

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

<p><b>In re:</b></p> <p><b>ALDRICH PUMP LLC, et al.,<sup>1</sup></b></p> <p style="text-align: center;"><b>Debtors.</b></p>	<p>Chapter 11</p> <p>Case No. 20-30608</p> <p>Jointly Administered</p>
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**SUMMARY OF TWELFTH INTERIM APPLICATION OF ORRICK, HERRINGTON & SUTCLIFFE LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND 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:	Orrick, Herrington & Sutcliffe LLP
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants’ Representative
Date of Order Approving Retention:	October 15, 2020, effective as of August 21, 2020 (Doc. No. 394)
Period for which compensation and reimbursement is sought:	February 1, 2024 – May 31, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$563,076.50
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$19,282.50
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$582,359.00

This is a(n)   x   interim    final application.

<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.



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

**In re:**

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

**Debtors.**

Chapter 11

Case No. 20-30608

Jointly Administered

**TWELFTH INTERIM APPLICATION OF ORRICK, HERRINGTON &  
SUTCLIFFE LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND 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**

Orrick, Herrington & Sutcliffe LLP (“Orrick”), counsel to Joseph W. Grier, III, the Court-appointed future claimants’ representative in these cases (the “FCR”), hereby brings its twelfth interim application for allowance of compensation of \$563,076.50 and reimbursement of expenses of \$19,282.50 for the period of February 1, 2024 through May 31, 2024 (the “Interim Period”) in accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals (Doc. No. 171) (the “Fee Procedures Order”), and in support, respectfully represents as follows:

**BACKGROUND**

1. On June 18, 2020 (the “Petition Date”), the above-captioned Debtors commenced their bankruptcy cases (together, the “Chapter 11 Case”) by filing voluntary petitions 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

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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.

authorized to continue to 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 Chapter 11 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.

4. On October 15, 2020, the Court entered an order authorizing the FCR to retain Orrick as his counsel in this Chapter 11 Case, effective as of August 21, 2020. (Doc. No. 394).

5. Pursuant to the Fee Procedures Order, professionals may request monthly compensation and reimbursement of expenses. 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 Procedures 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**

6. Pursuant to the Fee Procedures Order, Orrick has submitted monthly fee statements to the Debtors for the Interim Period. Copies of the relevant monthly fee statements are attached as **Exhibit A-1 and A-4**. Summarized below are the requested professional fees and expenses and payments that Orrick has received on the same.

Date of Monthly Fee Statement	Description	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
3/11/2024	Forty-Second Monthly	2/1/2024 – 2/29/2024	\$79,275.50	\$1,068.86	\$75,304.31	\$5,040.05
4/9/2024	Forty-Third Monthly	3/1/2024 – 3/31/2024	\$235,371.50	\$15,274.19	\$227,108.54	\$23,537.15
5/10/2024	Forty-Fourth Monthly	4/1/2024 – 4/30/2024	\$111,179.00	\$1,048.28	\$101,109.38	\$11,117.90
6/12/2024	Forty-Fifth Monthly	5/1/2024 – 5/31/2024	\$137,250.50	\$1,891.17	\$0.00	\$139,141.67
<b>Total:</b>			<b>\$563,076.50</b>	<b>\$19,282.50</b>	<b>\$403,522.23</b>	<b>\$178,836.77</b>

7. In total, Orrick has submitted fee statements during the Interim Period for total fees of \$563,076.50 and total expenses of \$19,282.50. As of the date of this Application, no party has objected to the fee statements circulated by Orrick.

**SUMMARY OF SERVICES RENDERED**

8. Attached hereto as **Exhibits A-1 through A-4** are Orrick’s monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by Orrick during the Interim Period. In summary, during the Interim Period, Orrick expended a total of 576.9 hours rendering necessary services in this Chapter 11 Case and incurred total fees of \$563,076.50 and \$19,282.50 in expenses.

9. As counsel to the FCR, Orrick provided a variety of services in connection with the Chapter 11 Case as set forth in the summary description below and in detail in **Exhibits A-1 through A-4**.

10. Orrick believes that the services it provided to the FCR in the context of the Chapter 11 Case during the Interim Period were necessary and beneficial to the administration of this case. Orrick further believes that its services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the tasks addressed.

11. Orrick 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. **Litigation – 545.4 hours, \$533,667.00.** During the Interim Period, counsel for the FCR reviewed and prepared pleadings regarding the motions for certification, motions to dismiss, and various other motions and appeal matters. Counsel for the FCR also strategized regarding next steps, prepared outlines and summaries, prepared for and participated in omnibus hearings in this Chapter 11 Case, and listened to omnibus hearings in other asbestos bankruptcy cases and reviewed the pleadings regarding the same. In addition, counsel for the FCR communicated with counsel for the Debtors' regarding case strategy and next steps.

B. **Orrick Compensation – 5.1 hours, \$6,280.00.** During the Interim Period, counsel for the FCR prepared and circulated Orrick's invoices and monthly fee statements for January, February, March, and April 2024. Counsel for the FCR also prepared and finalized its interim fee application for the period October 1, 2023 through January 31, 2024.

C. **FCR and Other Professionals' Retention – 2.9 hours, \$3,349.50.** During the Interim Period, counsel for the FCR reviewed, revised, and finalized the engagement letter and retention application with TetraRho LLC as the FCR's financial advisor.

D. **FCR and Other Professionals' Compensation – 8.0 hours, \$9,752.50.** During the Interim Period, counsel for the FCR reviewed and/or prepared monthly fee statements for Anderson Kill, Ankura, TetraRho, the FCR, and the FCR's counsel at Grier Wright Martinez PA, and reviewed interim fee applications regarding the same.

E. **Non-Working Travel – 15.5, \$10,027.50.** During the Interim Period, counsel for the FCR traveled to and from Charlotte, North Carolina for omnibus hearings in this Chapter 11 Case.

12. **Exhibit B** provides a summary of Orrick’s time by the project categories recommended by the Guidelines for Compensation and Reimbursement of Professionals referenced in Rule 2016-1 of this Court’s Local Rules of Practice and Procedure.

13. **Exhibit C** reflects a summary by category of the expenses that Orrick incurred during the Interim Period, which totaled \$19,282.50.

14. **Exhibit D** provides information as to Orrick’s professionals, including years of practice, position, billing rates, and the total number of hours billed during the Interim Period. Orrick maintains that its billing rates for the Interim Period, which reflect its customary hourly rates for 2024, should be deemed a “reasonable billing rate” for purposes of this Court’s determination of the “reasonableness” of the fees for the services that Orrick has rendered.

15. **Exhibit E** is a summary of Orrick’s prior interim applications for compensation in this Chapter 11 Case.

### **DISBURSEMENTS**

16. Orrick 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.

17. Orrick requests reimbursement for its actual and necessary expenses incurred during the Interim Period in the amount of \$19,282.50. A detailed breakdown of such expenses were included in Orrick’s invoices (attached hereto as **Exhibits A-1 through A-4**) and those

expenses are summarized in **Exhibit C**. Orrick's expenses during the Interim Period were necessary and reasonable under the circumstances of this Chapter 11 Case.

### **NOTICE**

18. 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 and Fee Procedures Order entered in this Chapter 11 Case. Orrick submits that, in light of the nature of the relief requested, no other or further notice need be provided.

### **NO PRIOR REQUEST**

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

### **CONCLUSION**

20. Based on the foregoing, Orrick makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred in connection with representing the FCR.

WHEREFORE, Orrick respectfully requests that the Court enter an Order:

1) Allowing interim compensation to Orrick in the amount of \$563,076.50 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 \$19,282.50 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay Orrick the amount of \$582,359.00, which is equal to 100% of Orrick's requested compensation for the Interim Period and 100% of Orrick's requested expense reimbursement for the Interim Period, less all previous payments made to Orrick pursuant to the Fee Procedures Order; and

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

Dated: July 11, 2024

Respectfully submitted,

/s/ A. Cotten Wright

A. Cotten Wright (State Bar No. 28162)

Grier Wright Martinez, PA

521 E Morehead Street, Suite 440

Charlotte, NC 28202

Telephone: (704) 332-0207

Facsimile: (704) 332-0215

Email: cwright@grierlaw.com

-and-

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com; dfelder@orrick.com

*Counsel for Joseph W. Grier, III,*

*Future Claimants' Representative*



# **EXHIBIT A-1**

**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
Debtors.	)	(Jointly Administered)
	)	

**FORTY-SECOND MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED  
BY ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO  
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,  
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”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Forty-Second Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from February 1, 2024 through February 29, 2024* (the “Monthly Fee Statement”).

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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.

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period February 1, 2024 through February 29, 2024 (the “Fee Statement Period”).

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

2. The total amounts of fees and expenses incurred by Orrick during the Fee Statement Period are as follows:

<b>Fee Statement Period: February 1, 2024 – February 29, 2024</b>	
Total Fees:	\$79,275.50 <sup>2</sup>
Total Expenses:	\$1,068.86
<b>TOTAL:</b>	<b>\$80,344.36</b>

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$72,416.81 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’s fees and (b) 100% of its incurred expenses.

**Billing Adjustments**

4. Pursuant to the Interim Compensation Order, Orrick’s time for non-working travel will be billed at 50% of the professional’s normal hourly rate. Accordingly, Orrick’s fees for non-working travel during this Fee Statement Period have been reduced by \$2,887.50 to reflect a 50% reduction of the professional’s normal hourly rate.

**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, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the

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<sup>2</sup> Includes a 50% reduction of hourly rates for time spent on non-working travel.

Debtors' counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 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 for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, 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., pamoamccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and Phillip S. Pavlick, Esq., ppavlick@mccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31<sup>st</sup> Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., stacy@cordes-law.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 and Davis Lee Wright, Esq., dwright@rc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com, and Todd E. Phillips, Esq., tphillips@capdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq.,

gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Orrick, no later than March 25, 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 Orrick an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required 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 Orrick.

This is the 11<sup>h</sup> day of March 2024.

/s/ Jonathan P. Guy

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

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Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

*Counsel for Joseph W. Grier, III,  
Future Claimants' Representative*

# **Exhibit A**



Grier Wright Martinez PA  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

March 5, 2024  
Client No. 24998  
Invoice No. 2170137

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through February 29, 2024 in connection with the matters described on the attached pages:	\$ 82,163.00
<i>Nonworking travel reduced by 50%:</i>	<i>(2,887.50)</i>
<b>SUBTOTAL:</b>	<b>\$ 79,275.50</b>
DISBURSEMENTS as per attached pages:	1,068.86
<b>TOTAL CURRENT FEES &amp; DISBURSEMENTS (Pay this Amount):</b>	<b>\$ <u>80,344.36</u></b>

Matter(s): 24998/2014, 2019, 2021, 2022

**DUE UPON RECEIPT**

The following is for information only:  
Previous Balance not included in this invoice:  
\$74,080.76  
If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,  
please reference your **INVOICE** and **CLIENT** numbers on your remittance.  
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

**REMITTANCE COPY - PLEASE RETURN WITH PAYMENT**

**REMITTANCE ADDRESS:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
Reference: 24998/ Invoice: 2170137*

**ELECTRONIC FUNDS TRANSFERS:**

**ACH & Wire Transfers:**  
**ABA Number 121000248**  
**SWIFT CODE: WFBIUS6S**  
**Account Number: 4123701088**  
Wells Fargo  
420 Montgomery Street  
San Francisco, CA 94104  
Account of  
Orrick, Herrington & Sutcliffe LLP  
Reference: 24998/ Invoice: 2170137  
E.I.N. 94-2952627

**OVERNIGHT DELIVERY:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
(304) 231-2703  
Reference: 24998/ Invoice:  
2170137*

**To pay online visit [www.e-billexpress.com/ebpp/Orrick/](http://www.e-billexpress.com/ebpp/Orrick/)**



Grier Wright Martinez PA  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

March 5, 2024  
Client No. 24998  
Invoice No. 2170137

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through February 29, 2024 in Connection With:

**Matter: 2014 - Aldrich Pump - Litigation**

02/01/24	J. Guy	Detailed analysis and review of Debtors' opposition to motion for certification (2.0); further analysis of dismissal order (.7); preparation for Feb. 9 oral argument (.5); emails to/from Debtors and ACC regarding discovery matters (.2); review of various asbestos debtor dockets (collected over separate occasions) (.8).	4.20	5,712.00
02/02/24	A. Eudy	Locate and obtain case law information for D. Felder.	0.10	35.00
02/02/24	J. Guy	Emails to/from J. Grier, Debtors' counsel, M. Hirst regarding Feb. 9 hearing (.2); prepare argument for hearing and review parties' motion to dismiss filings in Aldrich and other cases (separate occasions) (4.6); various emails to/from parties regarding briefing schedules (.2).	5.00	6,800.00
02/05/24	D. Felder	Review pleadings regarding motion to certify (1.5); telephone conference with Debtors and ACC regarding claims file sample (.5).	2.00	2,310.00
02/05/24	J. Guy	Review and analyze responses from Mr. Semian and ACC on direct appeal issue (2.4); review dockets of other asbestos cases (separate occasions) (1.2).	3.60	4,896.00
02/06/24	S. Whitney	Review ACC, Semian, and Debtors' motions regarding requests for certification and outline arguments for hearing.	3.30	2,557.50
02/06/24	D. Felder	Review pleadings in preparation for argument on certification motions.	4.50	5,197.50





Grier, Joseph W. III. - 24998  
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March 5, 2024  
Invoice No. 2170137

02/06/24	J. Guy	Strategize for Feb. 9 hearing (.8); emails to/from S. Whitney regarding bench memo (.3); emails to/from D. Felder regarding oral argument (.2).	1.30	1,768.00
02/07/24	S. Whitney	Review ACC, Semian, and Debtors' filings and case law regarding section 158(d)(2).	2.30	1,782.50
02/07/24	D. Felder	Prepare for oral argument regarding motions for certification.	6.00	6,930.00
02/07/24	J. Guy	Telephone conference with J. Grier regarding Feb. 9 argument and related matters (.5); telephone conference with Debtors' counsel, B. Erens regarding hearing (.1); review materials for hearing and comment on same (.8); work on argument outline (.4); review research on cert standards (.8); review dockets in pending asbestos cases (separate occasions) (1.0).	3.60	4,896.00
02/08/24	S. Whitney	Research interlocutory order appeals for J. Guy.	1.50	1,162.50
02/08/24	D. Felder	Review pleadings and prepare for argument on requests for certification.	3.00	3,465.00
02/08/24	J. Guy	Review various filings related to pending motions to dismiss (2.0); review and analyze potential issues for argument (1.8).	3.80	5,168.00
02/09/24	S. Whitney	Telephonic participation in hearing regarding ACC and Semian's request for certification.	2.40	1,860.00
02/09/24	D. Felder	Prepare for hearing on requests for certification (1.0); attend hearing and follow-up regarding same (3.5).	4.50	5,197.50
02/12/24	S. Whitney	Research prior Bestwall 2019 dismissal order briefing and federal rules at 4th Circuit.	1.60	1,240.00
02/12/24	J. Guy	Telephone conference with B. Erens regarding strategy (.1); emails to/from D. Felder regarding timing on 4th Circuit filings and related issues, analyze same (.8).	0.90	1,224.00
02/20/24	J. Guy	Emails to/from parties and court regarding continuing Feb. 29 hearing.	0.20	272.00
02/21/24	J. Guy	Review Judge Beyer's decision denying motion to dismiss in Bestwall and analyze same (2.0); review dockets of other asbestos cases (.8).	2.80	3,808.00



Grier, Joseph W. III. - 24998  
page 3

March 5, 2024  
Invoice No. 2170137

02/22/24	J. Guy	Strategize regarding briefing before the 4th Circuit and prepare outline for same (2.5); various emails to/from D. Felder and S. Whitney regarding same (.2).	2.70	3,672.00
02/27/24	D. Carnie	Review case law in preparation for strategy call with D. Felder.	1.60	1,112.00
02/27/24	J. Guy	Telephone conference with FCR concerning current issues and next steps (.5); telephone conference with FCR and claimant counsel regarding next steps (separate occasions) (.8); telephone conference with B. Erens regarding strategy (.2).	1.50	2,040.00
02/29/24	J. Guy	Review of filings in various asbestos cases, including Aldrich (separate occasions).	0.40	544.00
		<b>Total Hours</b>	<b>62.80</b>	
		<b>Total For Services</b>	<b>\$</b>	<b>73,649.50</b>

<b><u>Timekeeper Summary</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Dan Carnie	1.60	695.00	1,112.00
April E. Eudy	0.10	350.00	35.00
Debra L. Felder	20.00	1,155.00	23,100.00
Jonathan P. Guy	30.00	1,360.00	40,800.00
Sean Whitney	11.10	775.00	8,602.50
<b>Total All Timekeepers</b>	<b>62.80</b>	<b>\$1,172.76</b>	<b>\$73,649.50</b>

Disbursements

Hotel	913.94	
Other Business Meals	32.07	
Parking Expense	87.00	
Taxi Expense	35.85	
<b>Total Disbursements</b>		<b>\$1,068.86</b>

**Total For This Matter** **\$74,718.36**



Grier, Joseph W. III. - 24998  
page 4

March 5, 2024  
Invoice No. 2170137

For Legal Services Rendered Through February 29, 2024 in Connection With:

**Matter: 2019 - Aldrich Pump - Orrick Compensation**

02/06/24	J. Guy	Review Orrick invoices (separate occasions).	0.40	544.00
02/15/24	D. Felder	Review and revise Orrick's January prebill.	0.20	231.00
		Total Hours	0.60	
		Total For Services	\$	775.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.20	1,155.00	231.00
Jonathan P. Guy	0.40	1,360.00	544.00
Total All Timekeepers	0.60	\$1,291.67	\$775.00

**Total For This Matter** **\$775.00**



Grier, Joseph W. III. - 24998  
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March 5, 2024  
Invoice No. 2170137

For Legal Services Rendered Through February 29, 2024 in Connection With:

**Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation**

02/07/24	D. Felder	Review monthly and interim fee applications in Aldrich, Bestwall, and DBMP and update fee charts regarding same.	1.50	1,732.50
02/15/24	D. Felder	Review GWM and J. Grier's monthly fee statements and invoices for January 2024.	0.20	231.00
		Total Hours	1.70	
		Total For Services	\$	1,963.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	1.70	1,155.00	1,963.50
Total All Timekeepers	1.70	\$1,155.00	\$1,963.50

**Total For This Matter \$1,963.50**



# **EXHIBIT A-2**

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
	)	
Debtors.	)	(Jointly Administered)
_____	)	

**FORTY-THIRD MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS’ REPRESENTATIVE, 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”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Forty-Third Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from March 1, 2024 through March 31, 2024* (the “Monthly Fee Statement”).

<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.

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period March 1, 2024 through March 31, 2024 (the “Fee Statement Period”).

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

2. The total amounts of fees and expenses incurred by Orrick during the Fee Statement Period are as follows:

<b>Fee Statement Period: March 1, 2024 – March 31, 2024</b>	
Total Fees:	\$235,371.50
Total Expenses:	\$15,274.19
<b>TOTAL:</b>	<b>\$250,645.69</b>

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$227,108.54 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’s fees and (b) 100% of its incurred expenses.

**Billing Adjustments**

4. Pursuant to the Interim Compensation Order, Orrick’s time for non-working travel will be billed at 50% of the professional’s normal hourly rate. Accordingly, Orrick’s fees for non-working travel during this Fee Statement Period have been reduced by \$2,887.50 to reflect a 50% reduction of the professional’s normal hourly rate.

**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, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors’ counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com,



and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 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 for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, 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., pamoamccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartellmccarter.com and Phillip S. Pavlick, Esq., ppavlickmccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31<sup>st</sup> Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascittimccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., stacycordes-law.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., nramseyrc.com and Davis Lee Wright, Esq., dwrightrc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclaycapdale.com, James P. Wehner, Esq., jwehnercapdale.com, and Todd E. Phillips, Esq., tphillipscapdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompsonlawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn:

A. Cotten Wright, cwright@grierlaw.com).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an “Objection”), if any, must be served upon the Notice Parties, including Orrick, no later than April 23, 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 Orrick an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required 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 Orrick.

This is the 9<sup>th</sup> day of March 2024.

*/s/ Jonathan P. Guy*

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

*Counsel for Joseph W. Grier, III,  
Future Claimants' Representative*

# **Exhibit A**



Grier Wright Martinez P.A.  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

April 8, 2024  
Client No. 24998  
Invoice No. 2177986

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through March 31, 2024 in connection with the matters described on the attached pages:	\$ 235,371.50
DISBURSEMENTS as per attached pages:	15,274.19
<b>TOTAL CURRENT FEES &amp; DISBURSEMENTS (Pay this Amount):</b>	<b>\$ <u>250,645.69</u></b>

Matter(s): 24998/2014, 2019, 2020, 2021

**DUE UPON RECEIPT**

The following is for information only:  
Previous Balance not included in this invoice:  
\$88,876.87 If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,  
please reference your **INVOICE** and **CLIENT** numbers on your remittance.  
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

**REMITTANCE COPY - PLEASE RETURN WITH PAYMENT**

**REMITTANCE ADDRESS:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
Reference: 24998/ Invoice: 2177986*

**ELECTRONIC FUNDS TRANSFERS:**

**ACH & Wire Transfers:**  
**ABA Number 121000248**  
**SWIFT CODE: WFBIUS6S**  
**Account Number: 4123701088**  
Wells Fargo  
420 Montgomery Street  
San Francisco, CA 94104  
Account of  
Orrick, Herrington & Sutcliffe LLP  
Reference: 24998/ Invoice: 2177986  
E.I.N. 94-2952627

**OVERNIGHT DELIVERY:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
(304) 231-2703  
Reference: 24998/ Invoice:  
2177986*

**To pay online visit [www.e-billexpress.com/ebpp/Orrick/](http://www.e-billexpress.com/ebpp/Orrick/)**



Grier Wright Martinez PA  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

April 8, 2024  
Client No. 24998  
Invoice No. 2177986

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through March 31, 2024 in Connection With:

**Matter: 2014 - Aldrich Pump - Litigation**

03/01/24	D. Carnie	Review case law provided by S. Whitney in preparation for group call (.7); confer with D. Felder, J. Guy and S. Whitney regarding next steps in case (.2); follow up with D. Felder regarding specifics for me to follow up on (.2); create list of relevant case law, then download and circulate selection to team (.1).	1.20	834.00
03/01/24	S. Whitney	Telephone conference with D. Felder and J. Guy to discuss stipulated briefing schedule for 4th Circuit cert motions.	0.50	387.50
03/01/24	J. Guy	Telephone conference with D. Felder, S. Whitney and D. Carnie regarding case status, next steps, staffing and prepare for same (.7); emails to/from FCR and Debtors regarding stipulated briefing schedule for the 4th Circuit (.2).	0.90	1,224.00
03/02/24	D. Carnie	Review filings in LTL, DBMP, and Bestwall bankruptcy cases, including contested matters and related adversary proceedings (2.5); review other case law in bankruptcy cases involving asbestos liabilities in preparation for team call next week (1.5).	4.00	2,780.00
03/03/24	D. Carnie	Review relevant case law in the Fourth Circuit (1.0); compare arguments raised in our filings (.4); evaluate strengths and weaknesses of various arguments made (.2).	1.60	1,112.00
03/04/24	J. Guy	Detailed review and analysis of findings of DBMP referee on discovery disputes and related issues (.8); email to FCR regarding same (.1).	0.90	1,224.00



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April 8, 2024  
Invoice No. 2177986

03/05/24	D. Carnie	Review recent filings in the DBMP case (.6); review Bestwall decisions and filings (2.1).	2.70	1,876.50
03/06/24	S. Whitney	Research admission and appearance requirements for 4th Circuit (1.4); summarize Appellants' Motion for Leave to Appeal to District Court Dismissal Order in Bestwall, Dkt. 3297 (.8).	2.20	1,705.00
03/07/24	D. Carnie	Attend and take notes during DBMP hearing.	2.00	1,390.00
03/07/24	D. Carnie	Confer with Debtors' counsel regarding next steps.	1.00	695.00
03/07/24	S. Whitney	DBMP hearing regarding discovery disputes (1.9); strategy call regarding 4th Circuit appeal of order denying Motion to Dismiss (.9).	2.80	2,170.00
03/07/24	D. Felder	Telephonic participation in DBMP hearing regarding discovery issues.	1.70	1,963.50
03/07/24	D. Felder	Telephone conference with Debtors' counsel regarding strategy and next steps.	0.90	1,039.50
03/07/24	J. Guy	Attend DBMP telephone conference on discovery disputes (.7); email to FCR regarding same (.2).	0.90	1,224.00
03/11/24	S. Whitney	Draft J. Guy appearance of counsel form for 4th Circuit (.1); DBMP Hearing regarding legal custodian issues (.2).	0.30	232.50
03/11/24	J. Guy	Attend DBMP status conference on various discovery disputes, review related filings (.4); email to FCR regarding hearing (.1); review dockets/filings in Bestwall, DBMP and Aldrich, bankruptcy and appellate (collected over separate occasions) (1.5); initial review of Petitioners' filings with the 4th Circuit for direct review (1.2).	3.20	4,352.00
03/12/24	D. Carnie	Review Fourth Circuit Petition filed by Semian.	1.30	903.50
03/12/24	S. Whitney	Review Semian petition to 4th Circuit regarding Motion to Dismiss direct appeal.	0.30	232.50
03/13/24	D. Carnie	In preparation for strategy call, review ACC petition and related case law (2); review Semian petition (.5); review previous filings (2); review notes from last meeting with Debtors' counsel (.5); consolidate notes, identifying relevant cases (.4).	5.40	3,753.00
03/13/24	S. Whitney	Finalize and file appearance of counsel form for J. Guy at 4th Circuit.	0.40	310.00



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April 8, 2024  
Invoice No. 2177986

03/13/24	J. Guy	Review Petitioners' filings for direct review and work on outline for FCR response (3.0); review motion for consolidated briefing (.2).	3.20	4,352.00
03/14/24	D. Carnie	Review case law and consolidate further findings.	1.30	903.50
03/14/24	D. Carnie	Review case law regarding appellate discretion in granting certification, then consolidate and circulate findings (2.9); review dockets in cases where certification was granted or denied for additional guidance on appellate discretion (4.8).	7.70	5,351.50
03/14/24	J. Guy	Review 4th Circuit order on consolidated briefing (.1); numerous emails and telephone conference to/from FCR team and Debtors regarding correction of order (separate occasions) (.6); analyze research on standard for reviewing Circuit court petitions (2.5).	3.20	4,352.00
03/15/24	D. Carnie	On request of J. Guy, correspond with Legal Services and T. Grosko to determine filing requirements for appellate brief.	0.40	278.00
03/15/24	D. Carnie	Review case law to assist J. Guy in drafting Fourth Circuit response brief (1.4); review petition and notices of appeal, and send to J. Guy for further review (.3); research further case law in Fourth Circuit, and summarize (1.2).	2.90	2,015.50
03/15/24	D. Carnie	Correspond with document services regarding template for Fourth Circuit response brief (.4); make modifications to template document (1.8); send template to J. Guy (.1).	2.30	1,598.50
03/15/24	D. Carnie	Send case law to assist J. Guy in drafting Fourth Circuit response brief.	0.10	69.50
03/15/24	J. Guy	Continued review of prior filings by FCR, petitions for direct review, current and previous, and case law governing such petitions (3.5); numerous emails to/from D. Carnie regarding same (.7); preparation of FCR response (4.0).	8.20	11,152.00
03/16/24	D. Carnie	Draft fact narrative for Fourth Circuit response brief.	2.30	1,598.50
03/16/24	J. Guy	Continued drafting of FCR response to 4th Circuit petitions.	7.50	10,200.00
03/17/24	D. Carnie	Draft fact narrative for Circuit response brief.	4.00	2,780.00



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03/17/24	D. Carnie	Review filings and organize notes for Circuit brief fact narrative.	0.80	556.00
03/18/24	D. Carnie	Confer with S. Whitney regarding division of tasks for drafting fact narrative.	0.50	347.50
03/18/24	D. Carnie	Draft Circuit brief fact narrative (.6); after conferring with J. Guy on outline, review filings (2); modify fact narrative to implement suggestions (4.5).	7.10	4,934.50
03/18/24	S. Whitney	Research and draft FCR response for 4th Circuit (Case No. 24-148).	2.50	1,937.50
03/18/24	S. Whitney	Draft and file corporate disclosure statement for 4th Circuit (Case No. 24-128).	0.50	387.50
03/18/24	D. Felder	Review local 4th Circuit Rules and FRAP regarding disclosure statement, briefs, and related rules (.7); review draft disclosure statement and emails regarding same with S. Whitney (.5); review emails from J. Guy and Orrick team regarding briefing in 4th Circuit (1.0).	2.20	2,541.00
03/18/24	J. Guy	Telephone conference with B. Erens regarding case status and next steps (various occasions) (.2); telephone conference with FCR regarding same (.1); attention to correction/clarification of consolidated briefing order and numerous emails to/from FCR, Orrick team and Debtors regarding same (3.5); analyze case law on direct petitions (2.0); work on insert for FCR brief (4.5).	10.10	13,736.00
03/19/24	D. Carnie	Send email regarding draft progress to J. Guy (.1); continue to draft 4th Circuit brief (2.8).	2.90	2,015.50
03/19/24	D. Carnie	Confer with J. Guy and incorporate comments into legal standard (.6); confer with S. Whitney and discuss draft of brief (.3); draft fact narrative for brief (4.5); send to S. Whitney (.1).	5.50	3,822.50
03/19/24	S. Whitney	Draft FCR Response to ACC and Semian Petitions for Direct Appeal of Dismissal Order to 4th Circuit.	8.90	6,897.50
03/19/24	J. Guy	Continued work on response brief to petitions (6.0); continued work on briefing schedule and clarification regarding same (1.5).	7.50	10,200.00
03/20/24	D. Carnie	Review redline of Circuit draft by S. Whitney and new version (.5); edit and send to D. Felder and J. Guy (2.5).	3.00	2,085.00





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Invoice No. 2177986

03/20/24	S. Whitney	Review and revise FCR Response to ACC and Semian Petitions for Direct Appeal of Dismissal Order to 4th Circuit.	0.20	155.00
03/20/24	J. Guy	Review prior FCR filings, filings from Bestwall regarding petitions, petition filings from other cases (3.0); continued preparation and drafting of response (4.5); numerous emails to/from D. Carnie, S. Whitney, and D. Felder regarding response and briefing schedule (1.0).	8.50	11,560.00
03/21/24	D. Carnie	Condense draft (1.5); confer with J. Guy, D. Felder and S. Whitney (.2); confer with S. Whitley regarding same (.2); cite check, implement changes per J. Guy's suggestions and send to S. Whitney (2.7).	4.60	3,197.00
03/21/24	S. Whitney	Revise FCR Response to ACC and Semian Petitions for Direct Appeal of Dismissal Order to 4th Circuit.	8.80	6,820.00
03/21/24	J. Guy	Finalize FCR response to 4th Circuit petitions, edit as applicable (7.0); emails to/from Orrick team regarding same (separate occasions) (.8).	7.80	10,608.00
03/22/24	D. Carnie	Confer with Debtors' counsel and confer with S. Whitney after (1.1); follow up with J. Guy as to next steps (.1); implement edits to condense draft and compare notes with S. Whitney (2.0); review further suggestions from J. Guy and FCR, and implement (3.0); compare notes with S. Whitney (.3); prepare exhibits for filing (.5).	7.00	4,865.00
03/22/24	S. Whitney	Revise FCR Response to ACC and Semian Petitions for Direct Appeal of Dismissal Order to 4th Circuit.	7.60	5,890.00
03/22/24	M. Bostwick	Review and comment on draft response to request for direct appeal.	1.70	2,167.50
03/22/24	J. Guy	Telephone conference with Debtors and FCR counsel regarding pending petitions before the 4th Circuit, prepare for call (.8); emails to/from C. Wright, FCR, and Orrick team regarding finalizing response to petitions (.6); finalize and proof same (4.5).	5.90	8,024.00
03/23/24	D. Carnie	Implement further suggestions from FCR (.5); adapt suggestions from M. Bostwick on previous version to current and circulate to S. Whitney (1.0), cite checking brief (5.4).	6.90	4,795.50



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03/23/24	S. Whitney	Revise FCR Response to ACC and Semian Petitions for Direct Appeal of Dismissal Order to 4th Circuit.	1.80	1,395.00
03/24/24	S. Whitney	Revise FCR Response to ACC and Semian Petitions for Direct Appeal of Dismissal Order to 4th Circuit.	3.30	2,557.50
03/24/24	J. Guy	Review and tighten FCR response to conform to page limit and incorporate internal comments/review (6.5); numerous emails to/from Orrick team regarding same (.4).	6.90	9,384.00
03/25/24	D. Carnie	Proof brief.	0.30	208.50
03/25/24	S. Whitney	Review and revise FCR Response to ACC and Semian Petitions for Direct Appeal of Dismissal Order to 4th Circuit.	3.60	2,790.00
03/25/24	J. Guy	Final editing and review of FCR response.	6.50	8,840.00
03/26/24	D. Carnie	Leave voicemail for deputy clerk to address misunderstanding regarding address.	0.10	69.50
03/26/24	J. Guy	Various emails to/from FCR, C. Wright and Orrick team regarding correction notices from 4th Circuit, address same.	2.40	3,264.00
03/27/24	S. Whitney	Review and summarize ACC Objection to DBMP subpoena for claims records from Aldrich and Bestwall (DBMP Dkt. 2730).	0.50	387.50
03/27/24	J. Guy	Review Bestwall, DBMP, and Aldrich dockets, bankruptcy and appellate (collected over separate occasions).	2.00	2,720.00
03/28/24	D. Carnie	Attend Bestwall hearing on certification for appeal to Fourth Circuit, take notes (2.3); check Aldrich docket (.1).	2.40	1,668.00
03/28/24	S. Whitney	Attend Bestwall certification for direct appeal hearing regarding Dismissal Order (2.4); summarize Judge Beyer's holdings regarding ACC and Mr. Buckingham's certification requests (0.8).	3.20	2,480.00
03/28/24	J. Guy	Attend Bestwall hearing on petitions for direct review on dismissal order and lift stay order and prepare for same (3.0); emails to/from Orrick team and FCR regarding hearing and next steps in Aldrich/Murray (.3); emails to/from Debtors and ACC regarding estimation discovery and parameters of same (.3).	3.60	4,896.00
03/29/24	D. Carnie	Review Aldrich, DBMP and (appellate) LTL dockets.	0.10	69.50



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03/29/24	S. Whitney	Draft FCR Response to DBMP Subpoenas of Aldrich/Murray (3.6); pull relevant filings and transcripts from 2022 and 2024 subpoenas (.5).	4.10	3,177.50
03/29/24	J. Guy	Attention to various ACC requests to quash and strike subpoenas across Bestwall, DBMP and Aldrich (.6); attention to requests in DBMP regarding discovery disputes with debtor (.3).	0.90	1,224.00
Total Hours			229.50	
Total For Services			\$	226,733.00

<b>Timekeeper Summary</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Mel Bostwick	1.70	1,275.00	2,167.50
Dan Carnie	81.40	695.00	56,573.00
Debra L. Felder	4.80	1,155.00	5,544.00
Jonathan P. Guy	90.10	1,360.00	122,536.00
Sean Whitney	51.50	775.00	39,912.50
<b>Total All Timekeepers</b>	<b>229.50</b>	<b>\$987.94</b>	<b>\$226,733.00</b>

Disbursements

Travel Expense, Air Fare	43.69	
Westlaw Research	15,043.00	
Word Processing	187.50	
<b>Total Disbursements</b>		<b>\$15,274.19</b>

**Total For This Matter** **\$242,007.19**



Grier, Joseph W. III. - 24998  
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April 8, 2024  
Invoice No. 2177986

For Legal Services Rendered Through March 31, 2024 in Connection With:

**Matter: 2019 - Aldrich Pump - Orrick Compensation**

03/01/24	J. Guy	Work on Orrick's invoices (separate occasions).	1.00	1,360.00
03/05/24	D. Felder	Review and revise February prebill (.3); begin preparing Orrick's quarterly fee application for the period October 1, 2023 through January 31, 2024 (.8).	1.10	1,270.50
03/07/24	D. Felder	Prepare Orrick's February monthly fee statement (.3); review and revise Orrick's interim fee application for the period October 1, 2023 through January 31, 2024 (.6).	0.90	1,039.50
03/21/24	J. Guy	Review Orrick invoices and fee statements (collected over separate occasions).	0.50	680.00
		Total Hours	3.50	
		Total For Services	\$	4,350.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	2.00	1,155.00	2,310.00
Jonathan P. Guy	1.50	1,360.00	2,040.00
Total All Timekeepers	3.50	\$1,242.86	\$4,350.00

**Total For This Matter \$4,350.00**



Grier, Joseph W. III. - 24998  
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April 8, 2024  
Invoice No. 2177986

For Legal Services Rendered Through March 31, 2024 in Connection With:

**Matter: 2020 - Aldrich Pump - FCR and Other Professionals Retention**

03/18/24	D. Felder	Review and revise retention application for TetraRho as financial advisor.	0.70	808.50
		Total Hours	0.70	
		Total For Services	\$	808.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.70	1,155.00	808.50
Total All Timekeepers	0.70	\$1,155.00	\$808.50

**Total For This Matter** **\$808.50**



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April 8, 2024  
Invoice No. 2177986

For Legal Services Rendered Through March 31, 2024 in Connection With:

**Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation**

03/04/24	D. Felder	Review Ankura's January 2024 invoice and prepare monthly fee statement (.3); email to notice parties (.1).	0.40	462.00
03/07/24	D. Felder	Prepare Ankura's interim fee application for the period October 1, 2023 through January 31, 2024.	0.70	808.50
03/21/24	D. Felder	Review Anderson Kill monthly fee statement for February and email to A. Pelton regarding same (.2); prepare Ankura's monthly statement for February and review invoice (.3).	0.50	577.50
03/21/24	J. Guy	Review invoices for FCR and FCR professionals (claims experts and insurance) (collected over separate occasions).	1.20	1,632.00
		Total Hours	2.80	
		Total For Services	\$	3,480.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	1.60	1,155.00	1,848.00
Jonathan P. Guy	1.20	1,360.00	1,632.00
Total All Timekeepers	2.80	\$1,242.86	\$3,480.00

**Total For This Matter \$3,480.00**

**\*\*\* COMBINED TOTALS \*\*\***

Total Hours	236.50	
Total Fees, all Matters		\$235,371.50
Total Disbursements, all Matters		\$15,274.19
Total Amount Due		\$250,645.69

# **EXHIBIT A-3**

**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
Debtors.	)	(Jointly Administered)
	)	

**FORTY-FOURTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED  
BY ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO  
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,  
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”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Forty-Fourth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from April 1, 2024 through April 30, 2024* (the “Monthly Fee Statement”).

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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.



**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period April 1, 2024 through April 30, 2024 (the “Fee Statement Period”).

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

2. The total amounts of fees and expenses incurred by Orrick during the Fee Statement Period are as follows:

<b>Fee Statement Period: April 1, 2024 – April 30, 2024</b>	
Total Fees:	\$111,179.00 <sup>2</sup>
Total Expenses:	\$1,048.28
<b>TOTAL:</b>	<b>\$112,227.28</b>

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$101,109.38 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’s fees and (b) 100% of its incurred expenses.

**Billing Adjustments**

4. Pursuant to the Interim Compensation Order, Orrick’s time for non-working travel will be billed at 50% of the professional’s normal hourly rate. Accordingly, Orrick’s fees for non-working travel during this Fee Statement Period have been reduced by \$7,140.00 to reflect a 50% reduction of the professional’s normal hourly rate.

**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, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the

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<sup>2</sup> Orrick’s fees were reduced by \$7,140.00 for non-working travel.

Debtors' counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 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 for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, 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., pamoamccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and Phillip S. Pavlick, Esq., ppavlick@mccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31<sup>st</sup> Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., stacy@cordes-law.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 and Davis Lee Wright, Esq., dwright@rc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com, and Todd E. Phillips, Esq., tphillips@capdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq.,

gthompson@lawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwright@grierlaw.com).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Orrick, no later than May 24, 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 Orrick an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required 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 Orrick.

This is the 10<sup>th</sup> day of May 2024.

/s/ Jonathan P. Guy

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

*Counsel for Joseph W. Grier, III,  
Future Claimants' Representative*

# **Exhibit A**



Grier, Joseph W. III.  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

May 7, 2024  
Client No. 24998  
Invoice No. 2184997

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through April 30, 2024 in connection with the matters described on the attached pages:	\$ 118,319.00
<i>Nonworking travel reduced by 50%:</i>	<i>(7,140.00)</i>
SUBTOTAL:	\$ 111,179.00
DISBURSEMENTS as per attached pages:	1,048.28
<b>TOTAL CURRENT FEES &amp; DISBURSEMENTS (Pay this Amount):</b>	<b>\$ 112,227.28</b>

Matter(s): 24998/2014, 2019, 2020, 2021, 2022

**DUE UPON RECEIPT**

The following is for information only:  
Previous Balance not included in this invoice:  
\$269,993.25  
If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,  
please reference your **INVOICE** and **CLIENT** numbers on your remittance.  
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

**REMITTANCE COPY - PLEASE RETURN WITH PAYMENT**

**REMITTANCE ADDRESS:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
Reference: 24998/ Invoice: 2184997*

**ELECTRONIC FUNDS TRANSFERS:**

**ACH & Wire Transfers:**  
**ABA Number 121000248**  
**SWIFT CODE: WFBIUS6S**  
**Account Number: 4123701088**  
*Wells Fargo  
420 Montgomery Street  
San Francisco, CA 94104  
Account of  
Orrick, Herrington & Sutcliffe LLP  
Reference: 24998/ Invoice: 2184997  
E.I.N. 94-2952627*

**OVERNIGHT DELIVERY:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
(304) 231-2703  
Reference: 24998/ Invoice:  
2184997*

**To pay online visit [www.e-billexpress.com/ebpp/Orrick/](http://www.e-billexpress.com/ebpp/Orrick/)**



Grier, Joseph W. III.  
 521 E. Morehead St., Suite 440  
 Charlotte, NC 28202  
 Attn: Joseph W. Grier, III.

May 7, 2024  
 Client No. 24998  
 Invoice No. 2184997

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through April 30, 2024 in Connection With:

**Matter: 2014 - Aldrich Pump - Litigation**

04/01/24	D. Carnie	Review docket.	0.10	69.50
04/01/24	S. Whitney	Research case law and revise FCR Response to ACC Motion regarding DBMP Subpoenas.	2.90	2,247.50
04/01/24	J. Guy	Prepare FCR response to ACC Motion to Quash Subpoenas.	5.50	7,480.00
04/02/24	S. Whitney	Revise FCR Response to ACC Motion to Quash DBMP subpoena to Debtors.	3.50	2,712.50
04/02/24	J. Guy	Review and revise FCR response to ACC Motion to Quash Subpoenas (5.0); attention to subpoena response and emails to/from S. Whitney and FCR regarding same (multiple occasions) (.8); telephone conference with B. Erens regarding pending matters (.3).	6.10	8,296.00
04/03/24	D. Carnie	Revise response to motion to quash.	1.50	1,042.50
04/03/24	S. Whitney	Finalize FCR Response to ACC Motion to Quash DBMP subpoenas to Debtors.	1.60	1,240.00
04/03/24	D. Felder	Review FCR's draft response to ACC's motion to quash DBMP subpoena.	0.50	577.50
04/03/24	J. Guy	Telephone conference with FCR regarding pending matters, FCR response to motion to quash (.3); final preparation of FCR Response (4.0); numerous emails to/from FCR, C. Wright, and Orrick team regarding same (.4).	4.70	6,392.00
04/04/24	D. Felder	Review Semian's motion to require admissions about funding agreements.	0.60	693.00
04/10/24	J. Guy	Review and analyze issues presented by filings across asbestos cases – Aldrich, Bestwall, and DBMP (collected over separate occasions).	1.50	2,040.00
04/12/24	D. Carnie	Review Fourth Circuit docket for new filings.	0.10	69.50



Grier, Joseph W. III. - 24998  
page 2

May 7, 2024  
Invoice No. 2184997

04/15/24	S. Whitney	Summarize and pull ACC Motion Re: Funding Agreement Enforceability and Debtor/Corporate Parent Statements, Dkt. 2172, for J. Guy (1.5); summarize and pull all DBMP and Aldrich filings related to April 17 hearing Re: DBMP Subpoenas for J. Guy (3.5); summarize and pull all Truck v. Kaiser SCOTUS filings Re: insurance neutrality doctrine for J. Guy (1.2).	6.20	4,805.00
04/16/24	D. Carnie	Circulate Fourth Circuit court order (.1); review dockets in adversary cases in relation to Semian's recently filed motion, and confer with S. Whitney (.9); review Bestwall docket per J. Guy's suggestion and circulate relevant filings (.5); draft email response to J. Guy regarding motion (.4).	1.90	1,320.50
04/16/24	S. Whitney	Finalize summary of ACC Motion Re: Funding Agreement Enforceability, Dkt. 2172, for J. Guy (1.2); finalize summary of DBMP/Aldrich filings related to April 17 hearing Re: DBMP Subpoenas for J. Guy (2.5); summarize Truck v. Kaiser SCOTUS filings Re: insurance neutrality doctrine and potential outcomes for J. Guy (6.8).	10.50	8,137.50
04/16/24	J. Guy	Travel to Charlotte – while preparing for hearing and analysis of Semian motion to require admissions from Trane (3.0); prepare for 4.17.24 hearing (2.5).	5.50	7,480.00
04/17/24	D. Carnie	Observe consolidated Aldrich and DBMP hearing regarding motion to quash subpoenas (.3); review objections to Semian motion, and draft summary for D. Felder, J. Guy and S. Whitney (1.3).	1.60	1,112.00
04/17/24	S. Whitney	Observe Aldrich/DBMP consolidated hearing regarding DBMP subpoenas.	3.10	2,402.50
04/17/24	S. Whitney	Review respondents briefs and finalize Truck v. Kaiser SCOTUS filings regarding insurance neutrality doctrine and potential outcomes for J. Guy.	4.30	3,332.50
04/17/24	S. Whitney	Review responses to Semian motion regarding funding agreements.	0.20	155.00



Grier, Joseph W. III. - 24998  
page 3

May 7, 2024  
Invoice No. 2184997

04/17/24	J. Guy	Prepare for April 17th hearing (.4); attend hearing (1.5); review and analyze asbestos dockets (collected over separate occasions) (1.5); emails to/from S. Whitney and D. Carnie regarding docket review and related issues (.4).	3.80	5,168.00
04/18/24	D. Carnie	Observe Bestwall hearing regarding motion to quash subpoenas.	1.50	1,042.50
04/18/24	D. Carnie	Confer with Orrick team on updates to FCR regarding case status.	0.50	347.50
04/18/24	S. Whitney	Observe Bestwall omnibus hearing regarding ACC motion to quash DBMP subpoenas.	1.60	1,240.00
04/18/24	S. Whitney	Call with J. Guy to discuss Kaiser summary and status update for Aldrich/Bestwall/DBMP cases.	1.20	930.00
04/18/24	D. Felder	Video conference with Orrick team (J. Guy, S. Whitney, and D. Carnie) regarding updates and strategy.	0.30	346.50
04/18/24	J. Guy	Telephonic participation in Bestwall hearing on subpoenas (1.0); review motion for relief from stay in Bestwall (.3); work on case summaries (separate occasions) (1.2).	1.50	2,040.00
04/19/24	D. Carnie	Draft pro hac vice applications.	0.60	417.00
04/19/24	D. Carnie	Review DBMP stay relief motion in preparation for meeting with S. Whitney regarding recent filings and preparing updates for team.	0.60	417.00
04/19/24	D. Carnie	Confer with S. Whitney on format for updates to team in related cases.	1.00	695.00
04/19/24	D. Carnie	Confer with T. Grosko about receiving calendar event updates in Aldrich case.	0.20	139.00
04/19/24	S. Whitney	Call with J. Guy regarding Aldrich case status (1.2); research and draft summary of Aldrich/DBMP/Bestwall case status (3.6).	4.80	3,720.00
04/21/24	D. Carnie	Review filings in LTL and Aldrich cases, inclusive of adversary proceedings and appeals, for weekly update to client.	4.30	2,988.50
04/21/24	D. Carnie	Circulate pro hac vice applications for myself and S. Whitney.	0.10	69.50
04/22/24	D. Carnie	Check Fourth Circuit docket for notable filings (.1); supplement chart with updates in Aldrich and related cases (.2).	0.30	208.50
04/22/24	S. Whitney	Research and draft summary of Aldrich/DBMP/Bestwall case status.	1.80	1,395.00





Grier, Joseph W. III. - 24998  
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May 7, 2024  
Invoice No. 2184997

04/23/24	S. Whitney	Finalize Aldrich template for case status updates for J. Guy.	1.90	1,472.50
04/23/24	J. Guy	Review case summaries prepared by S. Whitney.	0.60	816.00
04/24/24	D. Carnie	Prepare email to client with all substantive filings related to consolidated hearing tomorrow.	1.00	695.00
04/24/24	S. Whitney	Finalize Aldrich case summary for J. Grier review.	0.40	310.00
04/25/24	D. Carnie	Observe hearing on motions to quash to strike and to demand admissions (1.4); collect information to build list of in-house and outside counsel for parties (.2).	1.60	1,112.00
04/25/24	S. Whitney	Observe Aldrich/DBMP hearing regarding DBMP subpoenas and Maune motion on funding agreements.	1.40	1,085.00
04/25/24	D. Felder	Telephonic participation in omnibus hearing and follow-up emails regarding same.	1.00	1,155.00
04/25/24	J. Guy	Attend April 25th hearing on motion to require admissions (1.4); emails to/from S. Whitney and D. Carnie regarding pending matters and docket review (.4).	1.80	2,448.00
04/26/24	D. Carnie	Review recent filings on dockets in our and related cases and confer with S. Whitney on next update to the client.	1.50	1,042.50
04/26/24	S. Whitney	Review and edit Aldrich case updates for week of April 29.	0.30	232.50
04/29/24	D. Carnie	Draft case updates in the Aldrich Pump LLC bankruptcy and related cases for weekly summary to client.	0.90	625.50
04/29/24	S. Whitney	Revise Aldrich weekly case updates (.6); review 4th Circuit Bestwall opinion regarding sanction and contempt order (.4).	1.00	775.00
04/29/24	J. Guy	Review dockets of asbestos cases (collected over separate occasions) and 4th Circuit opinion on Maune sanctions (2.5); strategize regarding next steps in the case (.8).	3.30	4,488.00
04/30/24	D. Carnie	Review Fourth Circuit opinion in Bestwall.	0.30	208.50



Grier, Joseph W. III. - 24998  
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May 7, 2024  
Invoice No. 2184997

04/30/24	J. Guy	Review email from Debtors' counsel, J. Ellman, regarding proposed orders on motions to strike/quash subpoenas and respond to same (.2); strategize regarding next steps (.7).	0.90	1,224.00
		Total Hours	103.90	
		Total For Services	\$	100,458.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Dan Carnie	19.60	695.00	13,622.00
Debra L. Felder	2.40	1,155.00	2,772.00
Jonathan P. Guy	35.20	1,360.00	47,872.00
Sean Whitney	46.70	775.00	36,192.50
Total All Timekeepers	103.90	\$966.88	\$100,458.50

Disbursements

Hotel	376.11	
Out of Town Business Meals	93.94	
Taxi Expense	77.54	
Travel Expense, Air Fare	500.69	
Total Disbursements		\$1,048.28

**Total For This Matter \$101,506.78**



Grier, Joseph W. III. - 24998  
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May 7, 2024  
Invoice No. 2184997

For Legal Services Rendered Through April 30, 2024 in Connection With:

**Matter: 2019 - Aldrich Pump - Orrick Compensation**

04/08/24	D. Felder	Review Orrick's monthly fee statement for March.	0.50	577.50
		Total Hours	0.50	
		Total For Services	\$	577.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.50	1,155.00	577.50
Total All Timekeepers	0.50	\$1,155.00	\$577.50
<b>Total For This Matter</b>			<b>\$577.50</b>



Grier, Joseph W. III. - 24998  
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May 7, 2024  
Invoice No. 2184997

For Legal Services Rendered Through April 30, 2024 in Connection With:

**Matter: 2020 - Aldrich Pump - FCR and Other Professionals Retention**

04/03/24	D. Felder	Review, revise, and finalize TetraRho retention application (1.0); emails with J. Solganick regarding same (.2).	1.20	1,386.00
04/04/24	D. Felder	Finalize TetraRho retention application and engagement letter.	1.00	1,155.00
		Total Hours	2.20	
		Total For Services	\$	2,541.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	2.20	1,155.00	2,541.00
Total All Timekeepers	2.20	\$1,155.00	\$2,541.00

**Total For This Matter \$2,541.00**



Grier, Joseph W. III. - 24998  
page 8

May 7, 2024  
Invoice No. 2184997

For Legal Services Rendered Through April 30, 2024 in Connection With:

**Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation**

04/07/24	D. Felder	Review GWM and J. Grier monthly fee statements and invoices for March (.3); email with B. Franklin regarding same (.1).	0.40	462.00
		Total Hours	0.40	
		Total For Services	\$	462.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.40	1,155.00	462.00
Total All Timekeepers	0.40	\$1,155.00	\$462.00

**Total For This Matter \$462.00**



Grier, Joseph W. III. - 24998  
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May 7, 2024  
Invoice No. 2184997

For Legal Services Rendered Through April 30, 2024 in Connection With:

**Matter: 2022 - Aldrich Pump - Non Working Travel**

04/17/24	J. Guy	Travel back to DC.	3.50	4,760.00
04/24/24	J. Guy	Travel to Charlotte.	3.50	4,760.00
04/25/24	J. Guy	Travel back to DC.	3.50	4,760.00
		Total Hours	10.50	
		Total For Services	\$	14,280.00
		<i>Nonworking travel reduced by 50%</i>		<i>(7,140.00)</i>
		Total For Services	\$	<u>7,140.00</u>

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jonathan P. Guy	<u>10.50</u>	<u>1,360.00</u>	<u>14,280.00</u>
Total All Timekeepers	10.50	\$1,360.00	\$14,280.00

**Total For This Matter \$7,140.00**

**\*\*\* COMBINED TOTALS \*\*\***

Total Hours	117.50	
Total Fees, all Matters		\$111,179.00
Total Disbursements, all Matters		\$1,048.28
Total Amount Due		\$112,227.28

# **EXHIBIT A-4**

**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
	)	
Debtors.	)	(Jointly Administered)
	)	

**FORTY-FIFTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY  
ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO  
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,  
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”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Forty-Fifth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from May 1, 2024 through May 31, 2024* (the “Monthly Fee Statement”).

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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.



**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period May 1, 2024 through May 31, 2024 (the “Fee Statement Period”).

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

2. The total amounts of fees and expenses incurred by Orrick during the Fee Statement Period are as follows:

<b>Fee Statement Period: May 1, 2024 – May 31, 2024</b>	
Total Fees:	\$137,250.50
Total Expenses:	\$1,891.17
<b>TOTAL:</b>	<b>\$139,141.67</b>

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$125,416.62 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’s fees and (b) 100% of its incurred expenses.

**Notice and Objection Procedures**

4. 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, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors’ counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 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 for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel,

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., pamoamccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartellmccarter.com and Phillip S. Pavlick, Esq., ppavlickmccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31<sup>st</sup> Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascittimccarter.com); and (iv) Cordes Law, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., stacycordes-law.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., nramseyrc.com and Davis Lee Wright, Esq., dwrightrc.com), (ii) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100, Washington, D.C. 20005 (Attn: Kevin C. Maclay, Esq., kmaclaycapdale.com, James P. Wehner, Esq., jwehnercapdale.com, and Todd E. Phillips, Esq., tphillipscapdale.com), and (iii) Hamilton Stephens Steel + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompsonlawhssm.com); and (f) local counsel to the Future Claimants' Representative: Grier Wright Martinez, P.A., 521 E. Morehead Street, Suite 440, Charlotte, North Carolina 28202 (Attn: A. Cotten Wright, cwrightgrierlaw.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Orrick, no later than June 26, 2024 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay Orrick an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses required in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. 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 Orrick.

This is the 12<sup>th</sup> day of June 2024.

/s/ Jonathan P. Guy

Jonathan P. Guy, Esq. (admitted *pro hac vice*)

Debbie L. Felder, Esq. (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: [jguy@orrick.com](mailto:jguy@orrick.com)

[dfelder@orrick.com](mailto:dfelder@orrick.com)

*Counsel for Joseph W. Grier, III,  
Future Claimants' Representative*

# **Exhibit A**



Grier, Joseph W. III.  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

June 11, 2024  
Client No. 24998  
Invoice No. 2193261

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through May 31, 2024 in connection with the matters described on the attached pages:	\$ 137,250.50
DISBURSEMENTS as per attached pages:	1,891.17
<b>TOTAL CURRENT FEES &amp; DISBURSEMENTS (Pay this Amount):</b>	<b>\$ <u>139,141.67</u></b>

Matter(s): 24998/2014, 2019, 2021

**DUE UPON RECEIPT**

The following is for information only:  
Previous Balance not included in this invoice:  
\$144,947.09  
If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,  
please reference your **INVOICE** and **CLIENT** numbers on your remittance.  
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

**REMITTANCE COPY - PLEASE RETURN WITH PAYMENT**

**REMITTANCE ADDRESS:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
Reference: 24998/ Invoice: 2193261*

**ELECTRONIC FUNDS TRANSFERS:**

**ACH & Wire Transfers:**  
**ABA Number 121000248**  
**SWIFT CODE: WFBIUS6S**  
**Account Number: 4123701088**  
Wells Fargo  
420 Montgomery Street  
San Francisco, CA 94104  
Account of  
Orrick, Herrington & Sutcliffe LLP  
Reference: 24998/ Invoice: 2193261  
E.I.N. 94-2952627

**OVERNIGHT DELIVERY:**

*Orrick, Herrington & Sutcliffe LLP  
2121 Main Street  
Wheeling, WV 26003  
(304) 231-2703  
Reference: 24998/ Invoice:  
2193261*

**To pay online visit [www.e-billexpress.com/ebpp/Orrick/](http://www.e-billexpress.com/ebpp/Orrick/)**



Grier, Joseph W. III.  
521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
Attn: Joseph W. Grier, III.

June 11, 2024  
Client No. 24998  
Invoice No. 2193261

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through May 31, 2024 in Connection With:

**Matter: 2014 - Aldrich Pump - Litigation**

05/01/24	D. Carnie	Summarize updates in related cases for client and revise same (1.3); confer with S. Whitney regarding same (.1); consolidate information about attorneys in case (.1); review new Fourth Circuit filings and include in case summaries (.5).	2.00	1,390.00
05/01/24	S. Whitney	Revise Aldrich weekly case updates.	1.00	775.00
05/01/24	J. Guy	Review and approve weekly update/review of pending asbestos cases (.4); review docket entries in Aldrich/Murray, DBMP, and Bestwall (collected over separate occasions) (1.5).	1.90	2,584.00
05/02/24	D. Carnie	Attend and take notes during meeting with Debtor regarding next steps (.7); send email to client in relation to case updates (.1).	0.80	556.00
05/02/24	S. Whitney	Finalize Aldrich weekly case update.	1.10	852.50
05/02/24	S. Whitney	Call with Debtors and J. Guy regarding Aldrich/Murray updates.	0.60	465.00
05/02/24	D. Felder	Telephone conference with Debtors' counsel, FCR, and Orrick team regarding case strategy and updates.	0.60	693.00
05/02/24	J. Guy	Update call with Debtors' counsel and FCR and prepare for same.	0.90	1,224.00
05/04/24	D. Carnie	Revise list of parties and counsel for Aldrich and related cases, with notes from dockets and trial transcripts.	0.80	556.00



Grier, Joseph W. III. - 24998  
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June 11, 2024  
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05/05/24	D. Carnie	Revise list of parties and counsel for Aldrich and related cases, with notes from dockets and trial transcripts.	0.70	486.50
05/06/24	D. Carnie	Revise list of counsel for Aldrich/Murray and related cases, based on dockets and trial transcripts (3.0); confer with document services on formatting same (.3); revise and add photographs to same (2.0); circulate same to team (.2).	5.50	3,822.50
05/06/24	J. Guy	Review and comment on party/counsel list prepared by D. Carnie.	0.30	408.00
05/07/24	D. Carnie	Review dockets and contribute to group document for case summaries.	1.20	834.00
05/08/24	D. Carnie	Revise list of counsel following feedback from J. Guy and circulate to team (.8); revise case summaries for client (.1).	0.90	625.50
05/08/24	S. Whitney	Finalize weekly case update (1.5); research and draft Opposition to ACCs' motions for leave to file amicus brief for 4th circuit rehearing en banc (4.6).	6.10	4,727.50
05/08/24	J. Guy	Telephone conference with FCR regarding case update and next steps (.6); telephone conference with Debtors' counsel, B. Erens regarding same (.5); emails to/from N. Ramsey and FCR regarding petitions for rehearing en banc (various occasions) (.4); review ACC motion regarding same and strategize regarding response and next steps (1.2).	2.70	3,672.00
05/09/24	D. Carnie	Listen to DBMP hearing and take notes.	2.00	1,390.00
05/09/24	S. Whitney	Listen to DBMP hearing regarding two stay relief motions.	2.10	1,627.50
05/09/24	S. Whitney	Revise FCR opposition to 4th Circuit ACC motions for leave to file amicus brief.	2.10	1,627.50
05/09/24	J. Guy	Numerous emails to/from S. Whitney and D. Carnie regarding opposition to DBMP and Bestwall ACC's motion for leave to file amicus briefs (.5); review and comment on draft opposition (1.4); strategize regarding next steps (.7).	2.60	3,536.00
05/10/24	D. Carnie	Revise Fourth Circuit Opposition brief and confer with S. Whitney on edits (2.0); further revise same (.3).	2.30	1,598.50



Grier, Joseph W. III. - 24998  
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Invoice No. 2193261

05/10/24	S. Whitney	Finalize and file FCR opposition to ACC's Motions for Leave to file amicus brief in 4th circuit request for en banc hearing.	3.40	2,635.00
05/10/24	J. Guy	Continue work and numerous emails to/from Orrick team regarding opposition to motions to file amicus briefs (3.5); review dockets of various pending asbestos bankruptcy cases (collected over separate occasions) (1.3).	4.80	6,528.00
05/13/24	D. Carnie	Correspond with J. Guy regarding timeline for objection to relief from stay.	0.50	347.50
05/13/24	S. Whitney	Review stay relief motion (Dkt. 2243) and hearing date.	0.40	310.00
05/13/24	J. Guy	Review most recent motion for relief from stay in Aldrich/Murray matter (.4); emails regarding same to/from S. Whitney and D. Carnie (.2); emails to/from various ACC counsel regarding correction request on their petition for rehearing filing (.2); strategize regarding next steps (.5).	1.30	1,768.00
05/14/24	D. Carnie	Confer with J. Guy regarding case updates and outlining stay relief objection (.2); research case updates (.7); draft and send email to client with interim case updates (1.2).	2.10	1,459.50
05/14/24	J. Guy	Review dockets in pending asbestos cases (separate occasions) (1.4); review J-M Steptoe and Peebles complaints (.4); various emails to/from Orrick team regarding same (.2); strategize regarding next steps (.7).	2.70	3,672.00
05/15/24	D. Carnie	Confer with J. Guy and D. Felder regarding RICO complaint against asbestos plaintiffs' firm (.2); summarize case updates in Aldrich and related bankruptcies (4.7); revise case updates to client based on feedback from S. Whitney and J. Guy (.7).	5.60	3,892.00
05/15/24	S. Whitney	Finalize Aldrich weekly case updates.	1.70	1,317.50
05/15/24	J. Guy	Review 4th Cir. Order denying petitions for rehearing and rehearing en banc and email FCR regarding same.	0.20	272.00
05/16/24	D. Carnie	Confer with S. Whitney regarding outline for district court objection.	0.70	486.50
05/16/24	S. Whitney	Review ACC and Semian motions for leave to appeal dismissal order and research 158(a)(3).	1.60	1,240.00





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05/16/24	J. Guy	Review case updates (.4); emails to/from Orrick team regarding opposition to request for District Court appeals by ACC and Mr. Semian (.2).	0.60	816.00
05/17/24	D. Carnie	Confer with J. Guy regarding next steps (.1); draft and circulate update to client on district court appeal (.6); draft and send email to Debtors' counsel regarding same (.3); review Judge's order on ACC's Motion to Dismiss and contribute to outline of response in District Court appeal (1.6); confer with S. Whitney on next steps (.2).	2.80	1,946.00
05/17/24	S. Whitney	Call with D. Carnie to discuss outlines to stay relief motion and response to motions for leave to appeal dismissal order.	0.60	465.00
05/17/24	J. Guy	Attention and various emails to/from Orrick team regarding opposition to request for District Court appeals by ACC and Mr. Semian.	0.60	816.00
05/20/24	D. Carnie	Circulate calendar event for DBMP hearing.	0.10	69.50
05/20/24	S. Whitney	Outline and research case law for FCR Opposition to ACC and Semian Motions for Leave to Appeal MTD Order.	3.00	2,325.00
05/20/24	S. Whitney	Outline and research case law for FCR Opposition to Stay Relief Motion.	1.40	1,085.00
05/20/24	J. Guy	Emails to/from S. Whitney and D. Carnie regarding opposition to lift stay motion (.2); strategize regarding next steps (.4).	0.60	816.00
05/21/24	D. Carnie	Revise FCR opposition to ACC's district court appeal with supplementary research (3.0); confer with S. Whitney regarding same (.4); revise same and send to J. Guy (2.8).	6.20	4,309.00
05/21/24	S. Whitney	Call with D. Carnie and review FCR opposition outline to motions for leave to appeal dismissal order.	0.50	387.50
05/22/24	D. Carnie	Review dockets in related cases for update to client (1.8); confer with S. Whitney regarding update (.2); draft district court objection from outline (.1).	2.10	1,459.50
05/22/24	S. Whitney	Call with D. Carnie to discuss response to stay relief motion and finalize weekly Aldrich case updates.	1.50	1,162.50



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05/22/24	J. Guy	Work on FCR response to ACC and Mr. Semian's request for leave to appeal to District Court (separate occasions) (.8); emails to/from J. Miller regarding 5/30 hearing and continuance of same (.2).	1.00	1,360.00
05/23/24	D. Carnie	Listen to and take notes during DBMP omnibus hearing (2.5); confer with S. Whitney regarding same (.2); draft district court objection (9.6); confer with S. Whitney regarding same and next steps (.2).	12.50	8,687.50
05/23/24	S. Whitney	Finalize Aldrich case updates for D. Carnie review.	2.10	1,627.50
05/23/24	S. Whitney	Listen to DBMP May 23 hearing.	3.40	2,635.00
05/23/24	S. Whitney	Draft FCR Response to ACC Motion for Leave to Appeal Dismissal Order in District Court.	0.50	387.50
05/23/24	S. Whitney	Call with Debtors' counsel regarding Objection to ACC Motion to Leave to Appeal Dismissal Order at District Court.	0.30	232.50
05/23/24	J. Guy	Listen to DBMP hearing by telephone and review related filings (2.0); due diligence for FCR opposition to Mr. Semian and ACC's motions for leave for direct appeal (1.5) (separate occasions); emails to/from Orrick team regarding DBMP hearing and related issues (.4).	3.90	5,304.00
05/24/24	D. Carnie	Revise draft of district court objection (7.8); confer with Debtors' counsel regarding same (.4); research local rules for proper formatting (.7).	8.90	6,185.50
05/24/24	S. Whitney	Draft FCR Response to ACC Motion for Leave to Appeal Dismissal Order in District Court.	1.20	930.00
05/24/24	J. Guy	Telephone conference with Orrick counsel and Debtors' counsel regarding district court appeals and prepare for same (.4); continue work on District Court opposition (1.8); numerous emails to/from S. Whitney and D. Carnie regarding same (.4).	2.60	3,536.00



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05/27/24	D. Carnie	Review pro hac vice admissions for district court appeals and confer with J. Guy regarding same (.5); review local rules as to service in relation to filing of responses in same cases (.4); confer with J. Guy regarding draft of district court opposition (.1); implement his edits to same (.9).	1.90	1,320.50
05/27/24	J. Guy	Review and editing of District Court opposition (3.0); address various pro hac and other procedural issues for filing (.7).	3.70	5,032.00
05/28/24	D. Carnie	Confer with Document Services on formatting Table of Authorities and caption page for district court objection (.1); confer with district court chambers on pro hac vice admission for J. Guy (.3); confer with DC Managing Attorneys Office regarding filing (.3); draft pro hac vice motion and circulate draft to J. Guy for review (.7); implement J. Guy's edits to same and send back for review (.6); circulate redline and current draft to debtors' counsel and to client (.2); confer with Legal Support for assistance cite checking, and implement their changes (.4); confer with mailroom team to coordinate mail service (.3); confer with client on format of district court objection (.4); confer with S. Whitney on word count requirements, and implement changes to draft (1.2); implement client's suggested edits (.3); draft Certificate of Service and Word Count Compliance Statement for draft (.5); send final draft of district court objection to client for filing and correspond regarding e-filing (.5); correspond with J. Guy regarding service and complete arrangements for same (.5).	6.30	4,378.50
05/28/24	S. Whitney	Revise and finalize FCR Response to Motions for Leave to Appeal Dismissal Order to District Court.	3.40	2,635.00
05/28/24	J. Guy	Finalize District Court opposition (4.5); numerous emails to/from Orrick team, FCR, C. Wright, and counsel for Mr. Semian regarding opposition and pro hac vice request and attention to same (1.5).	6.00	8,160.00



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05/29/24	D. Carnie	Correspond with J. Guy and client regarding mail service of district court objection (.3); arrange mail service (.2).	0.50	347.50
05/29/24	S. Whitney	Attention to emails regarding mailing and FCR response to Aldrich stay relief motion (.5); draft FCR response to Aldrich stay relief motion (.7).	1.20	930.00
05/30/24	D. Carnie	Confer with J. Guy regarding district court filing (.1); review dockets in related cases for case update to client (1.5).	1.60	1,112.00
05/30/24	S. Whitney	Draft Aldrich case updates for week of May 27.	0.80	620.00
05/30/24	J. Guy	Prepare response to recent motion to lift stay in Aldrich/Murray (.3); emails regarding same to/from FCR, C. Wright and Orrick team (.2).	0.50	680.00
05/31/24	D. Carnie	Draft and circulate pro hac vice applications for myself and S. Whitney.	0.70	486.50
05/31/24	S. Whitney	Finalize Aldrich case summary for week of May 27.	1.50	1,162.50
05/31/24	J. Guy	Review asbestos bankruptcy dockets (separate occasions).	1.50	2,040.00
Total Hours			149.20	
Total For Services			\$	132,826.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Dan Carnie	68.70	695.00	47,746.50
Debra L. Felder	0.60	1,155.00	693.00
Jonathan P. Guy	38.40	1,360.00	52,224.00
Sean Whitney	41.50	775.00	32,162.50
Total All Timekeepers	149.20	\$890.25	\$132,826.00

Disbursements

Hotel	382.63	
Out of Town Business Meals	49.69	
Public Access to Court Electronic Records	330.40	
Taxi Expense	110.48	
Travel Expense, Air Fare	777.97	
Word Processing	240.00	
Total Disbursements		\$1,891.17



Grier, Joseph W. III. - 24998  
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June 11, 2024  
Invoice No. 2193261

For Legal Services Rendered Through May 31, 2024 in Connection With:

**Matter: 2019 - Aldrich Pump - Orrick Compensation**

02/07/24	D. Felder	Review and revise Orrick's April invoice.	0.50	577.50
		Total Hours	0.50	
		Total For Services	\$	577.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.50	1,155.00	577.50
Total All Timekeepers	0.50	\$1,155.00	\$577.50
<b>Total For This Matter</b>			<b>\$577.50</b>



Grier, Joseph W. III. - 24998  
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June 11, 2024  
Invoice No. 2193261

For Legal Services Rendered Through May 31, 2024 in Connection With:

**Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation**

05/02/24	D. Felder	Review TetraRho's April invoice and prepare monthly fee statement regarding same (.4); emails with J. Solganick and C. Wright regarding same (.2).	0.60	693.00
05/03/24	D. Felder	Finalize TetraRho's first month fee statement for April 2024 and serve notice parties regarding same.	0.40	462.00
05/03/24	J. Guy	Review monthly fee submissions of FCR professionals and emails regarding same with D. Felder.	0.30	408.00
05/09/24	D. Felder	Finalize Ankura monthly fee statement for April and circulate same to notice parties.	0.40	462.00
05/15/24	J. Guy	Emails to/from D. Felder, C. Wright, and J. Solganick regarding TetraRho retention and related matters.	0.20	272.00
05/16/24	D. Felder	Telephone conference with J. Guy, J. Grier, J. Solganick, and S. Abel regarding comments on TetraRho's first monthly fee statement.	0.40	462.00
05/16/24	J. Guy	Attention to and various phone calls and emails to/from FCR, D. Felder, J. Solganick, and BA regarding TetraRho retention and fee statement (separate and various occasions).	0.80	1,088.00
		Total Hours	3.10	
		Total For Services	\$	3,847.00



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June 11, 2024  
Invoice No. 2193261

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	1.80	1,155.00	2,079.00
Jonathan P. Guy	1.30	1,360.00	1,768.00
Total All Timekeepers	3.10	\$1,240.97	\$3,847.00
<b>Total For This Matter</b>			<b>\$3,847.00</b>

**\*\*\* COMBINED TOTALS \*\*\***

Total Hours	152.80	
Total Fees, all Matters		\$137,250.50
Total Disbursements, all Matters		\$1,891.17
Total Amount Due		\$139,141.67

# EXHIBIT B

## CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

February 1, 2024 through May 31, 2024

Project Category	Matter Number	Total Hours for the Interim Period (2/1/2024 - 5/31/2024)	Total Hours from the Petition Date (6/18/2020- 5/31/2024)	Total Fees for the Interim Period (2/1/2024- 5/31/2024)	Total Fees from the Petition Date (6/18/2020- 5/31/2024)
Case Administration	2012	0.0	3.1	\$0.00	\$3,878.00
Insurance	2013	0.0	37.8	\$0.00	\$40,402.00
Litigation	2014	545.4	2,514.1	\$533,667.00	\$2,581,393.00
Adversary Proceeding Litigation	2015	0.0	467.2	\$0.00	\$450,032.50
Plan & Disclosure Statement	2016	0.0	204.3	\$0.00	\$213,988.00
Due Diligence	2017	0.0	82.0	\$0.00	\$89,511.50
Orrick Retention	2018	0.0	56.3	\$0.00	\$47,570.00
Orrick Compensation	2019	5.1	97.3	\$6,280.00	\$96,102.50
FCR and Other Professionals - Retention	2020	2.9	67.7	\$3,349.50	\$67,472.00
FCR and Other Professionals - Compensation	2021	8.0	133.9	\$9,752.50	\$133,683.00
Non-Working Travel	2022	15.5	126.4	\$10,027.50	\$75,350.00
<b>TOTAL:</b>		<b>576.9</b>	<b>3,790.1</b>	<b>\$563,076.50</b>	<b>\$3,700,382.50</b>



# EXHIBIT C

## CUMULATIVE EXPENSE SUMMARY

February 1, 2024 through May 31, 2024

Expense Category	Total Expenses for the Interim Period (2/1/2024-5/31/2024)	Total Expenses from the Petition Date (6/18/2020-5/31/2024)
Document Reproduction (@ .20/page)	\$0.00	\$506.20
Hotel	\$1,672.68	\$8,062.20
Lexis Research	\$0.00	\$1,552.00
Out of Town Business Meals	\$175.70	\$1,248.59
Outside Services – Data Processing of Debtors and Non-Debtors Document Productions	\$0.00	\$2,033.60
PACER Charges	\$330.40	\$6,544.70
Parking Expense	\$87.00	\$835.00
Taxi Expense	\$223.87	\$1,135.58
Travel Expense, Air Fare (coach fare)	\$1,322.35	\$10,535.20
Westlaw Research	\$15,043.00	\$23,681.00
Word Processing	\$427.50	\$768.90
<b>TOTAL:</b>	<b>\$19,282.50</b>	<b>\$56,902.97</b>

# EXHIBIT D

## SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

February 1, 2024 through May 31, 2024

<b>Name of Professional</b>	<b>Position - Bar Year</b>	<b>2024 Hourly Billing Rate</b>	<b>Total Hours Billed (2/1/2024-5/31/2024)</b>	<b>Total Compensation (2/1/2024 - 5/31/2024)</b>
Mel Bostwick	Partner - 2008	\$1,275	1.7	\$2,167.50
Jonathan P. Guy	Senior Counsel - 1996	\$1,360	208.6	\$276,556.00
Debra L. Felder	Senior Associate - 2002	\$1,155	44.4	\$48,394.50
Sean Whitney	Associate - 2022	\$775	150.8	\$116,870.00
Daniel Carnie	Associate - 2023	\$695	171.3	\$119,053.50
April Eudy	Research Specialist	\$350	0.1	\$35.00
<b>TOTAL:</b>			576.9	\$563,076.50

# EXHIBIT E

## SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

Document	Interim Fee Application Date; Dkt. No.	Period Covered	Fees Requested/ Allowed	Expenses Requested/ Allowed	Order Approving Interim Application
1 <sup>st</sup> Interim	11/9/2020; Dkt. No. 423	8/21/2020- 9/30/2020	\$46,289.00	\$0.00	Dkt. No. 459; 12/3/2020
2 <sup>nd</sup> Interim	3/11/2021; Dkt. No. 617	10/1/2020- 1/31/2021	\$488,022.50	\$5,033.60	Dkt. No. 661; 4/2/2021
3 <sup>rd</sup> Interim	7/9/2021; Dkt. No. 762	2/1/2021- 5/31/2021	\$630,867.00	\$6,609.60	Dkt. No. 795; 8/2/2021
4 <sup>th</sup> Interim	10/29/2021; Dkt. No. 863	6/1/2021- 9/30/2021	\$240,028.50	\$1,488.88	Dkt. No. 928; 12/8/2021
5 <sup>th</sup> Interim	3/1/2022; Dkt. No. 1008	10/1/2021- 1/31/2022	\$251,136.00	\$1,506.62	Dkt. No. 1065; 3/23/2022
6 <sup>th</sup> Interim	7/11/2022; Dkt. No. 1262	2/1/2022- 6/31/2022	\$299,435.00	\$3,405.87	Dkt. No. 1311; 8/3/2022
7 <sup>th</sup> Interim	11/7/2022; Dkt. No. 1388	1/1/2022- 9/30/2022	\$289,310.50	\$5,524.85	Dkt. No. 1458; 12/7/2022
8 <sup>th</sup> Interim	3/8/2023; Dkt. No. 1631	10/1/2022- 1/31/2023	\$212,252.50	\$4,182.20	Dkt. No. 1827; 6/21/2023
9 <sup>th</sup> Interim	8/3/2023; Dkt. No. 1902	2/1/2023- 5/31/2023	\$368,257.00	\$3,956.38	Dkt. No. 1902; 8/2/2023
10 <sup>th</sup> Interim	11/7/2023; Dkt. No. 1990	6/1/2023- 9/30/2023	\$295,603.00	\$5,181.57	Dkt. No. 2026; 11/30/2023
11 <sup>th</sup> Interim	3/15/2024; Dkt. No. 2146	10/1/2023- 1/31/2024	\$115,605.00	\$730.90	Dkt. No. 2193; 4/11/2024
<b>TOTAL:</b>			<b>\$3,236,806.00</b>	<b>\$37,620.47</b>	