

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

In re:

CASE NO. 20-30608

ALDRICH PUMP LLC, *et al.*,¹

CHAPTER 11

Debtors.

Jointly Administered

**SUMMARY OF SIXTEENTH INTERIM APPLICATION FOR COMPENSATION OF
GRIER WRIGHT MARTINEZ, PA FOR SERVICES RENDERED TO AND FOR
REIMBURSEMENT OF EXPENSES AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM JUNE 1, 2025 THROUGH SEPTEMBER 30, 2025**

Name of Applicant:	Grier Wright Martinez, PA
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Appointment:	October 14, 2020
Period for which compensation and reimbursement is sought:	June 1, 2025 through September 30, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$19,614.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$302.70
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$19,916.70

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
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Debtors.

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CHAPTER 11

Jointly Administered

**SIXTEENTH INTERIM APPLICATION FOR COMPENSATION OF GRIER WRIGHT
MARTINEZ, PA FOR SERVICES RENDERED TO AND FOR REIMBURSEMENT OF
EXPENSES AS COUNSEL TO JOSEPH W. GRIER, III,
THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM JUNE 1, 2025 THROUGH SEPTEMBER 30, 2025**

Grier Wright Martinez, PA (“GWM”), counsel to Joseph W. Grier, III, the Future Claimants’ Representative in this case (the “FCR”), through counsel, hereby brings its sixteenth interim application for allowance of compensation of \$19,614.00 and reimbursement of expenses of \$302.70 for the period of June 1, 2025 through September 30, 2025 (the “Compensation Period”) in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Doc. No. 171) (the “Fee Procedure Order”), and in support, respectfully represents as follows:

BACKGROUND

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

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

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

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

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

COMPENSATION RECEIVED DURING THE INTERIM PERIOD

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

Date of Request	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
7/24/2025	6/1/2025-6/30/2025	\$1,102.50	\$0.00	\$992.25	\$110.25
9/03/2025	7/1/2025-7/31/2025	\$5,404.50	\$300.00	\$5,164.50	\$540.00
10/15/2025	8/1/2025-8/31/2025	\$8,488.50	\$0.00	\$1,804.17 ²	\$6,684.33
10/22/2025	9/1/2025-9/30/2025	\$4,618.50	\$2.70	\$0.00	\$4,621.20

6. In total, GWM has submitted fee statements during the Interim Period for total fees of \$19,614.00 and total expenses of \$302.70. As of the date of this Application, no party has objected to the fee statements circulated by GWM.

SUMMARY OF SERVICES RENDERED

7. Attached here as **Exhibit A** are GWM's monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by GWM during the Interim Period. In summary, GWM expended a total of 49.4 hours rendering necessary services in this Chapter 11 proceeding during the Interim Period. GWM's fees total \$19,614.00 for the Interim Period.

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

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

² On October 28, 2025, Grier Wright Martinez, PA received an overpayment of \$1,804.17. GWM has credited \$1,804.17 for August's fees and expenses.

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

A. **Case Administration and Business Operations** – 1.8 hours, \$945.00. During the Interim Period, GWM arranged for copies of hearing transcripts for the FCR's team, kept the FCR's professionals abreast of case issues, and monitored deadlines. GWM also reviewed and responded to emails from attorneys for the parties.

B. **Professional Retention/Fee Issues** – 9.2 hours, \$2,916.00. GWM reviewed and signed off on fee requests for the FCR's professionals, corresponded with Debtors' counsel regarding fee issues and overpayment, and worked on an application to employ the FCR's claims expert.

C. **Court Hearings** – 10.9 hours, \$3,675.00. GWM attended hearings in the Debtors' main case and adversary proceedings.

D. **Fee Application Preparation** – 2.0 hours, \$451.50. GWM prepared applications for compensation for the FCR and GWM.

E. **Asbestos Matters** – 8.9 hours, \$3,852.00. GWM reviewed an edited amicus brief for filing in *Bestwall* appeal.

F. **Litigation and Adversary Proceedings** – 16.6 hours, \$7,774.50. Reviewed, edited, and filed various pleadings on behalf of the FCR and exchanged emails with the FCR's team regarding the same.

11. In **Exhibit B**, GWM has categorized the firm's time by project categories recommended by the Guidelines for Compensation and Expense Reimbursement of Professionals

referenced in Rule 2016-1 of this Court's Local Rules of Practice and Procedure (the "Local Rules").

12. **Exhibit C** reflects a summary by category of the expenses that GWM incurred during the Interim Period, which totaled \$302.70.

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

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

DISBURSEMENTS

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

16. GWM requests reimbursement for the firm's actual and necessary expenses incurred during the Interim Period in the amount of \$302.70. A detailed breakdown of such expenses is provided in GWM's invoices included in **Exhibit A**, and those expenses are summarized in **Exhibit C**. GWM's expenses during the Interim Period were necessary and reasonable under the circumstances of this case.

NOTICE

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

NO PRIOR REQUEST

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

CONCLUSION

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

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

1) Allowing interim compensation to GWM in the amount of \$19,614.00 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 \$302.70 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay GWM the amount of \$19,916.70, which is equal to 100% of GWM's requested compensation for the Interim Period and 100% of

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

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

This is the 13th of November, 2025.

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

EXHIBIT A



ATTORNEYS AT LAW

Grier Wright Martinez, PA

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

STATEMENT

Statement # 1420
Date: 07/24/2025
Due On: 08/18/2025

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
06/04/2025	Professional Retention/Fee Issues: Reviewed emails re: documents relative to engagement of testifying expert.	ACW	0.20	\$525.00	\$105.00
06/05/2025	Professional Retention/Fee Issues: Prepare first draft of application to employ The Brattle Group. Email to M. Rosenberg, J. Guy and D, Carnie.	BLF	1.10	\$210.00	\$231.00
06/11/2025	Professional Retention/Fee Issues: Reviewed draft declaration from testifying expert and emails pertaining to same.	ACW	0.30	\$525.00	\$157.50
06/12/2025	Professional Retention/Fee Issues: Reviewed and responded to email from M.Rosenberg re: application to employ Brattle Group and attached documents.	ACW	0.10	\$525.00	\$52.50
06/13/2025	Professional Retention/Fee Issues: Prepare draft application to employ Brattle Group with attached engagement letter and signed declaration. Send to ACW for edits. Receive comments and pdf for filing from ACW. File and request service of same.	BLF	0.60	\$210.00	\$126.00
06/13/2025	Professional Retention/Fee Issues: Final review of application to employ Brattle Group; requested	ACW	0.40	\$525.00	\$210.00

BLF file same.					
06/13/2025	Professional Retention/Fee Issues: File Application to Employ Brattle Group. Upload proposed order re same.	BLF	0.20	\$210.00	\$42.00
06/25/2025	Fee Application Preparation: Prepare draft monthly fee statements for GWM and FCR for May 2025. Send to D. Felder.	BLF	0.40	\$210.00	\$84.00
06/26/2025	Fee Application Preparation: Make edits to May monthly fee statements. File and serve the same.	BLF	0.20	\$210.00	\$42.00
06/26/2025	Fee Application Preparation: Reviewed draft fee statements and approved same.	ACW	0.10	\$525.00	\$52.50
Quantity Subtotal					3.6

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	1.1	\$525.00	\$577.50
Brittany L. Franklin	2.5	\$210.00	\$525.00
Quantity Total			3.6
Subtotal			\$1,102.50
Total			\$1,102.50
Payment (08/26/2025)			-\$992.25
Balance Owing			\$110.25

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1440	09/24/2025	\$5,704.50	\$5,164.05	\$540.45
1445	11/03/2025	\$8,488.50	\$1,804.17	\$6,684.33
1480	11/12/2025	\$4,621.20	\$0.00	\$4,621.20

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
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1420	08/18/2025	\$1,102.50	\$992.25	\$110.25
Outstanding Balance				\$11,956.23
Total Amount Outstanding				\$11,956.23

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



ATTORNEYS AT LAW

Grier Wright Martinez, PA

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

STATEMENT

Statement # 1440
Date: 09/03/2025
Due On: 09/24/2025

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
07/01/2025	Litigation and Adversary Proceedings: Reviewed ACC motion to reconsider order authorizing FCR's employment of Brattle Group.	ACW	0.30	\$525.00	\$157.50
07/01/2025	Litigation and Adversary Proceedings: Brief review of ACC document requests relative to engagement of Brattle Group.	ACW	0.20	\$525.00	\$105.00
07/02/2025	Litigation and Adversary Proceedings: Reviewed and responded to email from J.Guy re: hearing on ACC's motion to reconsider.	ACW	0.20	\$525.00	\$105.00
07/07/2025	Case Administration and Business Operations: Emails with D. Carnie re hearing transcript.	ACW	0.10	\$525.00	\$52.50
07/08/2025	Fee Application Preparation: Make ACW edits to GWM and FCR fee applications. Send to D. Felder. Make D. Felder edits. Draft Notice of Opportunity for Hearing. Send to ACW for review.	BLF	0.60	\$210.00	\$126.00
07/09/2025	Fee Application Preparation: Prepare Application for Compensation PDF's for filing for GWM, FCR,	BLF	0.70	\$210.00	\$147.00

	Anderson Kill, Orrick, Ankura and TetraRho. File same. File notice of opportunity for hearing on fee applications. Request service of fee applications and notice of opportunity for hearing.				
07/09/2025	Case Administration and Business Operations: Responded to Orrick request for copies of hearing transcripts; sent request to counsel for the debtors.	ACW	0.20	\$525.00	\$105.00
07/10/2025	Litigation and Adversary Proceedings: Emails with J. Guy and team re: Brattle and motion to consider response.	ACW	0.20	\$525.00	\$105.00
07/11/2025	Professional Retention/Fee Issues: Sent email to Bankruptcy Administrator inquiring as to status of revised fee procedures; reviewed response.	ACW	0.10	\$525.00	\$52.50
07/11/2025	Professional Retention/Fee Issues: Review Orrick monthly fees.	ACW	0.10	\$525.00	\$52.50
07/14/2025	Professional Retention/Fee Issues: Reviewed and responded to M.Rosenberg re: ex parte applications to employ per local rule.	ACW	0.20	\$525.00	\$105.00
07/14/2025	Litigation and Adversary Proceedings: Brief review of draft objection to ACC motion to reconsider order authorizing employment of Brattle Group.	ACW	0.30	\$525.00	\$157.50
07/14/2025	Litigation and Adversary Proceedings: Reviewed email from J.Guy to N.Ramsey & D.Wright re: ACC discovery requests on engagement of Brattle Group; reviewed response from N.Ramsey.	ACW	0.10	\$525.00	\$52.50
07/15/2025	Litigation and Adversary Proceedings: Reviewed and provided comments and edits for the FCR's response to the ACC's motion to reconsider approval of employment of Brattle as testifying expert.	ACW	1.20	\$525.00	\$630.00
07/15/2025	Litigation and Adversary Proceedings: Reviewed additional edits by Orrick to response to ACC motion for reconsideration and finalized pleadings; requested BLF file same and arrange for service.	ACW	0.60	\$525.00	\$315.00
07/21/2025	Litigation and Adversary Proceedings: Telephone conference with J. Guy re: July 24 hearing and response by FCR.	ACW	0.10	\$525.00	\$52.50
07/23/2025	Court Hearings: Review of matters on for hearing July 24, 2025.	BDR	1.10	\$330.00	\$363.00
07/24/2025	Court Hearings: Travel to/from and attend hearing on ACC motion to reconsider order granting employment of Brattle Group.	BDR	1.50	\$330.00	\$495.00

07/25/2025	Professional Retention/Fee Issues: Correspond with J. Guy and M. Rosenberg re fee objection.	ACW	0.20	\$525.00	\$105.00
07/28/2025	Professional Retention/Fee Issues: Research re: standards for reimbursement of expenses incurred by case professionals.	BDR	1.60	\$330.00	\$528.00
07/28/2025	Professional Retention/Fee Issues: Additional research re: standards for reimbursement of expenses; drafted summary of same for JWG, ACW, and J. Guy.	BDR	0.50	\$330.00	\$165.00
07/28/2025	Professional Retention/Fee Issues: Research re: standards for awarding compensation to hourly employees/subcontractors under § 330.	BDR	1.20	\$330.00	\$396.00
07/30/2025	Litigation and Adversary Proceedings: Review email communications between ACW and J. Guy re: potential suppression of evidence as related to conflict of interest rules.	BDR	0.10	\$330.00	\$33.00
07/30/2025	Professional Retention/Fee Issues: Additional research re: excessive compensation of temporary employees under 330(a).	BDR	0.70	\$330.00	\$231.00
07/30/2025	Litigation and Adversary Proceedings: Emails with JWG and J. Guy re fiduciary duties of committees and conflict of interest issues.	ACW	0.20	\$525.00	\$105.00
07/31/2025	Litigation and Adversary Proceedings: Review Order Denying ACC motion to reconsider employment of Brattle Group.	BDR	0.10	\$330.00	\$33.00
07/31/2025	Case Administration and Business Operations: Reviewed email from J.Guy re: process for replacing members of the ACC; brief conference with JWG re: same; drafted response to J.Guy.	ACW	0.50	\$525.00	\$262.50
07/31/2025	Case Administration and Business Operations: Reviewed transcripts in other asbestos cases re: issues related to replacing committee members.	ACW	0.70	\$525.00	\$367.50
Quantity Subtotal					13.6
Services Subtotal					\$5,404.50

Expenses

Date	Notes	Quantity	Rate	Total
07/24/2025	USBC: Pro Hac Vice Filing Fee - Rosenberg	1.00	\$300.00	\$300.00
Expenses Subtotal				\$300.00

Time Keeper	Quantity	Rate	Total
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Benjamin Rhodes	6.8	\$330.00	\$2,244.00
A. Cotten Wright	5.5	\$525.00	\$2,887.50
Brittany L. Franklin	1.3	\$210.00	\$273.00
Quantity Total			13.6
Subtotal			\$5,704.50
Total			\$5,704.50
Payment (08/26/2025)			-\$207.26
Payment (09/17/2025)			-\$1,596.91
Payment (10/28/2025)			-\$3,359.88
Balance Owing			\$540.45

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1420	08/18/2025	\$1,102.50	\$992.25	\$110.25
1445	11/03/2025	\$8,488.50	\$1,804.17	\$6,684.33
1480	11/12/2025	\$4,621.20	\$0.00	\$4,621.20

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1440	09/24/2025	\$5,704.50	\$5,164.05	\$540.45
Outstanding Balance				\$11,956.23
Total Amount Outstanding				\$11,956.23

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



Grier Wright Martinez, PA

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

STATEMENT

Statement # 1445
Date: 10/01/2025
Due On: 11/03/2025

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
08/04/2025	Asbestos Matters: Review bestwall docket. Emails with J. Guy re same.	BLF	1.80	\$210.00	\$378.00
08/11/2025	Litigation and Adversary Proceedings: Review draft response to ACC motion to substitute members.	BDR	0.20	\$330.00	\$66.00
08/12/2025	Litigation and Adversary Proceedings: Review and analysis of draft response to ACC motion to substitute committee members.	BDR	0.20	\$330.00	\$66.00
08/13/2025	Court Hearings: Attend telephonic conference in ACC appeal to district court.	BDR	0.40	\$330.00	\$132.00
08/13/2025	Litigation and Adversary Proceedings: Prepare portfolio of record in ACC appeal of motion to dismiss.	BDR	2.00	\$330.00	\$660.00
08/14/2025	Litigation and Adversary Proceedings: Prepare portfolio of record in ACC appeal of motion to dismiss.	BDR	1.30	\$330.00	\$429.00
08/19/2025	Litigation and Adversary Proceedings: Review of Judge Volk's order on briefing schedule in ACC appeal of motion to dismiss.	BDR	0.20	\$330.00	\$66.00

08/20/2025	Litigation and Adversary Proceedings: Reviewed draft of response to ACC motion to substitute committee members.	ACW	1.20	\$525.00	\$630.00
08/20/2025	Litigation and Adversary Proceedings: Prepared redline of revised draft response and emailed same to JWG and J.Guy.	ACW	4.80	\$525.00	\$2,520.00
08/21/2025	Litigation and Adversary Proceedings: Reviewed redlined comments to draft response and made additional edits.	ACW	0.60	\$525.00	\$315.00
08/21/2025	Litigation and Adversary Proceedings: Review and analysis of revisions to FCR's response to ACC's motion to substitute.	BDR	0.40	\$330.00	\$132.00
08/21/2025	Litigation and Adversary Proceedings: Reviewed revised draft of FCR response to ACC motion to substitute and made edits to same; forwarded draft to Orrick for review; reviewed response arranged for filing.	ACW	0.80	\$525.00	\$420.00
08/21/2025	Litigation and Adversary Proceedings: Review and file FCR Response to ACC Motion to Substitute. Request service.	BLF	0.20	\$210.00	\$42.00
08/25/2025	Court Hearings: Reviewed email from J.Miller re: caution regarding listening in to hearings by phone; forwarded same to FCR team.	ACW	0.10	\$525.00	\$52.50
08/25/2025	Court Hearings: Requested dial-in information for hearing on August 28; reviewed response from T.Randolph and sent reply, identifying all members of FCR's team who might dial in.	ACW	0.20	\$525.00	\$105.00
08/27/2025	Court Hearings: Preparation for hearing on ACC Motion to Substitute Committee Members.	BDR	1.20	\$330.00	\$396.00
08/28/2025	Court Hearings: Travel to/from and attend hearing on ACC Motion to Substitute Committee Members; conference JWG and Jonathan Guy re: same; post-hearing conference with JWG, Jonathan Guy, and counsel for Debtors and Non-Debtor Affiliates.	BDR	6.30	\$330.00	\$2,079.00

Quantity Subtotal 21.9

Time Keeper	Quantity	Rate	Total
Benjamin Rhodes	12.2	\$330.00	\$4,026.00
A. Cotten Wright	7.7	\$525.00	\$4,042.50
Brittany L. Franklin	2.0	\$210.00	\$420.00

Quantity Total 21.9

Subtotal	\$8,488.50
Total	\$8,488.50
Payment (10/28/2025)	-\$1,804.17
Balance Owing	\$6,684.33

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1420	08/18/2025	\$1,102.50	\$992.25	\$110.25
1440	09/24/2025	\$5,704.50	\$5,164.05	\$540.45
1480	11/12/2025	\$4,621.20	\$0.00	\$4,621.20

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1445	11/03/2025	\$8,488.50	\$1,804.17	\$6,684.33
Outstanding Balance				\$11,956.23
Total Amount Outstanding				\$11,956.23

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



ATTORNEYS AT LAW

Grier Wright Martinez, PA

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

STATEMENT

Statement # 1480
Date: 10/22/2025
Due On: 11/12/2025

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
09/02/2025	Case Administration and Business Operations: Brief review of email from M.Tomsic and attached transcript of 8/28/2025 hearing; emailed transcript to FCR and Orrick team.	ACW	0.20	\$525.00	\$105.00
09/05/2025	Litigation and Adversary Proceedings: Reviewed email from S.Abel and attached draft order on reconstituting the ACC; reviewed email from J.Guy re: same; replied to S.Abel that FCR has no changes.	ACW	0.30	\$525.00	\$157.50
09/10/2025	Litigation and Adversary Proceedings: Reviewed email from J.Miller to S.Abel re: comments on draft order on reconstituting ACC.	ACW	0.10	\$525.00	\$52.50
09/10/2025	Litigation and Adversary Proceedings: Reviewed email from D.Wright re: comments on order from ACC; email from J.Guy responding to ACC's requested changes; and response from D.Wright.	ACW	0.20	\$525.00	\$105.00
09/11/2025	Litigation and Adversary Proceedings: Reviewed email from J.Miller re: incorporating comments	ACW	0.20	\$525.00	\$105.00

	from debtors and ACC in proposed order on reconstituting committee; reviewed email from S.Abel rejecting certain proposed edits to order.				
09/11/2025	Court Hearings: Reviewed email from J.Miller re: possibility of canceling September 25 hearing and response from J.Guy.	ACW	0.10	\$525.00	\$52.50
09/12/2025	Case Administration and Business Operations: Reviewed email from J.Guy re: upcoming filings and deadlines.	ACW	0.10	\$525.00	\$52.50
09/15/2025	Litigation and Adversary Proceedings: Reviewed email from J.Miller re: proposed revisions to order on reconstituting committee.	ACW	0.20	\$525.00	\$105.00
09/16/2025	Professional Retention/Fee Issues: Analyze payments from debtors and create a payment spreadsheet.	BLF	1.70	\$210.00	\$357.00
09/18/2025	Asbestos Matters: Reviewed email from J.Guy re: rough outline of arguments for amicus brief in Bestwall appeal.	ACW	0.20	\$525.00	\$105.00
09/22/2025	Litigation and Adversary Proceedings: Reviewed email from S.Abel re: edits to order on committee made by the court.	ACW	0.10	\$525.00	\$52.50
09/23/2025	Asbestos Matters: Reviewed email from J.Guy re: filing deadline for amicus brief in Bestwall appeal; reviewed FRAP 29 and sent email to J.Guy re: same.	ACW	0.20	\$525.00	\$105.00
09/23/2025	Asbestos Matters: Reviewed reviewed amicus brief filed by Aldrich ACC in Bestwall appeal pending before the 4th Circuit and emailed copy of same to JWG.	ACW	0.50	\$525.00	\$262.50
09/23/2025	Asbestos Matters: Review of Amicus briefs in Bestwall appeal.	BDR	0.50	\$330.00	\$165.00
09/25/2025	Asbestos Matters: Review of FCR's amicus brief re: ACC's petition for en banc re-hearing in Bestwall.	BDR	0.30	\$330.00	\$99.00
09/26/2025	Asbestos Matters: Reviewed FCR's draft motion to file amicus brief and brief in Bestwall appeal and prepared redlined edits for both documents.	ACW	4.90	\$525.00	\$2,572.50
09/29/2025	Asbestos Matters: Attention to communications re: exchange of expert reports.	BDR	0.30	\$330.00	\$99.00
09/29/2025	Asbestos Matters: Review of communications related to PEO designation of information in expert reports.	BDR	0.20	\$330.00	\$66.00
Quantity Subtotal					10.3

Services Subtotal \$4,618.50

Expenses

Date	Notes	Quantity	Rate	Total
08/01/2025	Online Research - Pacer: Online Research - Pacer	1.00	\$0.40	\$0.40
08/25/2025	Online Research - Pacer: Online Research - Pacer	1.00	\$2.30	\$2.30
Expenses Subtotal				\$2.70

Time Keeper	Quantity	Rate	Total
Benjamin Rhodes	1.3	\$330.00	\$429.00
A. Cotten Wright	7.3	\$525.00	\$3,832.50
Brittany L. Franklin	1.7	\$210.00	\$357.00
Quantity Total			10.3
Subtotal			\$4,621.20
Total			\$4,621.20

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1420	08/18/2025	\$1,102.50	\$992.25	\$110.25
1440	09/24/2025	\$5,704.50	\$5,164.05	\$540.45
1445	11/03/2025	\$8,488.50	\$1,804.17	\$6,684.33

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1480	11/12/2025	\$4,621.20	\$0.00	\$4,621.20
Outstanding Balance				\$11,956.23
Total Amount Outstanding				\$11,956.23

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

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

June 1, 2025 through September 30, 2025

Project Category	Total Hours for the Period	Total Hours from the Petition Date	Total Fees for the Period	Total Fees from the Petition Date
Case Administration & Business Operations	1.8	66.6	\$945.00	\$27,162.00
Court Hearings	10.9	92.8	\$3,675.00	\$36,355.50
Professional Retention / Fee Issues	9.2	39.15	\$2,916.00	\$15,392.75
Fee Application Preparation	2.0	99.1	\$451.50	\$15,561.00
Asbestos Matters	8.9	46.9	\$3,852.00	\$19,849.50
Litigation	16.6	86.8	\$7,774.50	\$38,511.00
Plan & Disclosure Statement	0.0	0.20	\$0.00	\$80.00
Total	49.4	431.55	\$19,614.00	\$152,911.75

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

Expense Category	Total Expenses for the Interim Period	Total Expenses from the Petition Date
Court Fee – <i>Pro Hac Vice</i> Applications	\$300.00	\$2,631.00
Westlaw – Online Research	\$0.00	\$268.46
Pacer – Online Research	\$2.70	\$523.77
TOTAL	\$302.70	\$3,422.90

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

Name of Professional	Position – Bar Year	Hourly Billing Rate	Total Hours Billed	Total Compensation
A. Cotten Wright	Member- 2001	\$525	21.6	\$11,340.00
Benjamin Rhodes	Associate - 2024	\$330	20.3	\$6,699.00
Brittany L. Franklin	Paralegal	\$210	7.5	\$1,575.00
Summer Clerk	Summer Clerk	\$175	0.0	\$0.00

EXHIBIT E

SUMMARY OF PRIOR FEE APPLICATIONS

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

10 th Interim	11/7/2023 Doc. No. 1989	June 1, 2023 – September 30, 2023	\$10,110.00	\$29.10	Doc. No. 2025 11/30/2023
11 th Interim	3/15/2024 Doc. No. 2149	October 1, 2023 – January 31, 2024	\$6,438.00	\$39.00	Doc. No. 2195 04/11/2024
12 th Interim	7/11/2024 Doc. No. 2299	February 1, 2024- May 31, 2024	\$9,135.00	\$612.00	Doc. No. 2338 8/2/2024
13 th Interim	11/13/2024 Doc. No. 2441	June 1, 2024- September 30, 2024	\$5,014.00	\$612.20	Doc. No. 2480 12/12/2024
14 th Interim	3/13/2025 Doc. No. 2586	October 1, 2024- January 31, 2024	\$13,496.50	\$25.50	Doc. No. 2636 4/4/2025
15 th Interim	7/9/2025 Doc. No. 2700	February 1, 2025 – May 31, 2025	\$7,585.50	\$4.30	Doc. No. 2756 8/4/2025