Docket #3404 Date Filed: 10/23/2026

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)

FIFTEENTH SUPPLEMENTAL DECLARATION OF DAVID F. MCGONIGLE IN CONNECTION WITH *EX PARTE* APPLICATION OF THE DEBTORS FOR AN ORDER AUTHORIZING THEM TO RETAIN AND EMPLOY K&L GATES LLP AS SPECIAL INSURANCE COUNSEL AS OF THE PETITION DATE

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2014-1 of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the "Local Bankruptcy Rules"), I, David F. McGonigle, hereby declare:

1. I am an attorney at law admitted and in good standing to practice in the Commonwealth of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States District Court for the Western District of Pennsylvania. I am a partner of K&L Gates LLP ("K&L Gates") and am duly authorized to make this declaration on behalf of K&L Gates. I make this declaration in connection with the *Ex Parte Application of the Debtors for an Order Authorizing Them to Retain and Employ K&L Gates LLP as Special Insurance Counsel as of the Petition Date* [Dkt. 25] (the "Application").[2] The facts set forth in this declaration are personally known to me and, if called as a witness, I could and would testify thereto.

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[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 Application.

Fifteenth Supplemental Disclosure

2. K&L Gates offers this Supplemental Declaration consistent with the continuing disclosure requirements in Bankruptcy Rule 2014.

3. K&L Gates offers a Supplement to Schedule 2 to the Application, attached as **Exhibit A** hereto.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 23, 2026
Pittsburgh, PA

/s/ *David F. McGonigle*
David F. McGonigle
K&L Gates LLP

EXHIBIT A

Supplement to Schedule 2

Name Searched	Relationship to Debtors	Name of Entity and/or Affiliate of Entity that is a K&L Gates Client	Client Status	Nature of Representation
JP Morgan Chase	Depository and Disbursement Banks	JPMorgan Chase Bank, N.A.; J.P. Morgan Chase & Co.; JPMorgan Asset Management; Bear Stearns & Co. Inc.; WePay, Inc.; clearXchange, LLC; JP Morgan Chase Bank, N.A. - Middle Market Banking; JPMC Strategic Investments I Corporation; Aquity Solutions, LLC; J.P. Morgan Securities plc; JPMorgan Asset Management (Australia) Limited; JPMorgan IIF Int'l Acquisitions Ltd on behalf of JPMorgan Infrastructure Investments Fund; UES Investment Limited	Active Client	Representation in matters unrelated to the Debtors