

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re:

ALDRICH PUMP LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

**EX PARTE MOTION FOR RELIEF FROM THE MAXIMUM PAGE LIMIT**

The Official Committee of Asbestos Personal Injury Claimants of Aldrich Pump LLC and Murray Boiler LLC (the “Committee”) files this *Ex Parte* Motion for Relief from the Maximum Page Limit set forth in Local Rule 9013-2, to the extent it applies, with respect to the Committee’s Objection to the *Joint Motion of the Debtors and the Future Claimants’ Representative for an Order (I) Establishing a Bar Date for Certain Known Asbestos Claims, (II) Approving Proof of Claim Form, (III) Approving Personal Injury Questionnaire, (IV) Approving Notice to Claimants, and (V) Granting Related Relief* [Dkt. No. 471] (the “Bar Date/PIQ Motion”). In support of the Motion, the Committee respectfully states as follows:

**JURISDICTION**

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334, and this matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).<sup>2</sup>

<sup>1</sup> The Debtors are the following entities (the last four digits of the Debtors’ 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.

<sup>2</sup> The Committee reserves all rights to object to the Court’s jurisdiction with respect to other matters, and nothing in this request for relief is intended to waive such an argument or act as the Committee’s consent to the appropriateness of jurisdiction here.



### **BACKGROUND**

2. Local Rule 9013-2 provides for a 25-page limit for briefs filed in adversary proceedings and contested matters.

3. The Committee is filing concurrently herewith an objection titled *Objection of the Official Committee of Asbestos Personal Injury Claimants to the Joint Motion of the Debtors and the Future Claimants' Representative for an Order (I) Establishing a Bar Date for Certain Known Asbestos Claims, (II) Approving Proof of Claim Form, (III) Approving Personal Injury Questionnaire, (IV) Approving Notice to Claimants, and (V) Granting Related Relief* (the "Objection").

4. The Objection is filed in response to the Bar Date/PIQ Motion. The multiple forms of relief the Debtor requests in the Bar Date/PIQ Motion, coupled with the complex history of the relevant asbestos litigation and the applicable legal standards, requires extensive discussion, argument and citation of authority, which are matters that cannot fully be addressed in 25 pages.

5. The Committee respectfully states that, to ensure that the Court is adequately informed on matters raised in the Bar Date/PIQ Motion, additional space above the 25-page limit is required. The Objection is 33 pages in length, not including signature blocks.

### **RELIEF REQUESTED**

6. The Committee seeks relief from the 25-page limit as set forth in Local Rule 9013-2.

7. Given the nature of the issues raised in the original Motion, it is in the interests of justice that the Committee be excused from the 25-page limit in its Objection.

WHEREFORE, the Committee moves this Court to grant relief from the 25-page limit of Local Rule 9013-2 with respect to the Objection and (a) enter an order, substantially in the form attached hereto as Exhibit A, granting the relief requested herein and (b) grant such other and further relief to the Committee as the Court may deem just and proper.

Dated: Charlotte, North Carolina  
January 14, 2021

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**EXHIBIT A**

**UNITED STATES BANKRUPTCY COURT  
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**ORDER AUTHORIZING THE COMMITTEE  
TO EXCEED MAXIMUM PAGE LIMIT**

This matter came before the Court on the Ex Parte *Motion for Relief From the Maximum Page Limit* (the “**Motion**”)<sup>2</sup> filed by the Official Committee of Asbestos Personal Injury Claimants (the “**Committee**”). According to the Motion, the Committee will file its objection titled *Objection of the Official Committee of Asbestos Personal Injury Claimants to the Joint Motion of the Debtors and the Future Claimants’ Representative for an Order (I) Establishing a Bar Date for Certain Known Asbestos Claims, (II) Approving Proof of Claim Form, (III) Approving*

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<sup>1</sup> The Debtors are the following entities (the last four digits of the Debtors’ 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.

<sup>2</sup> Capitalized terms used but not defined herein shall have the respective meanings given to such terms in the Motion.

*Personal Injury Questionnaire, (IV) Approving Notice to Claimants, and (V) Granting Related Relief* (the “**Objection**”) that will exceed the 25-page limit established 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 (the “**Local Rules**”).

Based on the Motion, the Court finds and concludes that good cause exists to grant the Committee relief from the 25-page limit imposed by Local Rule 9013-2(a), to the extent that it applies to the Objection. Accordingly, the Motion is GRANTED and the page limit established by Local Rule 9013-2(a) is hereby lifted with respect to the Objection.

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