

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

In re:

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

Debtors.

OFFICIAL COMMITTEE OF ASBESTOS  
PERSONAL INJURY CLAIMANTS,

Plaintiff,

V.

ALDRICH PUMP LLC,  
MURRAY BOILER LLC,  
TRANE TECHNOLOGIES COMPANY LLC,  
and TRANE U.S. INC.,

Defendants.

## Chapter 11

Case No. 20-30608 (JCW)

Jointly Administered

Adversary Proceeding

No. 21-03029

**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 Substantive Consolidation of Debtors’*

<sup>1</sup> The “**Debtors**” are the following entities (the last four digits of the Debtors’ taxpayer identification number follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler (0679). The Debtors’ address is 800 E. Beaty Street, Davidson, North Carolina 28036.



*Estates with Certain Nondebtor Affiliates or, Alternatively, to Reallocate Debtors' Asbestos Liabilities to those Affiliates* [Adv. Dkt No. 2, Case No. 20-30608, Dkt. No. 851] (the "Substantive Consolidation Motion"), which is 34 pages exclusive of the table of contents/table of authorities.

### **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 an order appointing the Committee in the Debtors' bankruptcy cases [Case No. 20-30308, Dkt. No. 147].
3. On October 18, 2021, the Committee filed its *Complaint for Substantive Consolidation of Debtors' Estates with Certain Nondebtor Affiliates or, Alternatively, to Reallocate Debtors' Asbestos Liabilities to those Affiliates* (the "Complaint") [Advs. Proc. No. Dkt. 1] initiating Adversary Proceeding No. 21-03029 (the "Substantive Consolidation AP"). Additionally, on October 18, 2021, the Committee filed the Substantive Consolidation.

### **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 in relation to the Substantive Consolidation Motion. Attached hereto as **Exhibit A** is the proposed Order granting the relief requested in this Motion.

5. The Complaint and Substantive Consolidation Motion seek to substantively consolidate (1) the bankruptcy estate of Aldrich Pump LLC ("Aldrich") with Trane Technologies Company LLC ("TTC"), and (2) the bankruptcy estate of Murray Boiler LLC ("Murray") with Trane U.S. Inc. ("Trane"). Alternatively, the Complaint and Substantive Consolidation Motion

seek to reallocate the asbestos liabilities of Aldrich to TTC and the asbestos liabilities of Murray to Trane.

6. Given the extensive factual and legal background necessary to explain and justify the relief sought in the Substantive Consolidation Motion, the Committee was unable to adequately address the requested relief within 25 pages. To ensure that the Court is adequately informed on matters raised in the Substantive Consolidation Motion, additional space above the 25-page limit is required.

7. The Committee therefore seeks relief from the 25-page limits as set forth in Local Rule 9013-2.

8. Given the nature of the issues raised in the Substantive Consolidation Motion, the Committee assert that it is in the interests of justice that Substantive Consolidation 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 the Committee to exceed the page limits imposed by Local Rule 9013-2(a) with respect to the Substantive Consolidation Motion.

Dated: October 19, 2021

HAMILTON STEPHENS STEELE  
+ MARTIN, PLLC

/s/ Robert A. Cox, Jr.

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*Counsel to the Official Committee  
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**Exhibit A**

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

	:	
In re:	:	Chapter 11
	:	
ALDRICH PUMP LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 20-30608 (JCW)
	:	
Debtors.	:	Jointly Administered
	:	
OFFICIAL COMMITTEE OF ASBESTOS	:	
PERSONAL INJURY CLAIMANTS,	:	
	:	
Plaintiff,	:	
	:	Adversary Proceeding
v.	:	
	:	No. 21-03029
ALDRICH PUMP LLC,	:	
MURRAY BOILER LLC,	:	
TRANE TECHNOLOGIES COMPANY LLC,	:	
and TRANE U.S. INC.,	:	
	:	
Defendants.	:	
	:	

**[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

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<sup>1</sup> The “**Debtors**” are the following entities (the last four digits of the Debtors’ taxpayer identification number follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler (0679). The Debtors’ address is 800 E. Beaty Street, Davidson, North Carolina 28036.

*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 filed the *Motion of the Official Committee of Asbestos Personal Injury Claimants for Substantive Consolidation of Debtors’ Estates with Certain Nondebtor Affiliates or, Alternatively, to Reallocate Debtors’ Asbestos Liabilities to those Affiliates* (the “Substantive Consolidation 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 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 Substantive Consolidation Motion. Accordingly, the Motion is GRANTED and the page limit established by Local Rule 9013-2(a) is hereby lifted with respect to the Substantive Consolidation 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

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