

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

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In re:	)	
	)	Case No. 20-30608
	)	
ALDRICH PUMP LLC, <i>et al.</i> , <sup>1</sup>	)	Chapter 11
	)	
Debtors.	)	(Jointly Administered)

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**NOTICE OF FILING OF THIRD SUPPLEMENTAL DECLARATION OF JONATHAN P. GUY IN SUPPORT OF THE *EX PARTE* APPLICATION OF JOSEPH W. GRIER, III, LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS CLAIMANTS, FOR AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO THE LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS CLAIMANTS, EFFECTIVE AS OF AUGUST 21, 2020**

PLEASE TAKE NOTICE of the attached *Third Supplemental Declaration of Jonathan P. Guy in Support of the Ex Parte Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, for an Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as Counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* attached hereto.

This is the 18<sup>th</sup> day of April 2022.

A. Cotten Wright  
A. Cotten Wright (State Bar No. 28162)  
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*Attorneys for Joseph W. Grier, III*  
*Future Claimants' Representative*

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<sup>1</sup> 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.



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**THIRD SUPPLEMENTAL DECLARATION OF JONATHAN P. GUY  
IN SUPPORT OF THE *EX PARTE* APPLICATION OF JOSEPH W. GRIER, III,  
LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS CLAIMANTS, FOR AN  
ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF  
ORRICK, HERRINGTON & SUTCLIFFE LLP AS COUNSEL TO THE  
LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS CLAIMANTS,  
EFFECTIVE AS OF AUGUST 21, 2020**

I, Jonathan P. Guy, state:

1. I am a senior counsel in the law firm of Orrick, Herrington & Sutcliffe LLP (“Orrick”), and authorized to make this declaration on its behalf. Orrick maintains offices for the practice of law at 1152 15th Street, N.W., Washington, D.C. 20005 and in other cities across the world. I am a member in good standing of the bars of the District of Columbia and the State of New York.

2. On October 15, 2020, I submitted a declaration (“Initial Declaration”) pursuant to Rules 2014, 2016, and 5002 of the Federal Rules of Bankruptcy Procedure in support of the *Ex Parte Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, For an Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP*

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<sup>1</sup> 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.

*as Counsel to the Legal Representative for Future Asbestos Claimants, Effective As of August 21, 2020* (Dkt. No. 392) (the “Application”).

3. On October 15, 2020, this Court entered an Order approving the Application (Dkt. No. 394).

4. On August 24, 2021, I submitted the *First Supplemental Declaration of Jonathan P. Guy in Support of the Ex Parte Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, for an Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* [Dkt. No. 815].

5. On September 9, 2021, I submitted the *Second Supplemental Declaration of Jonathan P. Guy in Support of the Ex Parte Application of Joseph W. Grier, III, Legal Representative for Future Asbestos Claimants, for an Order Authorizing the Retention and Employment of Orrick, Herrington & Sutcliffe LLP as counsel to the Legal Representative for Future Asbestos Claimants, Effective as of August 21, 2020* [Dkt. No. 827].

6. The facts set forth in this Third Supplemental Declaration are based upon my personal knowledge, upon records maintained by Orrick in the ordinary course of business and which have been reviewed by me and/or by other partners or employees of Orrick at my direction, or upon information known by other partners or employees of Orrick and conveyed to me.

7. Orrick reviews periodically its database to examine whether any relationships or connections exist between Orrick and any interested parties in these Chapter 11 cases. In connection therewith, Orrick searched its database for any relationships or connections with the list of additional interested parties attached hereto as Exhibit 1.

8. I make this Third Supplemental Declaration out of an abundance of caution, and not because I believe the matters set forth herein are within the scope of Rules 2014 or 5002 of the Federal Rules of Bankruptcy Procedure.

9. In my Initial Declaration, I disclosed Orrick's representation of Johnson & Johnson as trial counsel in cases arising from the use of its talcum powder products. After Johnson & Johnson's corporate restructuring in October 2021, Orrick continued to represent Johnson & Johnson, and now also represents LTL Management LLC ("LTL") as trial counsel, and is employed as special counsel in LTL's Chapter 11 case pending in the United States Bankruptcy Court for the District of New Jersey, Case No. 21-30589 (MBK) (Dkt. No. 1993, entered April 6, 2022) (Order Authorizing Retention of Orrick, Herrington & Sutcliffe LLP as Special Appellate Counsel, Effective as of October 14, 2021). The Orrick attorneys representing the FCR in the Aldrich/Murray Chapter 11 cases will not work on any Johnson & Johnson or LTL matters.

10. AIG Property Casualty Company is listed as a creditor in these Chapter 11 cases. See Consolidated Master Creditors List, Dkt. No. 31. Orrick represents certain entities within the American International Group, Inc. group of companies in matters unrelated to the Debtors and these Chapter 11 cases.

11. SCOR UK Company Limited is listed as a creditor in these Chapter 11 cases. Id. Orrick represents an affiliate of SCOR UK Company in matters unrelated to the Debtors and these Chapter 11 cases.

12. U.S. Bank National Association entered its appearance in these Chapter 11 cases (Dkt. No. 911) as the initial trustee of the qualified settlement fund established in these Chapter 11 cases (Dkt. No. 994). Orrick represents U.S. Bancorp, the parent company of U.S. Bank National Association, in matters unrelated to the Debtors and these Chapter 11 cases.

13. Dentons US LLP entered its appearance in these Chapter 11 cases as counsel to creditor Affiliated FM Insurance Company. Orrick represents Dentons US LLP in matters unrelated to the Debtors and these Chapter 11 cases.

14. FTI Consulting, Inc. is employed as the financial advisor to the Official Committee as Asbestos Personal Injury Claimants in these Chapter 11 cases. Orrick represents FTI Consulting, Inc. in matters unrelated to the Debtors and these Chapter 11 cases.

15. Robinson, Bradshaw & Hinson, P.A. entered its appearance in these Chapter 11 cases. Orrick previously represented Robinson, Bradshaw & Hinson, P.A. in matters unrelated to the Debtors and these Chapter 11 cases.

16. Orrick will use reasonable efforts to identify any additional relevant fact or relationship not previously disclosed. If any fact or relationship is discovered, Orrick will, as soon as reasonably practicable, file additional supplemental declarations with the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: April 18, 2022

/s/ Jonathan P. Guy  
Jonathan P. Guy  
Orrick, Herrington & Sutcliffe LLP

**Exhibit 1:**

**Aldrich Pump LLC, *et al.***  
**Additional Potentially Interested Parties**

**Known Professionals for Official Committee of Asbestos Personal Injury Claimants**

FTI Consulting, Inc.

Gilbert LLP

Hamilton Stephens Steele + Martin, PLLC

Legal System Analysis

**Known Professionals for the Future Claimants' Representative**

Anderson Kill P.C.

Ankura Consulting Group, LLC

Grier Wright Martinez, PA

**Insurers and Their Counsel**

Accident & Casualty Co.

Accident & Casualty Insurance of Winterthur

Affiliated FM Insurance Company

AIG Property Casualty Insurance Company, formerly known as Birmingham Fire  
Insurance Company of Pennsylvania

AIU Insurance Company

American Home Assurance Company

Certain Underwriters at Lloyd's, London

Certain London Market Companies

Columbia Casualty Company

Continental Casualty Company and Continental Insurance Company (in its own right and as  
successor to Harbor Insurance Company and as Successor by Merger  
to the Fidelity & Casualty Company of New York)

Dentons US LLP

Duane Morris LLP

Employers Mutual Insurance Company

Government Employees Insurance Company

Granite State Insurance Company

Hartford Accident and Indemnity Company

Haywood/Gen Re Synd

Ifrah, PLLC

Insurance Company of The State Of Pennsylvania

Landmark Insurance Company  
Lexington Insurance Company  
National Union Fire Insurance Company of Pittsburgh, Pa  
New England Insurance Company  
New England Reinsurance Corporation  
NRG Victory Reinsurance Company Limited  
The Ocean Marine Insurance Company Limited f/k/a/ Indemnity Marine JT  
Republic Insurance Company  
Shipman & Goodwin LLP  
Wellfleet New York Insurance Company (formerly known as Atlanta Insurance Company);  
Wilmer Cutler Pickering Hale and Dorr LLP  
Windels Marx Lane & Mittendorf, LLP  
Winterthur Swiss Insurance Company;  
World Auxiliary Insurance Corporation Limited;  
Yasuda Fire & Marine Insurance Company (UK) Limited

**Counsel to Certain Asbestos Claimants**

Bergman Draper Oslund Udo  
Brayton Purcell LLP  
Dean Omar Branham, LLP  
Kazan, McClain, Satterly & Greenwood  
Maune Raichle Hartley French & Mudd, LLC  
Shepard Law, P.C.

**Parties That Have Filed A Notice of Appearance and Their Counsel**

Greenberg Traurig, LLP  
U.S. Bank National Association  
FranGecker LLP  
The Oakfabco Liquidating Trust  
Moon Wright & Houston, PLLC  
Robinson, Bradshaw & Hinson, P.A.

**Parties to Contested Proceeding**

Hull & Chandler, P.A.  
Sander L. Esserman  
Young Conaway Stargatt & Taylor, LLP