Docket #3271 Date Filed: 08/03/2026

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

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

***EX PARTE* MOTION OF THE DEBTORS REQUESTING AUTHORITY TO EXCEED MAXIMUM PAGE LIMIT**

Aldrich Pump LLC and Murray Boiler LLC, the debtors and debtors in possession in the above-captioned chapter 11 cases (together, the "Debtors"), file this *ex parte* motion (the "Motion") requesting authority to exceed the page limit established for briefs filed pursuant to Rule 9013-2(a) of the *Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina* (the "Local Bankruptcy Rules") with respect to *Debtors' Phase I Estimation Pre-Trial Brief* (the "Pre-Trial Brief"). In support of this Motion, the Debtors respectfully represent as follows:

Background

1. On April 18, 2022, the Court entered the *Order Authorizing Estimation of Asbestos Claims* [Dkt. 1127], which authorized the estimation of asbestos personal injury claims in these cases and identified the parties to the estimation proceeding. Since that time, 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

[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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First Amended Case Management Order [Dkt. 1804], and the *Second Amended Case Management Order for Estimation of Asbestos Claims* [Dkt. 2656].

2. 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").

3. The Phase I Estimation Order sets August 3, 2026 as the deadline to file pre-trial briefs prior to the Phase I Trial.

Relief Requested

4. By this Motion, the Debtors seek entry of an order, substantially in the form attached hereto as Exhibit A, authorizing the Pre-Trial Brief to exceed the 25-page limit for briefs filed in contested matters established under Local Bankruptcy Rule 9013-2(a). The Pre-Trial Brief explains in detail the Debtors' expert's estimation methodology for the Phase I Trial, as well as the myriad errors in the estimation methodology of the expert for the Official Committee of Asbestos Personal Injury Claimants (the "ACC"). The Pre-Trial Brief thus addresses expert opinions set forth in several affirmative and rebuttal expert reports and is intended to summarize the Debtors' arguments with respect to the merits of expert testimony anticipated to last at least four trial days. The Debtors were therefore unable to address these extensive topics within the 25-page limit established by the Local Rules. The Debtors therefore seek authority to exceed the 25-page limit imposed by Local Bankruptcy Rule 9013-2(a) by approximately 31 pages.

Notice

5. Pursuant to Local Bankruptcy Rule 9013-1(f), the Debtors seek approval of this Motion on an *ex parte* basis. Nevertheless, consistent with the *Order Establishing*

Certain Notice, Case Management, and Administrative Procedures [Dkt. 123] (the "Case Management Order"), notice of this Motion has been provided to: (a) the Office of the United States Bankruptcy Administrator for the Western District of North Carolina; (b) counsel to the ACC; (c) counsel for the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc; (d) the Future Claimants' Representative and his counsel; and (e) the other parties on the Service List established by the Case Management Order. The Debtors submit that, in light of the *ex parte* nature of the relief requested, no other or further notice need be provided.

No Prior Request

6. No prior request for the relief sought in this Motion has been made to this or any other court.

WHEREFORE, the Debtors respectfully request that the Court: (a) enter an order, substantially in the form attached hereto as Exhibit A, granting the relief requested herein and (b) grant such other and further relief to the Debtors as the Court may deem just and proper.

Dated: August 3, 2026
Charlotte, North Carolina

Respectfully submitted,

/s/ John R. Miller, Jr.

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ATTORNEYS FOR DEBTORS
AND DEBTORS IN POSSESSION

Exhibit A

Proposed Order

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)

***EX PARTE* ORDER GRANTING THE**
DEBTORS AUTHORITY TO EXCEED MAXIMUM PAGE LIMIT

This matter coming before the Court on the *Ex Parte Motion of the Debtors Requesting Authority to Exceed Maximum Page Limit* (the "Motion"),[2] filed by the debtors and debtors in possession in the above-captioned chapter 11 cases (together, the "Debtors"); the Court having reviewed the Motion, the Court finding that (a) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) venue is proper in this district pursuant to 28 U.S.C. § 1409, (c) this is a core proceeding under 28 U.S.C. § 157(b), (d) notice of the Motion was sufficient under the circumstances, and (e) *ex parte* relief is appropriate under Local Bankruptcy Rule

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[2] Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

9013-1(f); and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the *ex parte* relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

2. The Debtors are authorized to exceed the 25-page limit with respect to the *Debtors' Phase I Estimation Pre-Trial Brief*.

3. Pursuant to Local Bankruptcy Rule 9013-1(f), any party shall be entitled to request a hearing or request that the Court reconsider entry of this Order by filing a motion for reconsideration within 14 days of service of this Order.

4. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

5. This Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation, enforcement, or interpretation of this Order.

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