

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

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

**NOTICE OF FILING OF FOURTH 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 *Fourth 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 22<sup>nd</sup> day of June 2022.

/s/ A. Cotten Wright  
A. Cotten Wright (State Bar No. 28162)  
Grier Wright Martinez, PA  
521 E. Morehead Street, Suite 440  
Charlotte, NC 28202  
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*Attorneys for Joseph W. Grier, III*  
*Future Claimants' Representative*

<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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FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
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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)

**FOURTH 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. On April 18, 2022, I submitted the *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* [Dkt. No. 1126].

7. The facts set forth in this Fourth 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.

8. 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.

9. I make this Fourth 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.

10. In my Initial Declaration, I disclosed Orrick's representation of Union Carbide Corporation ("UCC") in connection with two pending appeals of asbestos cases. With the addition of two lateral partners who joined Orrick on June 20, 2022, Orrick now also represents UCC as lead trial counsel in two asbestos personal injury lawsuits pending against UCC in the Superior Court for the Commonwealth of Massachusetts (the "UCC Cases"). The UCC Cases are unrelated to the Debtors and these Chapter 11 Cases. The Orrick attorneys representing the FCR will not work on any Union Carbide Corporation matters. Orrick has an ethical wall in place between the attorneys involved in the UCC Cases and the attorneys representing the FCR in these Chapter 11 Cases.

11. Lauren Baron joined Orrick's New York office as a summer associate, effective May 31, 2022 through July 29, 2022. Ms. Baron is the daughter of Steven Baron, a shareholder in Baron & Budd, P.C., a plaintiffs law firm that handles toxic tort litigation matters including asbestos (the "Baron Firm"). The Baron Firm represents asbestos claimants in these Chapter 11 Cases (See Dkt. No. 1 at page 12 for the List of 20 Law Firms With Significant Representations of Asbestos Claimants). Ms. Baron will not work on any matters relating to the Debtors, the FCR, or these Chapter 11 Cases (the "Restricted Matter"). Orrick erected an ethical cone around

Ms. Baron that prohibits her from working on, discussing, or accessing any materials relating to the Restricted Matter.

12. 3M Company is a significant co-defendant in asbestos-related litigation. Orrick represents 3M Company in matters unrelated to the Debtors and these Chapter 11 Cases.

13. Latham & Watkins LLP entered its appearance in these Chapter 11 cases. Orrick represents Latham & Watkins LLP in matters unrelated to the Debtors and these Chapter 11 cases.

14. 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: June 22, 2022

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

**Exhibit 1:**

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

**Professional Employed by the Debtors**

Donlin, Recano and Company, Inc.

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

Blanco Tackabery & Matamoros, P.A.

Latham & Watkins LLP

Paddock Enterprises, LLC