Docket #3348 Date Filed: 08/21/2026

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

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

THE FUTURE ASBESTOS CLAIMANTS' REPRESENTATIVE'S PROPOSED MULTIPLIER FOR NON-MESOTHELIOMA CLAIMS

Joseph W. Grier, III, the representative for future asbestos claimants in the above-captioned cases (the "FCR") files this *Proposed Multiplier for Non-Mesothelioma Claims.*

The Court ordered the Parties to estimate the Debtors' liabilities for current and future mesothelioma claims, plus an application of "a" gross-up or multiplier for non-mesothelioma claims.[2] Because the Court ordered an estimate of the Debtors' combined liabilities, it was not contemplated, and the Court's Orders did not provide for, individual multipliers for each Debtor. Rather, a combined multiplier would be used.

The multiplier is derived directly from the claims database, which shows what the Debtors paid to mesothelioma and non-mesothelioma claims prepetition. As such, ordinarily, parties in asbestos bankruptcy cases commonly reach agreement on the multiplier very early on. Numerous attempts to do so here, however, proved to be unsuccessful.

The Debtors have two separate claims databases, one for Aldrich and one for Murray, which had different experiences in the tort system. As set forth in the Debtors' Expert Report by

[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.
[2] Dkt. 1127, *Order Authorizing Estimation of Asbestos Claims* at 2-3; Dkt. 2656, *Second Amended Case Management Order for Estimation of Asbestos Claims* at 3.

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Dr. Charles Mullin, the Debtors' derivation of the multiplier from those claims databases is 1.21 for Aldrich and 1.24 for Murray.[3] As set forth in his Pre-Trial Brief, the FCR's derivation of the multiplier is 1.20 for Aldrich and 1.23 for Murray.[4] These are rounded numbers so actual difference is less than 1% in each instance. The tiny difference between the Debtors' and the FCR's calculations is a function of the fact, as the Court heard during the estimation trial, that the Debtors looked at calendar year claims data and whereas the FCR uses fiscal years tied to the Debtors' June 18, 2020 Petition Date for greater granularity.[5]

The ACC did not calculate a multiplier for either Debtor. However, on August 20, 2026, James Wehner, counsel for the ACC, advised that the ACC would agree to the use of calendar year multipliers calculated by the Debtors, *i.e.*, 1.21 for Aldrich and 1.24 for Murray. The FCR and the Debtors have no objection.

However, because the Court ordered the Parties to provide combined mesothelioma liabilities and a combined multiplier for Aldrich and Murray, the FCR asked that the Parties agree to the use of single blended multiplier of 1.22 across both Debtors. 1.22 is an appropriate weighted blend average given most asbestos indemnity claims were paid by Aldrich. The Court will not find individual multipliers helpful when deriving non-mesothelioma liabilities; the Parties gave the Court combined mesothelioma liabilities, not individual ones. On the other hand, the use of a single multiplier will simplify the Court's preparation of the estimate, which does not require mathematical precision in any event. The Debtors have no objection to the 1.22 single multiplier.

[3] Dkt. 3189, *Motion in Limine of the Official Committee of Asbestos Personal Injury Claimants to Exclude Certain Expert Testimony of Charles H. Mullin*, Exhibit A – Corrected Initial Expert Report of Charles H. Mullin PhD (Sept. 15, 2025) ¶¶ 171-173 & Figs. 53-54.
[4] Dkt. 3269, *The Future Asbestos Claimants' Representative's Phase I Pre-Trial Brief* at 20.
[5] *Id.* at 20 n.92.

The ACC are opposed, suggesting that the Court should use separate multipliers, but did not specify why.

Accordingly, the FCR respectfully submits that a multiplier of 1.22 is appropriate for the Phase I estimation.[6]

Dated: August 21, 2026
Charlotte, North Carolina

Respectfully submitted,

/s/ A. Cotten Wright

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[6] Counsel for the FCR is still searching for a helpful glossary of terms from an academic publication to provide to the Court as mentioned during the estimation trial. Counsel for the FCR could create such a glossary but worry that it could complicate things rather than help the Court.