Docket #3272 Date Filed: 08/03/2026

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
Debtors.	:	(Jointly Administrated)

JOINDER OF THE NON-DEBTOR AFFILIATES TO THE DEBTORS' PHASE I ESTIMATION PRE-TRIAL BRIEF

Trane Technologies Company LLC and Trane U.S. Inc. (collectively, the "**Non-Debtor Affiliates**") submit this joinder to the Debtors' Phase I Estimation Pre-Trial Brief (the "**Pretrial Brief**"), and respectfully state as follows:

JOINDER

1. On August 3, 2026, the Debtors filed the Pretrial Brief in support of their estimate of the Debtors' liability for current and future asbestos claims under the tort system extrapolation method, as provided by 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**"). As set forth in the Pretrial Brief, the Debtors' expert, Dr. Charles Mullin of Bates White, has extensive experience in valuing personal injury liabilities and has repeatedly qualified as an expert in that area. Here, Dr. Mullin's estimate is the product of basic, well-accepted methodology for tort system extrapolation and reflects the Debtors' actual tort-system experience. Further, Dr. Mullin's methodology and estimate are consistent with those of the reputable expert of the Future Claimants Representative ("**FCR**"), Mr. David McKnight of 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.

Brattle Group. In contrast to Dr. Mullin and Mr. McKnight, the expert of the Official Committee of Asbestos Personal Injury Claimants (the "**ACC**"), Dr. Andrew Sackett of Legal Analysis Systems, has never been qualified as an expert witness by any court on any topic, and the unfounded and improper modifications by Dr. Sackett to the estimation framework employed by the other experts resulted in an unreasonable estimate that deviates from the sound estimates of Dr. Mullin and Mr. McKnight.

2. The Non-Debtor Affiliates join the Debtors' Pretrial Brief, and respectfully request that the Court, for the reasons stated therein, reject the ACC's estimate and instead estimate the Debtors' liability for present and future mesothelioma claims consistent with Dr. Mullin's $460 million "best" estimate.

CONCLUSION

For the foregoing reasons and those stated in the Pretrial Brief, the Non-Debtor Affiliates respectfully request that the Court estimate the Debtors' liability for present and future mesothelioma claims as provided in Dr. Mullin's estimate, and grant such other and further relief as the Court may deem proper.

Dated: August 3, 2026

Respectfully submitted,

/s/ Bradley R. Kutrow

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