Case 20-30608 Doc 2302 Filed 07/11/24 Entered 07/11/24 19:27:59 Desc Main Document Fage 10/30 Docket #2302 Date Filed: 7/11/2024

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

Chapter 11
Case No. 20-30608
Jointly Administered

SUMMARY OF ELEVENTH INTERIM APPLICATION OF ANKURA CONSULTING GROUP, LLC FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS ASBESTOS CLAIMS CONSULTANT AND FINANCIAL ADVISOR TO JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE, FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024

Name of Applicant:	Ankura Consulting Group, LLC
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Order Approving Retention:	December 3, 2020 (Dkt. No. 464)
Period for which compensation and reimbursement is sought:	February 1, 2024 – May 31, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$2,613.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$2,613.00

This is a(n) <u>x</u> interim	final application	1.
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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

Chapter 11
Case No. 20-30608
ointly Administered
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ELEVENTH INTERIM APPLICATION OF ANKURA CONSULTING GROUP, LLC FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS ASBESTOS CLAIMS CONSULTANT AND FINANCIAL ADVISOR TO JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE, FOR THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MAY 31, 2024

Ankura Consulting Group, LLC ("Ankura"), asbestos claims consultant to Joseph W. Grier, III, the Court-appointed future claimants' representative in these cases (the "FCR"), hereby brings its eleventh interim application for allowance of compensation of \$2,613.00 and reimbursement of expenses of \$0.00 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

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 December 3, 2020, the Court entered an order authorizing the FCR to retain Ankura as his asbestos claims consultant and financial advisor² in this Chapter 11 Case, effective as of December 3, 2020. (Doc. No. 464).
- 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, Ankura has submitted monthly fee statements to the Debtors for the Interim Period. Copies of the relevant monthly fee statements

While the FCR's asbestos claims consultant team continues to be employed by Ankura and retained in this Chapter 11 Case, the FCR's financial advisory team, led by Jason Solganick, resigned from Ankura in October 2023 and formed TetraRho LLC. By order dated April 5, 2024, the Court approved the retention of TetraRho LLC as the FCR's financial advisor, effective as of April 5, 2024 (Dkt. No. 2187).

are attached as **Exhibit A-1 and A-4**. Summarized below are the requested professional fees and expenses and payments that Ankura has received on the same.

Date of	Description	Period	Requested	Requested	Payment	Amount
Monthly		Covered	Fees	Expenses	Received	Outstanding
Fee						
Statement						
3/22/2024	Thirty-Ninth	2/1/2024-	\$819.00	\$0.00	\$734.40	\$84.60
	Monthly	2/29/2024				
4/5/2024	Fortieth	3/1/2024-	\$1,014.00	\$0.00	\$912.60	\$101.40
	Monthly	3/31/2024				
5/9/2024	Forty-First	4/1/2024-	\$702.00	\$0.00	\$631.80	\$70.20
	Monthly	4/30/2024				
7/9/2024	Forty-Second	5/1/2024-	\$78.00	\$0.00	\$0.00	\$78.00
	Monthly	5/31/2024				
	·	TOTAL:	\$2,613.00	\$0.00	\$2,278.80	\$334.20

7. In total, Ankura has submitted fee statements during the Interim Period for total fees of \$2,613.00 and total expenses of \$0.00. As of the date of this Application, no party has objected to the fee statements circulated by Ankura.

SUMMARY OF SERVICES RENDERED

- 8. Attached hereto as **Exhibits A-1 through A-4** are Ankura's monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by Ankura during the Interim Period. In summary, during the Interim Period, Ankura expended a total of 6.7 hours rendering necessary services in this Chapter 11 Case and incurred total fees of \$2,613.00 and \$0.00 in expenses.
- 9. As the asbestos claims consultant and financial advisor to the FCR, Ankura provided a variety of services in connection with the Chapter 11 Case set forth in the summary description below and in detail in **Exhibits A-1 through A-4**.
- 10. Ankura 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. Ankura 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. Ankura 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. Claims Administration 4.4 hours, \$1,716.00. During the Interim Period, members of Ankura's estimation team conducted database processing and importing and data aggregation and analysis.
 - b. Staffing Report/Fee Applications 2.3 hours, \$897.00. During the Interim
 Period, members of Ankura's estimation team prepared monthly staffing reports,
 and prepared and reviewed Ankura's interim fee application.
 - 12. **Exhibit B** provides a summary of Ankura's time by project category.
- 13. **Exhibit C** reflects a summary by category of the expenses that Ankura incurred during the Interim Period, which totaled \$0.00.
- 14. **Exhibit D** provides information as to Ankura's professionals, including position, billing rates, and the total number of hours billed during the Interim Period. Ankura 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 Ankura has rendered.
- 15. Attached as **Exhibit E** is a summary of Ankura's prior applications for compensation in this Chapter 11 Case.

DISBURSEMENTS

16. Ankura must incur certain expenses in the course of rendering services to the FCR.

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Those expenses may include items such as 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. Ankura did not incur any expenses during the Interim Period.

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. Ankura submits that, in light of the nature of the relief requested, no other or further notice need be provided.

NO PRIOR REQUEST

19. Ankura 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, Ankura makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred in connection with rendering asbestos claims consultant services and financial advisory services to the FCR.

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

- 1) Allowing interim compensation to Ankura in the amount of \$2,613.00 as reasonable, actual and necessary for professional services rendered by it on behalf of the FCR during the Interim Period and interim reimbursement of expenses incurred during the Interim Period of \$0.00 as reasonable, actual and necessary;
- 2) Authorizing and directing the Debtors to pay Ankura the amount of \$2,613.00, which is equal to 100% of Ankura's requested compensation for the Interim Period and 100% of Ankura's requested expense reimbursement for the Interim Period, less all previous payments made to Ankura pursuant to the Fee Procedures Order; and
 - 3) Granting such further relief as is just and proper.

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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, NW 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

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EXHIBIT A-1

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

In re:)	Chapter 11
III IC.)	Chapter 11
ALDRICH PUMP LLC, et al.,1)	Case No. 20-30608
Deb	otors.)	(Jointly Administered)

THIRTY-NINTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY ANKURA CONSULTING GROUP, LLC AS ASBESTOS CLAIMS CONSULTANT AND FINANCIAL ADVISOR 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 Authorizing Joseph W. Grier, III, the Future Claimants' Representative, to Retain and Employ Ankura Consulting Group, LLC as Asbestos Claims Consultant and Financial Advisor, effective as of December 3, 2020 (Dkt. No. 464), Ankura Consulting Group, LLC ("Ankura"), as asbestos claims consultant and financial advisor to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the "Future Claimants' Representative), submits its Thirty-Ninth Monthly Statement of Fees and Expenses Incurred by Ankura Consulting Group, LLC as Asbestos Claims Consultant and Financial Advisor to Joseph W. Grier, III, the Future Claimants' Representative, for the Period from February 1, 2024 through February 29, 2024 (the "Monthly Fee Statement").

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 <u>Exhibit A</u> is Ankura's invoice for the period February 1, 2024 through February 29, 2024 (the "<u>Fee Statement Period</u>").

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: February 1, 2024 – February 29,	2024
Total Fees:	\$819.00
Total Expenses:	\$0.00
TOTAL:	\$819.00

3. Pursuant to the Interim Compensation Order, Ankura seeks payment of \$737.10 from the Debtors for the Fee Statement Period (the "<u>Interim Amount</u>"), representing (a) 90% of Ankura'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

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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., pamoa@mccarter.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, 31st 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).

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 Ankura, no later than April 5, 2024 (the "Objection Deadline"). Any Objection must set forth the

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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 Ankura 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 Ankura.

This is the 22nd 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

ankura ())

Ankura Consulting Group LLC PO Box 74007043 Chicago, IL 60674-7043

INVOICE

Date	Invoice Number
03/14/2024	CI-107878

Payment Terms	Due Date
Net 14	03/28/2024

FEIN NO.:	47-2435218

P-002780

Bill To:

Jonathan P. Guy Orrick, Herrington & Sutcliffe LLP 2100 Pennsylvania Avenue, NW Washington, DC 20037 United States of America Project Information:

Project Name: P-002780 Aldrich Pump FCR

Project Number:

PO Number:

Professional Services rendered February 1, 2024 through February 29, 2024.

Net Amount:

819.00

Tax:

Total Invoice Amount:

USD 819.00

For any questions regarding billing, wire or ACH payments, please contact accounting@ankura.com.

Remittance Information:

Electronic Payment Info

Wire Instructions

Account Name: Ankura Consulting Group LLC

Account Number: 226005697768

Bank of America 222 Broadway New York, NY 10038 United States ABA# 026009593 SWIFT: BOFAUS3N ACH Instructions

Account Name: Ankura Consulting Group LLC

Account Number: 226005697768

Bank of America 1455 Market Street San Francisco, CA 94109

United States ABA# 054001204 SWIFT: BOFAUS3N

Please include the invoice number and/or Ankura project number to your remittance to ensure prompt application of funds.

Project #: P-002780 voice Date: 3/14/2024

Invoice Date: 3/1
Invoice Number: CI-

Invoice Number: CI-107878
Professional Services Through: 2/29/2024

Currency: USD

Invoice Summary

Professional Services 819.00

Current Invoice Total: 819.00

Outstanding Invoices 975.06

Outstanding Invoices

Invoice Number	Invoice Date	Due Date	Days Past Due	Description	Invoice Amount	Payment Applied	Tax Amount	Amount Due	Currency
CI-097515	11/8/2023	11/22/2023	113	October 2023	484.00	435.63	-	48.37	USD
CI-100089	12/8/2023	12/22/2023	83	November 2023	1,893.00	1,703.71	-	189.29	USD
CI-102720	1/12/2024	1/26/2024	48	December 2023	744.00	669.60	-	74.40	USD
CI-104771	2/8/2024	2/22/2024	21	January 2024	663.00	-	-	663.00	USD
Total					3,784.00	2,808.94	-	975.06	

P-002780 Project #:

Invoice Date: Invoice Number:

3/14/2024 CI-107878

Professional Services Through:

2/29/2024

USD

Currency:

Professional Services - Summary By Person

Name	Title	Rate	Hours	Amount
Muthayee Chockalingam	Senior Director	390.00	1.0	390.00
Nathaniel Tess	Senior Director	390.00	0.8	312.00
Michelle Petruolo	Senior Associate	390.00	0.3	117.00
Total			2.1	819.00

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Project #: Invoice Date: Invoice Number: Professional Services Through:

P-002780 3/14/2024 CI-107878 2/29/2024 USD

Currency:

Time Detail by Date

Date	Name	Title	Task	Time Narrative	Rate	Hours	Amount
2/7/2024	Muthayee Chockalingam	Senior Director	Claims Administration	LADMF - SSA Update - Import January 2024 data, Compare with NTIS. Gov summary total, Rerun Dec 2023 update and verify file totals.	390.00	1.0	390.00
2/7/2024	Nathaniel Tess	Senior Director	Claims Administration	Supplemental database processing.	390.00	0.8	312.00
2/7/2024	Michelle Petruolo	Senior Associate	Staffing Report/ Fee Applications	Prepare January staffing report template including latest time report and time detail.	390.00	0.3	117.00
Total					_	2.1	819.00

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EXHIBIT A-2

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

)	
)	Chapter 11
)	
)	Case No. 20-30608
)	
)	(Jointly Administered)
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	-))))

FORTIETH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY ANKURA CONSULTING GROUP, LLC AS ASBESTOS CLAIMS CONSULTANT AND FINANCIAL ADVISOR 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 Authorizing Joseph W. Grier, III, the Future Claimants' Representative, to Retain and Employ Ankura Consulting Group, LLC as Asbestos Claims Consultant and Financial Advisor, effective as of December 3, 2020 (Dkt. No. 464), Ankura Consulting Group, LLC ("Ankura"), as asbestos claims consultant and financial advisor to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the "Future Claimants' Representative), submits its Fortieth Monthly Statement of Fees and Expenses Incurred by Ankura Consulting Group, LLC as Asbestos Claims Consultant and Financial Advisor to Joseph W. Grier, III, the Future Claimants' Representative, for the Period from March 1, 2024 through March 31, 2024 (the "Monthly Fee Statement").

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 Ankura'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 Ankura during the Fee Statement Period are as follows:

Fee Statement Period: March 1, 2024 – March 31, 2024				
Total Fees:	\$1,014.00			
Total Expenses:	\$0.00			
TOTAL:	\$1,014.00			

3. Pursuant to the Interim Compensation Order, Ankura seeks payment of \$912.60 from the Debtors for the Fee Statement Period (the "<u>Interim Amount</u>"), representing (a) 90% of Ankura'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

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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., pamoa@mccarter.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, 31st 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).

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 Ankura, no later than April 19, 2024 (the "Objection Deadline"). Any Objection must set forth

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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 Ankura 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 Ankura.

This is the 5th day of April 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

ankura ())

Ankura Consulting Group LLC PO Box 74007043 Chicago, IL 60674-7043

INVOICE

Date	Invoice Number
04/04/2024	CI-109554

Payment Terms	Due Date		
Net 14	04/18/2024		

FEIN NO.:	47-2435218

P-002780

Bill To:

Jonathan P. Guy Orrick, Herrington & Sutcliffe LLP 2100 Pennsylvania Avenue NW Washington, DC 20037

United States of America

Project Information:

Project Name: P-002780 Aldrich Pump FCR

Project Number:

PO Number:

Professional Services rendered March 1, 2024 through March 31, 2024.

Net Amount:

1,014.00

Tax:

Total Invoice Amount:

USD 1,014.00

For any questions regarding billing, wire or ACH payments, please contact accounting@ankura.com.

Remittance Information:

Electronic Payment Info

Wire Instructions

Account Name: Ankura Consulting Group LLC Account Number: 226005697768 Bank of America 222 Broadway

New York, NY 10038 United States ABA# 026009593 SWIFT: BOFAUS3N **ACH Instructions**

Account Name: Ankura Consulting Group LLC Account Number: 226005697768 Bank of America

1455 Market Street San Francisco, CA 94109 United States

ABA# 054001204 SWIFT: BOFAUS3N

Please include the invoice number and/or Ankura project number to your remittance to ensure prompt application of funds.

Project #: P-002780 Invoice Date: 4/4/2024

Invoice Number: CI-109554

Professional Services Through: 3/31/2024

Currency: USD

Invoice Summary

Professional Services 1,014.00

Current Invoice Total: 1,014.00

Outstanding Invoices 1,794.06

Outstanding Invoices

Invoice Number	Invoice Date	Due Date	Days Past Due	Description	Invoice Amount	Payment Applied	Amount Due	Currency
CI-097515	11/8/2023	11/22/2023	134	October 2023	484.00	435.63	48.37	USD
CI-100089	12/8/2023	12/22/2023	104	November 2023	1,893.00	1,703.71	189.29	USD
CI-102720	1/12/2024	1/26/2024	69	December 2023	744.00	669.60	74.40	USD
CI-104771	2/8/2024	2/22/2024	42	January 2024	663.00	-	663.00	USD
CI-107878	3/14/2024	3/28/2024	7	February 2024	819.00	-	819.00	USD
Total					4,603.00	2,808.94	1,794.06	

Project #: P-002780

Invoice Date: 4/4/2024 Invoice Number: CI-109554

Professional Services Through: 3/31/2024

Currency: USD

Professional Services - Summary By Person

Name	Title	Rate	Hours	Amount
Muthayee Chockalingam	Senior Director	390.00	0.5	195.00
Nathaniel Tess	Senior Director	390.00	0.8	312.00
Michelle Petruolo	Senior Associate	390.00	1.3	507.00
Total			2.6	1,014.00

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Project #: Invoice Date: Invoice Number: Professional Services Through: Currency:

P-002780 4/4/2024 CI-109554 3/31/2024 USD

Time Detail by Date

Date	Name	Title	Task	Time Narrative	Rate	Hours	Amount
3/13/2024	Muthayee Chockalingam	Senior Director	Claims Administration	Import data updates from SSA Death database, compare file total with information on NTIS website.	390.00	0.5	195.00
3/13/2024	Nathaniel Tess	Senior Director	Claims Administration	Supplemental database processing.	390.00	0.8	312.00
3/14/2024	Michelle Petruolo	Senior Associate	Staffing Report/ Fee Applications	Prepare February staffing report template including latest time report and time detail.	390.00	0.4	156.00
3/14/2024	Michelle Petruolo	Senior Associate	Staffing Report/ Fee Applications	Create the October through January interim fee application exhibits.	390.00	0.9	351.00
Total					_	2.6	1,014.00

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EXHIBIT A-3

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

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

FORTY-FIRST MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY ANKURA CONSULTING GROUP, LLC AS ASBESTOS CLAIMS CONSULTANT AND FINANCIAL ADVISOR 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 Authorizing Joseph W. Grier, III, the Future Claimants' Representative, to Retain and Employ Ankura Consulting Group, LLC as Asbestos Claims Consultant and Financial Advisor, effective as of December 3, 2020 (Dkt. No. 464), Ankura Consulting Group, LLC ("Ankura"), as asbestos claims consultant and financial advisor to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the "Future Claimants' Representative), submits its Forty-First Monthly Statement of Fees and Expenses Incurred by Ankura Consulting Group, LLC as Asbestos Claims Consultant and Financial Advisor to Joseph W. Grier, III, the Future Claimants' Representative, for the Period from April 1, 2024 through April 30, 2024 (the "Monthly Fee Statement").

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.

<u>Itemization of Services Rendered and Expenses Incurred</u>

1. Attached hereto as **Exhibit A** is Ankura'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 Ankura during the Fee Statement Period are as follows:

Fee Statement Period: April 1, 2024 – April 30, 2024				
Total Fees:	\$702.00			
Total Expenses:	\$0.00			
TOTAL:	\$702.00			

3. Pursuant to the Interim Compensation Order, Ankura seeks payment of \$631.80 from the Debtors for the Fee Statement Period (the "<u>Interim Amount</u>"), representing (a) 90% of Ankura'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

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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., pamoa@mccarter.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, 31st 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).

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 Ankura, no later than May 23, 2024 (the "Objection Deadline"). Any Objection must set forth the

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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 Ankura 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 Ankura.

This is the 9th 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



Ankura Consulting Group LLC PO Box 74007043 Chicago, IL 60674-7043

INVOICE

Date	Invoice Number
05/07/2024	CI-112089

Payment Terms	Due Date
Net 14	05/21/2024

FEIN NO.:	47-2435218

P-002780

Bill To:

Jonathan P. Guy Orrick, Herrington & Sutcliffe LLP 2100 Pennsylvania Avenue NW Washington, DC 20037

United States of America

Project Information:

Project Name: P-002780 Aldrich Pump FCR

Project Number:

PO Number:

Professional Services rendered April 1, 2024 through April 30, 2024.

Net Amount:

702.00

Tax:

Total Invoice Amount:

USD 702.00

For any questions regarding billing, wire or ACH payments, please contact accounting@ankura.com.

Remittance Information:

Electronic Payment Info

Wire Instructions

Account Name: Ankura Consulting Group LLC Account Number: 226005697768 Bank of America 222 Broadway

New York, NY 10038 United States ABA# 026009593 SWIFT: BOFAUS3N **ACH Instructions**

Account Name: Ankura Consulting Group LLC Account Number: 226005697768 Bank of America 1455 Market Street

1455 Market Street San Francisco, CA 94109 United States

ABA# 054001204 SWIFT: BOFAUS3N

Please include the invoice number and/or Ankura project number to your remittance to ensure prompt application of funds.

Project #: P-002780 voice Date: 5/7/2024

Invoice Date: 5/7/2024 Invoice Number: CI-112089

Professional Services Through: 4/30/2024

Currency: USD

Invoice Summary

Professional Services 702.00

Current Invoice Total: 702.00

Outstanding Invoices 1,476.95

Outstanding Invoices

Invoice Number	Invoice Date	Due Date	Days Past Due	Description	Invoice Amount	Payment Applied	Amount Due	Currency
CI-097515	11/8/2023	11/22/2023	167	October 2023	484.00	435.63	48.37	USD
CI-100089	12/8/2023	12/22/2023	137	November 2023	1,893.00	1,703.71	189.29	USD
CI-102720	1/12/2024	1/26/2024	102	December 2023	744.00	669.60	74.40	USD
CI-104771	2/8/2024	2/22/2024	75	January 2024	663.00	596.71	66.29	USD
CI-107878	3/14/2024	3/28/2024	40	February 2024	819.00	734.40	84.60	USD
CI-109554	4/4/2024	4/18/2024	19	March 2024	1,014.00	-	1,014.00	USD
Total					5.617.00	4.140.05	1.476.95	

Project #: P-002780 Invoice Date:

Invoice Number:

5/7/2024 CI-112089

4/30/2024

Professional Services Through:

Currency: USD

Professional Services - Summary By Person

Name	Title	Rate	Hours	Amount
Muthayee Chockalingam	Senior Director	390.00	0.5	195.00
Nathaniel Tess	Senior Director	390.00	8.0	312.00
Michelle Petruolo	Senior Associate	390.00	0.5	195.00
Total			1.8	702.00

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Project #: Invoice Date: Invoice Number: Professional Services Through:

P-002780 5/7/2024 CI-112089 4/30/2024 USD Currency:

Time Detail by Date

Date	Name	Title	Task	Time Narrative	Rate	Hours	Amount
4/3/2024	Michelle Petruolo	Senior Associate	Staffing Report/ Fee Applications	Prepare March Staffing Report prior to sending to B. Gaston (ACG) for review and approval.	390.00	0.5	195.00
4/23/2024	Muthayee Chockalingam	Senior Director	Claims Administration	Import March 2024 update from SSA, compare file totals with NTIS database.	390.00	0.5	195.00
4/23/2024	Nathaniel Tess	Senior Director	Claims Administration	Supplemental database processing.	390.00	0.8	312.00
Total						1.8	702.00

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EXHIBIT A-4

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

)	
In re:)	Chapter 11
)	
ALDRICH PUMP LLC, et al., ¹)	Case No. 20-30608
)	
	Debtors.)	(Jointly Administered)
)	•

FORTY-SECOND MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY ANKURA CONSULTING GROUP, LLC AS ASBESTOS CLAIMS CONSULTANT AND FINANCIAL ADVISOR 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 Authorizing Joseph W. Grier, III, the Future Claimants' Representative, to Retain and Employ Ankura Consulting Group, LLC as Asbestos Claims Consultant and Financial Advisor, effective as of December 3, 2020 (Dkt. No. 464), Ankura Consulting Group, LLC ("Ankura"), as asbestos claims consultant and financial advisor 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 Ankura Consulting Group, LLC as Asbestos Claims Consultant and Financial Advisor to Joseph W. Grier, III, the Future Claimants' Representative, for the Period from May 1, 2024 through May 31, 2024 (the "Monthly Fee Statement").

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 <u>Exhibit A</u> is Ankura's invoice for the period May 1, 2024 through May 31, 2024 (the "<u>Fee Statement Period</u>").

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: May 1, 2024 – May 31, 2024				
Total Fees:	\$78.00			
Total Expenses:	\$0.00			
TOTAL:	\$78.00			

3. Pursuant to the Interim Compensation Order, Ankura seeks payment of \$70.20 from the Debtors for the Fee Statement Period (the "Interim Amount"), representing (a) 90% of Ankura'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

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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., pamoa@mccarter.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, 31st 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).

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 Ankura, no later than July 23, 2024 (the "Objection Deadline"). Any Objection must set forth the

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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 Ankura 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 Ankura.

This is the 9th day of July 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

ankura ())

Ankura Consulting Group LLC PO Box 74007043 Chicago, IL 60674-7043

INVOICE

Date	Invoice Number
07/09/2024	CI-117276

Payment Terms	Due Date
Net 14	07/23/2024

FEIN NO.:	47-2435218

P-002780

Bill To:

Jonathan P. Guy Orrick, Herrington & Sutcliffe LLP 2100 Pennsylvania Avenue NW Washington, DC 20037

United States of America

Project Information:

Project Name: P-002780 Aldrich Pump FCR

Project Number:

PO Number:

Professional Services rendered May 1, 2024 through May 31, 2024.

Net Amount:

78.00

Tax:

Total Invoice Amount:

USD 78.00

For any questions regarding billing, wire or ACH payments, please contact accounting@ankura.com.

Remittance Information:

Electronic Payment Info

Wire Instructions

Account Name: Ankura Consulting Group LLC

Account Number: 226005697768

Bank of America 222 Broadway New York, NY 10038 United States ABA# 026009593 SWIFT: BOFAUS3N **ACH Instructions**

Account Name: Ankura Consulting Group LLC

Account Number: 226005697768

Bank of America 1455 Market Street San Francisco, CA 94109

United States ABA# 054001204 SWIFT: BOFAUS3N

Please include the invoice number and/or Ankura project number to your remittance to ensure prompt application of funds.

Project #: P-002780 Invoice Date: 7/9/2024

Invoice Number: CI-117276

Professional Services Through: 5/31/2024

Currency: USD

Invoice Summary

Professional Services 78.00

Current Invoice Total: 78.00

Outstanding Invoices 634.55

Outstanding Invoices

Invoice Number	Invoice Date	Due Date	Days Past Due	Description	Invoice Amount	Payment Applied	Amount Due	Currency
CI-097515	11/8/2023	11/22/2023	230	October 2023	484.00	435.63	48.37	USD
CI-100089	12/8/2023	12/22/2023	200	November 2023	1,893.00	1,703.71	189.29	USD
CI-102720	1/12/2024	1/26/2024	165	December 2023	744.00	669.60	74.40	USD
CI-104771	2/8/2024	2/22/2024	138	January 2024	663.00	596.71	66.29	USD
CI-107878	3/14/2024	3/28/2024	103	February 2024	819.00	734.40	84.60	USD
CI-109554	4/4/2024	4/18/2024	82	March 2024	1,014.00	912.60	101.40	USD
CI-112089	5/6/2024	5/20/2024	50	April 2024	702.00	631.80	70.20	USD
Total					6,319.00	5,684.45	634.55	

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Project #: P-002780

Invoice Date: 7/9/2024 Invoice Number: CI-117276

Professional Services Through: 5/31/2024

Currency: USD

Professional Services - Summary By Person

Name	Title	Rate	Hours	Amount
Michelle Petruolo	Senior Associate	390.00	0.2	78.00
Total			0.2	78.00

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P-002780 7/9/2024 CI-117276 5/31/2024 USD

Project #: Invoice Date: Invoice Number: Professional Services Through: Currency:

Time Detail by Date

Date	Name	Title	Task	Time Narrative	Rate	Hours	Amount
5/7/2024	Michelle Petruolo	Senior Associate	Staffing Report/ Fee Applications	Prepare April Staffing Report prior to sending to B. Gaston (ACG) for review and approval.	390.00	0.2	78.00
Total					_	0.2	78.00

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

February 1, 2024 through May 31, 2024

Project Category	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)
Business Operations	0.0	65.6	\$0.00	\$56,841.50
Case Administration	0.0	7.3	\$0.00	\$6,247.50
Claims Administration	4.4	1,241.8	\$1,716.00	\$493,614.50
Court Hearings	0.0	0.2	\$0.00	\$189.00
Litigation	0.0	89.7	\$0.00	\$74,178.50
Plan and Disclosure Statement	0.0	3.2	\$0.00	\$2,880.00
Staffing Report/Fee Applications	2.3	42.2	\$897.00	\$19,641.50
Claims Advisory Services	0.0	106.7	\$0.00	\$43,177.00
Financial Advisory Services	0.0	41.7	\$0.00	\$30,377.50
TOTAL:	6.7	1,598.41	\$2,613.00	\$727,147.00

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

February 1, 2024 through May 31, 2024

Expense Category	Total Expenses for the Period	Total Expenses from the Petition Date
N/A	\$0.00	\$0.00

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

February 1, 2024 through May 31, 2024

Name of Professional	Position	2024	Total	Total
		Hourly	Hours Billed	Compensation
		Billing Rate	Dilleu	
Muthayee Chockalingam	Senior Director	\$390	2.0	\$780.00
Michelle Petruolo	Senior Associate	\$390	2.3	\$897.00
Nathaniel Tess	Senior Director	\$390	2.4	\$936.00
		Total:	6.7	\$2,613.00

EXHIBIT E

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

Document	Application Date; Dkt. No.	Period Covered	Fees Requested/ Allowed	Expenses Requested/ Allowed	Order Approving Interim Application
1 st Interim	3/11/2021; Dkt.	12/3/2020-	\$73,554.50	\$0.00	Dkt. No. 663;
	No. 618	1/31/2021			4/2/2021
2 nd Interim	7/9/2021;	2/1/2021-	\$383,029.50	\$0.00	Dkt. No. 797;
	Dkt. No. 765	5/31/2021			8/2/2021
3 rd Interim	10/29/2021;	6/1/2021-	\$38,209.00	\$0.00	Dkt. No. 930;
	Dkt. No. 865	9/30/2021			12/8/2021
4 th Interim	3/1/2022;	10/1/2021-	\$36,742.00	\$0.00	Dkt. No. 1061;
	Dkt. No. 1010	1/31/2022			3/23/2022
5 th Interim	7/11/2022;	2/1/2022-	\$17,495.50	\$0.00	Dkt. No. 1312;
	Dkt. No. 1260	5/31/2022			8/3/2022
6 th Interim	11/7/2022;	6/1/2022-	\$11,042.00	\$0.00	Dkt. No. 1459
	Dkt. No. 1392	9/30/2022			12/7/2022
7 th Interim	3/8/2023;	10/1/2022-	\$61,218.50	\$0.00	Dkt. No. 1828;
	Dkt. No. 1633	1/31/2023			6/21/2033
8 th Interim	7/12/2023;	2/1/2023-	\$88,249.50	\$0.00	Dkt. No. 1903;
	Dkt. No. 1869	5/31/2023			8/2/2023
9 th Interim	11/7/2023;	6/1/2023-	\$11,209.50	\$0.00	Dkt. No. 2028;
	Dkt. No. 1992	9/30/2023			11/30/2023
10 th Interim	3/15/2024;	10/1/2023-	\$3,784.00	\$0.00	Dkt. No. 2192;
	Dkt. No. 2145	1/31/2024			4/11/2024