
1126	04/15/2024	\$480.00	\$432.00	\$48.00
1135	04/29/2024	\$5,145.00	\$4,630.51	\$514.49
1167	06/17/2024	\$1,646.20	\$0.00	\$1,646.20

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1175	07/01/2024	\$2,475.80	\$0.00	\$2,475.80
Outstanding Balance				\$5,328.27
Total Amount Outstanding				\$5,328.27

Please make all amounts payable to: Grier Wright Martinez, PA
 Our tax ID is 56-1643255

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

February 1, 2024 through May 31, 2024

Project Category	Total Hours for the Period	Total Hours from the Petition Date	Total Fees for the Period	Total Fees from the Petition Date
Case Administration & Business Operations	0.8	51.8	\$384.00	\$19,977.00
Court Hearings	0.3	61.6	\$144.00	\$25,119.00
Professional Retention / Fee Issues	1.9	19.05	\$622.00	\$7,684.25
Fee Application Preparation	1.1	87.8	\$209.00	\$12,964.00
Asbestos Matters	1.2	31.4	\$576.00	\$12,816.00
Litigation	15.0	65.8	\$7,200.00	\$28,561.50
Plan & Disclosure Statement	0.0	0.20	\$0.00	\$80.00
Total	20.3	317.65	\$9,135.00	\$107,201.75

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

Expense Category	Total Expenses for the Interim Period	Total Expenses from the Petition Date
Court Fee – <i>Pro Hac Vice</i> Applications	\$600.00	\$1,731.00
Westlaw – Online Research	\$0.00	\$268.46
Pacer – Online Research	\$12.00	\$478.74
TOTAL	\$612.00	\$2,478.20

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

Name of Professional	Position – Bar Year	Hourly Billing Rate	Total Hours Billed	Total Compensation
A. Cotten Wright	Member- 2001	\$480	18.2	\$8,736.00
Brittany L. Franklin	Paralegal	\$190	2.1	\$399.00
Summer Clerk	Summer Clerk	\$175	0.0	\$0.00

EXHIBIT E

SUMMARY OF PRIOR FEE APPLICATIONS

Document	Interim Fee Application Date and Doc. No.	Period Covered	Fees Requested/Allowed	Expenses Requested/Allowed	Order Approving Interim Application
1 st Interim	11/9/2020 Doc. No. 421	9/23/2020 – 9/30/2020	\$1,960.00	\$281.00	Doc. No. 460 12/3/2020
2 nd Interim	3/11/2021 Doc. No. 615	October 1, 2020 – January 31, 2021	\$21,926.25	\$355.00	Doc. No. 660 4/2/2021
3 rd Interim	7/9/2021 Doc. No.763	February 1, 2021- May 31, 2021	\$17,825.00	\$915.78	Doc. No. 794 8/2/2021
4 th Interim	10/29/2021 Doc. No. 862	June 1, 2021 – September 30, 2021	\$14,200.00	\$96.32	Doc No. 927 12/8/2021
5 th Interim	03/01/2022 Doc. No. 1007	October 1, 2021 – January 31, 2022	\$6,542.50	\$44.00	Doc. No. 1064 03/23/2022
6 th Interim	07/11/2022 Doc. No. 1263	February 1, 2022- May 31, 2022	\$4,335.00	\$31.90	Doc. No. 1314 08/03/2022
7 th Interim	11/7/2022 Doc. No. 1389	June 1, 2022- September 30, 2022	\$4,797.50	\$37.30	Doc. No. 1456 12/7/2022
8 th Interim	3/8/2023 Doc. No. 1630	October 1, 2022 – January 31, 2023	\$4,017.50	\$8.70	Doc. No. 1826 6/21/2023
9 th Interim	7/12/23 Doc. No 1866	February 1, 2023 – May 31, 2023	\$5,915.00	\$309.30	Doc. No. 1904 8/2/2023

10 th Interim	11/7/2023 Doc. No. 1989	June 1, 2023 – September 30, 2023	\$10,110.00	\$29.10	Doc. No. 2025 11/30/2023
11 th Interim	3/15/2024 Doc. No. 2149	October 1, 2023 – January 31, 2024	\$6,438.00	\$39.00	Doc. No. 2195 04/11/2024