Docket #3192 Date Filed: 06/25/2026

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re	Chapter 11
ALDRICH PUMP LLC, *et al.*,[1]	Case No. 20-30608 (LMJ)
Debtors.	(Jointly Administered)

MOTION TO FILE CONFIDENTIAL INFORMATION UNDER SEAL

The Official Committee of Asbestos Personal Injury Claimants (the "Committee" or "Movant"), by and through undersigned counsel, pursuant to 11 U.S.C. § 105(a), 11 U.S.C. § 107(b), Rule 9018 of the Federal Rules of Bankruptcy Procedure, Rule 6.1 of the Rules of Practice and Procedure of the United States District Court for the Western District of North Carolina and Section I.1 of the Agreed Protective Order Governing Confidential Information (Case No. 20-30608, Dkt. No. 345) entered on September 23, 2020 ("Protective Order"), hereby files this Motion (the "Motion") for an Order authorizing Movant to file its *Motion in Limine to Exclude Certain Expert Testimony of David L. McKnight* (the "Motion in Limine") and the exhibits thereto under seal.

In support, the Movant respectfully states as follows:

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334, and this matter is a core proceeding within the meaning of 28 U.S.C. § 157(b).

2. The statutory bases for the relief requested herein are 11 U.S.C. § 105(a), 11 U.S.C. § 107(b) and Federal Rule of Bankruptcy Procedure 9018. 11 U.S.C. § 105(a) gives this Court

[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.

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authority to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." The Bankruptcy Code authorizes the Court, in appropriate circumstances, to issue orders to protect entities from potential harm that may result from the disclosure of confidential information. 11 U.S.C. § 107(b). Federal Rule of Bankruptcy Procedure 9018 provides that "[o]n motion or on its own initiative, with or without notice, the court may make any order which justice requires (1) to protect the estate or any entity in respect of . . . confidential . . . commercial information."

3. The Protective Order was entered on or about September 23, 2020. The Protective Order governs the parties' rights and obligations with respect to "Confidential Information," defined in the order as:

> [I]nformation, documents or things produced or provided (formally or informally) by the Disclosing Party that such Disclosing Party or a Designating Party reasonably believes in good faith contains confidential, proprietary or commercially sensitive information, including, but not limited to, (a) trade secrets, (b) proprietary business information and (c) information implicating an individual's legitimate expectation of privacy, including medical information and social security numbers. This term shall include information furnished or otherwise disclosed in any manner, including, without limitation, in written form, orally or through any electronic, facsimile or computer-related communication, and also shall include, without limitation, those portions of deposition testimony (whether based upon oral examination or written questions), answers to interrogatories, requests for admissions, responses to requests for admission, notes, summaries, compilations, memoranda or similar materials disclosing or discussing Confidential Information. Confidential Information also shall include information, documents or things designated by the Disclosing Party or Designating Party as "Confidential – Professional Eyes Only" in accordance with Paragraph J.

Protective Order [Case No. 20-30608, Dkt. No. 345, at 3-4].

4. Section I (Disclosure of Covered Information in the Bankruptcy Proceedings), subparagraph 1 (Protection of Covered Information) of the Protective Order provides that:

> [T]he Party seeking to use Covered Information in the court may file a Motion to Seal pursuant to Rule 9037-1 of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina and Local Civil

> Rule 6.1 of the Rules of Practice and Procedure of the United States District Court for the Western District of North Carolina, as appropriate; *provided that* (a) pending a ruling on such Motion to Seal or other agreement or court order that permits the public filing of the materials at issue, the Parties shall maintain the confidentiality of the Covered Information; (b) where necessary, the moving Party may file a redacted copy of its Motion to Seal, brief or other relevant materials, eliminating the Covered Information; and (c) the moving Party may provide an unredacted copy of these materials to the Court under seal to assist in its consideration of the Motion to Seal.

Protective Order [Case No. 20-30608, Dkt. No. 345, at 15].

5. On June 25, 2026, Movant filed the Motion in Limine and the exhibits thereto, which contain information that Committee believes is "Confidential Information" pursuant to the Protective Order (the "Confidential Information"). In accordance with the Protective Order, Movant has filed the Motion in Limine and exhibits under seal on the public docket.

6. The parties have not reached an agreement that avoids the need to file such Confidential Information under seal. Therefore, Movant is bringing this Motion to comply with the terms of the Protective Order.

7. Movant will work with the Debtors and/or the affiliates of the Debtors to determine which, if any, of the Confidential Information may be unsealed. By filing this motion, Movant is not taking a position as to whether the materials would be appropriately designated as "Confidential."

8. As provided for in the Protective Order, Movant will deliver an unredacted copy of the Motion in Limine to the Court.

WHEREFORE, Movant respectfully requests that the Court enter an order substantially in the form attached hereto as **Exhibit A**: (a) authorizing the filing of the Confidential Information as contained in the Motion in Limine under seal, (b) providing that any portion of a hearing

requiring the disclosure of the Confidential Information be conducted *in camera*, and (c) granting such other and further relief to the Movant as the Court may deem proper.

Dated: June 25, 2026
Charlotte, North Carolina

HAMILTON STEPHENS STEELE + MARTIN, PLLC

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EXHIBIT A

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re	Chapter 11
ALDRICH PUMP LLC, *et al.*,[2]	Case No. 20-30608 (LMJ)
Debtors.	(Jointly Administered)

[PROPOSED] ORDER GRANTING MOTION OF THE OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS TO FILE CONFIDENTIAL INFORMATION UNDER SEAL

Upon consideration of the Motion of the Official Committee of Asbestos Personal Injury Claimants (the "Committee") to file their *Motion in Limine to Exclude Certain Expert Testimony of David L. McKnight* with confidential information contained therein filed under seal (the "Motion"); and the Movant having demonstrated upon the record herein good cause for the relief requested in the Motion; and after due deliberation,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

2. The Motion in Limine and its exhibits shall remain under seal on the public docket.

3. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

[2] 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.

This order has been signed electronically. The Judge's signature and Court's seal appear at the top of this Order.	United States Bankruptcy Court

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re	Chapter 11
ALDRICH PUMP LLC, *et al.*,[1]	Case No. 20-30608 (LMJ)
Debtors.	(Jointly Administered)

NOTICE OF HEARING

PLEASE TAKE NOTICE that the Official Committee of Asbestos Personal Injury Claimants filed a *Motion to File Confidential Information Under Seal* (the "Motion") related to the *Motion in Limine of the Official Committee of Asbestos Personal Injury Claimants to Exclude Certain Expert Testimony of David L. McKnight*.

PLEASE TAKE FURTHER NOTICE that, pursuant to Fed. R. Bankr. P. 9006 and the Case Management Order, written responses, if any, must be filed on or before **July 16, 2026** (the "Response Deadline"), in order to be considered. If you do not want the Court to grant the relief requested in the Motion, or if you oppose it in any way, you MUST:

1. File a formal, written response with the Bankruptcy Court at:

   Clerk, United States Bankruptcy Court
   Charles Jonas Federal Building
   401 West Trade Street
   Charlotte, North Carolina 28202

2. Serve a copy of your response on all parties in interest, including:

   a) U.S. Bankruptcy Administrator
   401 West Trade Street, Suite 2400
   Charlotte, NC 28202

   b) HAMILTON STEPHENS STEELE + MARTIN, PLLC
   Glenn C. Thompson
   Robert A. Cox, Jr.
   525 North Tryon Street, Suite 1400
   Charlotte, North Carolina 28202

[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.

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PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **July 23, 2026 at 9:30 a.m. (ET)** before the Honorable Lena M. James at the United States Bankruptcy Court, Charles Jonas Federal Building, Courtroom 2B, 401 West Trade Street, Charlotte, North Carolina 28202.

PLEASE TAKE FURTHER NOTICE that, if you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting the relief requested. No further notice of the hearing will be given.

Dated: June 25, 2026
Charlotte, North Carolina

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