Docket #3275 Date Filed: 08/04/2026

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)

EX PARTE MOTION OF THE FUTURE ASBESTOS CLAIMANTS' REPRESENTATIVE REQUESTING AUTHORITY TO EXCEED MAXIMUM PAGE LIMIT

Joseph W. Grier, III, the representative for future asbestos claimants in the above-captioned cases (the "FCR"), through counsel, hereby files this *Ex Parte Motion of the Future Asbestos Claimants' Representative Requesting Authority to Exceed Maximum Page Limit* (this "Motion") requesting authorization 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 the FCR's *Phase I Trial Brief* (Dkt. 3269), and in support, respectfully shows the Court as follows:

BACKGROUND

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

2. On October 14, 2020, the Court entered its *Order Appointing Joseph W. Grier, III as Legal Representative for Future Asbestos Claimants*. (Dkt. 389).

3. On April 18, 2022, the Court entered the *Order Authorizing Estimation of Asbestos Claims* (Dkt. 1127) authorizing the estimation of asbestos personal injury claims in these cases

[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.

2030608260804000000000001

and identifying the parties to the estimation proceeding. The Court subsequently entered certain case management orders, 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).

4. 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. 2011), setting a trial on "Phase I Estimation" for August 10 – 14, 2026 (the "Phase I Trial").

5. On August 3, 2026, the FCR filed his *Future Claimants Representative's Phase I Trial Brief* (the "FCR's Trial Brief").

RELIEF REQUESTED

6. Through this Motion, the FCR seeks authority to exceed the 25-page limit for briefs provided in Local Bankruptcy Rule 9013-2(a).

7. The FCR's Trial Brief details the results, methodologies, and opinions of the FCR's expert and compares the same with the opinions of the experts and rebuttal witnesses for the Debtors and the Asbestos Creditors' Committee (the "ACC"). The FCR was unable to address those complex topics within the 25-page limit imposed by Local Bankruptcy Rule 9013-2(a).

8. Providing the Court with the necessary background and analysis of the parties' various approaches to the estimation of claims in this case necessitated exceeding Rule 9013-2(a)'s page limit in preparation for the Phase I Trial.

WHEREFORE, the FCR respectfully requests that the Court enter an order, substantially in the form attached hereto as Exhibit A, granting this Motion and providing such further relief as the Court deems just and proper.

This is the 4th day of August, 2026.

Respectfully submitted,

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

-and-

Jonathan P. Guy, Esq. (admitted *pro hac vice*)
Debbie L. Felder, Esq. (admitted *pro hac vice*)
Michael M. Rosenberg, Esq. (admitted *pro hac vice*)
Amy L. Lenz, Esq. (admitted *pro hac vice*)
ORRICK, HERRINGTON & SUTCLIFFE LLP
2100 Pennsylvania Avenue N.W.
Washington, D.C. 20037
Telephone: (202) 339-8400
Facsimile: (202) 339-8500
Email: jguy@orrick.com
dfelder@orrick.com
mrosenberg@orrick.com
alenz@orrick.com

COUNSEL FOR JOSEPH W. GRIER, III,
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.*,[2]	Case No. 20-30608 (LMJ)
Debtors.	(Jointly Administered)

EX PARTE ORDER GRANTING THE FUTURE CALAMINTS' REPRESENTATIVE AUTHORITY TO EXCEED MAXIMUM PAGE LIMIT

This matter came before the Court on the *Ex Parte Motion of the Future Asbestos Claimants' Representative Requesting Authority to Exceed Maximum Page Limit* (the "Motion") filed by Joseph W. Grier, III, the Future Claimants' Representative (the "FCR") in this case. In the Motion, the FCR seeks authority to exceed the 25-page limit set 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 ("Local Bankruptcy Rule 9013-2(a)"). The Court, having reviewed the Motion and considered the record in this case has determined that the Motion should be allowed.

[2] 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.

IT IS, THEREFORE, ORDERED that the Motion is GRANTED and the FCR is authorized to exceed the page limit set in Local Bankruptcy Rule 9013-2(a) for the *Future Claimants Representative's Phase I 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