

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

In re	:	
	:	
	:	Chapter 11
ALDRICH PUMP LLC, et al., ¹	:	
	:	
Debtors.	:	Case No. 20-30608
	:	

EX PARTE MOTION FOR RELIEF FROM THE MAXIMUM PAGE LIMIT

The Official Committee of Asbestos Personal Injury Claimants (the “Committee”), by and through its undersigned counsel, hereby submits this motion (the “Motion”) for entry of an order (the “Order”) substantially in the form attached hereto as **Exhibit A** requesting authority to exceed the page limit established for briefs filed in contested matters pursuant to 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”) in connection with the filing of the *Motion of the Official Committee of Asbestos Personal Injury Claimants for Entry of an Order Granting Leave, Standing, and Authority to Investigate, Commence, Prosecute, and to Settle Certain Causes of Action* [Dkt. No. 848](the “Standing Motion”), which is 30 pages long not including signature pages.

BACKGROUND

1. On June 17, 2020 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).
2. On July 7, 2020, the Court entered its *Order Appointing the Official Committee of Asbestos Personal Injury Claimants* [Dkt. No. 147].

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.



3. On October 18, 2021, the Committee filed the Standing Motion.

RELIEF REQUESTED

4. By this Motion, the Committee seeks authority to exceed the 25-page limit established pursuant to Local Rule 9013-2(a) for briefs filed in contested matters. Attached hereto as **Exhibit A** is the proposed Order granting the relief requested in this Motion.

5. The Standing Motion was filed to request that the Court enter an order granting the Committee leave, standing and authority to investigate, commence, prosecute, and non-exclusive authority to settle, causes of action on behalf of the estates of Aldrich Pump LLC and Murray Boilers LLC (the “Debtors”) with respect to the Corporate Restructuring (as defined in the Standing Motion).

6. In the Findings of Fact and Conclusions of Law regarding the Preliminary Injunction [AP Dkt. No. 308], the Court identified the issues raised in the Standing Motion as the “core dispute between the parties.” See Id at ¶ 156. To ensure that the Court is adequately informed on matters raised in the Standing Motion, additional space above the 25-page limit is required for each filing. The history of this case, the history of the Debtors’ predecessors leading up to the creation of the Debtors, and the nature of the relief requested in the Standing Motion make it impractical to give the Court all the relevant factual and procedural history, as well as recitation of the salient statutory and caselaw predicates, and, where appropriate, to formulate argument within the restrictions typically placed on briefs by the local rules. The Committee has made efforts to be as concise as possible while creating an adequate record for each filing.

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

CONCLUSION

By this Motion, the Committee respectfully requests entry of the Order attached hereto as **Exhibit A** permitting it to exceed the page limits imposed by Local Rule 9013-2(a) with respect to the Standing Motion.

October 18, 2021

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**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
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In re	:	
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**[PROPOSED] 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”)² filed by the Official Committee of Asbestos Personal Injury Claimants (the “Committee”). As set forth in the Motion, the Committee filed its *Motion of the Official Committee of Asbestos Personal Injury Claimants for Entry of An Order Granting Leave, Standing, and Authority to Investigate, Commence, Prosecute, and to Settle Certain Causes of Action* (the “Standing Motion”) 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

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

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 Standing Motion. Accordingly, the Motion is GRANTED and the page limit established by Local Rule 9013-2(a) is hereby lifted with respect to the Standing Motion.

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