

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)

MOTION FOR ADMISSION TO PRACTICE *PRO HAC VICE*

NOW COMES undersigned counsel for the Official Committee of Asbestos Personal Injury Claimants (the “Committee”), in the above-captioned case, and hereby moves pursuant to Local Bankruptcy Rule 2090-2 for admission *pro hac vice* of Earl M. Forte (“Applicant”) to the court for the purpose of representing the Committee. In support of the Motion, the undersigned would respectfully show the Court the following:

1. Applicant is a partner with the law firm of Robinson + Cole LLP with offices located in Pennsylvania and Delaware.
2. Applicant is a member in good standing of the bars of the State of California and the Commonwealth of Pennsylvania. Applicant is also admitted and in good standing before the following United States District Courts: Eastern District of Pennsylvania; Middle District of Pennsylvania; Northern, Eastern, Central and Southern Districts of California; the District of Arizona; and the Eastern District of Wisconsin. Applicant is also admitted and in good standing before the First, Third, Sixth and Ninth United States Circuit Courts of Appeal and the Supreme Court of the United States.

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. Applicant's appearance in this matter will be in association with the undersigned, who is a member in good standing of the North Carolina State Bar and who is admitted to practice before this Court.

4. The Declaration of Applicant supporting this Motion is attached hereto and is incorporated herein by reference.

5. The \$281.00 fee for admission *pro hac vice* is being submitted with the filing of this Motion.

WHEREFORE, the Movant respectfully requests that this Court enter an Order admitting Earl M. Forte *pro hac vice* in this matter as set forth herein.

Dated: October 19, 2021
Charlotte, North Carolina

HAMILTON STEPHENS
STEELE + MARTIN, PLLC

/s/ Glenn C. Thompson
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*Counsel for the Official Committee of
Asbestos Personal Injury Claimants*

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

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**DECLARATION OF EARL M. FORTE IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

Earl M. Forte, in support of the Motion for Admission *Pro Hac Vice*, declares as follows:

1. I am a partner with the law firm of Robinson + Cole LLP, 1650 Market Street, Suite 3600, Philadelphia, PA 19103. My telephone number is (215) 398-0559, and my e-mail address is eforte@rc.com.

2. I am and have been a member in good standing before the following United States District Courts: Eastern District of Pennsylvania; Middle District of Pennsylvania; Northern, Eastern, Central and Southern Districts of California; the District of Arizona; and the Eastern District of Wisconsin. I am also admitted and in good standing before the First, Third, Sixth and Ninth United States Circuit Courts of Appeal and the Supreme Court of the United States.

3. I am in good standing in all courts where I have been admitted.

4. I have never been disbarred, suspended, or denied admissions to practice.

5. I declare under the penalty of perjury that the foregoing is true and correct.

This the 19th day of October, 2021.

/s/ Earl M. Forte

Earl M. Forte, Declarant

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.

CERTIFICATE OF SERVICE

I hereby certify that on this day, the foregoing Motion for Admission to Practice *Pro Hac Vice* and Declaration of Earl M. Forte were served by electronic means on those parties registered with the United States Bankruptcy Court, Western District of North Carolina ECF system to receive notices for this case.

Dated: October 19, 2021
Charlotte, North Carolina

HAMILTON STEPHENS
STEELE + MARTIN, PLLC

/s/ Glenn C. Thompson

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