

**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)

Jointly Administered

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that pursuant to Fed. R. Bankr. P. 2002(g), 9007 and 9010, the undersigned appears for and on behalf of Affiliated FM Insurance Company (“Affiliated FM”), a creditor in the above-captioned chapter 11 cases, and requests that all notices given or required to be given in this case and all papers served or required to be served in this case, be given to and served upon the following, and the following be added to any special or limited service lists used in this case:

Patrick C. Maxcy
Dentons US LLP
233 South Wacker Drive, Suite 5900
Chicago, Illinois 60606-6361
patrick.maxcy@dentons.com
(312) 876 2810

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers shall not be deemed or construed to be a waiver of Affiliated FM’s rights (1) to have final orders in non-core matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any

¹The 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.



matter subject to mandatory or discretionary withdrawal, or (4) to assert any other rights, claims, actions, setoffs, or recoupment to which Affiliated FM is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupment it expressly reserves.

This Notice of Appearance and Request for Service of Papers does not give express or implied consent by the undersigned or Dentons US LLP to accept service of process of any action commenced under Rule 7001 of the Federal Rules of Bankruptcy Procedure.

Dated: January 19, 2021

MOORE & VAN ALLEN PLLC

/s/ Hillary B. Crabtree

Zachary H. Smith (NC Bar 48993)

Hillary B. Crabtree (NC Bar 26500)

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Company*

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CERTIFICATE OF SERVICE

I, Hillary B. Crabtree, hereby certify that on this 19th day of January, 2021, I caused the foregoing *Notice of Appearance and Request for Service of Papers* filed herewith to be served by this Court's CM/ECF System.

/s/ Hillary B. Crabtree

Hillary B. Crabtree (NC Bar No. 26500)

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Attorney for Creditor

Affiliated FM Insurance Company

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