Docket #3219 Date Filed: 07/16/2026

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)

FUTURE CLAIMANTS' REPRESENTATIVE'S MOTION TO FILE DOCUMENTS UNDER SEAL

Joseph W. Grier, III, the representative for future asbestos claimants in the above-captioned cases (the "FCR"), by and through undersigned counsel, pursuant to 11 U.S.C. § 105(a), 11 U.S.C. § 107(b), Rule 6.1 of the Rules of Practice and Procedure of the United States District Court for the Western District of North Carolina, Rule 9037-1 of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina and Section I.1 of the Agreed Protective Order Governing Confidential Information (Case No. 20-30608, Docket No. 345) entered on September 23, 2020 ("Protective Order"), hereby files this Motion (the "Motion") for an Order authorizing Movant to file under seal (1) the FCR's Response in Opposition to the Official Committee of the Asbestos Personal Injury Claimants' Motion to Exclude Certain Expert Testimony of David L. McKnight (the "Opposition to ACC's MIL") and the exhibits thereto; and (2) Response in Support of the Debtors' Motions in Limine (i) to Exclude Evidence of Defense Costs; (ii) to Exclude "Ground-Up" Estimate for Non-Mesothelioma Claims; and (iii) to Preclude Opinions Asserted by the Committee's Experts on Discount Rates (the "Response in Support of

[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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Debtors' MILs") (together with the Opposition to ACC's MIL the "Response Motions"). In support, the FCR 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). Section 105(a) gives this Court 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).

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 . . . information[.] This term shall include information furnished or otherwise disclosed in any manner, including, without limitation . . . those portions of deposition testimony (whether based upon oral examination or written questions[.] . . . 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, Docket 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 April 18, 2022, the Court entered the Order Authorizing Estimation of Asbestos Claims [Dkt. No. 1127] (the "Estimation Order"). Under the Estimation Order, the parties to the estimation proceeding are the Debtors Aldrich Pump LLC and Murray Boiler, LLC (together, the "Debtors"), the Official Committee of Asbestos Personal Injury Claimants (the "ACC"), the FCR, and certain non-debtor affiliates (the "NDA's" and, collectively with the Debtors, the ACC, and the FCR, the "Estimation Parties"). On January 23, 2026, the Court entered the Order Commencing Phase 1 of the Estimation Trial with Hearings Based on the Tort System Extrapolation Method and the Parties' Expert Reports [Dkt. No. 3011] (the "Phase 1 Estimation Order"). Pursuant to the Phase 1 Estimation Order, the Estimation Parties exchanged expert reports and rebuttal reports (collectively, the "Expert Reports") and took depositions of the Estimation Parties' expert witnesses (the "Expert Depositions"). The Estimation Parties have marked the Expert Reports and Expert Depositions "Confidential" under the Protective Order and have marked certain portions of those Expert Reports and Expert Depositions as "Professional Eyes Only" Under the Protective Order.

6. Contemporaneously herewith, the FCR has filed its Response Motions which are replete with references to the contents of the Expert Reports and Expert Depositions.

7. The Opposition to ACC's MIL also includes the FCR's expert reports and portions of transcripts of the Expert Depositions as exhibits.

8. Pursuant to the Protective Order, the Estimation Parties have designated the Expert Reports and Expert Deposition transcripts confidential. Consequently, in accordance with the Protective Order, the FCR has not filed the contents of the Response Motions and the Expert Reports and Expert Deposition transcripts attached to the Opposition to ACC's MIL with the public docket. The FCR considered whether the Response Motions could be filed in redacted form by removing references to the Confidential Information, but determined the redactions would be so pervasive as to make the Response Motions unreadable.

9. The Estimation Parties have not reached an agreement that avoids the need to file such Confidential Information under seal.[2] Therefore, the FCR is bringing this Motion to comply with the terms of the Protective Order.

10. The FCR will work with the Estimation Parties to determine what, if any, of the Confidential Information may be unsealed. By filing this Motion, the FCR is not taking a position as to whether the materials would be appropriately designated as "Confidential."

11. As provided for in the Protective Order, the FCR will deliver an unredacted copy of the Response Motions, together with all exhibits, to the Court and the Estimation Parties.

[2] The FCR attempted to obtain agreement from the ACC necessary to avoid filing the Response Motions under seal due to the additional work for the Court and Court staff—given that all confidential information has been redacted from the Brattle Reports and deposition transcripts—nevertheless, the FCR was unable to obtain such agreement.

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 Response Motions under seal, and (b) granting such other and further relief to the Movant as the Court may deem proper.

Dated: July 16, 2026
Charlotte, North Carolina

Respectfully submitted,

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FUTURE CLAIMANTS' REPRESENTATIVE

EXHIBIT A

PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re	Chapter 11
ALDRICH PUMP LLC, *et al.*,[3]	Case No. 20-30608 (LMJ)
Debtors.	(Jointly Administered)

ORDER GRANTING FCR'S MOTION TO FILE DOCUMENTS UNDER SEAL

Upon consideration of the FCR's Motion to File the FCR's Response in Opposition to the Official Committee of the Asbestos Personal Injury Claimants' Motion to Exclude Certain Expert Testimony of David L. McKnight and the exhibits thereto, and the FCR's Response in Support of the Debtors' Motions in Limine (i) to Exclude Evidence of Defense Costs; (ii) to Exclude "Ground-Up" Estimate for Non-Mesothelioma Claims; and (iii) to Preclude Opinions Asserted by the Committee's Experts on Discount Rates, under seal (the "Motion"); and for good cause shown:

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

[3] 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.

2. The Motion and its exhibits shall remain sealed in the Motion filed on the public docket.

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

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