Docket #3372 Date Filed: 09/08/2026

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)

THIRTEENTH MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER EXTENDING THE PERIOD WITHIN WHICH THE DEBTORS MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND RULE 9027 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

Aldrich Pump LLC ("Aldrich") and Murray Boiler LLC ("Murray"), as debtors and debtors in possession (together, the "Debtors"), hereby move the Court for the entry of an order, pursuant to Rule 9006(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), further extending the period within which the Debtors may remove actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 (the "Removal Period") through and including March 9, 2027. In support of this Motion, the Debtors respectfully state as follows:

Background

1. On June 18, 2020 (the "Petition Date"), the Debtors commenced their reorganization cases (the "Chapter 11 Cases") by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). These Chapter 11 Cases have been consolidated for procedural purposes only and are being administered jointly.

[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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2. The Debtors are authorized to continue to manage their property and operate their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

3. A comprehensive description of the Debtors, their history, their assets and liabilities, and the events leading to the commencement of these Chapter 11 Cases can be found in the *Declaration of Ray Pittard in Support of First Day Pleadings* [Dkt. 27] (the "Pittard Declaration") and the *Declaration of Allan Tananbaum in Support of Debtors' Complaint for Injunctive and Declaratory Relief, Related Motions, and the Chapter 11 Cases* [Dkt. 29] (the "Tananbaum Declaration" and, together with the Pittard Declaration, the "First Day Declarations"), which were filed on the Petition Date. The Debtors also filed the *Informational Brief of Aldrich Pump LLC and Murray Boiler LLC* [Dkt. 5] (the "Informational Brief"), and the *Case History and Status Report of Aldrich Pump LLC and Murray Boiler LLC* [Dkt. 2378] (the "Status Report") to provide additional information about their asbestos litigation, related costs, case progress, and plans to address these matters in these Chapter 11 Cases.

4. On July 7, 2020, the Court entered an order [Dkt. 147] appointing an official committee of asbestos personal injury claimants (the "ACC") in these Chapter 11 Cases. On October 14, 2020, the Court entered an order [Dkt. 389] appointing Joseph W. Grier, III as legal representative for future asbestos claimants in these Chapter 11 Cases (the "FCR").

Prior Extension Orders

5. On October 29, 2020, April 1, 2021, October 4, 2021, April 1, 2022, October 4, 2022, April 3, 2023, October 3, 2023, April 3, 2024, October 3, 2024, April 2, 2025, October 14, 2025, and April 1, 2026 the Court entered orders [Dkts. 405, 650, 842, 1086, 1357, 1699, 1968, 2171, 2373, 2624, 2831, 3108] (together, the "Prior Extension Orders") extending

the Removal Period through and including September 9, 2026, to the extent the time period for filing any notices of removal otherwise would expire on or before such date.[2]

6. The Prior Extension Orders were entered without prejudice to (a) any position the Debtors may take regarding whether section 362 of the Bankruptcy Code applies to stay any given civil action pending against the Debtors and (b) the Debtors' right to seek from this Court further extensions of the period within which the Debtors may file notices of removal under Bankruptcy Rule 9027(a) (any such request, an "Extension Request"). Further, in the event of an Extension Request, the Prior Extension Orders authorize the Debtors to utilize the no protest motion process set forth in Rule 9013-1(e) of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the "Local Rules").

Jurisdiction

7. This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

8. By this Motion, the Debtors seek the entry of an order pursuant to Bankruptcy Rule 9006(b) further extending the Removal Period by approximately six months, through and including March 9, 2027, to the extent that the time period for filing any notices of removal expires on or before such date.

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[2] Pursuant to paragraph 24 of the *Notice, Case Management, and Administrative Procedures* in these cases, because this Motion has been filed before the expiration of the Removal Period on September 9, 2026, such period automatically is extended until the Court acts on this Motion. See *Order Establishing Certain Notice, Case Management, and Administrative Procedures* [Dkt. 123] (the "Case Management Order"), Annex A, ¶ 24.

9. As with the extensions granted by the Prior Extension Orders, the relief requested is without prejudice to (a) any position the Debtors may take regarding whether section 362 of the Bankruptcy Code applies to stay any given civil action pending against the Debtors and (b) the Debtors' right to seek from this Court further extensions of the Removal Period.

Basis for Relief Requested

10. Section 1452 of title 28 of the United States Code provides for the removal of pending claims in civil actions related to bankruptcy cases. Section 1452 provides in pertinent part as follows:

> A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.

28 U.S.C. § 1452(a).

11. Bankruptcy Rule 9027 establishes the deadline for filing notices of removal of claims or causes of action. Bankruptcy Rule 9027(a)(2) provides in pertinent part as follows:

> If the claim or cause of action in a civil action is pending when a case under the [Bankruptcy] Code is commenced, a notice of removal may be filed [in the bankruptcy court] only within the longest of (A) 90 days after the order for relief in the case under the [Bankruptcy] Code, (B) 30 days after entry of an order terminating a stay, if the claim or cause of action in a civil action has been stayed under § 362 of the [Bankruptcy] Code, or (C) 30 days after a trustee qualifies in a chapter 11 reorganization case but not later than 180 days after the order for relief.

Fed. R. Bankr. P. 9027(a)(2).

12. With respect to postpetition actions, Bankruptcy Rule 9027(a)(3) provides that a notice of removal may be filed:

> only within the shorter of (A) 30 days after receipt, through service or otherwise, of a copy of the initial pleading setting forth the claim or cause of action sought to be removed or (B) 30 days after receipt of the summons if the initial pleading has been filed with the court but not served with the summons.

Fed. R. Bankr. P. 9027(a)(3).

13. Finally, Bankruptcy Rule 9006(b)(1) provides that the Court can extend the period within which the Debtors may remove actions provided for by Bankruptcy Rule 9027, without notice, upon a showing of cause:

> Except as provided in paragraphs (2) and (3) of this subdivision, when an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion (1) with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order. . . .

Fed. R. Bankr. P. 9006(b)(1).

14. It is well-settled that this Court is authorized by Bankruptcy Rule 9006 to extend the Removal Period provided under Bankruptcy Rule 9027. See, e.g., Pacor, Inc. v. Higgins, 743 F.2d 984, 996 n.17 (3d Cir. 1984) (stating that "it is clear that the court may grant such an extension" of the time limit for removal under the Bankruptcy Rules), overruled in part on other grounds by Things Remembered, Inc. v. Petrarca, 516 U.S. 124 (1995); Caperton v. A.T. Massey Coal Co., Inc., 251 B.R. 322, 325 (S.D.W.Va. 2000) (explaining that Bankruptcy Rule 9006(b) allows a court to enlarge the time period for removing actions under Bankruptcy Rule 9027(a)(3)); Jandous Elec. Constr. Corp. v. City of New York (In re Jandous Elec. Constr. Corp.), 106 B.R. 48, 50 (Bankr. S.D.N.Y. 1989) (indicating that the removal period may be extended under Bankruptcy Rule 9006); In re World Fin. Servs. Ctr., Inc., 81 B.R. 33, 39 (Bankr.

S.D. Cal. 1987) (stating that the court may enlarge the time period for filing removal notices under Bankruptcy Rule 9027(a)(3)).

15. The Debtors submit that "cause" exists to extend the Removal Period within the meaning of Bankruptcy Rule 9006. The Debtors have not yet determined whether to remove any actions that may be subject to removal. As of the Petition Date, among other things, the Debtors were defendants in roughly 7,400 mesothelioma actions and 28,000 non-mesothelioma actions throughout the United States (the "Actions"). The Debtors' records currently reflect in excess of 65,000 asbestos-related claims as pending against them.[3]

16. Furthermore, the Debtors are engaged in a proceeding, authorized by the Court (see [Dkt. 1127]), to estimate their aggregate liability for all current and future asbestos personal injury claims, including a Phase I estimation trial (see [Dkt. 3011], where the Debtors, ACC, and FCR presented their respective estimation of the Debtors' current and future mesothelioma liability based on a tort system history methodology.

17. Since the Debtors' last request to extend the Removal Period, the parties have prepared, exchanged, and reviewed their respective initial expert reports and rebuttal reports, and have deposed each side's respective estimation experts in preparation for the Phase I estimation trial. On June 25, 2026, the Debtors filed several substantive motions in limine in advance of the Phase I estimation trial [Dkts. 3183, 3184, 3185], and on July 16, 2026 filed the

[3] In addition, there were approximately 31,000 non-mesothelioma claims pending against the Debtors on the Petition Date that were either on formal inactive dockets or designated as inactive by counsel. On the Petition Date, the Debtors' records reflected a total of approximately 100,000 claims pending against them on various dockets in courts across the country. See Tananbaum Decl. ¶¶ 20, 42; Informational Br. at 3. Since that time, however, the Debtors have updated their claims database to reflect a large number of prepetition dismissals that were not yet posted in the Debtors' claims database at the time of the Petition Date. On April 4, 2022, the Debtors amended their schedules of assets and liabilities and statements of financial affairs to, among other things, reflect these changes in the Debtors' claims database. See No. 30609 [Dkts. 60 and 61]; No. 30608 [Dkts. 1096 and 1097].

Debtors' Opposition to the Motion in Limine of the Official Committee of Asbestos Personal Injury Claimants to Exclude Certain Expert Testimony of Charles H. Mullin, Ph.D. [Dkt. 3226]. The Court held a pre-trial conference on July 23, 2026 and entered orders on the motions in limine. The Debtors filed their Phase I pre-trial brief on August 3, 2026 [Dkt. 3270]. Finally, the Debtors devoted substantial resources towards preparing for and participating in the Phase I estimation trial, which took place between August 10 and August 14, 2026.

18. In addition, the ACC has filed various adversary proceedings that, among other things, seek to challenge the prepetition corporate restructuring that established the Debtors. In these proceedings, the Debtors are either named parties or parties to discovery. While the Court stayed these adversary proceedings on June 18, 2026 (see No. 22-03028; [Adv. Dkt. 180]), the Court also ordered that these proceedings recommence following issuance of the Phase I estimation ruling. Furthermore, counsel for certain individual claimants has filed additional motions with the Court that have required the Debtors to expend additional time and resources.[4]

19. Given (a) the sheer number of Actions and (b) the other critical matters that have demanded the Debtors' attention during these Chapter 11 Cases to date, and that

[4] These motions include, among others: (a) *Robert Semian's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)* [Dkt. 1588] (the "Semian Lift Stay Motion") and (b) the *Motion by the Estate of Robert Semian and 46 Other Claimants Represented by Maune Raichle Hartley French & Mudd, LLC to Allow Their Participation in All Proceedings* [Dkt. 3012] (the "Participation Motion"). The Court denied the Semian Lift Stay Motion and the Participation Motion. See [Dkts. 2438, 3061]. Counsel appealed the order denying the Semian Lift Stay Motion to the District Court. See *Notice of Appeal*, Robert Semian v. Aldrich Pump LLC et al., No. 24-01042 (W.D.N.C) [Dkt. 1]. The District Court stayed all deadlines in that appeal pending the outcome of multiple appeals, including most recently two appeals in the Bestwall case. See No. 24-01042, *Text Only Order* (June 3, 2026) (staying all proceedings pending the outcome of the Fourth Circuit appeal, *Weiss et al. v. Bestwall LLC*, 4th Cir. No. 26-1513 (the "Weiss Fourth Circuit Appeal"), and the Supreme Court appeal *Official Committee of Asbestos Claimants of Bestwall LLC v. Bestwall LLC*, U.S. No. 25-1013 (the "Bestwall Supreme Court Appeal"); see also *Text Only Order* (January 30, 2025). On June 1, 2026, the Supreme Court entered an order denying the petition for certiorari in the Bestwall Supreme Court Appeal, but the Weiss Fourth Circuit Appeal remains pending.

continue to have high priority, the Debtors require additional time to evaluate whether the removal of any Actions under 28 U.S.C. § 1452 is appropriate and desirable. Absent an extension of the Removal Period, the Debtors risk waiving their removal rights before they have had an opportunity to complete an evaluation of these issues.[5] The requested relief will protect the Debtors' right to remove lawsuits under 28 U.S.C. § 1452 if the circumstances warrant.

20. This Court has granted similar relief in bankruptcy cases involving a large number of asbestos claims. See, e.g In re DBMP LLC, No. 20-30080 (AAE) (Bankr. W.D.N.C. May 28, 2026) [Dkt. 3471] (granting a thirteenth extension of the removal deadline through a date more than seven years after the petition date); In re Bestwall LLC, No. 17-31795 (LTB) (Bankr. W.D.N.C. Apr. 28, 2026) [Dkt. 4121] (granting an eighteenth extension of the removal deadline through a date approximately nine and a half years after the petition date); In re Kaiser Gypsum Co., No. 16-31602 (JCW) (Bankr. W.D.N.C. June 17, 2021) [Dkt. 2731] (granting an eighteenth extension of the removal deadline through a date nearly five years after the petition date); In re Garlock Sealing Techs., No. 10-31607 (JCW) (Bankr. W.D.N.C. Sept. 15, 2016) [Dkt. 5495] (granting a thirteenth extension of the removal deadline through a date more than seven years after the petition date).

21. The Debtors have notified counsel to the ACC and counsel to the FCR of the proposed extension of the Removal Period requested herein. The Debtors have been informed that the ACC and the FCR do not oppose the extension of the Removal Period

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[5] As quoted above, the actual deadline for the Debtors under Bankruptcy Rule 9027(a) and the Prior Extension Orders with respect to removal of a prepetition action is the **longer** of (a) September 9, 2026, or (b) 30 days after entry of an order terminating the automatic stay as to an action. Because the Actions currently are stayed by section 362 of the Bankruptcy Code, the Debtors believe that they would have until 30 days after the entry of any order terminating the automatic stay as to a particular Action to remove such action under 28 U.S.C. § 1452 and Bankruptcy Rule 9027(a)(2), which deadline could extend well beyond September 9, 2026. Nevertheless, the Debtors seek the extension herein out of an abundance of caution to ensure that the Removal Period does not lapse.

requested herein.

22. For the foregoing reasons, the Debtors have demonstrated cause for the relief requested herein.

Notice

23. Consistent with 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 (the "Bankruptcy Administrator"); (b) counsel to the ACC; (c) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.; (d) counsel to the FCR; and (e) the other parties on the Service List established by the Case Management Order. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be provided.

No Prior Request

24. No prior request for the relief sought herein has been made to this Court or any other court.

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

Dated: September 8, 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)

THIRTEENTH ORDER EXTENDING THE PERIOD WITHIN WHICH THE DEBTORS MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND RULE 9027 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

This matter coming before the Court on the *Thirteenth Motion of the Debtors for Entry of an Order Extending the Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. §1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure* (the "Motion"),[2] filed by the debtors and debtors in possession in the above-captioned cases (together, the "Debtors"); the Court having reviewed the Motion and having considered the statements of counsel; the Court finding that (a) the Court 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. §§ 1408 and 1409, (c) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2),

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

(d) notice of the Motion and the opportunity for a hearing was sufficient under the circumstances and (e) cause exists under Bankruptcy Rule 9006(b)(1) to grant an extension of the removal periods established under Bankruptcy Rule 9027(a); and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

2. The time period provided under Bankruptcy Rule 9027(a) within which the Debtors may file notices of removal of any and all civil actions is extended to and including March 9, 2027, to the extent that the time period for filing any such notices of removal otherwise would expire before such date.

3. This Order shall be without prejudice to (a) any position the Debtors may take regarding whether section 362 of the Bankruptcy Code applies to stay any given civil action pending against the Debtors and (b) the Debtors' right to seek from this Court further extensions of the period within which the Debtors may file notices of removal under Bankruptcy Rule 9027(a) (any such request, an "Extension Request").

4. The Debtors are authorized to continue to utilize the no protest motion process set forth in Local Rule 9013-1(e) in connection with any further Extension Requests in these cases.

5. This Order shall be immediately effective and enforceable upon its entry.

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

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)

NOTICE OF OPPORTUNITY FOR HEARING[2]

NOTICE IS HEREBY GIVEN that Aldrich Pump LLC., et al., Debtors in the above-captioned cases, have filed the Thirteenth Motion of the Debtors for Entry of an Order Extending the Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure (the "Motion").

If a copy of the Motion is not included with this Notice, a copy may be viewed at the Court's website, *www.ncwb.uscourts.gov* under Debtor Aldrich Pump LLC's name and case number, you may obtain a copy of the Motion from the Debtors' claims and noticing agent at www.kccllc.net/aldrich, or you may request in writing a copy from the undersigned counsel to the Debtors.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THESE BANKRUPTCY CASES. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)

IF YOU DO NOT WANT THE COURT TO GRANT THE RELIEF REQUESTED IN THE MOTION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE MOTION, THEN ON OR BEFORE TUESDAY, SEPTEMBER 22, 2026 YOU MUST:

(1) A. File with the Bankruptcy Court a written objection at:

Clerk, United States Bankruptcy Court
401 W. Trade Street
Charlotte, North Carolina 28202

[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] Pursuant to the Order Extending the Period Within Which Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure [Docket No. 405], the Debtors are permitted to request the relief set forth in the Motion through a no protest motion process as set forth in Local Rule 9013-1(e).

B. If you have your attorney file a written objection then the objection should be filed with the Bankruptcy Court by electronic means through the Court's website, *www.ncwb.uscourts.gov* under the jointly administered name and case number shown above.

(2) Serve the objection pursuant to the procedures set forth in the Order Establishing Certain Notice, Case Management, and Administrative Procedures (Docket No. 123).

(3) Attend the hearing scheduled for October 15, 2026 at 9:30 a.m. EST or as soon thereafter as the matters can be heard in the Bankruptcy Courtroom 2B, 401 West Trade Street, Charlotte, North Carolina. You should attend this hearing if you file an objection.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought and may enter an Order granting the relief requested. If no objections are timely filed and served, the court may rule on the Motion without a hearing. No further notice of that hearing will be given.

This the 8th day of September, 2026.

RAYBURN COOPER & DURHAM, P.A.

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