

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 (JCW)

(Joint Administration Requested)

**NOTICE OF CHAPTER 11 FILING AND OF
EMERGENCY HEARING ON FIRST DAY PLEADINGS**

PLEASE TAKE NOTICE THAT Aldrich Pump LLC and Murray Boiler LLC, the debtors and debtors in possession in the above-captioned cases (together, the "Debtors"), filed voluntary petitions under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Western District of North Carolina on June 18, 2020 (the "Petition Date") and have filed the following pleadings on the Petition Date (collectively, the "First Day Pleadings"):

- (a) *Motion of the Debtors for an Order Directing the Joint Administration of Their Chapter 11 Cases* [Dkt. 3];
- (b) *Application of the Debtors for an Order Authorizing the Retention and Employment of Kurtzman Carson Consultants LLC as Claims, Noticing, and Ballot Agent* [Dkt. 6];
- (c) *Motion of the Debtors for an Order: (I) Authorizing the Filing of (A) Consolidated Master List of Creditors and (B) Consolidated List of 20 Law Firms With Significant Asbestos Cases Against the Debtors in Lieu of the Lists of 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Asbestos Claimants; and (III) Approving the Form and Manner of Notice of Commencement of These Cases* [Dkt. 7];

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.



- (d) *Motion of the Debtors for Entry of an Order Establishing Certain Notice, Case Management, and Administrative Procedures* [Dkt. 8]; and
- (e) *Motion of the Debtors for an Order: (I) Approving the Continued Use of Their Bank Accounts, Cash Management System, and Business Forms; (II) Granting a Waiver of the Requirements of Section 345(b) of the Bankruptcy Code; and (III) Authorizing the Debtors' Banks to Charge Certain Fees and Other Amounts* [Dkt. 9].

The Debtors also filed the *Declaration of Ray Pittard in Support of First Day Pleadings* [Dkt. 27], the *Declaration of Allan Tananbaum in Support of Debtors' Complaint for Injunctive and Declaratory Relief, Related Motions, and the Chapter 11 Cases* [Dkt. 29], and the *Informational Brief of Aldrich Pump LLC and Murray Boiler LLC* [Dkt. 5], as well as certain motions and applications on an *ex parte* basis.² Further, the Debtors have filed the following motions to be heard at a hearing following the First Day Hearing:

- (a) *Motion of the Debtors for an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtors in the Ordinary Course of Business* [Dkt. 17];
- (b) *Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 18]; and
- (c) *Motion of the Debtors for an Order Authorizing Them to Perform Under Certain Intercompany Agreements With Non-Debtor Affiliate* [Dkt. 26].

PLEASE TAKE FURTHER NOTICE THAT an emergency hearing to consider the First Day Pleadings and the relief requested therein will be held before the

². In addition, the Debtors filed certain pleadings in an adversary proceeding they commenced on the Petition Date styled Aldrich Pump LLC and Murray Boiler LLC v. Those Parties to Actions Listed on Appendix A to Complaint and John and Jane Does 1-1000 (the "Adversary Proceeding Pleadings"). The Debtors requested an emergency hearing on certain Adversary Proceeding Pleadings by a motion filed on the Petition Date. The Adversary Proceeding Pleadings and all other filings in these Chapter 11 Cases and the adversary proceeding may be accessed (a) at the Clerk of Court's office, (b) through the website maintained by the Debtors' claims, noticing, and ballot agent at <http://www.kccllc.net/aldrich> free of charge, or (c) through PACER on the Court's website at <https://www.ncwb.uscourts.gov> for a nominal fee.

Honorable J. Craig Whitley on June 22, 2020 at 2:00 p.m., prevailing Eastern Time, to consider the relief requested in the First Day Pleadings.

In response to the COVID-19 pandemic, the First Day Hearing will be held via video conference and telephone conference using ZoomGov.com. All parties who intend to appear by ZoomGov.com (either by video or telephonically) should contact Ursula Hamilton at ursula_c_hamilton@ncwb.uscourts.gov by June 22, 2020 at 10:30 a.m., prevailing Eastern Time for the needed link, codes and dial-in information. Parties who plan to speak via ZoomGov.com should plan to wear headphones, if available, to prevent feedback.

Dated: June 18, 2020
Charlotte, North Carolina

Respectfully submitted,

/s/ John R. Miller, Jr.

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