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

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

# NOTICE OF APPEARANCE AND <u>REQUEST FOR NOTICES</u>

**PLEASE TAKE NOTICE** that Trane Technologies Company LLC and Trane U.S. Inc. (the "<u>Notice Parties</u>"), by and through undersigned counsel, hereby respectfully request, in accordance with Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>"), that all notices given or required to be given and all papers served or required to be served in this case as provided in 11 U.S.C. § 342 and Bankruptcy Rules 2002 and 9007 be given to and sent to:

Phillip S. Pavlick (NY Bar No. 5259676) McCARTER & ENGLISH, LLP Four Gateway Center 100 Mulberry Street Newark, NJ 07102 Telephone: (973) 849-4181 Facsimile: (973) 624-7070

<sup>&</sup>lt;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.



#### E-mail: ppavlick@mccarter.com

**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, orders and notices of any petition, pleading, complaint, conference, hearing, application, motion, request, or demand, whether formal or informal, written or oral, or transmitted or conveyed by mail, electronic mail, delivery, telephone, telegraph, telex, telecopy, or otherwise in this case.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance or Request for Service nor any subsequent appearance, pleading, claim or suit, shall be deemed consent to or a waiver of the right to challenge the jurisdiction of the Bankruptcy Court, including, without limitation, the jurisdiction of the Bankruptcy Court to enter final orders in non-core matters or the waiver of a right to a jury trial, all of which are reserved. Notice Parties further reserve the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal and reserves any other rights, claims, actions, defenses, setoffs or recoupments to which Notice Parties are or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

This the  $23^{rd}$  day of May, 2022.

#### CORDES LAW, PLLC

By:

/s/ Stacy C. Cordes Stacy C. Cordes 1800 East Boulevard Charlotte, North Carolina 28203 Telephone: 704.332.3565 Facsimile: 704.332.3324 E-mail: stacy@cordes-law.com Case 21-03029 Doc 83 Filed 05/23/22 Entered 05/23/22 14:29:30 Desc Main Document Page 3 of 3

### **CERTIFICATE OF SERVICE**

I hereby certify that on 23<sup>rd</sup> day of May, 2022, I electronically filed the foregoing Notice of Appearance and Request for Notices with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following parties:

U.S. Bankruptcy Administrator

All parties requesting service by CM.ECF System

This the 23<sup>rd</sup> day of May, 2022.

#### **CORDES LAW, PLLC**

By: <u>/s/ Stacy C. Cordes</u>

Stacy C. Cordes 1800 East Boulevard Charlotte, North Carolina 28203 Telephone: 704.332.3565 Facsimile: 704.332.3324 E-mail: stacy@cordes-law.com