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FILED & JUDGMENT ENTERED
Christine F. Ramsey
July 30 2026
Clerk, U.S. Bankruptcy Court
Western District of North Carolina

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA

Lena M James
United States Bankruptcy Judge

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)

STIPULATED ORDER REGARDING
CONFIDENTIALITY ISSUES FOR PHASE I ESTIMATION TRIAL

Aldrich Pump LLC ("Aldrich") and Murray Boiler LLC ("Murray"), as debtors and debtors in possession (together, the "Debtors"), the Official Committee of Asbestos Personal Injury Claimants (the "ACC"), the Future Claimants Representative, Joseph W. Grier, III (the "FCR"), and Trane Technologies Company LLC and Trane U.S. Inc. (the "NDAs" and, collectively with

[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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the Debtors, the ACC, and the FCR, the "Estimation Parties") hereby stipulate, and the Court so orders (the "Stipulated Order") as follows:

WHEREAS, on June 18, 2020, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, and by an order entered on June 25, 2020, the Debtors' cases have been consolidated for procedural purposes only and are being jointly administered under Case No. 20-30608.

WHEREAS, on April 18, 2022, the Court entered the *Order Authorizing Estimation of Asbestos Claims* [Dkt. 1127] (the "Estimation Order"), which authorized the estimation of asbestos personal injury claims in these cases and identified the parties to the estimation proceeding.

WHEREAS, the Court has entered a series of case management orders governing the estimation proceeding, including the *Case Management Order for Estimation of Asbestos Claims* [Dkt. 1302], as amended by the *First Amended Case Management Order* [Dkt. 1804], and the *Second Amended Case Management Order for Estimation of Asbestos Claims* [Dkt. 2656] (the "Second Amended CMO").

WHEREAS, on January 23, 2026, the Court entered the *Order Commencing Phase I of the Estimation Trial with Hearings Based on the Tort System Extrapolation Method and the Parties' Expert Reports* [Dkt. 3011] (the "Phase I Estimation Order"), which set the Phase I Estimation Hearing for August 10-14, 2026 (the "Phase I Trial"), as well as a pre-hearing schedule.

WHEREAS, the Court entered the *Agreed Protective Order Governing Confidential Information* on September 23, 2020 [Dkt. 345] (the "Protective Order"), which governs the

parties' rights and obligations with respect to "Confidential Information" and "Confidential – Professional Eyes Only" designations.

WHEREAS The Court entered the *Order Approving Personal Injury Questionnaire and Related Relief* on July 6, 2022 [Dkt. 1246] (the "PIQ Order"), which governs the parties' rights and obligations with respect to Personal Injury Questionnaires ("PIQs") submitted in this bankruptcy case**.**

WHEREAS, pursuant to the Phase I Estimation Order and the Second Amended CMO, the Estimation Parties exchanged initial expert reports and rebuttal reports (collectively, the "Expert Reports") and took depositions of the Estimation Parties' expert witnesses (the "Expert Depositions").

WHEREAS, the Estimation Parties marked all the Expert Reports, related reliance materials, and Expert Depositions "Confidential" and certain portions thereof "Confidential – Professional Eyes Only" under the Protective Order.

WHEREAS, recognizing that the Phase I estimation trial will be a public proceeding, the Estimation Parties have conferred and agreed on protocols for the redaction or anonymization of all non-public Personally Identifiable Information ("PII") or information defined as Professional Eyes Only pursuant to the Protective Order from the Expert Reports, related reliance materials, and the Expert Deposition transcripts so that the redacted/anonymized versions may be referred to in the Phase I Trial without restriction.

WHEREAS, the Estimation Parties now request this Order wherein these agreed protocols are memorialized, thereby facilitating the conduct of the public Phase I trial.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Estimation Parties, as follows:

1. **Definitions**. Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Estimation Order, the Second Amended CMO, the Phase I Estimation Order, the Protective Order, or the PIQ Order, as applicable. As used in this Stipulated Order: (a) "Claims Database" means the extract of the Debtors' asbestos claims database maintained by PACE Claims Services and produced in these bankruptcy cases on December 14, 2020 at DEBTORS 00051537 and any derivative version thereof, including cleaned or standardized versions or sub-sets thereof, produced by experts in these cases; and (b) "Anonymization Nomenclature" means the agreed system of anonymous identifiers (e.g., "Law Firm 1," "Law Firm 2," etc.) and conforming redactions used to replace identifying information in materials offered as evidence or otherwise submitted to the Court.

2. **Public Proceedings**. Consistent with the laws of the State of North Carolina and applicable federal law, the Phase I Trial and the associated trial record shall be open to the public.

3. **Claims Database**.

   a. Neither the Claims Database nor any portion thereof shall be admitted into evidence at the Phase I Trial.

   b. No party shall object, on the basis that the Claims Database has not been entered into evidence, to any expert's reliance on the Claims Database in forming opinions or preparing the Expert Reports.

   c. Each party reserves the right to raise with the Court and Parties the need for admission or other use of the Claims Database, or any portions thereof, during the Phase I Trial if necessary for impeachment or other purposes, subject to the confidentiality protections set forth in this Stipulated Order and the Protective Order.

4. **Claimant PII**. To the extent any evidence containing specific claimant Personally Identifiable Information ("PII") is sought to be introduced at the Phase I Trial, such PII shall be redacted or otherwise anonymized prior to its introduction into the public record.

5. **Professional Eyes Only Information**. To the extent any evidence containing information designated as "Professional Eyes Only" under the Protective Order is sought to be introduced at the Phase I Trial, (a) Claimant PII shall be redacted or otherwise anonymized as described above (b) identifying information of any law firm(s) associated with such Professional Eyes Only information shall be redacted or otherwise anonymized using the Anonymization Nomenclature prior to its introduction into the public record, (c) to the extent not otherwise addressed above, individual or aggregate settlement values associated with an identifiable claimant or law firm shall be redacted.

6. **Personal Injury Questionnaires**. The confidentiality and use provisions established in the PIQ Order, including but not limited to paragraph 13 of that order, shall apply in this Phase I Trial

7. **Expert Reports, Expert Depositions, and Anonymization Nomenclature**.

   a. To the extent an Expert Report or Expert Deposition is sought to be admitted into evidence, referred to, published, or otherwise relied upon at the Phase I Trial, the version offered shall be the version currently marked "Confidential" under the Protective Order, with information currently designated as "Professional Eyes Only" under the Protective Order to be replaced using the agreed Anonymization Nomenclature.

   b. The anonymization protocol set forth in Paragraph 7(a) shall also apply to Expert Reports and Expert Depositions submitted to the Court in connection with any

pretrial briefs and/or motions with the Phase I Trial. Once the Parties agree that the Anonymization Protocol has been appropriately completed as to a particular Expert Report or Expert Deposition, then those copies of Expert Reports and Expert Depositions already submitted with the Motions *in Limine* shall be replaced on the docket with updated versions using the agreed Anonymization Nomenclature to replace any information marked "Professional Eyes Only." Likewise future versions of pretrial briefs, motions, and/or exhibits to the same utilizing the agreed Anonymization Nomenclature may be filed on the public docket without the need for any sealing restrictions. Further, once the already submitted Motions *in Limine* are replaced on the docket with versions utilizing the Anonymization Nomenclature, the associated Motions to Seal will be deemed withdrawn.

8. **Additional Safeguards**. The Estimation Parties shall meet and confer following the exchange of exhibit lists to determine whether additional confidentiality safeguards are necessary for specific exhibits or other materials to be offered at the Phase I Trial. Nothing in this Stipulated Order shall preclude any party from seeking additional relief from the Court regarding confidentiality issues that may arise during the Phase I Trial.

9. **Preservation of Evidentiary Objections**. The terms of this Stipulated Order shall not be construed to affect the admissibility of any evidence offered at the Phase I Trial or any other proceeding. The Estimation Parties reserve all rights to object to the admissibility of any exhibit. Conformance with the terms of this Stipulated Order, including but not limited to the preparation or review of redacted and/or anonymized materials by any Party, shall not be construed as a waiver by any Party of its right to object to the admissibility of such materials.

10. **General Provisions**. Nothing herein shall be construed as a waiver of any rights, claims, or defenses of any party, or as an admission of any fact or legal position, except as expressly set forth herein. This Stipulated Order supplements, and does not supersede or modify, the Protective Order, which remains in full force and effect. In the event of any conflict between the terms of this Stipulated Order and the Protective Order, the Protective Order shall govern except to the extent this Stipulated Order expressly provides otherwise with respect to the Phase I Trial.

SO ORDERED

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

United States Bankruptcy Court

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Dated: July 23, 2026
Charlotte, North Carolina

/s/ Robert A. Cox, Jr.
Glenn C. Thompson (Bar No. 37221)
Robert A. Cox, Jr. (Bar No. 21998)
HAMILTON STEPHENS STEELE + MARTIN, PLLC
525 North Tryon Street, Suite 1400
Charlotte, North Carolina 28202
Telephone: (704) 344-1117
Facsimile: (704) 344-1483
gthompson@lawhssm.com
rcox@lawhssm.com

-and-

Natalie D. Ramsey (admitted *pro hac vice*)
Davis Lee Wright (admitted *pro hac vice*)
Rachel Jaffe Mauceri (admitted *pro hac vice*)
ROBINSON & COLE LLP
1201 North Market Street, Suite 1406
Wilmington, Delaware 19801
Telephone: (302) 516-1700
Facsimile: (302) 516-1699
nramsey@rc.com
dwright@rc.com
rmauceri@rc.com

-and-

Kevin C. Maclay (admitted *pro hac vice*)
Todd E. Phillips (admitted *pro hac vice*)
Jeffrey A. Liesemer (admitted *pro hac vice*)
CAPLIN & DRYSDALE, CHARTERED
One Thomas Circle NW, Suite 1100
Washington, DC 20005
Telephone: (202) 862-5000
Facsimile: (202) 429-3301
kmaclay@capdale.com
tphillips@capdale.com
jliesemer@capdale.com

Co-Counsel for the Official Committee of Asbestos Personal Injury Claimants

AGREED AND CONSENTED TO BY:

/s/ John R. Miller, Jr.
C. Richard Rayburn, Jr. (Bar No. 6357)
John R. Miller, Jr. (Bar No. 28689)
RAYBURN COOPER & DURHAM, P.A.
227 West Trade Street, Suite 1200
Charlotte, North Carolina 28202
Telephone: (704) 334-0891
Facsimile: (704) 377-1897
rrayburn@rcdlaw.net
jmiller@rcdlaw.net

-and-

Brad B. Erens (IL Bar No. 06206864)
Mark A. Cody (IL Bar No. 6236871)
David S. Torborg (DC Bar No. 475598)
Morgan R. Hirst (IL Bar No. 6275128)
JONES DAY
110 N. Wacker Driver, Suite 4800
Chicago, Illinois 60606
Telephone: (312) 782-3939
Facsimile: (312) 782-8585
bberens@jonesday.com
macody@jonesday.com
amandajohnson@jonesday.com

Counsel for the Debtors and Debtors in Possession

/s/ A. Cotten Wright
A. Cotten Wright (Bar No. 28162)
GRIER WRIGHT MARTINEZ, PA
521 E Morehead Street, Suite 440
Charlotte, NC 28202
Telephone: (704) 332-0207
Facsimile: (704) 332-0215
cwright@grierlaw.com

-and-

Jonathan P. Guy (admitted *pro hac vice*)
Debbie L. Felder. (admitted *pro hac vice*)
ORRICK, HERRINGTON & SUTCLIFFE LLP
1152 15th Street, N.W.
Washington, DC 20005
Telephone: (202) 339-8400
Facsimile: (202) 339-8500
jguy@orrick.com
dfelder@orrick.com

Counsel for the Future Claimants' Representative

/s/ Bradley R. Kutrow
Bradley R. Kutrow (Bar No. 13851)
McGUIREWOODS LLP
201 North Tryon Street, Suite 3000
Charlotte, NC 28202
Telephone: (704) 343-2000
Facsimile: (704) 343-2300
bkutrow@mcguirewoods.com

-and-

K. Elizabeth Sieg (admitted pro hac vice)
McGUIREWOODS LLP
800 East Canal Street
Richmond, VA 23141
Telephone: (804) 775-1137
Facsimile: (804) 698-2257
bsieg@mcguirewoods.com

Counsel for Trane Technologies Company LLC and Trane U.S. Inc.