

**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 (LMJ)

Debtors.

Jointly Administered

**SUMMARY OF SIXTEENTH INTERIM APPLICATION OF ORRICK, HERRINGTON
& SUTCLIFFE LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM JUNE 1, 2025 THROUGH SEPTEMBER 30, 2025**

Name of Applicant:	Orrick, Herrington & Sutcliffe LLP
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Order Approving Retention:	October 15, 2020, effective as of August 21, 2020 (Doc. No. 394)
Period for which compensation and reimbursement is sought:	June 1, 2025 – September 30, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$841,488.50
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$5,051.30
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$846,539.78

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 (LMJ)

Debtors.

Jointly Administered

**SIXTEENTH INTERIM APPLICATION OF ORRICK, HERRINGTON &
SUTCLIFFE LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO JOSEPH W.
GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE, FOR THE PERIOD
FROM JUNE 1, 2025 THROUGH SEPTEMBER 30, 2025**

Orrick, Herrington & Sutcliffe LLP (“Orrick”), counsel to Joseph W. Grier, III, the Court-appointed future claimants’ representative in these cases (the “FCR”), hereby brings its sixteenth interim application for allowance of compensation of \$841,488.50 and reimbursement of expenses of \$5,051.30 for the period of June 1, 2025 through September 30, 2025 (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 October 15, 2020, the Court entered an order authorizing the FCR to retain Orrick as his counsel in this Chapter 11 Case, effective as of August 21, 2020. (Doc. No. 394).

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

COMPENSATION RECEIVED DURING THE INTERIM PERIOD

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

Date of Monthly Fee Statement	Description	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
7/12/2025	Fifty-Eighth Monthly	6/1/2025 – 6/30/2025	\$62,958.00	\$386.80	\$57,049.00	\$6,295.80
8/6/2025	Fifty-Ninth Monthly	7/1/2025 – 7/31/2025	\$303,430.00	\$1,286.74	\$274,373.74	\$30,342.98
9/9/2025	Sixtieth Monthly	8/1/2025 – 8/31/2025	\$244,261.00	\$2,133.33	\$64,736.54	\$181,657.79
10/15/2025	Sixty-First Monthly	9/1/2025 – 9/30/2025	\$230,839.50	\$1,244.43	\$0.00	\$232,083.93
Total:			\$841,488.50	\$5,051.30	\$396,159.28	\$450,380.50

7. In total, Orrick has submitted fee statements during the Interim Period for total fees of \$841,488.50 and total expenses of \$5,051.30. As of the date of this Application, no party has objected to the fee statements circulated by Orrick.

SUMMARY OF SERVICES RENDERED

8. Attached hereto as **Exhibits A-1 through A-4** are Orrick's monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by Orrick during the Interim Period. In summary, during the Interim Period, Orrick expended a total of 634.30 hours rendering necessary services in this Chapter 11 Case and incurred total fees of \$841,488.50 and \$5,051.30 in expenses.

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

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

commensurate with the complexity, importance, and nature of the tasks addressed.

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

A. **Case Administration – 0.20 hours, \$298.00.** During the Interim Period, counsel for the FCR corresponded with colleagues regarding staffing and docket management.

B. **Litigation – 582.10 hours, \$781,027.50.** During the Interim Period, counsel for the FCR reviewed dockets and pleadings from other asbestos cases, conferred with The Brattle Group (the FCR's claims testifying expert) and Debtors' counsel regarding strategy, and reviewed the ACC's motion to reconsider the Court's order approving the retention of The Brattle Group. Counsel for the FCR also attended an in-person meeting with The Brattle Group to discuss expert reports. In addition, counsel for the FCR prepared a response to the ACC's motion to reconsider and motion to substitute committee counsel. Counsel for the FCR also prepared a motion for leave and amicus brief in Bestwall, finalized an amendment to the Plan Support Agreement, reviewed The Brattle Group's expert report, and prepared for and attended omnibus hearings in these Cases.

C. **Adversary Proceeding Litigation – 4.30 hours, \$5,375.00.** During the Interim Period, counsel for the FCR evaluated Trane's discovery responses to the ACC and reviewed the Debtors' response to a motion for leave to appeal. Counsel for the FCR also conferred on adversary proceeding discovery issues.

D. **FCR and Other Professionals' Retention – 23.20 hours, \$30,890.50.** During the Interim Period, counsel for the FCR considered issues regarding expert retention and prepared pleadings regarding the same.

E. **Orrick Compensation – 5.70 hours, \$7,930.50.** During the Interim Period, counsel for the FCR prepared and circulated Orrick’s invoices and monthly fee statements.

F. **FCR and Other Professionals’ Compensation – 5.30 hours, \$6,749.50.** During the Interim Period, counsel for the FCR reviewed and/or prepared monthly fee statements for Anderson Kill, TetraRho, the FCR, and the FCR’s counsel at Grier Wright Martinez PA.

G. **Non-Working Travel – 13.50 hours, \$9,217.50.** During the Interim Period, counsel for the FCR traveled to and from Charlotte, North Carolina for omnibus hearings in these Cases. Pursuant to the Interim Compensation Order, Orrick’s time for non-working travel is billed at 50% of the professional’s normal hourly rate. Accordingly, Orrick’s fees for non-working travel during the Interim Period have been reduced by \$9,217.50 to reflect a 50% reduction of the professional’s normal hourly rate.

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

13. **Exhibit C** reflects a summary by category of the expenses that Orrick incurred during the Interim Period, which totaled \$5,051.30.

14. **Exhibit D** provides information as to Orrick’s professionals, including years of practice, position, billing rates, and the total number of hours billed during the Interim Period. Orrick maintains that its billing rates for the Interim Period, which reflect its customary hourly rates for 2025, should be deemed a “reasonable billing rate” for purposes of this Court’s determination of the “reasonableness” of the fees for the services that Orrick has rendered.

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

DISBURSEMENTS

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

17. Orrick requests reimbursement for its actual and necessary expenses incurred during the Interim Period in the amount of \$5,051.30. A detailed breakdown of such expenses were included in Orrick's invoices (attached hereto as **Exhibits A-1 through A-4**) and those expenses are summarized in **Exhibit C**. Orrick's expenses during the Interim Period were necessary and reasonable under the circumstances of this Chapter 11 Case.

NOTICE

18. Notice of this Application has been provided to: (a) the office of the United States Bankruptcy Administrator for the Western District of North Carolina; (b) counsel for the Debtors; (c) counsel for the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.; (d) counsel to the ACC; and (e) the other parties on the Service List established by the Case Management Order and Fee Procedures Order entered in this Chapter 11 Case. Orrick submits that, in light of the nature of the relief requested, no other or further notice need be provided.

NO PRIOR REQUEST

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

CONCLUSION

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

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

1) Allowing interim compensation to Orrick in the amount of \$841,488.50 as reasonable, actual and necessary for professional services rendered by it on behalf of the FCR during the Interim Period and interim reimbursement of expenses incurred during the Interim Period of \$5,051.30 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay Orrick the amount of \$846,539.80, which is equal to 100% of Orrick's requested compensation for the Interim Period and 100% of Orrick's requested expense reimbursement for the Interim Period, less all previous payments made to Orrick pursuant to the Fee Procedures Order; and

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

Dated: November 13, 2025

Respectfully submitted,

/s/ A. Cotten Wright

A. Cotten Wright (State Bar No. 28162)

Grier Wright Martinez, PA

521 E Morehead Street, Suite 440

Charlotte, NC 28202

Telephone: (704) 332-0207

Facsimile: (704) 332-0215

Email: cwright@grierlaw.com

-and-

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

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

EXHIBIT A-1

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

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

**FIFTY-EIGHTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM JUNE 1, 2025 THROUGH JUNE 30, 2025**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Dkt. No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Eighth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from June 1, 2025 through June 30, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Orrick's invoice for the period June 1, 2025 through June 30, 2025 (the "Fee Statement Period").

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: June 1, 2025 – June 30, 2025	
Total Fees:	\$62,958.00
Total Expenses:	\$386.80
TOTAL:	\$63,344.80

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$57,049.00 from the Debtors for the Fee Statement Period (the "Interim Amount"), representing (a) 90% of Orrick's fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"):

(a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors' counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel,

feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.: (i) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoamccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartellmccarter.com and Phillip S. Pavlick, Esq., ppavlickmccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 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 Orrick, no later than July 28, 2025 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

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

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Orrick.

This is the 12th day of July 2025.

/s/ Jonathan P. Guy

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

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

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

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

Exhibit A



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

July 11, 2025
Client No. 24998
Invoice No. 2290030

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through June 30, 2025 in connection with the matters described on the attached pages:	\$	62,958.00
DISBURSEMENTS as per attached pages:		386.80
TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):	\$	<u>63,344.80</u>

Matter(s): 24998/2014, 2019, 2020, 2021
ASB-12739487

DUE UPON RECEIPT

The following is for information only:
Previous Balance not included in this invoice:
\$148,329.14 If this amount has already been paid, please disregard.

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

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2290030*

**ELECTRONIC FUNDS
TRANSFERS:**

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S
Account Number: 4123701088
*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2290030
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice:
2290030*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



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

July 11, 2025
Client No. 24998
Invoice No. 2290030

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through June 30, 2025 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation

Matter: ASB-12739487

06/05/25	J. Guy	Strategize regarding potential plan resolution (.8); review asbestos bankruptcy dockets (separate occasions) (1.5); review Revlon amicus brief and email to FCR regarding same (.6).	2.90	4,321.00
06/09/25	D. Carnie	Review dockets in related cases.	0.20	174.00
06/11/25	J. Guy	Review asbestos bankruptcy dockets, including Aldrich/Murray (separate occasions).	1.20	1,788.00
06/13/25	D. Carnie	Review related bankruptcy dockets.	0.20	174.00
06/18/25	D. Carnie	Confer with Brattle team regarding next steps.	1.20	1,044.00
06/18/25	D. Felder	Telephone conference with Brattle team (D. McKnight, P. Hinton, and A. Gunn) regarding case strategy and next steps.	0.90	1,138.50
06/18/25	J. Guy	Continued claims due diligence and zoom call with Orrick team (.9); various emails to/from Orrick team and experts regarding initial expert report (.4); strategize regarding consensual plan confirmation (3.4).	4.70	7,003.00
06/23/25	D. Carnie	Confer with team regarding estimation and claims database (.1); confer with Jones Day regarding same (.3); review bankruptcy dockets in related cases for notable filings (.3).	0.70	609.00



Grier, Joseph W. III. - 24998
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July 11, 2025
Invoice No. 2290030

06/23/25	M. Rosenberg	Evaluate expert materials from Garlock to inform methodologies and treatment of data relevant to claims analysis in Aldrich.	3.30	4,125.00
06/23/25	J. Guy	Telephone conference with B. Erens regarding case status (.3); schedule expert meeting and various emails with The Brattle Group and Orrick team regarding claims and discovery databases (.5); review asbestos bankruptcy dockets, including Aldrich/Murray (separate occasions) (1.5).	2.30	3,427.00
06/24/25	D. Carnie	Confer with Orrick team, Brattle and Debtors' counsel regarding claims database.	0.40	348.00
06/24/25	D. Carnie	Review related bankruptcy dockets for notable filings.	0.30	261.00
06/24/25	J. Guy	Continued strategizing regarding consensual plan confirmation (.8); emails to/from claims expert and Debtors regarding access to various databases (.2).	1.00	1,490.00
06/25/25	J. Guy	Emails to/from Orrick team, TBG, and Debtors regarding access to various databases.	0.20	298.00
06/26/25	J. Guy	Continued work on access to Debtors' databases for claims experts.	0.20	298.00
06/30/25	J. Guy	Review and analyze various asbestos bankruptcy docket filings (separate occasions) (1.0); continued work on potential plan resolution (.3).	1.30	1,937.00
		Total Hours	21.00	
		Total For Services	\$	28,435.50



Grier, Joseph W. III. - 24998
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July 11, 2025
Invoice No. 2290030

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Dan Carnie	3.00	870.00	2,610.00
Debra L. Felder	0.90	1,265.00	1,138.50
Jonathan P. Guy	13.80	1,490.00	20,562.00
Mike Rosenberg	3.30	1,250.00	4,125.00
Total All Timekeepers	21.00	\$1,354.07	\$28,435.50

Disbursements

Deposition/Transcript Expenses 41.80

Travel Expense, Out of Town 345.00

Total Disbursements \$386.80

Total For This Matter \$28,822.30



Grier, Joseph W. III. - 24998
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July 11, 2025
Invoice No. 2290030

For Legal Services Rendered Through June 30, 2025 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation

Matter: ASB-12739487

06/05/25	J. Guy	Review Orrick monthly invoices and emails to/from D. Felder regarding same (separate occasions).	0.40	596.00
06/10/25	D. Felder	Review and revise Orrick's May invoice and prepare monthly fee statement regarding same.	0.60	759.00
		Total Hours	1.00	
		Total For Services	\$	1,355.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.60	1,265.00	759.00
Jonathan P. Guy	0.40	1,490.00	596.00
Total All Timekeepers	1.00	\$1,355.00	\$1,355.00

Total For This Matter **\$1,355.00**



Grier, Joseph W. III. - 24998
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July 11, 2025
Invoice No. 2290030

For Legal Services Rendered Through June 30, 2025 in Connection With:

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

Matter: ASB-12739487

06/03/25	M. Rosenberg	Review and incorporate additional edits to expert engagement letter (1.5); correspond with expert's general counsel (.3); evaluate latest round of revisions (.2).	2.00	2,500.00
06/03/25	D. Felder	Review and comment on expert retention issues for FCR.	0.60	759.00
06/03/25	J. Guy	Various emails with Orrick team regarding and attention to expert retention/claims database.	1.70	2,533.00
06/04/25	M. Rosenberg	Draft declaration for prospective testifying expert.	2.60	3,250.00
06/04/25	D. Felder	Review issues regarding expert due diligence and email with Orrick team regarding same.	0.50	632.50
06/04/25	J. Guy	Emails to/from M. Rosenberg, FCR, and The Brattle Group regarding expert retention (separate occasions).	0.80	1,192.00
06/05/25	M. Rosenberg	Confer with prospective expert (.3); evaluate application to employ (.8).	1.10	1,375.00
06/05/25	J. Guy	Attention to and review expert retention application (.8); various emails to Orrick and Grier teams regarding same (.3).	1.10	1,639.00
06/06/25	M. Rosenberg	Evaluate and cross-reference declarations from prospective expert in other bankruptcies.	2.20	2,750.00
06/11/25	D. Carnie	Redline draft declaration from Brattle and circulate.	0.20	174.00
06/11/25	M. Rosenberg	Send follow-up e-mails regarding expert retention and conflicts (.4); review and revise application (2.1).	2.40	3,000.00
06/11/25	J. Guy	Finalize expert application and various emails to/from Orrick team regarding same.	2.30	3,427.00
06/12/25	M. Rosenberg	Finalize retention materials and provide to C. Wright.	1.40	1,750.00
06/13/25	J. Guy	Attention to claims expert application (various occasions).	1.30	1,937.00
06/17/25	D. Carnie	Confer with Orrick and Brattle teams regarding scheduled meeting.	0.30	261.00



Grier, Joseph W. III. - 24998
page 6

July 11, 2025
Invoice No. 2290030

06/17/25	J. Guy	Emails to/from Orrick, Grier teams and The Brattle Group regarding expert claims estimation, attention to same.	1.40	2,086.00
06/18/25	M. Rosenberg	Participate in telephone conference with experts regarding scope of work (.9); review CMO and Garlock CMP (.4).	1.30	1,625.00
Total Hours			23.20	
Total For Services			\$	30,890.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Dan Carnie	0.50	870.00	435.00
Debra L. Felder	1.10	1,265.00	1,391.50
Jonathan P. Guy	8.60	1,490.00	12,814.00
Mike Rosenberg	13.00	1,250.00	16,250.00
Total All Timekeepers	23.20	\$1,331.49	\$30,890.50

Total For This Matter **\$30,890.50**



Grier, Joseph W. III. - 24998
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July 11, 2025
Invoice No. 2290030

For Legal Services Rendered Through June 30, 2025 in Connection With:

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

Matter: ASB-12739487

06/03/25	D. Felder	Review TetraRho's May invoice and prepare monthly fee statement regarding same.	0.30	379.50
06/04/25	D. Felder	Finalize TetraRho's May monthly fee statement and invoice and serve on notice parties.	0.20	253.00
06/11/25	D. Felder	Review Anderson Kill's May monthly fee statement and invoice and email with A. Pelton regarding same.	0.10	126.50
06/25/25	D. Felder	Review GWM and J. Grier's monthly fee statements and invoices for June.	0.20	253.00
06/28/25	D. Felder	Prepare interim fee applications for Ankura and TetraRho for the period February 1, 2025 to May 31, 2025.	1.00	1,265.00
		Total Hours	1.80	
		Total For Services	\$	2,277.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	1.80	1,265.00	2,277.00
Total All Timekeepers	1.80	\$1,265.00	\$2,277.00
Total For This Matter			\$2,277.00

* * * COMBINED TOTALS * * *

Total Hours	47.00	
Total Fees, all Matters		\$62,958.00
Total Disbursements, all Matters		\$386.80
Total Amount Due		\$63,344.80

EXHIBIT A-2

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

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

**FIFTY-NINTH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM JULY 1, 2025 THROUGH JULY 31, 2025**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Dkt. No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Fifty-Ninth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from July 1, 2025 through July 31, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period July 1, 2025 through July 31, 2025 (the “Fee Statement Period”).

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: July 1, 2025 – July 31, 2025	
Total Fees:	\$303,430.00 ²
Total Expenses:	\$1,286.74
TOTAL:	\$304,716.74

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$274,373.74 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’s fees and (b) 100% of its incurred expenses.

Billing Adjustments

4. Pursuant to the Interim Compensation Order, Orrick’s time for non-working travel will be billed at 50% of the professional’s normal hourly rate. Accordingly, Orrick’s fees for non-working travel during this Fee Statement Period have been reduced by \$6,610.00 to reflect a 50% reduction of the professional’s normal hourly rate.

Notice and Objection Procedures

5. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the

² Orrick’s fees were reduced by \$6,610.00 for non-working travel.

Debtors' counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.: (i) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoamccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and Phillip S. Pavlick, Esq., ppavlick@mccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 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).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Orrick, no later than August 20, 2025 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

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

8. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Orrick.

This is the 6th day of August 2025.

/s/ Jonathan P. Guy

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

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

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

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

Exhibit A



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

August 5, 2025
Client No. 24998
Invoice No. 2295861

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through July 31, 2025 in connection with
the matters described on the attached pages:

Nonworking travel reduced by 50%:

SUBTOTAL:

DISBURSEMENTS as per attached pages:

TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):

\$	310,040.00
	<i>(6,610.00)</i>
\$	<u>303,430.00</u>
	<u>1,286.74</u>
\$	<u>304,716.74</u>

Matter(s): 24998/2012, 2014, 2019, 2020, 2021, 2022
ASB-12739487

DUE UPON RECEIPT

The following is for information only:

Previous Balance not included in this invoice:

\$121,291.71

If this amount has already been paid, please disregard.

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

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2295861*

ELECTRONIC FUNDS TRANSFERS:

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S
Account Number: 4123701088
*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2295861
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice:
2295861*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



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

August 5, 2025
Client No. 24998
Invoice No. 2295861

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through July 31, 2025 in Connection With:

Matter: 2012 - Aldrich Pump - Case Administration
Matter: ASB-12739487

07/19/25	J. Guy	Emails to/from M. Rosenberg regarding staffing and docket management.	0.20	298.00
		Total Hours	0.20	
		Total For Services	\$	298.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jonathan P. Guy	0.20	1,490.00	298.00
Total All Timekeepers	0.20	\$1,490.00	\$298.00

Total For This Matter **\$298.00**



Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

For Legal Services Rendered Through July 31, 2025 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation
Matter: ASB-12739487

07/01/25	D. Carnie	Review document requests as well as motion to reconsider (.5); confer with Orrick team regarding response times (.3).	0.80	696.00
07/01/25	J. Guy	Continued due diligence on claims expert issues.	1.30	1,937.00
07/01/25	J. Guy	Review ACC's motion to reconsider Court's order approving retention of the Brattle Group (.4); various emails to/from Orrick team regarding same (.3); outline argument in response (1.5); strategize regarding next steps (.6); review various asbestos bankruptcy dockets (collected over separate occasions) (1.5).	4.30	6,407.00
07/02/25	D. Carnie	Confer with team regarding discovery from ACC.	0.70	609.00
07/02/25	J. Guy	Emails to/from FCR, C. Wright, Orrick team regarding motion to reconsider and related discovery (various occasions) (.8); work on argument outline (1.2).	2.00	2,980.00
07/03/25	D. Carnie	Confer with J. Guy regarding discovery responses (.2); confer with J. Guy and M. Rosenberg regarding estimation meeting (.5).	0.70	609.00
07/03/25	J. Guy	Telephone conference with Orrick team and Debtors' counsel regarding next steps (.4); prepare for meeting with Brattle Group (.8); due diligence on expert reports generally (1.4).	2.60	3,874.00
07/06/25	M. Rosenberg	Evaluate motion for reconsideration and applicable rules (.8); strategize regarding discovery requests (.4); draft outline in response (1.8).	3.00	3,750.00
07/06/25	J. Guy	Emails to/from Debtors and FCR and Orrick team (separate occasions) regarding PSA amendment (.7); outline arguments in response to motion to reconsider (.5).	1.20	1,788.00
07/07/25	D. Carnie	Circulate filings related to CMO to Orrick team (.4); confer with J. Guy regarding transcript from hearing (.1); confer with C. Wright regarding same and attend and take notes during estimation meeting (2.2).	2.70	2,349.00



Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

07/07/25	M. Rosenberg	Listen to meeting regarding expert analysis and reports (1.7); compile and evaluate docket materials in connection with reconsideration motion (3.8).	5.50	6,875.00
07/07/25	J. Guy	Prepare for and attend in person meeting with TBG experts to discuss expert report and related issues (3.5); numerous emails to/from FCR and Orrick team regarding expert report and response to motion to reconsider (.8); strategize regarding next steps (1.2).	5.50	8,195.00
07/08/25	D. Carnie	Confer with Orrick team and client regarding deadline for discovery responses.	0.10	87.00
07/08/25	M. Rosenberg	Collect and review docket material across Aldrich, Paddock, and Garlock in connection with expert retention.	4.80	6,000.00
07/08/25	J. Guy	Emails to/from Orrick team regarding responses to ACC discovery (.3); finalize PSA amendment (.2); review materials relating to CMO amendment, including transcripts of hearing and all correspondence to/from the Court (2.4).	2.90	4,321.00
07/09/25	M. Rosenberg	Draft portions of objections to motion to reconsider (3.2); analyze ACC cited case law (1.8); research related case law (2.5).	7.50	9,375.00
07/09/25	J. Guy	Prepare for follow up meeting with TBG experts (.4); attend zoom meeting with experts (.8); various emails to/from Orrick team regarding ACC motion to reconsider and related issues (1.8); prepare outline for opposition to motion to reconsider (1.2); address disinterestedness arguments of the ACC and supplemental disclosure (.6).	4.80	7,152.00
07/10/25	D. Carnie	Draft discovery responses in relation to contested Brattle retention.	0.10	87.00
07/10/25	M. Rosenberg	Conduct additional research with respect to expert retention, reconsideration standard, and related issues (3.5); draft further portions of objection (5.3).	8.80	11,000.00
07/10/25	J. Guy	Emails to/from Orrick team, FCR, C. Wright (numerous occasions) regarding supplemental disclosures from Brattle and response to motion to reconsider (.8); work on argument (1.0).	1.80	2,682.00
07/11/25	B. Leifer	Expert research.	2.50	1,987.50



Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

07/11/25	M. Rosenberg	Continue drafting objection to ACC motion for reconsideration.	9.30	11,625.00
07/11/25	J. Guy	Address various expert retention issues.	0.60	894.00
07/11/25	J. Guy	Emails to/from Orrick team regarding expert research, professional fees, and 7/24 hearing (various occasions) (.7); review memorandum discussing expert retention and related cases (.8); monitor developments in asbestos bankruptcy cases around the country (separate occasions) (2.0).	3.50	5,215.00
07/12/25	D. Carnie	Confer with Orrick team regarding discovery responses (.2); draft discovery responses and circulate draft to M. Rosenberg (2.8).	3.00	2,610.00
07/12/25	M. Rosenberg	Expand and revise objection, incorporating citations from related cases (6.5); evaluate discovery objections (0.9).	7.40	9,250.00
07/12/25	J. Guy	Review first draft of FCR response to motion to reconsider Brattle retention.	1.00	1,490.00
07/13/25	J. Guy	Emails to/from M. Rosenberg regarding FCR response (.4); strategize regarding various additional arguments to motion to reconsider and analyze same (2.8).	3.20	4,768.00
07/14/25	D. Carnie	Review case management order for modifications to default discovery deadlines (.3); revise draft objection re motion to reconsider Brattle retention (.5); review Congoleum docket and circulate filings (1.0); review Ankura interim applications for compensation in Bestwall (.5); review legal standard for certifying discovery requests and draft insert (1.3).	3.60	3,132.00
07/14/25	M. Rosenberg	Continue to review and revise objections to motion to reconsider (5.6); verify and add relevant case law (2.2).	7.80	9,750.00
07/14/25	D. Felder	Review and create exhibit to FCR's objection to ACC's motion to reconsider retention application.	2.40	3,036.00



Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

07/14/25	J. Guy	Work on objection to ACC motion to reconsider the Brattle Retention Order, reviewing, revising and drafting same (10.0); numerous emails to/from Orrick and Grier team regarding same (.8); telephone conference with N. Ramsey, ACC counsel, regarding motion to reconsider and withdrawal of same (.3); telephone conference with FCR regarding same (.2); telephone conference with. B. Erens (separate occasions) regarding motion to reconsider (.3).	11.60	17,284.00
07/15/25	D. Carnie	Revise objection to motion to reconsider and confer with M. Rosenberg regarding same.	1.90	1,653.00
07/15/25	M. Rosenberg	Revise discovery responses (1.4); draft declaration and assemble exhibits (2.2); incorporate further revisions, finalize, and file objections (4.6).	8.20	10,250.00
07/15/25	J. Guy	Continued work on objection to ACC motion to reconsider the Brattle Retention Order, reviewing, revising and drafting same (7.5); numerous emails to/from Orrick and Grier team regarding same (2.2); telephone conference with M. Hirst regarding response to motion to reconsider (.2); monitor developments in related asbestos bankruptcy cases (1.4); various emails to/from ACC counsel and Debtors' counsel regarding discovery, motion to reconsider, and meet and confer (.3); various emails to/from E. Harron, counsel for Bestwall FCR, regarding fiduciary duties (.2).	11.80	17,582.00
07/16/25	D. Carnie	Review hearing transcripts and circulate to Orrick team in connection with Brattle retention (.5); confer with Orrick team regarding research spreadsheet (.2); confer with J. Guy regarding deadlines for written discovery and anticipated date of estimation trial (.3); confer with M. Rosenberg regarding related research (.2).	1.20	1,044.00



Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

07/16/25	J. Guy	Review Debtors' response to Motion to Reconsider (.5); prepare for 7/24 hearing (.8); monitor developments in Bestwall and review motion in limine filings (1.6); telephone conference with FCR regarding next steps (.7); telephone conference with B. Erens regarding 7/24 hearing (.5); email to experts regarding available databases (.1); analysis of jury trial opt out issues (.4); emails to Debtors regarding principal to principal meeting (.2); analyze of ACC's obligation to substitute committee members for those who have died waiting for compensation (.4); review materials relating to committee member substitutions (.3).	5.50	8,195.00
07/17/25	M. Rosenberg	Conduct follow-up research on motion to reconsider standard (1.2); evaluate information on ACC claimants (.3); review additional prior transcripts (.8).	2.30	2,875.00
07/17/25	J. Guy	Monitor developments in asbestos bankruptcies and mass torts (2.7); review various materials in preparation for 7/24 hearing (2.0); attention to initial report of the Brattle Group (.8); review and analyze research of expert/fact witness issues (.8); analysis of suppression of evidence exposure and concurrent conflict of interest issues (.8).	7.10	10,579.00
07/18/25	M. Rosenberg	Confer with J. Guy regarding 7/24 hearing (.3); obtain and provide additional information in preparation for hearing (.9).	1.20	1,500.00
07/18/25	J. Guy	Emails to/from M. Rosenberg (multiple occasions) regarding argument at 7/24 hearing and related issues.	0.40	596.00
07/19/25	J. Guy	Email to ACC counsel regarding misplaced discovery requests and withdrawal of same in light of objection.	0.20	298.00
07/21/25	D. Carnie	Review Aldrich docket and circulate statement from Mr. Esserman regarding motion to reconsider Brattle retention order.	0.30	261.00
07/21/25	M. Rosenberg	Confer with J. Guy (.2); evaluate correspondence regarding upcoming hearing and potential resolution (.6).	0.80	1,000.00



Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

07/21/25	J. Guy	Telephone conference with N. Ramsay regarding motion to reconsider and withdrawal of same (.6); telephone conference with FCR regarding same (.1); telephone conference with B. Erens regarding proposed withdrawal and 7/24 hearing (separate occasions) (1.0); continuing monitoring of developments in Bestwall (.4); telephone conference with C. Wright regarding 7/24 hearing and FCR response (.1); emails to/from Brattle Group regarding 7/24 hearing (.2); emails to/from N. Ramsay, Debtors, and ACC regarding ACC request to withdraw objection without prejudice (numerous occasions) (2.2); strategize regarding next steps (.8).	5.40	8,046.00
07/22/25	M. Rosenberg	Prepare for upcoming hearing (.8); evaluate parties' latest correspondence (.3); correspond with J. Guy regarding hearing prep (.2); confer with D. Carnie regarding same (.3).	1.60	2,000.00
07/22/25	J. Guy	Telephone conference with B. Erens regarding 7/24 hearing (separate occasions) (.3); further emails to/from N. Ramsay, FCR and Debtors regarding ACC proposal to withdraw motion to reconsider without prejudice (numerous occasions) (1.4); emails to/from experts regarding 7/24 hearing (.1); emails to/from Orrick team regarding preparation for 7/24 hearing (.3); prepare for hearing (2.0).	4.10	6,109.00
07/23/25	D. Carnie	Circulate payment percentage chart, Kaiser TDP, transcript excerpt and other documents to J. Guy in preparation for hearing on Brattle retention (1.4); revise and recirculate slides for hearing (.3).	1.70	1,479.00
07/23/25	M. Rosenberg	Prepare for hearing (2.8); review S. Esserman filing in response to FCR (.3); correspond and confer with J. Guy (.7).	3.80	4,750.00



Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

07/23/25	J. Guy	Telephone conference with M. Rosenberg regarding preparation for 7/24 hearing (.2); travel to Charlotte while preparing for hearing (3.5); prepare for oral argument (3.5); strategize regarding next steps (1.4); telephone conference with J. Grier to discuss strategy and 7/24 hearing (.3); emails to/from Debtors and ACC regarding virtual hearing and ACC request to withdraw motion without prejudice (.3); attention to revision of trust discovery order (separate occasions), and emails to J. Miller and N. Ramsay regarding same (.3); strategize regarding jury trial opt outs (.5); numerous emails to/from Orrick team regarding final preparation for 7/24 argument (.6).	10.60	15,794.00
07/24/25	M. Rosenberg	Attend hearing (1.5); confer with J. Grier, J. Guy, and B. Rhodes (.7).	2.20	2,750.00
07/24/25	J. Guy	Final preparation for 7/24 hearing (2.0); meet with M. Rosenberg to discuss same (.3); attend hearing in person and argue FCR objection (1.5); telephone conference with J. Grier to discuss next steps in light of Court's ruling denying ACC motion (separate occasions) (1.0); review Debtors' objection to Verus fees and work on case strategy while traveling (1.0); emails to/from BA regarding committee member substitutions and fee procedures order (.1).	5.90	8,791.00
07/25/25	D. Carnie	Organize notes from telephone conference with Bates White and circulate to M. Rosenberg (.5); draft chart in response to ask from J. Guy (1.0).	1.50	1,305.00
07/25/25	M. Rosenberg	Evaluate fee objection (.2); correspond with C. Wright and J. Guy regarding same (.2).	0.40	500.00



Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

07/25/25	J. Guy	Telephone conference with B. Erens regarding next steps in case (.5); emails to/from FCR regarding committee fiduciary duties and composition of membership (.2); analysis of Debtors' objection to Verus fee and related issues and emails regarding same to/from FCR and C. Wright (.7); emails to/from BA regarding substitution of Ctte members (.2); emails to/from Debtors regarding principal to principal meeting, organize same (.2); emails to/from ACC counsel regarding timing of motion to substitute new members for those who have died of their asbestos diseases (.2); continued analysis of concurrent conflict issues and strategize regarding same (2.3).	4.30	6,407.00
07/27/25	J. Guy	Emails to/from M. Rosenberg regarding case strategy (.2); work on case strategy (.7).	0.90	1,341.00
07/28/25	D. Carnie	Circulate responses to discovery referee report in DBMP (.3); confer with J. Guy regarding pleadings (.3).	0.60	522.00
07/28/25	M. Rosenberg	Evaluate DBMP briefs following discovery referee report.	0.40	500.00
07/28/25	J. Guy	Telephone conference with B. Erens regarding next steps (.3); research and analysis of concurrent conflict of interest issues with regard to bankruptcy and committees (3.8); emails to/from B. Rhodes and FCR regarding professional fee issues (.2).	4.30	6,407.00
07/29/25	J. Guy	Telephone conference with D. McKnight regarding expert report (.4); telephone conference with B. Erens regarding next steps (.2); monitor developments across multiple asbestos bankruptcy cases (collected over separate occasions) (2.0); continued research and analysis of concurrent conflict of interest issues (2.5).	5.10	7,599.00
07/30/25	J. Guy	Research and analyze fiduciary duties of committees and concurrent conflict of interest issues (1.4); emails to/from FCR and C. Wright regarding same (separate occasions) (.2).	1.60	2,384.00
07/31/25	D. Carnie	Circulate order on motion to reconsider to Orrick team (.1); revise omnibus document and confer with J. Guy and M. Rosenberg regarding same (.5).	0.60	522.00



Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

07/31/25	D. Carnie	Confer with research team regarding committee members in Aldrich.	0.40	348.00
07/31/25	M. Rosenberg	Evaluate redline to trust discovery order (.3); review court order regarding reconsideration (.1).	0.40	500.00
07/31/25	J. Guy	Emails to/from the FCR and C. Wright regarding concurrent conflict of interest issues and Ctte representation (.3); analysis of the conflict issues (.4); email to N. Ramsey and D. Wright requested consideration of issue in context of appointing new ACC claimant members (.1); emails to/from J. Miller regarding trust discovery order and amendment of same to include Brattle (.1); Zoom meeting with experts, FCR to discuss claims expert report (1.5); review court's order denying ACC motion to reconsider and distribute same (.2); strategize regarding next steps (.3); analyze various expert report issues (.4).	3.30	4,917.00
Total Hours			217.00	
Total For Services			\$	290,618.50

Timekeeper Summary	Hours	Rate	Amount
Dan Carnie	19.90	870.00	17,313.00
Debra L. Felder	2.40	1,265.00	3,036.00
Jonathan P. Guy	116.80	1,490.00	174,032.00
Branson Leifer	2.50	795.00	1,987.50
Mike Rosenberg	75.40	1,250.00	94,250.00
Total All Timekeepers	217.00	\$1,339.26	\$290,618.50



Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

Disbursements

Hotel	432.97	
Other Business Meals	42.18	
Out of Town Business Meals	53.65	
Parking Expense	82.00	
Taxi Expense	38.98	
Travel Expense, Air Fare	636.96	
Total Disbursements		\$1,286.74

Total For This Matter	\$291,905.24
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Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

For Legal Services Rendered Through July 31, 2025 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation
Matter: ASB-12739487

07/11/25	D. Felder	Review and revise Orrick's June 2025 invoice.	0.30	379.50
07/11/25	D. Felder	Prepare Orrick's monthly fee statement and circulate to J. Grier and C. Wright.	0.30	379.50
07/12/25	D. Felder	Finalize and serve Orrick's June monthly fee statement and invoice on notice parties.	0.20	253.00
07/30/25	J. Guy	Attention to Orrick compensation and bills for July 2025.	1.50	2,235.00
		Total Hours	2.30	
		Total For Services	\$	3,247.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.80	1,265.00	1,012.00
Jonathan P. Guy	1.50	1,490.00	2,235.00
Total All Timekeepers	2.30	\$1,411.74	\$3,247.00

Total For This Matter **\$3,247.00**



Grier, Joseph W. III. - 24998
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August 5, 2025
Invoice No. 2295861

For Legal Services Rendered Through July 31, 2025 in Connection With:

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

Matter: ASB-12739487

07/08/25	D. Felder	Review interim fee applications for GWM and J. Grier and email with B. Franklin regarding same.	0.60	759.00
07/11/25	D. Felder	Review fees in other NC bankruptcy cases and update spreadsheets regarding same.	1.50	1,897.50
		Total Hours	2.10	
		Total For Services	\$	2,656.50

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	2.10	1,265.00	2,656.50
Total All Timekeepers	2.10	\$1,265.00	\$2,656.50

Total For This Matter **\$2,656.50**

August 5, 2025
Invoice No. 2295861

Matter: ASB-12739487

07/23/25	M. Rosenberg	Travel to Charlotte, NC for July hearing.	3.50	4,375.00
07/24/25	M. Rosenberg	Return travel to Chicago, Illinois from July hearing.	3.50	4,375.00
07/24/25	J. Guy	Travel to DC - flights delayed.	3.00	4,470.00
		Total Hours	10.00	
		Total For Services	\$	13,220.00
		<i>Nonworking travel reduced by 50%</i>	\$	<i>(6,610.00)</i>
		Total For Services	\$	<u>6,610.00</u>

Timekeeper Summary	Hours	Rate	Amount
Jonathan P. Guy	3.00	1,490.00	4,470.00
Mike Rosenberg	7.00	1,250.00	8,750.00
Total All Timekeepers	10.00	\$1,322.00	\$13,220.00

Total For This Matter **\$6,610.00**

*** * * COMBINED TOTALS * * ***

Total Hours	231.60	
Total Fees, all Matters		\$303,430.00
Total Disbursements, all Matters		\$1,286.74
Total Amount Due		\$304,716.74

EXHIBIT A-3

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

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

**SIXTIETH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM AUGUST 1, 2025 THROUGH AUGUST 31, 2025**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Dkt. No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Sixtieth Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from August 1, 2025 through August 31, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period August 1, 2025 through August 31, 2025 (the “Fee Statement Period”).

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: August 1, 2025 – August 31, 2025	
Total Fees:	\$244,261.00 ²
CREDIT FROM DUPLICATE PAYMENT	(\$14,171.61) ³
Total Fees After Application of Credit	\$230,089.39
Total Expenses:	\$2,133.33
TOTAL:	\$232,222.72

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$209,213.78 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’s fees (*after application of the credit*) and (b) 100% of its incurred expenses.

Billing Adjustments

4. Pursuant to the Interim Compensation Order, Orrick’s time for non-working travel will be billed at 50% of the professional’s normal hourly rate. Accordingly, Orrick’s fees for non-working travel during this Fee Statement Period have been reduced by \$2,607.50 to reflect a 50% reduction of the professional’s normal hourly rate.

Notice and Objection Procedures

5. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”):

(a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North

² Orrick’s fees were reduced by \$2,607.50 for non-working travel.

³ Due to a duplicate payment, Orrick is holding a credit of \$14,171.61, which is being applied to the outstanding fees.

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., 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).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon the Notice Parties, including Orrick, no later than September 23, 2025 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

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

8. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Orrick.

This is the 9th day of September 2025.

/s/ Jonathan P. Guy

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

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

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

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

Exhibit A



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

September 8, 2025
Client No. 24998
Invoice No. 2304196

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through August 31, 2025 in connection
with the matters described on the attached pages:

Nonworking travel reduced by 50%:

SUBTOTAL:

DISBURSEMENTS as per attached pages:

TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):

\$	246,868.50
	<u>(2,607.50)</u>
\$	244,261.00
	<u>2,133.33</u>
\$	<u>246,394.33</u>

Matter(s): 24998/2014, 2019, 2021, 2022
ASB-12739487

DUE UPON RECEIPT

The following is for information only:

Previous Balance not included in this invoice:

\$359,165.70

If this amount has already been paid, please disregard.

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

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2304196*

ELECTRONIC FUNDS TRANSFERS:

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S
Account Number: 4123701088

*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2304196
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice:
2304196*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



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

September 8, 2025
Client No. 24998
Invoice No. 2304196

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through August 31, 2025 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation
Matter: ASB-12739487

08/01/25	M. Rosenberg	Evaluate Bestwall opinion (.6); correspondence regarding same (.5); confer with J. Guy (.2).	1.30	1,625.00
08/01/25	J. Guy	Review 4th Circuit ruling and analyze same (.8); emails to/from Orrick and FCR teams regarding ruling (.2); telephone conference with the FCR regarding 4th Circuit ruling (.1); telephone conference with M. Rosenberg regarding same and expert issues (.4); telephone conference with B. Erens regarding next steps (.4); detailed research on ethical issues in asbestos bankruptcies (5.0); emails to/from M. Rosenberg regarding committee fiduciary and related issues (.4); emails to/from B. Franklin regarding docket research items (.2).	7.50	11,175.00
08/04/25	M. Rosenberg	Review J. Guy correspondence to ACC (.2); evaluate Kazan motion and relevant law journal articles (1.8).	2.00	2,500.00
08/04/25	J. Guy	Emails to/from M. Rosenberg, D. Carnie, and B. Franklin regarding continued due diligence on committee good governance issues (.7); research committee formation and governance questions, including positional and concurrent conflict of interest (2.4).	3.10	4,619.00
08/05/25	D. Carnie	Circulate notable filings from case to Orrick team.	0.20	174.00



Grier, Joseph W. III. - 24998
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September 8, 2025
Invoice No. 2304196

08/05/25	M. Rosenberg	Pull and review entries from Paddock docket (.3); continue review of law articles relevant to potential motion (.8); evaluate chart prepared by D. Carnie (.6).	1.70	2,125.00
08/05/25	J. Guy	Telephone conference with B. Erens regarding recent rulings from the 4th Circuit and the bankruptcy court (.7); strategize regarding next steps (1.2); monitor Aldrich and other asbestos bankruptcy dockets (collected over various occasions) (1.7).	3.60	5,364.00
08/06/25	D. Carnie	Revise omnibus chart of research and send to Orrick team.	2.00	1,740.00
08/06/25	J. Guy	Telephone conference with B. Erens regarding case status.	0.20	298.00
08/07/25	D. Carnie	Circulate status conference notice from district court case to Orrick team.	0.10	87.00
08/07/25	M. Rosenberg	Docket Semian and ACC substitution motion deadlines.	0.20	250.00
08/07/25	J. Guy	Telephone conference with The Brattle Group regarding upcoming initial expert report (.7); expert report due diligence (.8); emails to FCR and Orrick team and Debtors re District Court status conference (.2).	1.70	2,533.00
08/08/25	C. Barclay	Search dockets at the request of D. Carnie.	0.60	300.00
08/08/25	B. Randall	Review court documents to identify any professionals or law firms conferring with committee members, per the request of D. Carnie.	0.40	200.00
08/08/25	D. Carnie	Circulate filings from case to Orrick team (.1); confer with J Guy and research requests re committee fee applications (.5).	0.60	522.00
08/08/25	M. Rosenberg	Correspond with J. Guy (.1); evaluate outline for potential response to motion (1.7).	1.80	2,250.00
08/08/25	J. Guy	Telephone conference with B. Erens regarding 8.28.25 hearing and related issues (.1); emails to/from Orrick team regarding preparation of response to Ctte substitution motion (numerous occasions) (.7); prepare outline for FCR response (3.4); continued research on committee conflict and fiduciary duty issues (3.5); strategize re next steps (.5).	8.20	12,218.00
08/11/25	D. Carnie	Research committee pleadings and confer with J. Guy (.5); circulate article to Orrick team (.1).	0.60	522.00



Grier, Joseph W. III. - 24998
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September 8, 2025
Invoice No. 2304196

08/11/25	M. Rosenberg	Evaluate case law with respect to substitution motion (2.4); revise outline (1.1).	3.50	4,375.00
08/11/25	J. Guy	Continued work on outline for FCR response to ACC motion to substitute (1.5); prepare preliminary statement and circulate same to FCR and FCR team (.7); numerous emails to/from Orrick team and FCR team regarding FCR response (1.6); research committee conflict of interest issues, including positional conflicts (2.5).	6.30	9,387.00
08/12/25	D. Carnie	Attend and take notes during meeting with Brattle.	2.00	1,740.00
08/12/25	M. Rosenberg	Confer with J. Guy regarding response (.3); evaluate correspondence from J. Miller (.2); obtain and review additional material from underlying dockets (1.1); evaluate case law and filings circulated by J. Guy (1.2).	2.80	3,500.00
08/12/25	J. Guy	Continued due diligence with The Brattle Group on forthcoming expert report (separate occasions) (3.0); telephone conference with FCR regarding expert report and related issues (.4); telephone conference with M. Rosenberg regarding pending issues and case status (.4); emails to/from FCR and Orrick teams regarding FCR response (.3); due diligence positional conflict issues on committee formation and evidence suppression in asbestos cases (2.5).	6.60	9,834.00
08/13/25	M. Rosenberg	Listen to hearing in Semian.	0.40	500.00
08/13/25	J. Guy	Status conference before District Court regarding leave to appeal motions from ACC and Mr. Semian (.6); prepare for same (.4); emails to/from B. Rhodes regarding due diligence on District Court appeals (.3); analyze status of same (.5); review expert report materials (separate occasions) (.8); monitor developments in asbestos bankruptcy cases (separate occasions) (1.6).	4.20	6,258.00
08/14/25	M. Rosenberg	Conduct additional case law research regarding Section 1102 (1.0); draft portions of response (2.2).	3.20	4,000.00
08/15/25	M. Rosenberg	Review and shepardize cases regarding fiduciary duties and 1102/1103 (2.3); continue to draft sections of response brief (2.8).	5.10	6,375.00



Grier, Joseph W. III. - 24998
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September 8, 2025
Invoice No. 2304196

08/15/25	J. Guy	Due diligence on evidence suppression issues (.2); monitor various asbestos bankruptcy dockets (separate occasions) (1.8).	2.00	2,980.00
08/16/25	M. Rosenberg	Collect and incorporate into draft additional material from Aldrich and related asbestos dockets.	2.50	3,125.00
08/17/25	M. Rosenberg	Continue drafting brief in response to ACC substitution motion.	8.20	10,250.00
08/18/25	M. Rosenberg	Continue draft of response brief (5.6); confirm and fill in relevant citations (3.0).	8.60	10,750.00
08/18/25	J. Guy	Work on substitution arguments (2.7); telephone conference with J. Grier regarding case status (.3); telephone conference with B. Erens regarding 8/28 hearing (separate occasions) (.6); emails to/from FCR and Orrick teams regarding District Court appeals and potential appellee filing (.2); strategize regarding next steps (1.5).	5.30	7,897.00
08/19/25	D. Carnie	Review draft objection and fill in citations.	0.30	261.00
08/19/25	M. Rosenberg	Confer with J. Guy and D. Carnie regarding response to substitution motion (.2); incorporate additional case law research (2.2).	2.40	3,000.00
08/19/25	J. Guy	Review and revise draft of response to Ctte substitution motion (7.4); continued research regarding same (2.0); various emails to/from Orrick team, FCR, and C. Wright regarding same (separate occasions) (.4); attention to September 15 expert report (.3).	10.10	15,049.00
08/20/25	M. Rosenberg	Confer with client and team regarding draft (.6); continue to revise, incorporate client edits, and fill in citations and footnotes (8.9).	9.50	11,875.00
08/20/25	J. Guy	Emails to/from Orrick and FCR teams regarding FCR response to ACC substitution motion (.5); continued drafting and revision of FCR response (3.5); monitor developments in asbestos bankruptcy cases and review pending asbestos docket filings (separate occasions) (1.5).	5.50	8,195.00
08/21/25	M. Rosenberg	Confer with J. Guy (.3); finalize and file response to motion to substitute (6.2); evaluate Debtor and Trane filings (.2).	6.70	8,375.00



Grier, Joseph W. III. - 24998
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September 8, 2025
Invoice No. 2304196

08/21/25	J. Guy	Numerous emails to/from Orrick team regarding FCR response to ACC substitution motion (.8); final review of FCR response and edits of same (2.8); attention to expert report issues and related due diligence (.8).	4.40	6,556.00
08/22/25	M. Rosenberg	Confer with J. Guy (.3); review incoming correspondence (.1).	0.40	500.00
08/22/25	M. Rosenberg	Evaluate expert report outline.	0.60	750.00
08/22/25	J. Guy	Various emails and telephone conferences to/from ACC and Debtors regarding request to continue 8.28.25 hearing to accommodate ACC counsel (.7); expert report due diligence (.4).	1.10	1,639.00
08/25/25	J. Guy	Teams conference with parties to discuss trial dates and related matter on ACC adversary proceedings (.5); emails to/from FCR and Orrick teams regarding same and 8.28.25 hearing (separate occasions) (.8); prepare for 8.28.25 hearing (2.5).	3.80	5,662.00
08/26/25	M. Rosenberg	Collect and review material in preparation for hearing (1.8); confer with J. Guy (.2); evaluate Maune response (.3).	2.30	2,875.00
08/26/25	J. Guy	Telephone conference with FCR regarding next steps and upcoming hearing (.4); telephone conference with M. Rosenberg to prepare for hearing (.4); telephone conference with B. Erens regarding same (.4); research and analysis of committee substitution issues (3.0).	4.20	6,258.00
08/27/25	D. Carnie	Recirculate dial-in instructions to Orrick team.	0.10	87.00
08/27/25	M. Rosenberg	E-mail and confer with J. Guy (.4); pull additional material (.6); provide documents to B. Rhodes (.2); transmit claims data to Brattle (.3).	1.50	1,875.00
08/27/25	J. Guy	Telephone conference with Debtors' counsel to discuss 8.28.25 hearing (.4); travel to Charlotte while preparing for hearing (3.5); conference with FCR regarding 8.28.25 hearing (.5); work on oral argument outline (2.5); expert report due diligence (.3).	7.20	10,728.00
08/28/25	M. Rosenberg	Listen to conference (2.0); de-brief (.2).	2.20	2,750.00



Grier, Joseph W. III. - 24998
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September 8, 2025
Invoice No. 2304196

08/28/25	J. Guy	Prepare outline for oral argument (3.0); meet with FCR and Debtors in advance of oral argument (.7); attend oral argument (1.3); meet with FCR and Debtors regarding next steps (1.0); strategize regarding plan confirmation issues (1.0).	7.00	10,430.00
08/29/25	M. Rosenberg	Confer with J. Guy regarding next steps.	0.40	500.00
08/29/25	J. Guy	Telephone conference with B. Erens regarding confirmation options and next steps (.6); various emails to/from FCR, M. Rosenberg regarding committee substitution issues (.6); review consolidated filing made by Maune and ACC for District Court appeal (.8); strategize regarding next steps (.7); monitor developments in the asbestos and mass tort arena (separate occasions) (2.0).	4.70	7,003.00
08/31/25	J. Guy	Due diligence on claim issues (.3); monitor developments in the asbestos arena (separate occasions) (2.5).	2.80	4,172.00
Total Hours			173.70	
Total For Services			\$	238,013.00

Timekeeper Summary	Hours	Rate	Amount
Carrie Barclay	0.60	500.00	300.00
Dan Carnie	5.90	870.00	5,133.00
Jonathan P. Guy	99.50	1,490.00	148,255.00
Bianca Randall	0.40	500.00	200.00
Mike Rosenberg	67.30	1,250.00	84,125.00
Total All Timekeepers	173.70	\$1,370.25	\$238,013.00

Disbursements

Parking Expense	20.00
Public Access to Court Electronic Records	493.20
Travel Expense, Air Fare	62.00
Word Processing	190.50
Total Disbursements	\$765.70

Total For This Matter **\$238,778.70**



Grier, Joseph W. III. - 24998
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September 8, 2025
Invoice No. 2304196

For Legal Services Rendered Through August 31, 2025 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation
Matter: ASB-12739487

08/05/25	D. Felder	Review and revise Orrick's July 2025 invoice.	0.50	632.50
08/06/25	D. Felder	Prepare Orrick's July monthly fee statement and email to notice parties.	0.30	379.50
08/31/25	J. Guy	Work on Orrick August invoices and review.	0.80	1,192.00
		Total Hours	1.60	
		Total For Services	\$	2,204.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra L. Felder	0.80	1,265.00	1,012.00
Jonathan P. Guy	0.80	1,490.00	1,192.00
Total All Timekeepers	1.60	\$1,377.50	\$2,204.00

Total For This Matter **\$2,204.00**



Grier, Joseph W. III. - 24998
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September 8, 2025
Invoice No. 2304196

For Legal Services Rendered Through August 31, 2025 in Connection With:

Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation
Matter: ASB-12739487

08/01/25	D. Felder	Prepare monthly fee statement for TetraRho's July invoice.	0.30	379.50
08/01/25	J. Guy	Emails to/from J. Solganick regarding TetraRho monthly fee statement.	0.20	298.00
08/07/25	D. Felder	Review Anderson Kill's July monthly fee statement and invoice and email correspondence with B. Horkovich regarding same.	0.20	253.00
08/07/25	D. Felder	Telephone conference with P. Hinton (Brattle) regarding monthly and interim compensation procedures.	0.40	506.00
		Total Hours	1.10	
		Total For Services	\$	1,436.50

Timekeeper Summary	Hours	Rate	Amount
Debra L. Felder	0.90	1,265.00	1,138.50
Jonathan P. Guy	0.20	1,490.00	298.00
Total All Timekeepers	1.10	\$1,305.91	\$1,436.50

Total For This Matter **\$1,436.50**



Grier, Joseph W. III. - 24998
page 9

September 8, 2025
Invoice No. 2304196

For Legal Services Rendered Through August 31, 2025 in Connection With:

Matter: 2022 - Aldrich Pump - Non Working Travel
Matter: ASB-12739487

08/28/25	J. Guy	Travel to DC.	3.50	5,215.00
		Total Hours	3.50	
		Total For Services	\$	5,215.00
		<i>Nonworking travel reduced by 50%</i>	\$	<i>(2,607.50)</i>
		Total For Services	\$	<u>2,607.50</u>

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jonathan P. Guy	<u>3.50</u>	<u>1,490.00</u>	<u>5,215.00</u>
Total All Timekeepers	3.50	\$1,490.00	\$5,215.00

Disbursements

Hotel	394.16	
Taxi Expense	129.61	
Travel Expense, Air Fare	804.97	
Travel Expense, Out of Town	38.89	
Total Disbursements		\$1,367.63

Total For This Matter **\$3,975.13**

*** * * COMBINED TOTALS * * ***

Total Hours	179.90	
Total Fees, all Matters		\$244,261.00
Total Disbursements, all Matters		\$2,133.33
Total Amount Due		\$246,394.33

EXHIBIT A-4

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

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

**SIXTY-FIRST MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM SEPTEMBER 1, 2025 THROUGH SEPTEMBER 30, 2025**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Dkt. No. 171) (the “Interim Compensation Order”) and the *Ex Parte Order Approving the Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For An Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* (Dkt. No. 394) (the “Orrick Retention Order”), Orrick, Herrington & Sutcliffe LLP (“Orrick”), as counsel to Joseph W. Grier, III, the court-appointed legal representative for future asbestos claimants (the “Future Claimants’ Representative”), submits its *Sixty-First Monthly Statement of Fees and Expenses Incurred by Orrick, Herrington & Sutcliffe LLP as Counsel to Joseph W. Grier, III, the Future Claimants’ Representative, for the Period from September 1, 2025 through September 30, 2025* (the “Monthly Fee Statement”).

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.

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as **Exhibit A** is Orrick’s invoice for the period September 1, 2025 through September 30, 2025 (the “Fee Statement Period”).

Total Fees and Expenses for the Fee Statement Period

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

Fee Statement Period: September 1, 2025 – September 30, 2025	
Total Fees:	\$230,839.50
Total Expenses:	\$1,244.43
TOTAL:	\$232,083.93

3. Pursuant to the Interim Compensation Order, Orrick seeks payment of \$208,999.98 from the Debtors for the Fee Statement Period (the “Interim Amount”), representing (a) 90% of Orrick’s fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtors, Aldrich Pump LLC and Murray Boiler LLC, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) the Debtors’ counsel: (i) Jones Day, 110 North Wacker Drive, Suite 4800, Chicago, Illinois 60606 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, and Caitlin K. Cahow, Esq., ccahow@jonesday.com); and (ii) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator for the Western District of North Carolina, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel,

feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.: (i) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoamccarter.com); (ii) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartellmccarter.com and Phillip S. Pavlick, Esq., ppavlickmccarter.com); (iii) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Avenue, 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 Orrick, no later than October 29, 2025 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

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

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by Orrick.

This is the 15th day of October 2025.

/s/ Jonathan P. Guy

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

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

ORRICK, HERRINGTON & SUTCLIFFE LLP

2100 Pennsylvania Avenue, N.W.

Washington, D.C. 20037

Telephone: (202) 339-8400

Facsimile: (202) 339-8500

Email: jguy@orrick.com

dfelder@orrick.com

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

Exhibit A



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

October 14, 2025
Client No. 24998
Invoice No. 2316465

Orrick Contact: Jonathan P. Guy

FOR SERVICES RENDERED through September 30, 2025 in connection with the matters described on the attached pages:	\$	230,839.50
DISBURSEMENTS as per attached pages:		1,244.43
TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):	\$	<u>232,083.93</u>

Matter(s): 24998/2014, 2015, 2019, 2021
ASB-12739487

DUE UPON RECEIPT

The following is for information only:
Previous Balance not included in this invoice:
\$594,453.40

If this amount has already been paid, please disregard.

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

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
Reference: 24998/ Invoice: 2316465*

ELECTRONIC FUNDS TRANSFERS:

ACH & Wire Transfers:
ABA Number 121000248
SWIFT CODE: WFBIUS6S

Account Number:
4123701088

*Wells Fargo
333 Market Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 24998/ Invoice: 2316465
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Orrick, Herrington & Sutcliffe LLP
2121 Main Street
Wheeling, WV 26003
(304) 231-2703
Reference: 24998/ Invoice:
2316465*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



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

October 14, 2025
Client No. 24998
Invoice No. 2316465

Orrick Contact: Jonathan P. Guy

For Legal Services Rendered Through September 30, 2025 in Connection With:

Matter: 2014 - Aldrich Pump - Litigation
Matter: ASB-12739487

09/02/25	M. Rosenberg	Prepare for expert meeting (.6); meet with Brattle (1.0); retrieve and transmit additional material (.4).	2.00	2,500.00
09/02/25	J. Guy	Telephone conference with B. Erens regarding case (.2); due diligence on ongoing asbestos bankruptcy cases (separate and various occasions) (2.0); attention to Brattle Expert report, and zoom call with Brattle and FCR (4.0).	6.20	9,238.00
09/03/25	J. Guy	Telephone conference with B. Erens regarding case (.2); attention and due diligence for various expert report issues (1.4); review and analyze filings in various pending asbestos matters and Aldrich (collected over separate occasions) (1.5).	3.10	4,619.00
09/04/25	M. Rosenberg	Evaluate Jones Day correspondence regarding prospective appeal brief.	0.30	375.00
09/04/25	J. Guy	Analyze en banc issues for recent 4th Circuit ruling (.6); email to FCR regarding same (.1).	0.70	1,043.00
09/05/25	M. Rosenberg	Review J. Guy and Brattle correspondence regarding report.	0.30	375.00
09/05/25	J. Guy	Emails to/from C. Wright and FCR regarding substitution order, attention to same (.2); continued due diligence on expert report issues and emails to/from Debtors regarding motion to extend exclusivity (2.1).	2.30	3,427.00
09/10/25	M. Rosenberg	Evaluate expert report (1.2); attend conferences with experts (2.5); obtain and review additional research material on claims modeling (.4).	4.10	5,125.00



09/10/25	J. Guy	Review Brattle draft report, attend Zoom call with Brattle, continued expert due diligence (5.5); telephone conference with FCR to discuss expert report (.3); telephone conference with B. Erens regarding case status (.3); telephone conference with M. Rosenberg regarding report (.2).	6.30	9,387.00
09/11/25	M. Rosenberg	Meet with Brattle (.6); continue to evaluate report (1.2).	1.80	2,250.00
09/11/25	J. Guy	Telephone conference with Brattle Group regarding expert report (1.0); telephone conference with B. Erens regarding strategy (separate occasions) (.2); telephone conference with D. McKnight regarding report (.2); due diligence on expert report issues, including discount rate and trust rates of return (2.5); emails to/from C. Wright regarding proposed order on substitution motion, review same (.2); attention to consolidating briefing in District Court appeal and FCR response (1.5).	5.60	8,344.00
09/12/25	J. Guy	Telephone conference with M Rosenberg regarding staffing issues and next steps (.2); telephone conference with FCR regarding case status and expert report issues (.3); telephone conference with B. Erens regarding plan issues (.2); telephone conference with D. McKnight regarding expert report (.2); various emails to/from FCR, Orrick team regarding 9/11 District Court filing and next steps (.4); continued expert report due diligence (2.0).	3.30	4,917.00
09/14/25	J. Guy	Review and analyze draft expert report (2.7); email to FCR and Orrick team re same (.1).	2.80	4,172.00
09/15/25	M. Rosenberg	Meet with experts and team (.6); obtain citations and assist Brattle in finalizing report (2.2); assess and transmit expert report (2.7).	5.50	6,875.00
09/15/25	D. Felder	Review and provide comments on draft expert report from Brattle Group.	1.20	1,518.00
09/15/25	J. Guy	Meet with FCR, ACC members, and ACC counsel (separate and various occasions) to discuss plan related issues (2.0); attention to FCR expert report and review parties' reports (various and separate occasions) (7.5).	9.50	14,155.00
09/16/25	M. Rosenberg	Evaluate and circulate ACC and Debtor expert reports (1.6); attend FCR meeting and related discussions (1.8).	3.40	4,250.00



09/16/25	J. Guy	Telephone conference with FCR regarding expert reports (.2); meet with FCR and counsel for Debtors and other parties to discuss case matters (various occasions) (2.0); strategize regarding next steps (1.4); telephone conference with B. Erens regarding expert reports (.2); meet with FCR, ACC and ACC counsel to discuss plan related issues (separate and various occasions) (2.5).	6.30	9,387.00
09/17/25	M. Rosenberg	Evaluate Bestwall petition for en banc rehearing and confer with J. Guy.	1.80	2,250.00
09/17/25	J. Guy	Telephone conference with Brattle Group regarding next steps and further work and attention to next steps (.7); email to FCR regarding same (.2); telephone conference with FCR regarding amicus brief (.2); telephone conference with M. Rosenberg regarding amicus brief (.1); attention to amicus brief and due diligence regarding same (2.5); strategize regarding next steps and plan confirmation (1.5); review various asbestos documents and analyze case developments (collected over separate occasions) (2.0).	7.20	10,728.00
09/18/25	M. Rosenberg	Evaluate rough outline of argument for amicus in opposition to rehearing en banc.	1.50	1,875.00
09/18/25	J. Guy	Research, due diligence and prepare amicus brief in Bestwall (4.8); emails to/from Orrick team and FCR regarding same (.2); work on plan structure issues (separate occasions) (2.0).	7.00	10,430.00
09/19/25	M. Rosenberg	Assess past transcripts, evaluate and pull additional material in connection with proposed 4th Circuit arguments.	2.60	3,250.00
09/19/25	J. Guy	Emails to/from FCR, C. Wright, M. Rosenberg regarding amicus filing (.3); attention to same (.2).	0.50	745.00
09/20/25	J. Guy	Review correspondence from Debtors (.4); email same to FCR and Orrick team (.1).	0.50	745.00
09/21/25	M. Rosenberg	Draft portions of Fourth Circuit amicus brief.	5.40	6,750.00
09/22/25	M. Rosenberg	Continue drafting amicus brief (3.2); evaluate incoming amici briefs (1.0).	4.20	5,250.00
09/23/25	M. Rosenberg	Assess filing procedures (.3); continue drafting amicus brief (5.7); confer with J. Guy (.2); correspond with C. Redmond (.1); prepare shell of motion (.4).	6.70	8,375.00



09/23/25	J. Guy	Due diligence on claims processing times (.5); review and analyze amici briefs in Bestwall (1.2); attention to FCR amicus (3.0); emails to/from FCR, C. Wright and M. Rosenberg regarding same (.4); emails to/from C. Wright and attention to upcoming DBMP hearing (.2); due diligence on claims processing (.4).	5.70	8,493.00
09/24/25	M. Rosenberg	Draft motion for leave to file amicus (2.4); obtain and revise citations in amicus brief (2.2); incorporate edits and continue to revise brief (4.5).	8.90	11,125.00
09/24/25	J. Guy	Review, revise, draft amicus brief (6.0); emails to/from FCR and insurance counsel regarding proposed settlement (.2).	6.20	9,238.00
09/25/25	L. Temple	Cite check amicus brief and note suggested edits and questions for attorney review.	4.70	2,350.00
09/25/25	M. Rosenberg	Determine Fourth Circuit formatting and other filing requirements (.6); evaluate draft amicus by Bestwall (.5); finalize draft and circulate motion and amicus brief to J. Guy and team (3.0); answer questions by J. Guy regarding docket entries and citations (.8); evaluate correspondence regarding expert report de-designations (.4).	5.30	6,625.00
09/25/25	M. Rosenberg	Confer with L. Temple regarding open issues.	0.40	500.00
09/25/25	J. Guy	Work on plan related issues (2.5); review various asbestos bankruptcy dockets (collected over separate occasions) (1.5); emails to/from Debtors and ACC regarding expert report disclosures/redactions (.2); work on amicus brief (3.0).	7.20	10,728.00
09/26/25	L. Temple	Cite check motion and amicus brief and note suggested edits and questions for attorney review.	6.00	3,000.00
09/26/25	M. Rosenberg	Confer with paralegal regarding edits (.4); evaluate C. Wright edits (.6); revise citations in motion and amicus brief (1.8); attend to related administrative issues for filing (.5).	3.30	4,125.00
09/26/25	J. Guy	Review and revise motion for leave to file amicus (separate occasions) (.7); strategize regarding next steps (1.2); expert report due diligence (.8).	2.70	4,023.00
09/27/25	M. Rosenberg	Incorporate and harmonize client and team revisions across motion and amicus brief.	4.50	5,625.00



09/28/25	L. Temple	Review brief and motion and provide suggested edits for attorney review.	0.50	250.00
09/28/25	M. Rosenberg	Confer with J. Guy regarding brief and motion (.2); obtain updates from L. Temple (.4).	0.60	750.00
09/29/25	L. Temple	Review calendar alerts and follow up with attorney regarding same, prepare final PDFs for filing, communication with Managing Attorneys Office regarding same.	0.50	250.00
09/29/25	M. Rosenberg	Finalize and file amicus brief and motion in support of appellee.	5.60	7,000.00
09/29/25	D. Felder	Review and comment on motion for leave to file amicus brief and amicus brief in Bestwall.	1.70	2,150.50
09/29/25	J. Guy	Revise motion and amicus brief (.4); emails to Orrick team regarding same (.3); emails to/from debtors, ACC and insurance counsel regarding ACC claim expert reports void insurance (.4); analyze insurance question (collected over separate occasions) (.4); review other amicus brief and debtors' brief (1.2).	2.70	4,023.00
09/30/25	L. Temple	Create chart (with links) regarding cases being monitored/calendared to review with M. Rosenberg.	1.20	600.00
09/30/25	M. Rosenberg	Confer with C. Wright, insurance counsel, and Debtors regarding meet and confer timing (.4); confer with Brattle regarding reliance materials (.2).	0.60	750.00
Total Hours			170.40	
Total For Services			\$	223,960.50

Timekeeper Summary	Hours	Rate	Amount
Debra L. Felder	2.90	1,265.00	3,668.50
Jonathan P. Guy	85.80	1,490.00	127,842.00
Mike Rosenberg	68.80	1,250.00	86,000.00
Lisa J. Temple	12.90	500.00	6,450.00
Total All Timekeepers	170.40	\$1,314.32	\$223,960.50

Disbursements
Hotel

349.21



Out of Town Business Meals	37.31	
Parking Expense	49.00	
Taxi Expense	43.78	
Travel Expense, Air Fare	765.13	
Total Disbursements		\$1,244.43
Total For This Matter		\$225,204.93

For Legal Services Rendered Through September 30, 2025 in Connection With:

Matter: 2015 - Aldrich Pump - Adversary Proceeding Litigation
Matter: ASB-12739487

09/08/25	M. Rosenberg	Evaluate Trane discovery responses to ACC (.8); obtain and evaluate additional expert material from Garlock (.6).	1.40	1,750.00
09/11/25	M. Rosenberg	Assess Debtors' response to motion for leave to appeal (.4); prepare and file joinder (1.3).	1.70	2,125.00
09/12/25	M. Rosenberg	Confer with J. Guy (.3); correspond with W.D.N.C. clerk's office (.2); review C. Hardman discovery update (.2).	0.70	875.00
09/29/25	M. Rosenberg	Attend meet and confer on adversary proceeding discovery.	0.50	625.00
		Total Hours	4.30	
		Total For Services	\$	5,375.00

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Mike Rosenberg	4.30	1,250.00	5,375.00
Total All Timekeepers	4.30	\$1,250.00	\$5,375.00

Total For This Matter **\$5,375.00**

For Legal Services Rendered Through September 30, 2025 in Connection With:

Matter: 2019 - Aldrich Pump - Orrick Compensation

Matter: ASB-12739487

09/07/25	D. Felder	Review Orrick's August prebill and revise same.	0.30	379.50
09/19/25	J. Guy	Attention to Orrick monthly bills (separate occasions).	0.50	745.00
		Total Hours	0.80	
		Total For Services	\$	1,124.50

Timekeeper Summary	Hours	Rate	Amount
Debra L. Felder	0.30	1,265.00	379.50
Jonathan P. Guy	0.50	1,490.00	745.00
Total All Timekeepers	0.80	\$1,405.63	\$1,124.50

Total For This Matter **\$1,124.50**

For Legal Services Rendered Through September 30, 2025 in Connection With:

Matter: 2021 - Aldrich Pump - FCR and Other Professionals Compensation
Matter: ASB-12739487

09/02/25	D. Felder	Review TetraRho's August invoice, prepare monthly fee statement, and circulate same to notice parties.	0.30	379.50
		Total Hours	0.30	
		Total For Services	\$	379.50

Timekeeper Summary	Hours	Rate	Amount
Debra L. Felder	0.30	1,265.00	379.50
Total All Timekeepers	0.30	\$1,265.00	\$379.50

Total For This Matter	\$379.50
------------------------------	-----------------

*** * * COMBINED TOTALS * * ***

Total Hours	175.80	
Total Fees, all Matters		\$230,839.50
Total Disbursements, all Matters		\$1,244.43
Total Amount Due		\$232,083.93

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

June 1, 2025 through September 30, 2025

Project Category	Matter Number	Total Hours for the Interim Period (6/1/2025 - 9/30/2025)	Total Hours from the Petition Date (6/18/2020- 9/30/2025)	Total Fees for the Interim Period (6/1/2025-9/30/2025)	Total Fees from the Petition Date (6/18/2020- 9/30/2025)
Case Administration	2012	0.20	3.30	\$298.00	\$4,176.00
Insurance	2013	--	38.00	\$0.00	\$40,700.00
Litigation	2014	582.10	4,152.70	\$781,027.50	\$4,486,459.00
Adversary Proceeding Litigation	2015	4.30	471.50	\$5,375.00	\$455,407.50
Plan & Disclosure Statement	2016	--	204.30	\$0.00	\$213,988.00
Due Diligence	2017	--	82.00	\$0.00	\$89,511.50
Orrick Retention	2018	--	56.50	\$0.00	\$47,868.00
Orrick Compensation	2019	5.70	117.88	\$7,930.50	\$122,360.00
FCR and Other Professionals - Retention	2020	23.20	114.60	\$30,890.50	\$130,362.00
FCR and Other Professionals - Compensation	2021	5.30	159.60	\$6,749.50	\$165,547.50
Non-Working Travel	2022	13.50	159.90	\$9,217.50	\$99,077.50
TOTAL:		634.30	5,560.28	\$841,488.50	\$5,855,457.00

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

June 1, 2025 through September 30, 2025

Expense Category	Total Expenses for the Interim Period (6/1/2025-9/30/2025)	Total Expenses from the Petition Date (6/18/2020-9/30/2025)
Deposition Transcripts	\$41.80	\$590.50
Document Reproduction (@ .20/page)	\$0.00	\$506.20
Document Retrieval Fee	\$0.00	\$59.40
Express Delivery	\$0.00	\$36.88
Hotel	\$827.13	\$12,138.93
Lexis Research	\$0.00	\$1,552.00
Out of Town Business Meals / Other Business Meals	\$95.83	\$1,789.34
Outside Services – Data Processing of Debtors and Non-Debtors Document Productions	\$0.00	\$2,033.60
PACER Charges	\$493.20	\$8,460.70
Parking Expense	\$102.00	\$1,162.46
Taxi Expense	\$168.59	\$1,626.46
Travel Expense, Air Fare (coach fare)	\$1,503.93	\$15,132.67
Travel Expense, Mileage	\$383.89	\$927.93
Westlaw Research	\$0.00	\$23,681.00
Word Processing	\$190.50	\$959.40
TOTAL:	\$3,806.87	\$70,657.47

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

June 1, 2025 through September 30, 2025

Name of Professional	Position - Bar Year	2025 Hourly Billing Rate	Total Hours Billed (6/1/2025- 9/30/2025)	Total Compensation (6/1/2025- 9/30/2025)
Jonathan P. Guy	Senior Counsel - 1996	\$1,490	334.60	\$489,336.50
Debra L. Felder	Senior Associate - 2002	\$1,265	14.90	\$18,848.50
Michael Rosenberg	Senior Associate - 2013	\$1,250	239.10	\$298,875.00
Daniel Carnie	Associate – 2023	\$870	29.30	\$25,491.00
Branson Leifer	Summer Associate	\$795	2.50	\$1,987.50
Carrie Barclay	Senior Research Specialist	\$500	0.60	\$300.00
Bianca Randall	Research Specialist	\$500	0.40	\$200.00
Lisa Temple	Senior Paralegal	\$500	12.90	\$6,450.00
TOTAL:			634.30	\$841,488.50

EXHIBIT E

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

Document	Interim Fee Application Date; Dkt. No.	Period Covered	Fees Requested/ Allowed	Expenses Requested/ Allowed	Order Approving Interim Application
1 st Interim	11/9/2020; Dkt. No. 423	8/21/2020-9/30/2020	\$46,289.00	\$0.00	Dkt. No. 459; 12/3/2020
2 nd Interim	3/11/2021; Dkt. No. 617	10/1/2020-1/31/2021	\$488,022.50	\$5,033.60	Dkt. No. 661; 4/2/2021
3 rd Interim	7/9/2021; Dkt. No. 762	2/1/2021-5/31/2021	\$630,867.00	\$6,609.60	Dkt. No. 795; 8/2/2021
4 th Interim	10/29/2021; Dkt. No. 863	6/1/2021-9/30/2021	\$240,028.50	\$1,488.88	Dkt. No. 928; 12/8/2021
5 th Interim	3/1/2022; Dkt. Nos. 1008	10/1/2021-1/31/2022	\$251,136.00	\$1,506.62	Dkt. No. 1065; 3/23/2022
6 th Interim	7/11/2022; Dkt. No. 1262	2/1/2022-6/31/2022	\$299,435.00	\$3,405.87	Dkt. No. 1311; 8/3/2022
7 th Interim	11/7/2022; Dkt. No. 1388	1/1/2022-9/30/2022	\$289,310.50	\$5,524.85	Dkt. No. 1458; 12/7/2022
8 th Interim	3/8/2023; Dkt. No. 1631	10/1/2022-1/31/2023	\$212,252.50	\$4,182.20	Dkt. No. 1827; 6/21/2023
9 th Interim	8/3/2023; Dkt. No. 1902	2/1/2023-5/31/2023	\$368,257.00	\$3,956.38	Dkt. No. 1902; 8/2/2023
10 th Interim	11/7/2023; Dkt. No. 1990	6/1/2023-9/30/2023	\$295,603.00	\$5,181.57	Dkt. No. 2026; 11/30/2023
11 th Interim	3/15/2024; Dkt. No. 2146	10/1/2023-1/31/2024	\$115,605.00	\$730.90	Dkt. No. 2193; 4/11/2024
12 th Interim	7/11/2024; Dkt. No. 2300	2/1/2024-5/31/2024	\$563,076.50	\$19,282.50	Dkt. No. 2339; 8/2/2024
13 th Interim	11/13/2024; Dkt. No. 2442	6/1/2024-9/30/2024	\$201,324.00	\$684.90	Dkt. No. 2481; 12/12/2024
14 th Interim	3/13/2025; Dkt. No. 2587	10/1/2024-1/31/2025	\$432,916.50	\$2,354.83	Dkt. No. 2637; 4/4/2025
15 th Interim	7/9/2025; Dkt. No 2701	2/1/2025-5/31/2025	\$579,845.50	7,174.90	
TOTAL:			\$5,013,968.50	\$67,117.60	