

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

<p>In re:</p> <p>ALDRICH PUMP LLC, et al.,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 20-30608</p> <p>Jointly Administered</p>
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SUMMARY OF FIRST INTERIM APPLICATION OF TETRARHO LLC FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS FINANCIAL ADVISOR TO JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS’ REPRESENTATIVE, FOR THE PERIOD FROM APRIL 5, 2024 THROUGH MAY 31, 2024

Name of Applicant:	TetraRho LLC
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants’ Representative
Date of Order Approving Retention:	April 5, 2024 (Dkt. No. 2187)
Period for which compensation and reimbursement is sought:	April 5, 2024 – May 31, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$45,600.00
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:	\$45,600.00

This is a(n) x interim final application.

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



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

In re:

Chapter 11

ALDRICH PUMP LLC, et al.,¹

Case No. 20-30608

Debtors.

Jointly Administered

**FIRST INTERIM APPLICATION OF TETRARHO LLC
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES AS FINANCIAL ADVISOR TO JOSEPH W.
GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE, FOR THE PERIOD
FROM APRIL 5, 2024 THROUGH MAY 31, 2024**

TetraRho LLC (“Tetra”), financial advisor to Joseph W. Grier, III, the Court-appointed future claimants’ representative in these cases (the “FCR”), hereby brings its first interim application for allowance of compensation of \$45,600.00 and reimbursement of expenses of \$0.00 for the period of April 5, 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

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

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 Consulting Group, LLC (“Ankura”) as his asbestos claims consultant and financial advisor in this Chapter 11 Case, effective as of December 3, 2020 (Doc. No. 464) (the “Ankura Retention Order”). While the FCR’s asbestos claims consultant team continues to be employed by Ankura and retained in this Chapter 11 Case pursuant to the Ankura Retention Order, the FCR’s financial advisory team, led by Jason Solganick (“Mr. Solganick”), resigned from Ankura in October 2023 and formed Tetra. Mr. Solganick is the sole member and employee of Tetra.

5. On April 5, 2024, the Court entered an order authorizing the FCR to retain Tetra as his financial advisor in this Chapter 11 Case, effective as of April 5, 2024 (Doc. No. 2187) (the “Tetra Retention Order”). Ankura is continuing to provide asbestos claims consulting services to the FCR under the Ankura Retention Order and, pursuant to the Tetra Retention Order, Tetra will provide financial advisory services to the FCR.

6. 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

7. Pursuant to the Fee Procedures Order, Tetra 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-2**. Summarized below are the requested professional fees and expenses and payments that Tetra has received on the same.

Date of Monthly Fee Statement	Description	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
5/3/2024	First Monthly	4/5/2024-4/30/2024	\$34,105.00	\$0.00	\$0.00	\$34,105.00
6/5/2024	Second Monthly	5/1/2024-5/31/2024	\$11,495.00	\$0.00	\$0.00	\$11,495.00
TOTAL:			\$45,600.00	\$0.00	\$0.00	\$45,600.00

8. In total, Tetra has submitted fee statements during the Interim Period for total fees of \$45,600.00² and total expenses of \$0.00. As of the date of this Application, no party has objected to the fee statements circulated by Tetra.

SUMMARY OF SERVICES RENDERED

9. Attached hereto as **Exhibits A-1 through A-2** are Tetra’s monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by Tetra during the Interim Period. In summary, during the Interim Period, Tetra expended a total of

² Tetra’s fees were higher for the first two months of its engagement in this Chapter 11 Case given the passage of time between the financial advisory team’s resignation from Ankura in October 2023 and Tetra’s retention on April 5, 2024. As detailed in Tetra’s first and second monthly fee statements, Tetra spent time reviewing financial results, reports, and related documents filed during the period from October 2023 and April 2024 and provided summaries of the same to the FCR.

48.0 hours rendering necessary services in this Chapter 11 Case and incurred total fees of \$45,600.00 and \$0.00 in expenses.

10. As the financial advisor to the FCR, Tetra 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-2**.

11. Tetra 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. Tetra further believes that its services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the tasks addressed.

12. Tetra 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. **Business Operations – 41.3 hours, \$39,235.00.** During the Interim Period, Mr. Solganick reviewed Trane’s financial results from the third and fourth quarters of 2023 and the first quarter of 2024. Mr. Solganick also listened to Trane’s quarterly earnings calls and reviewed the Debtors’ monthly operating reports from August 2023 through March 2024. In addition, Mr. Solganick prepared a memo for the FCR with respect to Trane’s 2023 financial results.
- b. **Litigation – 6.5 hours, \$6,175.00.** During the Interim Period, Mr. Solganick reviewed the Debtors’ case dockets and related documents in connection with his analysis of the Debtors’ and Trane’s financial position.
- c. **Staffing Report/Fee Applications – 0.2 hours, \$190.00.** During the Interim Period, Mr. Solganick reviewed Tetra’s April monthly fee statement and invoice.

13. **Exhibit B** provides a summary of Tetra’s time by project category.

14. **Exhibit C** reflects a summary by category of the expenses that Tetra incurred during the Interim Period, which totaled \$0.00.

15. **Exhibit D** provides information as to Tetra’s professionals, including position, billing rates, and the total number of hours billed during the Interim Period. Tetra 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 Tetra has rendered.

16. **Exhibit E** states that this is Tetra’s first interim fee application.

DISBURSEMENTS

17. Tetra must incur certain expenses in the course of rendering services to the FCR. 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.

18. Tetra did not incur any expenses during the Interim Period.

NOTICE

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

NO PRIOR REQUEST

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

CONCLUSION

21. Based on the foregoing, Tetra 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, Tetra respectfully requests that the Court enter an Order:

1) Allowing interim compensation to Tetra in the amount of \$45,600.00 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 Tetra the amount of \$45,600.00, which is equal to 100% of Tetra's requested compensation for the Interim Period and 100% of Tetra's requested expense reimbursement for the Interim Period, less all previous payments made to Tetra 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, 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*

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

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

**FIRST MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
TETRARHO LLC AS FINANCIAL ADVISOR TO JOSEPH W. GRIER, III,
THE FUTURE CLAIMANTS’ REPRESENTATIVE,
FOR THE PERIOD FROM APRIL 5, 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 TetraRho LLC as Financial Advisor*, effective as of April 5, 2024 (Dkt. No. 2187), TetraRho LLC (“Tetra”), as financial advisor to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *First Monthly Statement of Fees and Expenses Incurred by TetraRho LLC as Financial Advisor to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from April 5, 2024 through April 30, 2024* (the “Monthly Fee Statement”).

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Tetra’s invoice for the period April 5, 2024 through April 30, 2024 (the “Fee Statement Period”).

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

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: April 5, 2024 – April 30, 2024	
Total Fees:	\$34,105.00
Total Expenses:	\$0.00
TOTAL:	\$34,105.00

3. Pursuant to the Interim Compensation Order, Tetra seeks payment of \$30,694.50 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Tetra’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., pamoam@mcarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mcarter.com and Phillip S. Pavlick, Esq., ppavlick@mcarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mcarter.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 Tetra, no later than May 17, 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 Tetra 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 Tetra.

This is the 3rd 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

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dfelder@orrick.com

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

Exhibit A



TetraRho LLC
1900 Half Moon Bay Drive
Croton, NY 10520

Date	Invoice #	Due Date	FEIN #
5/01/2024	ALD 202404	05/31/2024	93-428106

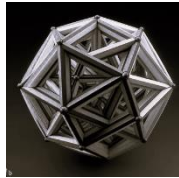
Jonathan Guy
Orrick, Herrington & Sutcliffe LLP
2100 Pennsylvania Ave., NW
Washington, DC 20037

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

Professional Services Rendered for the Month of April 2024 (Aldrich Pump FCR)

Total Invoice Amount:	\$34,105.00
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Remittance Information:
TetraRho LLC
Jason Solganick
1900 Half Moon Bay Drive
Croton, NY 10520



Project: Aldrich Pump FCR
 Invoice Date: 5/01/2024
 Invoice #: ALD 202404
 Professional Services Through: 04/30/2024

Invoice Summary

Professional Services: \$34,105.00
 Total Amount Due: \$34,105.00

Summary by Person:

Name	Title	Rate	Hours	Amount
Jason Solganick	Managing Director	\$950.00	35.9	\$34,105.00
Total			35.9	\$34,105.00

Time Detail:

Date	Name	Title	Hours	Rate	Amount	Description	Category
4/8/2024	Jason Solganick	Managing Director	1.4	950.0	\$ 1,330.00	Review Trane 10Q filing for 3Q2023	Business Operations
4/8/2024	Jason Solganick	Managing Director	0.4	950.0	\$ 380.00	Review Trane financial results presentation for 3Q2023	Business Operations
4/8/2024	Jason Solganick	Managing Director	1.1	950.0	\$ 1,045.00	Listen to Trane 3Q2023 earnings call	Business Operations
4/8/2024	Jason Solganick	Managing Director	2.9	950.0	\$ 2,755.00	Financial analysis re: Trane 3Q2023 financial results	Business Operations
4/9/2024	Jason Solganick	Managing Director	0.5	950.0	\$ 475.00	Review monthly operating reports (August 2023)	Business Operations
4/9/2024	Jason Solganick	Managing Director	0.4	950.0	\$ 380.00	Review monthly operating reports (September 2023)	Business Operations
4/10/2024	Jason Solganick	Managing Director	0.5	950.0	\$ 475.00	Review monthly operating reports (October 2023)	Business Operations
4/10/2024	Jason Solganick	Managing Director	0.8	950.0	\$ 760.00	Review orders (denying motion to withdraw derivative standing, denying motions to dismiss)	Litigation
4/10/2024	Jason Solganick	Managing Director	0.1	950.0	\$ 95.00	Review claims sampling order	Litigation
4/10/2024	Jason Solganick	Managing Director	0.5	950.0	\$ 475.00	Review monthly operating reports (November 2023)	Business Operations
4/10/2024	Jason Solganick	Managing Director	1.2	950.0	\$ 1,140.00	Review pleadings re: appeal of order denying motion to dismiss	Litigation
4/10/2024	Jason Solganick	Managing Director	0.2	950.0	\$ 190.00	Review periodic report regarding value, operations and profitability	Business Operations
4/10/2024	Jason Solganick	Managing Director	0.3	950.0	\$ 285.00	Review ACC statement of issues on appeal	Litigation
4/10/2024	Jason Solganick	Managing Director	0.5	950.0	\$ 475.00	Review monthly operating reports (December 2023)	Business Operations
4/10/2024	Jason Solganick	Managing Director	0.3	950.0	\$ 285.00	Review objections to ACC requests for direct appeal	Litigation
4/10/2024	Jason Solganick	Managing Director	0.6	950.0	\$ 570.00	Review Trane news releases	Business Operations
4/15/2024	Jason Solganick	Managing Director	0.7	950.0	\$ 665.00	Review Trane 8-K filings	Business Operations
4/15/2024	Jason Solganick	Managing Director	0.3	950.0	\$ 285.00	Review case dockets	Litigation
4/15/2024	Jason Solganick	Managing Director	0.6	950.0	\$ 570.00	Review replies to objections to ACC requests for direct appeal	Litigation
4/15/2024	Jason Solganick	Managing Director	0.4	950.0	\$ 380.00	Review monthly operating reports (January 2024)	Business Operations
4/15/2024	Jason Solganick	Managing Director	1.3	950.0	\$ 1,235.00	Review news updates for relevant coverage	Business Operations
4/15/2024	Jason Solganick	Managing Director	0.4	950.0	\$ 380.00	Review ACC motion to quash subpoenas and response	Litigation
4/15/2024	Jason Solganick	Managing Director	0.5	950.0	\$ 475.00	Review monthly operating reports (February 2024)	Business Operations
4/15/2024	Jason Solganick	Managing Director	0.4	950.0	\$ 380.00	Review motion to require admissions re: funding agreements	Litigation
4/15/2024	Jason Solganick	Managing Director	0.3	950.0	\$ 285.00	Review responses/objections to ACC motion to quash subpoenas	Litigation
4/15/2024	Jason Solganick	Managing Director	0.5	950.0	\$ 475.00	Review settlement facility audited financial statements	Business Operations
4/16/2024	Jason Solganick	Managing Director	0.1	950.0	\$ 95.00	Review hearing agenda	Litigation
4/17/2024	Jason Solganick	Managing Director	0.3	950.0	\$ 285.00	Review protective order, execute acknowledgement	Business Operations
4/17/2024	Jason Solganick	Managing Director	0.1	950.0	\$ 95.00	Review case dockets	Litigation
4/18/2024	Jason Solganick	Managing Director	1.1	950.0	\$ 1,045.00	Listen to Trane 4Q2023 earnings call	Business Operations
4/18/2024	Jason Solganick	Managing Director	0.6	950.0	\$ 570.00	Review Trane financial results presentation for 4Q2023	Business Operations
4/18/2024	Jason Solganick	Managing Director	2.9	950.0	\$ 2,755.00	Review Trane 10K filing for 2023	Business Operations
4/18/2024	Jason Solganick	Managing Director	0.3	950.0	\$ 285.00	Communications w/ Ankura re: coordination	Business Operations
4/19/2024	Jason Solganick	Managing Director	0.1	950.0	\$ 95.00	Review quarterly claims report	Litigation
4/19/2024	Jason Solganick	Managing Director	0.6	950.0	\$ 570.00	Review objections to motion to require admissions re: funding agreements	Litigation
4/23/2024	Jason Solganick	Managing Director	0.7	950.0	\$ 665.00	Review news updates for relevant coverage	Business Operations
4/23/2024	Jason Solganick	Managing Director	0.1	950.0	\$ 95.00	Review case dockets	Litigation
4/23/2024	Jason Solganick	Managing Director	0.3	950.0	\$ 285.00	Review claimants' reply re: funding agreements	Litigation
4/23/2024	Jason Solganick	Managing Director	2.9	950.0	\$ 2,755.00	Prepare update memo re: Trane 2023 financial results	Business Operations
4/24/2024	Jason Solganick	Managing Director	0.1	950.0	\$ 95.00	Review agenda and claimants' supplement	Litigation
4/24/2024	Jason Solganick	Managing Director	1.8	950.0	\$ 1,710.00	Prepare update memo re: Trane 2023 financial results	Business Operations
4/29/2024	Jason Solganick	Managing Director	0.5	950.0	\$ 475.00	Review news updates for relevant coverage	Business Operations
4/29/2024	Jason Solganick	Managing Director	0.1	950.0	\$ 95.00	Review case dockets	Litigation
4/29/2024	Jason Solganick	Managing Director	3.0	950.0	\$ 2,850.00	Prepare update memo re: Trane 2023 financial results	Business Operations
4/29/2024	Jason Solganick	Managing Director	0.7	950.0	\$ 665.00	Review Trane proxy statement and financial analysis	Business Operations
4/30/2024	Jason Solganick	Managing Director	2.5	950.0	\$ 2,375.00	Prepare update memo re: Trane 2023 financial results	Business Operations
Total:			35.9		\$ 34,105.00		

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

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

**SECOND MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
TETRARHO LLC AS 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 TetraRho LLC as Financial Advisor*, effective as of April 5, 2024 (Dkt. No. 2187), TetraRho LLC (“Tetra”), as financial advisor to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Second Monthly Statement of Fees and Expenses Incurred by TetraRho LLC as 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”).

Itemization of Services Rendered and Expenses Incurred

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

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

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: May 1, 2024 – May 31, 2024	
Total Fees:	\$11,495.00
Total Expenses:	\$0.00
TOTAL:	\$11,495.00

3. Pursuant to the Interim Compensation Order, Tetra seeks payment of \$10,345.50 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Tetra’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, 31st 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 Tetra, no later than June 19, 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 Tetra 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 Tetra.

This is the 5th 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

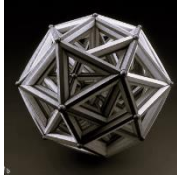
Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

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

Exhibit A



TetraRho LLC
1900 Half Moon Bay Drive
Croton, NY 10520

Date	Invoice #	Due Date	FEIN #
6/03/2024	ALD 202405	06/30/2024	93-428106

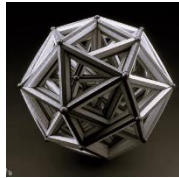
Jonathan Guy
Orrick, Herrington & Sutcliffe LLP
2100 Pennsylvania Ave., NW
Washington, DC 20037

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

Professional Services Rendered for the Month of May 2024 (Aldrich Pump FCR)

Total Invoice Amount:	\$11,495.00
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Remittance Information:
TetraRho LLC
Jason Solganick
1900 Half Moon Bay Drive
Croton, NY 10520



Project: Aldrich Pump FCR
 Invoice Date: 6/03/2024
 Invoice #: ALD 202405
 Professional Services Through: 05/31/2024

Invoice Summary

Professional Services: \$11,495.00
 Total Amount Due: \$11,495.00

Summary by Person:

Name	Title	Rate	Hours	Amount
Jason Solganick	Managing Director	\$950.00	12.1	\$11,495.00
Total			12.1	\$11,495.00

Time Detail:

Date	Name	Hours	Rate	Amount	Description	Category
5/1/2024	Jason Solganick	0.4	950.0	\$ 380.00	Review monthly operating reports (March 2024)	Business Operations
5/1/2024	Jason Solganick	1.9	950.0	\$ 1,805.00	Prepare update memo re: Trane 2023 financial results	Business Operations
5/2/2024	Jason Solganick	0.2	950.0	\$ 190.00	Review fee application	Staffing Report/ Fee Applications
5/2/2024	Jason Solganick	1.4	950.0	\$ 1,330.00	Prepare update memo re: Trane 2023 financial results	Business Operations
5/3/2024	Jason Solganick	1.6	950.0	\$ 1,520.00	Prepare update memo re: Trane 2023 financial results	Business Operations
5/6/2024	Jason Solganick	0.9	950.0	\$ 855.00	Listen to Trane 1Q2024 earnings call	Business Operations
5/6/2024	Jason Solganick	0.5	950.0	\$ 475.00	Review Trane financial results presentation for 1Q2024	Business Operations
5/6/2024	Jason Solganick	0.4	950.0	\$ 380.00	Review Trane 1Q2024 financial results news release	Business Operations
5/6/2024	Jason Solganick	1.5	950.0	\$ 1,425.00	Review Trane 10Q filing for 1Q2024	Business Operations
5/6/2024	Jason Solganick	2.3	950.0	\$ 2,185.00	Financial analysis re: Trane 1Q2024 financial results	Business Operations
5/6/2024	Jason Solganick	0.1	950.0	\$ 95.00	Review case dockets	Litigation
5/6/2024	Jason Solganick	0.4	950.0	\$ 380.00	Review news updates for relevant coverage	Business Operations
5/16/2024	Jason Solganick	0.1	950.0	\$ 95.00	Review case dockets	Litigation
5/22/2024	Jason Solganick	0.3	950.0	\$ 285.00	Review news updates for relevant coverage	Business Operations
5/28/2024	Jason Solganick	0.1	950.0	\$ 95.00	Review case dockets	Litigation
Total:		12.1		\$ 11,495.00		

Outstanding Invoices:

202404 5/01/24 \$34,105.00

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

April 5, 2024 through May 31, 2024

Project Category	Total Hours for the Interim Period (4/5/2024 – 5/31/2024)	Total Hours from the Petition Date (6/18/2020 – 5/31/2024)	Total Fees for the Interim Period (4/5/2024 – 5/31/2024)	Total Fees from the Petition Date (6/18/2020 – 5/31/2024)
Business Operations	41.3	41.3	\$39,235.00	\$39,235.00
Litigation	6.5	6.5	\$6,175.00	\$6,175.00
Staffing Report/Fee Applications	0.2	0.2	\$190.00	\$190.00
TOTAL:	48.0	48.0	\$45,600.00	\$45,600.00

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

April 5, 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

April 5, 2024 through May 31, 2024

Name of Professional	Position	2024 Hourly Billing Rate	Total Hours Billed	Total Compensation
Jason Solganick	Managing Director	\$950	48.0	\$45,600.00
Total:			48.0	\$45,600.00

EXHIBIT E

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

This is Tetra's first interim fee application.