Docket #3274 Date Filed: 08/03/2026

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

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

EX PARTE MOTION FOR RELIEF FROM THE MAXIMUM PAGE LIMIT

The Official Committee of Asbestos Personal Injury Claimants (the "Committee"), by and through its undersigned counsel, hereby submits this motion (the "Motion") for entry of an order (the "Order") substantially in the form attached hereto as **Exhibit A** requesting authority to exceed the page limit established for briefs filed in contested matters 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 Rules") in connection with the filing of the *Pre-Trial Brief of Official Committee of Asbestos Personal Injury Claimants of Aldrich Pump LLC and Murray Boiler LLC* (the "Pre-Trial Brief") which is 37 pages long, not including signature pages. In support thereof, the Committee respectfully states as follows:

BACKGROUND

1. On June 18, 2020 (the "Petition Date"), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").

2. On July 7, 2020, the Court entered its *Order Appointing the Official Committee of Asbestos Personal Injury Claimants* [Dkt. No. 147].

3. On January 23, 2026, the Court entered that *Order Commencing Phase 1 of the*

[1] The Debtors are the following entities (the last four digits of the Debtors' 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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Estimation Trial with Hearings Based on the Tort System Extrapolation Method and the Parties' Expert Reports (the "Phase I Estimation Order"). The Phase I Estimation Order scheduled a trial for Phase I estimation, as described in the Order, to commence on August 10, 2026. The Phase I Estimation Order further provided that pre-trial briefs would be due no later than August 3, 2026 with no responses permitted. See Phase I Estimation Order, ¶11.

4. In accordance with the Phase I Estimation Order, the Committee filed its Pre-Trial Brief on August 3, 2026.

RELIEF REQUESTED

5. By this Motion, the Committee seeks authority to exceed the 25-page limit established pursuant to Local Rule 9013-2(a) for briefs filed in contested matters in relation to the Pre-Trial Brief.

6. In the Pre-Trial Brief, the Committee summarizes the results, methodologies, and opinions of the Committee's experts in connection with the estimation of the net present value of the Debtors' liability for mesothelioma personal injury claims had neither entity filed for bankruptcy. The Pre-Trial Brief also addresses the opinions of the experts offered by the Debtors and the Future Claimants Representative.

7. In filing the Pre-Trial Brief, the Committee has attempted to be as succinct as possible. However, due to the complexity of the opinions related to estimation, the Committee was unable to present the full issue within the 25-page limit under the Court's local rules.

8. To provide the Court with the necessary background, explanation, and support ahead of the upcoming hearing on estimation, the Committee asserts that it is in the interests of justice that the Pre-Trial Brief be excused from the 25-page limit.

CONCLUSION

The Committee, therefore, respectfully requests entry of the Order attached hereto as **Exhibit A** permitting the Committee to exceed the page limits imposed by Local Rule 9013-2(a) with respect to the Pre-Trial Brief.

[signature page follows]

Dated: August 3, 2026
Charlotte, North Carolina

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EXHIBIT A

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

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

ORDER AUTHORIZING COMMITTEE TO EXCEED MAXIMUM PAGE LIMIT

This matter came before the Court on the Ex Parte *Motion for Relief From the Maximum Page Limit* (the "Motion")[2] filed by the Official Committee of Asbestos Personal Injury Claimants (the "Committee") in relation to the *Pre-Trial Brief of Official Committee of Asbestos Personal Injury Claimants of Aldrich Pump LLC and Murray Boiler LLC* (the "Pre-Trial Brief"). According to the Motion, the Committee filed the Pre-Trial Brief that exceeds the 25-page limit established by 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 Rules").

[1] The Debtors are the following entities (the last four digits of the Debtors' 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] Capitalized terms used but not defined herein shall have the respective meanings given to such terms in the Motion.

Based on the Motion, the Court finds and concludes that good cause exists to grant the Committee relief from the 25-page limit imposed by Local Rule 9013-2(a), to the extent that it applies. Accordingly, the Motion is GRANTED and the page limit established by Local Rule 9013-2(a) is hereby lifted with respect to the Pre-Trial Brief.

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