

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 20-30608

(Jointly Administrated)

**SUMMARY OF SIXTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES OF GILBERT LLP, SPECIAL INSURANCE COUNSEL TO THE  
OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS,  
FOR THE PERIOD JUNE 1, 2022 THROUGH SEPTEMBER 30, 2022**

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Official Committee of Asbestos Personal Injury Claimants
Date of retention:	Order entered December 22, 2020, effective as of November 24, 2020
Period for which compensation and Reimbursement are sought:	June 1, 2022 through September 30, 2022
Amount of compensation sought as actual, reasonable, and necessary:	\$244,021.50
Amount of expenses sought as as actual, reasonable, and necessary:	\$4,736.61
Amount of compensation paid as actual, reasonable and necessary for applicable period:	\$149,000.88
Amount of expenses reimbursed as actual, reasonable and necessary for applicable period:	\$4,280.81

<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.



2030608221115000000000003

Total amount of unpaid fees and expenses  
sought for applicable period: \$95,476.42

This is an:   x   interim        final application

**MONTHLY FEE STATEMENTS**

<b>Date Submitted</b>	<b>Period Covered</b>	<b>Fees Requested</b>	<b>Expenses Requested</b>	<b>Fees Paid (90%)</b>	<b>Expenses Paid (100%)</b>
08/01/2022	06/01/2022–06/30/2022	\$77,936.00	\$0.00	\$70,142.43	\$0.00
08/31/2022	07/01/2022–07/31/2022	\$87,620.50	\$4,280.81	\$78,858.45	\$4,280.81
09/30/2022	08/01/2022–08/31/2022	\$40,673.00	\$455.80	\$0.00	\$0.00
10/31/2022	09/01/2022–09/30/2022	\$37,792.00	\$0.00	\$0.00	\$0.00
	<b>Total</b>	<b>\$244,021.50</b>	<b>\$4,736.61</b>	<b>\$149,000.88</b>	<b>\$4,280.81</b>

**SUMMARY OF FEES BY PROFESSIONAL**

<b>Name</b>	<b>Position</b>	<b>Bar Year</b>	<b>Hourly Rate</b>	<b>Hours Billed</b>	<b>Total Compensation</b>
Kami Quinn	Partner	2000	\$1,250	8.2	\$10,250.00
Heather Frazier	Associate	2009	\$750	32.0	\$24,000
Brandon Levey	Associate	2017	\$610	82.7	\$50,447.00
Rachel Jennings	Associate	2017	\$560	15.1	\$8,456.00
			\$610 <sup>2</sup>	23.6	\$14,396.00
Janet Sanchez	Associate	2020	\$475	11.2	\$5,320.00
Lelia Parker	Associate	2017	\$560	16.9	\$9,464.00
John Girgenti	Staff Attorney	2002	\$365	144.2	\$52,633.00
Blair Hubbard	Director of Analytics	N/A	\$425	26.2	\$11,135.00
Samone Smith	Law Clerk	N/A	\$200	11.9	\$2,380.00
Stephanie Seymour	Paralegal	N/A	\$350	112.6	\$39,410.00
Sarah Ogrey	Paralegal	N/A	\$240	33.7	\$8,088.00
Michael Lloyd	Project Assistant	N/A	\$200	3.6	\$720.00
Carmen Turner	Project Assistant	N/A	\$200	1.2	\$240.00
Alyssa Bonesteel	eDiscovery Specialist	N/A	\$375	18.3	\$6,862.50
Mary Carter Hudgins	Billing Specialist	N/A	\$200	1.1	\$220.00
			<b>Total</b>	<b>542.5</b>	<b>\$244,021.50</b>

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<sup>2</sup> Ms. Jennings' hourly rate increased due to a promotion that was effective July 1, 2022.

**SUMMARY OF FEES BY PROJECT CATEGORY**

<b>Matter</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
001	Insurance Analysis & Recovery	536.3	\$240,483.50
002	Retention / Fee Applications	1.1	\$220.00
004	Hearings	5.1	\$3,318.00
	<b>Total</b>	<b>542.5</b>	<b>\$244,021.50</b>

**SUMMARY OF EXPENSES**

<b>Expense</b>	<b>Total</b>
Contracted Professional Fees	\$4,736.61
<b>Total</b>	<b>\$4,736.61</b>

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

In re

ALDRICH PUMP LLC, *et al.*,

Debtors.<sup>3</sup>

Chapter 11

Case No. 20-30608

(Jointly Administrated)

**SIXTH INTERIM APPLICATION FOR ALLOWANCE OF COMPENSATION  
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES OF  
GILBERT LLP, SPECIAL INSURANCE COUNSEL TO THE OFFICIAL  
COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS, FOR  
THE PERIOD JUNE 1, 2022 THROUGH SEPTEMBER 30, 2022**

Gilbert, LLP (“Gilbert”), special insurance counsel to the Official Committee of Asbestos Personal Injury Claimants (the “Committee”) of Aldrich Pump LLC, *et al.*, (the “Debtors”), hereby submits its sixth interim fee application (the “Sixth Interim Application”) for allowance of compensation for professional services rendered and reimbursement of actual and necessary expenses incurred for the period June 1, 2022 through September 30, 2022 (the “Application Period”).

**JURISDICTION AND STATUTORY BASIS FOR RELIEF**

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1334 and 157. This Sixth Interim Application is made pursuant to 11 U.S.C. § 331.

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<sup>3</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.

## **BACKGROUND**

2. On June 18, 2020, (the “Petition Date”), the Debtors filed voluntary petitions for relief under Chapter 11 under Title 11 of the United States Code (the “Bankruptcy Code”).

3. The Debtors have continued to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. On June 30, 2020, the Office of the United States Bankruptcy Administrator (the “Bankruptcy Administrator”) filed its *Motion of the Bankruptcy Administrator to Appoint Official Committee of Asbestos Claimants* [Docket No. 126]. On July 7, 2020, the Court entered an order appointing the Committee pursuant to section 1102 of the Bankruptcy Code [Docket No. 147].

5. On July 15, 2020, the Court entered an *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “Interim Compensation Order”) [Docket No. 171].

6. On December 22, 2020, the Committee filed and served an *Ex Parte Application to Retain and Employ Gilbert LLP* (the “Retention Application”) as its special insurance counsel [Docket No. 483]. On December 22, 2020, the Court entered an order approving the Retention Application [Docket No. 484].

7. Pursuant to the Interim Compensation Order, professionals may request monthly compensation and reimbursement. Such requests are to be served on certain identified parties for review (the “Notice Parties”). If no objection to a professional’s request is received within fourteen (14) days of such request, the Debtors are authorized to pay 90% of the fees and 100% of the expenses requested.

8. Beginning with the period ending September 30, 2020, the Interim Compensation Order also requires each retained professional to file at four-month intervals an application for interim Court approval and allowance pursuant to section 331 of the Bankruptcy Code of 100% of the compensation for services and reimbursement of expenses for prior months not already included in a previous interim fee application.

**SERVICES TO BE PROVIDED**

9. As set forth in the *Declaration of Kami E. Quinn in Support of the Ex Parte Application of the Official Committee of Asbestos Personal Injury Claimants for an Order Authorizing it to Retain and Employ Gilbert, LLP as Special Insurance Counsel, Effective as of November 24, 2020* [Docket No. 483], Gilbert was engaged by the Committee to perform the following services:

- A. analyzing the Debtors' insurance policies and providing strategic advice as to the coverage potentially available to respond to asbestos claims;
- B. advising the Committee on steps to be taken to preserve insurance coverage and maximize insurance recoveries;
- C. attending meetings and negotiations with the Committee, representatives of the Debtors, their insurance carriers, and other parties-in-interest in these Chapter 11 Cases related to the preservation of insurance coverage;
- D. advising and representing the Committee with respect to insurance settlements executed prior to the commencement of these Chapter 11 Cases;
- E. advising and representing the Committee with respect to the use of insurance coverage and insurance proceeds in connection with a plan of reorganization;
- F. advising and representing the Committee with respect to other matters and pleadings that may be raised by insurers or that may impact insurance coverage;
- G. advising and representing the Committee in any dispute that may arise including, but not limited to, an adversary proceeding, arbitration, or mediation related to insurance coverage; and

- H. assisting the Committee with any other insurance-related matters arising in conjunction with the formulation of a plan of reorganization and funding of a trust for the payment of asbestos claims established under plan.

**MONTHLY FEE STATEMENTS DURING THE APPLICATION PERIOD**

10. In accordance with the Interim Compensation Order, Gilbert provided the Notice Parties with true and correct copies of the monthly fee statements as follows:

- For the period June 1, 2022 through June 30, 2022: fees in the amount of \$77,936.00 and expenses in the amount of \$0.00 (the “June Monthly Fee Statement”). A copy of the June Monthly Fee Statement is attached hereto as Exhibit B-1.
- For the period July 1, 2022 through July 31, 2022: fees in the amount of \$87,620.50 and expenses in the amount of \$4,280.81 (the “July Monthly Fee Statement”). A copy of the July Monthly Fee Statement is attached hereto as Exhibit B-2.
- For the period August 1, 2022 through August 31, 2022: fees in the amount of \$40,673.00 and expenses in the amount of \$455.80 (the “August Monthly Fee Statement”). A copy of the August Monthly Fee Statement is attached hereto as Exhibit B-3.
- For the period September 1, 2022 through September 30, 2022: fees in the amount of \$37,792.00 and expenses in the amount of \$0.00 (the “September Monthly Fee Statement”). A copy of the September Monthly Fee Statement is attached hereto as Exhibit B-4.

11. Gilbert submitted monthly fee statements during the Application Period of fees in the total amount of \$244,021.50 and expenses in the total amount of \$4,736.61. A chart



summarizing the monthly statements submitted during this Application Period is included in the summary cover pages submitted with this Sixth Interim Application.

12. At the time of filing this Sixth Interim Application, the objection deadline related to the September Monthly Fee Statement is November 21, 2022.

### **SUMMARY OF SERVICES**

13. The professional services performed by Gilbert during the Application Period were necessary and appropriate to the administration of these Chapter 11 Cases. The services were in the best interest of the Committee, the Debtors, and creditors. The compensation requested is commensurate with the complexity and nature of the issues and tasks involved.

14. During the Application Period, Gilbert 542.5 hours to the representation of the Committee in these Chapter 11 Cases. A summary of the services performed by Gilbert professionals and paraprofessionals during the Application Period by category is as follows:

**A. Insurance Analysis & Recovery (001):**  
**Hours: 536.3; Fees: \$240,483.50**

This category generally includes time spent by Gilbert related to analyzing insurance issues, policies and related documents, preparing an insurance presentation for co-counsel, researching coverage-in-place agreements, conducting document review, analyzing discovery issues, and communicating with co-counsel.

**B. Retention / Fee Applications (002):**  
**Hours: 1.1; Fees: \$220.00**

This category includes time spent drafting the fifth interim fee application.

**C. Hearings (004):**  
**Hours: 5.1; Fees: \$3,318.00**

This category includes time spent by Gilbert attending an omnibus hearing and a case management order hearing.

All of Gilbert's work reflected in the Sixth Interim Application was necessary, reasonable, and beneficial to the Committee and its constituency.

**EXPENSES INCURRED DURING THE APPLICATION PERIOD**

15. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by the professionals employed in a chapter 11 case. Gilbert seeks reimbursement for actual expenses in the amount of \$4,736.61 incurred during the Application Period.

16. It is Gilbert's policy to bill clients for all other expenses incurred and disbursements in connection with representation of its clients. These costs include, but are not limited to, major photocopying charges, courier and overnight delivery charges, travel expenses (including mileage, parking, airfare, lodging, meals, and ground transportation), costs incurred related to litigation support systems, and filing fees. Gilbert's practice is to bill costs to its clients at the same rate at which they are billed and paid; Gilbert does not write up costs for a profit. Gilbert does not bill clients for overhead, telephone, facsimile or routine copying charges. Gilbert charges for these expenses in a manner and at rates consistent with charges made generally to the firm's other clients and the Local Rules.

17. Gilbert submits that the actual expenses incurred in providing professional services during the Application Period were necessary, reasonable and justified to serve the needs of the Committee in these Chapter 11 Cases. A summary of the expenses incurred is included on the summary pages submitted with this Sixth Interim Application.

**LEGAL BASIS FOR REQUESTED RELIEF**

18. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code

to govern the Court's award of such compensation. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 1103 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered . . . and . . . reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1)(A) and (B).

19. Section 330 of the Bankruptcy Code also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded to . . . [a] professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3)(A)-(F).

20. The foregoing professional services performed by Gilbert were appropriate and necessary to the effective administration of these Chapter 11 Cases. The services were in the best interests of the Committee. Compensation for the foregoing services as requested is commensurate with the complexity, importance, and nature of the problems, as well as issues or

tasks involved. The professional services were performed in an appropriately expeditious and efficient manner. In addition, Gilbert has made every effort to minimize its disbursements in this case. The actual expenses incurred in providing professional services were absolutely necessary, reasonable, and justified under the circumstances to serve the needs of the Committee.

21. In accordance with section 504 of the Bankruptcy Code and Fed. R. Bankr. P. 2016(a), no agreement or understanding exists between Gilbert and any other person for the sharing of compensation received or to be received for services rendered in or in connection with this case.

22. No agreement or understanding prohibited by 18 U.S.C. § 155 has been or will be made by Gilbert.

**COMPENSATION REQUESTED FOR THE APPLICATION PERIOD**

23. The services for which Gilbert seeks compensation in this Sixth Interim Application were, at the time rendered, necessary for, beneficial to, and in the best interests of, the Committee and the Debtors' estates. The services rendered by Gilbert were consistently performed in a timely manner commensurate with the complexity, importance, and nature of the issues involved. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Gilbert is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

**NO PRIOR REQUEST**

24. No prior request for the relief sought in this Sixth Interim Application has been made to this or any other court in connection with these Chapter 11 Cases apart from the delivery of the monthly fee statements.

**RESERVATION OF RIGHTS**

25. The Committee expressly reserves all rights with respect to challenging the validity, propriety, jurisdiction and venue of these Chapter 11 Cases, including without limitation seeking to dismiss these Chapter 11 Cases pursuant 11 U.S.C. § 1112 and seeking to transfer these Chapter 11 Cases pursuant to 28 U.S.C. §§ 1406 and 1408 and 11 U.S.C. § 105.

**NOTICE**

26. Notice of this Sixth Interim Application has been provided in accordance with the Interim Compensation Order. Gilbert submits that no other or further notice need be provided.

**CONCLUSION**

WHEREFORE, Gilbert respectfully requests that the Court: (i) enter the order attached as Exhibit A granting the Sixth Interim Application and authorizing interim allowance of compensation in the amount of \$244,021.50 for professional services rendered on behalf of the Official Committee of Asbestos Personal Injury Claimants and reimbursement for actual and necessary expenses in the amount of \$4,736.61; (ii) direct payment by the Debtors of the foregoing amounts less any amount already paid pursuant to the Interim Compensation Order; and (iii) grant such other and further relief as the Court deems just and proper.

Dated: November 15, 2022  
Charlotte, North Carolina

HAMILTON STEPHENS STEELE  
+ MARTIN, PLLC

/s/ Glenn C. Thompson  
Glenn C. Thompson (Bar No. 37221)  
525 North Tryon Street, Suite 1400  
Charlotte, North Carolina 28202  
Telephone: (704) 344-1117  
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gthompson@lawhssm.com

*Local Counsel for the Official Committee of  
Asbestos Personal Injury Claimants*

and

GILBERT LLP

/s/ Kami E. Quinn  
Kami E. Quinn (*Admitted pro hac vice*)  
700 Pennsylvania Avenue SE, Suite 400  
Washington, DC 20003  
Telephone: (202) 772-2336  
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*Special Insurance Counsel for the Official  
Committee of Asbestos Personal Injury Claimants*

**EXHIBIT A**

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

In re

ALDRICH PUMP LLC, *et al.*,

Debtors.<sup>4</sup>

Chapter 11

Case No. 20-30608

(Jointly Administrated)

**ORDER GRANTING SIXTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES OF GILBERT LLP, SPECIAL INSURANCE COUNSEL TO THE  
OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS,  
FOR THE PERIOD JUNE 1, 2022 THROUGH SEPTEMBER 30, 2022**

This matter coming before the Court on the *Sixth Interim Application for Allowance of Compensation for Services Rendered and Reimbursement of Expenses of Gilbert LLP, Special Insurance Counsel to the Official Committee of Asbestos Personal Injury Claimants, for the*

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<sup>4</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.



*Period June 1, 2022 through September 30, 2022* (the “Sixth Interim Application”)<sup>5</sup> filed by Gilbert LLP (“Gilbert”), special insurance counsel to the Official Committee of Asbestos Personal Injury Claimants (the “Committee”); the Court having reviewed the Sixth Interim Application; the Court having found that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); (c) notice of the Sixth Interim Application was sufficient pursuant to Local Rule 2002-1(g) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 171] (the “Interim Compensation Order”) and no other or further notice is required; (d) the compensation requested in the Sixth Interim Application is reasonable and for actual and necessary services rendered by Gilbert on behalf of the Committee during the period of June 1, 2022 through September 30, 2022 (the “Application Period”); (e) the expenses for which reimbursement is sought in the Sixth Interim Application are actual and necessary expenses incurred by Gilbert during the Application Period on behalf of the Committee; and (f) the Sixth Interim Application fully complies with the Interim Compensation Order, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Guidelines; and the Court having determined that the legal and factual bases set forth in the Sixth Interim Application establish just cause for the relief granted herein:

1. The Sixth Interim Application is GRANTED.
2. Gilbert is awarded, on an interim basis, compensation for professional services rendered during the Application Period in the amount of \$244,021.50 and reimbursement for actual and necessary expenses incurred by Gilbert during the Application Period in the amount of \$4,736.61.

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<sup>5</sup> Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Sixth Interim Application.

3. The Debtors are authorized and directed to pay Gilbert promptly the fees and expenses approved in this Order to the extent such amounts have not been paid previously by the Debtors.

4. The Debtors and Gilbert are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

5. This Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation, enforcement, or interpretation of this Order.

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

**EXHIBIT B-1**



700 Pennsylvania Avenue, SE  
Suite 400  
Washington, DC 20003  
O 202.772.2200  
F 202.772.3333  
[GilbertLegal.com](http://GilbertLegal.com)

APICC for Aldrich Pump LLC, et al.  
c/o Kevin Maclay, Esq.  
Caplin & Drysdale, Chartered  
One Thomas Circle NW, Suite 1100  
Washington, DC 20005

August 1, 2022  
Invoice Number: 11327434  
Client Number: 1626

FOR PROFESSIONAL SERVICES RENDERED through June 30, 2022

**Re: APICC for Aldrich Pump LLC**

Matter Description	Fees	Costs	Total
Insurance Analysis & Recovery	74,923.00	.00	74,923.00
Hearings	3,013.00	.00	3,013.00
<b>Total</b>	<b>77,936.00</b>	<b>.00</b>	<b>77,936.00</b>

TOTAL FEES \$ 77,936.00

TOTAL EXPENSES \$ .00

**TOTAL FEES AND EXPENSES \$ 77,936.00**

FOR PROFESSIONAL SERVICES RENDERED through June 30, 2022

**Insurance Analysis & Recovery**

<b>Date</b>	<b>Name</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
6/01/22	Girgenti, J.	Confer with team re status and strategy.	.60	219.00
6/01/22	Seymour, S.	Review and code WABCO policies.	1.00	350.00
6/01/22	Seymour, S.	Confer with team re status and strategy.	.60	210.00
6/01/22	Sanchez, J.	Review miscellaneous batch of policies for recovery information.	2.60	1,235.00
6/01/22	Sanchez, J.	Confer with team re status and strategy.	.60	285.00
6/01/22	Frazier, H.	Confer with team re status and strategy.	.60	450.00
6/01/22	Frazier, H.	Confer with N. Ramsey re claims data insurance analysis.	.10	75.00
6/01/22	Frazier, H.	Communicate with B. Hubbard re Aldrich claims analysis.	.10	75.00
6/01/22	Levey, B.	Confer with team re status and strategy.	.60	366.00
6/01/22	Levey, B.	Confer with R. Jennings re policy review-related tasks.	.30	183.00
6/01/22	Ogrey, S.	Confer with team re status and strategy.	.60	144.00
6/01/22	Jennings, R.	Confer with team re status and strategy.	.60	336.00
6/01/22	Jennings, R.	Confer with B. Levey re policy review-related tasks.	.30	168.00
6/01/22	Hubbard, B.	Review correspondence re updated future liability estimate.	.60	255.00
6/01/22	Hubbard, B.	Confer with team re status and strategy.	.60	255.00
6/02/22	Quinn, K.	Review updated information re liability reporting.	.30	375.00
6/02/22	Girgenti, J.	Review and code Aldrich policies re certain language and information.	5.90	2,153.50
6/02/22	Seymour, S.	Continue reviewing and coding WABCO policies.	3.00	1,050.00
6/02/22	Bonesteel, A.	Confer with A. Currin re policy review.	.70	262.50
6/02/22	Levey, B.	Review previous memoranda re shared insurance issue in preparation for drafting memorandum to client (0.6); review underlying litigation documents re same (0.5).	1.10	671.00
6/02/22	Levey, B.	Identify and resolve discrepancies from first-level review.	.80	488.00
6/03/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	6.20	2,263.00
6/03/22	Seymour, S.	Continue reviewing and coding WABCO policies.	4.00	1,400.00

Invoice Number: 11327434  
August 1, 2022

Date	Name	Services	Hours	Amount
6/03/22	Frazier, H.	Review complaints re fraudulent transfer and fiduciary duty re insurance issues.	1.30	975.00
6/03/22	Levey, B.	Review policies from first-level review re discrepancies (1.4); communicate with team re same (0.4).	1.80	1,098.00
6/06/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	5.80	2,117.00
6/06/22	Seymour, S.	Continue reviewing and coding WABCO policies.	4.40	1,540.00
6/06/22	Frazier, H.	Review final insurance-related draft 2004 requests.	.30	225.00
6/06/22	Bonesteel, A.	Review policy database in preparation for second-level review.	.30	112.50
6/06/22	Levey, B.	Revise policy spreadsheet re Ingersoll-Rand coverage.	.80	488.00
6/06/22	Ogrey, S.	Revise additional and named insured on AMPE.	.80	192.00
6/06/22	Jennings, R.	Revise protocol for consolidation of material in preparation for second-level review.	.40	224.00
6/07/22	Quinn, K.	Confer with T. Phillips re information requests.	.20	250.00
6/07/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	6.00	2,190.00
6/07/22	Seymour, S.	Continue reviewing and coding WABCO policies.	3.60	1,260.00
6/07/22	Seymour, S.	Confer with B. Levey, R. Jennings, L. Parker, and S. Ogrey re Ingersoll Rand coverage and second-level review.	1.00	350.00
6/07/22	Frazier, H.	Communicate with R. Jennings re strategic issues and status.	.20	150.00
6/07/22	Bonesteel, A.	Confer with A. Currin re policy review.	2.90	1,087.50
6/07/22	Bonesteel, A.	Continue reviewing policy database in preparation for second-level review.	1.30	487.50
6/07/22	Levey, B.	Confer with R. Jennings, L. Parker, S. Seymour, S. Ogrey re policy review issues and strategy.	1.00	610.00
6/07/22	Levey, B.	Second-level review of named and additional insured information in policies.	.70	427.00
6/07/22	Ogrey, S.	Confer with R. Jennings, L. Parker, B. Levey, and S. Seymour re strategy for second-level policy review.	1.00	240.00
6/07/22	Jennings, R.	Confer with B. Levey, L. Parker, S. Seymour, and S. Ogrey re second-level policy review.	1.00	560.00
6/07/22	Parker, L.	Confer with team re second-level policy review.	1.00	560.00
6/08/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	6.00	2,190.00
6/08/22	Seymour, S.	Continue reviewing and coding WABCO policies.	.90	315.00

Invoice Number: 11327434  
August 1, 2022

Date	Name	Services	Hours	Amount
6/08/22	Seymour, S.	Review multi-year policy evidence for non-Ingersoll Rand policies.	.80	280.00
6/08/22	Frazier, H.	Analyze Clark settlement issues.	.70	525.00
6/08/22	Bonesteel, A.	Confer with A. Currin re policy review.	1.30	487.50
6/08/22	Levey, B.	Review filings re upcoming omnibus hearing re impact on insurance coverage.	.20	122.00
6/08/22	Jennings, R.	Communicate with team re case status and strategy.	.70	392.00
6/08/22	Hubbard, B.	Draft summary of allocation modeling future liability analysis.	1.30	552.50
6/09/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	6.10	2,226.50
6/09/22	Seymour, S.	Continue review of multi-year policy evidence for non-Ingersoll-Rand policies (2.0); confer with A. Bonesteel re same (0.2).	2.20	770.00
6/09/22	Frazier, H.	Analyze next steps and strategic issues re insurance coverage.	.40	300.00
6/09/22	Bonesteel, A.	Confer with S. Seymour re policy review.	.20	75.00
6/09/22	Bonesteel, A.	Confer with A. Currin re policy review.	.50	187.50
6/09/22	Levey, B.	Review draft client memorandum.	.30	183.00
6/09/22	Levey, B.	Review revisions to policy review protocols.	.40	244.00
6/09/22	Jennings, R.	Communicate with J. Girgenti and J. Sanchez re current case status.	.30	168.00
6/09/22	Jennings, R.	Draft status update and next steps for team.	.70	392.00
6/09/22	Parker, L.	Review issues re first-level review.	2.60	1,456.00
6/10/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	6.00	2,190.00
6/10/22	Seymour, S.	Continue reviewing multi-year policy evidence for non-Ingersoll-Rand policies.	.90	315.00
6/10/22	Frazier, H.	Review fraudulent transfer and fiduciary breach complaints re insurance issues.	.80	600.00
6/13/22	Quinn, K.	Review draft brief re fraudulent transfer.	3.50	4,375.00
6/13/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	6.00	2,190.00
6/13/22	Frazier, H.	Communicate with R. Jennings re strategic issues and status.	.10	75.00
6/13/22	Levey, B.	Review recent filings re insurance implications and potential next steps.	.40	244.00
6/14/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	1.60	584.00
6/14/22	Seymour, S.	Continue reviewing multi-year policy evidence for non-Ingersoll-Rand policies.	1.70	595.00

Invoice Number: 11327434  
August 1, 2022

Date	Name	Services	Hours	Amount
6/15/22	Seymour, S.	Continue reviewing multi-year policy evidence for non-Ingersoll-Rand policies.	2.00	700.00
6/15/22	Levey, B.	Review ACC proposed case management order and motion re same.	.40	244.00
6/15/22	Levey, B.	Confer with R. Jennings re second-level review status.	.40	244.00
6/15/22	Levey, B.	Review policies in second level-review for missing information and discrepancies.	.70	427.00
6/15/22	Jennings, R.	Confer with B. Levey re second-level review status.	.40	224.00
6/16/22	Quinn, K.	Communicate with H. Frazier re brief issue.	.30	375.00
6/16/22	Seymour, S.	Continue first-level review of Aldrich policies.	2.20	770.00
6/16/22	Frazier, H.	Review complaints and related exhibits re insurance issues.	.90	675.00
6/16/22	Bonesteel, A.	Prepare and run overlays in policy review database to update policy information.	1.80	675.00
6/16/22	Levey, B.	Review communications and information from Debtors' counsel.	.40	244.00
6/16/22	Levey, B.	Continue reviewing policies in second level-review for missing information and discrepancies.	.60	366.00
6/16/22	Ogrey, S.	Revise master policy tracking sheet re carrier group information.	2.60	624.00
6/16/22	Ogrey, S.	Revise master tracking sheet of Ingersoll-Rand CGL policies.	.60	144.00
6/16/22	Jennings, R.	Review documentation of policy review spreadsheet updates.	.40	224.00
6/17/22	Frazier, H.	Analyze D. McGonigle correspondence re Clark settlement.	.20	150.00
6/17/22	Levey, B.	Continue reviewing communications and information from Debtors' counsel.	.30	183.00
6/17/22	Jennings, R.	Communicate with B. Levey re case status.	.40	224.00
6/20/22	Frazier, H.	Confer with co-counsel and Debtors' counsel re 2004 insurance-related discovery.	.20	150.00
6/21/22	Sanchez, J.	Continue reviewing miscellaneous batch of policies for recovery information.	2.20	1,045.00
6/21/22	Ogrey, S.	Revise AMPE re carrier group information for American Excess.	.50	120.00
6/21/22	Hubbard, B.	Analyze revised future forecast memorandum received from LAS.	1.20	510.00
6/22/22	Frazier, H.	Review correspondence re current status of matters.	.20	150.00
6/22/22	Frazier, H.	Confer with B. Hubbard re Aldrich forecast issues.	.40	300.00



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Date	Name	Services	Hours	Amount
6/22/22	Bonesteel, A.	Export deductible language review for attorney analysis.	1.20	450.00
6/22/22	Jennings, R.	Draft summary of case status and strategy.	1.30	728.00
6/22/22	Jennings, R.	Review complaints filed in two new adversary proceedings.	.50	280.00
6/22/22	Hubbard, B.	Confer with H. Frazier re Aldrich forecast issues.	.40	170.00
6/23/22	Frazier, H.	Confer with M. Cody re Clark settlement issues.	.20	150.00
6/23/22	Bonesteel, A.	Continue exporting deductible language review for attorney analysis.	.50	187.50
6/23/22	Levey, B.	Review communications re proposed settlement (0.2); research documents re same (0.3).	.50	305.00
6/24/22	Seymour, S.	Review revisions to Trane policy evidence.	.60	210.00
6/24/22	Bonesteel, A.	Revise coding language panels in policy review database.	.20	75.00
6/24/22	Ogrey, S.	Revise deductible language from database export.	.90	216.00
6/27/22	Seymour, S.	Review and organize exhaustion reports.	.70	245.00
6/27/22	Frazier, H.	Review 2004 requests in preparation for call re same.	.40	300.00
6/27/22	Frazier, H.	Confer with T. Phillips re Aldrich 2004 requests re insurance issues.	.30	225.00
6/27/22	Frazier, H.	Confer with Debtors' counsel and insurance counsel re 2004 insurance-related requests.	1.30	975.00
6/27/22	Frazier, H.	Review documents referenced by Debtors re 2004 requests to respond to questions re same.	.30	225.00
6/27/22	Frazier, H.	Confer with R. Jennings re 2004 requests.	.20	150.00
6/27/22	Ogrey, S.	Continue reviewing and organizing list of missing documents from New Jersey coverage action case.	3.40	816.00
6/27/22	Jennings, R.	Draft follow-up narrowing scope of discovery requests after call with Debtors.	.40	224.00
6/27/22	Jennings, R.	Confer with T. Phillips, B. Erens, M. Cody, and H. Frazier re Rule 2004 discovery requests (1.3); confer with H. Frazier re same (0.2).	1.50	840.00
6/27/22	Jennings, R.	Communicate with B. Levey re Debtors' requests to narrow scope of discovery.	.30	168.00
6/28/22	Sanchez, J.	Review liability estimation memoranda.	.40	190.00
6/28/22	Ogrey, S.	Continue revising list of missing documents from New Jersey coverage action.	3.60	864.00
6/29/22	Quinn, K.	Review status update from team.	.30	375.00
6/29/22	Girgenti, J.	Confer with team re status and strategy.	.30	109.50
6/29/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	3.20	1,168.00

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August 1, 2022

Date	Name	Services	Hours	Amount
6/29/22	Seymour, S.	Review and organize materials in preparation for upcoming hearing.	.60	210.00
6/29/22	Seymour, S.	Confer with team re status and strategy.	.30	105.00
6/29/22	Sanchez, J.	Confer with team re status and strategy.	.30	142.50
6/29/22	Frazier, H.	Confer with team re status and strategy.	.30	225.00
6/29/22	Jennings, R.	Draft status update and agenda for team meeting.	.50	280.00
6/29/22	Jennings, R.	Confer with team re status and strategy (0.3); communicate with S. Seymour and S. Ogrey re next steps in discovery with Debtors (0.5).	.80	448.00
6/29/22	Parker, L.	Communicate with B. Hubbard re status of policy review and overall data analysis.	.50	280.00
6/29/22	Parker, L.	Confer with team re status and strategy.	.30	168.00
6/29/22	Hubbard, B.	Confer with team re status and strategy.	.30	127.50
6/29/22	Hubbard, B.	Review analysis of updated LAS future liability forecast.	.80	340.00
6/30/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	2.50	912.50
6/30/22	Ogrey, S.	Review missing coverage-in-place agreements and policies re exhaustion and erosion of limits information.	5.50	1,320.00
6/30/22	Ogrey, S.	Confer with R. Jennings re potential narrowing of discovery requests.	.90	216.00
6/30/22	Jennings, R.	Confer with S. Ogrey re potential narrowing of discovery requests.	.90	504.00
6/30/22	Jennings, R.	Review documents re feasibility of Debtors' request to narrow the scope of discovery requests.	1.40	784.00
<b>TOTAL CHARGEABLE HOURS</b>			<b>172.30</b>	
<b>TOTAL FEES</b>				<b>\$ 74,923.00</b>

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August 1, 2022

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Quinn, K.	4.60	1,250.00	5,750.00
Girgenti, J.	56.20	365.00	20,513.00
Seymour, S.	30.50	350.00	10,675.00
Sanchez, J.	6.10	475.00	2,897.50
Frazier, H.	9.50	750.00	7,125.00
Bonesteel, A.	10.90	375.00	4,087.50
Levey, B.	11.70	610.00	7,137.00
Ogrey, S.	20.40	240.00	4,896.00
Jennings, R.	12.80	560.00	7,168.00
Parker, L.	4.40	560.00	2,464.00
Hubbard, B.	5.20	425.00	2,210.00
<b>TOTALS</b>	<b>172.30</b>		<b>\$ 74,923.00</b>

**TOTAL FEES AND EXPENSES FOR MATTER                      \$ 74,923.00**

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August 1, 2022

FOR PROFESSIONAL SERVICES RENDERED through June 30, 2022

**Hearings**

<b>Date</b>	<b>Name</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
6/30/22	Frazier, H.	Attend omnibus hearing.	2.30	1,725.00
6/30/22	Jennings, R.	Attend omnibus hearing.	2.30	1,288.00
<b>TOTAL CHARGEABLE HOURS</b>			<b>4.60</b>	
<b>TOTAL FEES</b>				<b>\$ 3,013.00</b>

**TIMEKEEPER SUMMARY**

<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Frazier, H.	2.30	750.00	1,725.00
Jennings, R.	2.30	560.00	1,288.00
<b>TOTALS</b>	<b>4.60</b>		<b>\$ 3,013.00</b>
<b>TOTAL FEES AND EXPENSES FOR MATTER</b>			<b>\$ 3,013.00</b>
<b>TOTAL FEES AND EXPENSES</b>			<b>\$ 77,936.00</b>

**EXHIBIT B-2**



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APICC for Aldrich Pump LLC, et al.  
c/o Kevin Maclay, Esq.  
Caplin & Drysdale, Chartered  
One Thomas Circle NW, Suite 1100  
Washington, DC 20005

August 31, 2022  
Invoice Number: 11327452  
Client Number: 1626

FOR PROFESSIONAL SERVICES RENDERED through July 31, 2022

**Re: APICC for Aldrich Pump LLC**

Matter Description	Fees	Costs	Total
Insurance Analysis & Recovery	87,095.50	4,280.81	91,376.31
Retention / Fee Application	220.00	.00	220.00
Hearings	305.00	.00	305.00
<b>Total</b>	<b>87,620.50</b>	<b>4,280.81</b>	<b>91,901.31</b>
TOTAL FEES			\$ 87,620.50
TOTAL EXPENSES			<u>\$ 4,280.81</u>
<b>TOTAL FEES AND EXPENSES</b>			<b>\$ 91,901.31</b>

FOR PROFESSIONAL SERVICES RENDERED through July 31, 2022

**Insurance Analysis & Recovery**

<b>Date</b>	<b>Name</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
7/01/22	Girgenti, J.	Review and code Aldrich policies re certain language and information.	1.50	547.50
7/01/22	Ogrey, S.	Review Ingersoll-Rand policies information in master policy spreadsheet.	.40	96.00
7/01/22	Ogrey, S.	Revise master policy spreadsheet re missing policy information.	1.60	384.00
7/01/22	Jennings, R.	Draft summary of omnibus hearing.	.70	427.00
7/05/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	1.60	584.00
7/05/22	Frazier, H.	Confer with B. Hubbard re future forecast insurance implications.	.30	225.00
7/05/22	Bonesteel, A.	Create export of all Aldrich policies.	.50	187.50
7/05/22	Levey, B.	Confer with R. Jennings re status and strategy.	1.50	915.00
7/05/22	Levey, B.	Review information re insurance policies from Kewanee coverage line to address outstanding coverage questions (0.6); review same re other coverage lines (0.4); draft summary of same (0.2).	1.20	732.00
7/05/22	Jennings, R.	Confer with B. Levey re status and strategy.	1.50	915.00
7/05/22	Jennings, R.	Review materials re document requests to Debtors.	.80	488.00
7/05/22	Hubbard, B.	Confer with H. Frazier re future forecast insurance implications.	.30	127.50
7/06/22	Quinn, K.	Confer with team re status and strategy.	.60	750.00
7/06/22	Girgenti, J.	Confer with team re status and strategy.	.60	219.00
7/06/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	1.00	365.00
7/06/22	Frazier, H.	Analyze next steps in case strategy.	.30	225.00
7/06/22	Levey, B.	Confer with team re status and strategy (0.6); review status of proposed settlement (0.5).	1.10	671.00
7/06/22	Levey, B.	Analyze status of policy review and next steps.	.50	305.00
7/06/22	Levey, B.	Confer with R. Jennings re insurance implications of recent case hearings.	.20	122.00
7/06/22	Levey, B.	Review information re liability forecasts.	.30	183.00
7/06/22	Levey, B.	Review policies to identify and fill in gaps in policy data.	.80	488.00
7/06/22	Ogrey, S.	Confer with team re status and strategy.	.60	144.00

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Date	Name	Services	Hours	Amount
7/06/22	Ogrey, S.	Organize materials produced by Debtors.	2.30	552.00
7/06/22	Ogrey, S.	Revise export from database for all policies re evidence and carrier group (1.3); confer with R. Jennings re same (0.2).	1.50	360.00
7/06/22	Ogrey, S.	Review policy numbers for Ingersoll-Rand program.	1.20	288.00
7/06/22	Jennings, R.	Confer with team re status and strategy (0.6); confer with B. Levey re insurance implications of recent case hearings (0.2); confer with S. Ogrey re policy review (0.2).	1.00	610.00
7/06/22	Jennings, R.	Draft proposed next steps for gap-filling of policies with missing coding from first-level review.	.30	183.00
7/06/22	Jennings, R.	Revise proposed next steps for document request follow-up with Debtors.	.70	427.00
7/06/22	Parker, L.	Confer with team re status and strategy.	.60	336.00
7/06/22	Lloyd, M.	Draft summary of newly filed insurance-related pleadings.	1.30	260.00
7/06/22	Hubbard, B.	Confer with team re status and strategy.	.60	255.00
7/06/22	Hubbard, B.	Draft summary of current future liability estimation.	2.20	935.00
7/06/22	Smith, S.	Confer with team re status and strategy.	.60	120.00
7/06/22	Smith, S.	Research background information and documents re insurers in preparation for drafting insurance litigation chart.	4.60	920.00
7/07/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	1.00	365.00
7/07/22	Frazier, H.	Review summary of case management rulings.	.20	150.00
7/07/22	Levey, B.	Confer with R. Jennings re next steps in policy review (0.7); draft instructions re same (0.2); confer with R. Jennings re miscoding issues in policies (0.4).	1.30	793.00
7/07/22	Levey, B.	Review revisions to policy review spreadsheet (1.4); draft summary of next steps re second-level review (0.3).	1.70	1,037.00
7/07/22	Jennings, R.	Confer with B. Levey re miscoding of policies (0.4); confer with B. Levey re next steps in policy review (0.7).	1.10	671.00
7/07/22	Smith, S.	Draft chart re current information for all insurers.	5.90	1,180.00
7/08/22	Quinn, K.	Confer with co-counsel re discovery requests.	.10	125.00
7/08/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	1.00	365.00
7/08/22	Frazier, H.	Confer with R. Horkovich re insurance issues.	.20	150.00
7/08/22	Frazier, H.	Analyze follow-up issues re insurance-related discovery.	.70	525.00



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August 31, 2022

Date	Name	Services	Hours	Amount
7/08/22	Levey, B.	Revise insurance coverage spreadsheet.	1.00	610.00
7/08/22	Levey, B.	Draft summary of Murray coverage lines re discovery issues.	.40	244.00
7/08/22	Ogrey, S.	Revise master policy listing re additional insured, name insured, and other relevant provisions for second-level policy review.	.70	168.00
7/08/22	Ogrey, S.	Revise original policy numbers in master policy spreadsheet.	2.20	528.00
7/11/22	Parker, L.	Confer with A. Currin re second-level analysis of non-Ingersoll-Rand policies.	.30	168.00
7/12/22	Quinn, K.	Confer with R. Horkovich and H. Frazier re insurance issues.	.60	750.00
7/12/22	Frazier, H.	Confer with R. Horkovich and K. Quinn re insurance issues.	.60	450.00
7/12/22	Frazier, H.	Analyze outstanding discovery issues and plan proposal in preparation for call with R. Horkovich.	1.20	900.00
7/12/22	Frazier, H.	Analyze Clark settlement issues.	.30	225.00
7/12/22	Levey, B.	Confer with R. Jennings and L. Parker re process for gap-fillings first-level review (0.4); confer with R. Jennings re same (0.3); review proposed order re claimant reporting requirements (personal injury questionnaire) (0.5).	1.20	732.00
7/12/22	Levey, B.	Review newly obtained documents re new policy information (0.5); communicate with team re same (0.2).	.70	427.00
7/12/22	Jennings, R.	Confer with B. Levey and L. Parker re process for gap-filling first-level review (0.4); confer with B. Levey re same (0.3); communicate with B. Hubbard re personal injury questionnaire (0.4).	1.10	671.00
7/12/22	Jennings, R.	Compare discovery materials received from FCR re Debtors' prior settlements to materials already received.	.70	427.00
7/12/22	Parker, L.	Analyze status of review of non-Ingersoll-Rand policies (0.4); confer with B. Levey and R. Jennings re process for gap-fillings first-level review (0.4).	.80	448.00
7/12/22	Hubbard, B.	Draft summary of analytics re LAS future cost projection (0.9); review additional insurance asset indices for new content (0.7).	1.60	680.00
7/13/22	Quinn, K.	Confer with team re status and strategy.	.80	1,000.00
7/13/22	Girgenti, J.	Confer with team re status and strategy.	.80	292.00
7/13/22	Seymour, S.	Research insurance policy listings.	.50	175.00
7/13/22	Seymour, S.	Revise evidence for missing policies for Aldrich.	2.10	735.00

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August 31, 2022

Date	Name	Services	Hours	Amount
7/13/22	Seymour, S.	Review Debtors' insurance listing for Aldrich re discrepancies in evidence re same.	1.20	420.00
7/13/22	Seymour, S.	Confer with team re status and strategy.	.80	280.00
7/13/22	Seymour, S.	Review incoming document production re insurance-related information (0.8); confer with B. Levey and R. Jennings re same (0.2).	1.00	350.00
7/13/22	Frazier, H.	Confer with team re status and strategy.	.80	600.00
7/13/22	Frazier, H.	Review indexes and documents provided by FCR insurance counsel.	.70	525.00
7/13/22	Frazier, H.	Review rulings on personal injury questionnaire and mandatory mediation motion re insurance implications.	.90	675.00
7/13/22	Levey, B.	Draft summary of filing by Bankruptcy Administrator re mediation (0.4); draft summary of personal injury questionnaire order (0.4); communicate with B. Hubbard re same (0.2).	1.00	610.00
7/13/22	Levey, B.	Confer with team re status and strategy (0.8); draft agenda for same (0.6); confer with R. Jennings and B. Hubbard re same (0.4).	1.80	1,098.00
7/13/22	Levey, B.	Review coverage-in-place agreements re claims handling issue (0.6); communicate with B. Hubbard and R. Jennings re same (0.2).	.80	488.00
7/13/22	Levey, B.	Confer with R. Jennings and S. Seymour re recent document production (0.2); review information re same (0.2).	.40	244.00
7/13/22	Jennings, R.	Confer with B. Levey and B. Hubbard re next steps based on last hearing (0.4); confer with S. Seymour and B. Levey re recent document production (0.2).	.60	366.00
7/13/22	Jennings, R.	Confer with team re status and strategy.	.80	488.00
7/13/22	Jennings, R.	Review motions for estimation and personal injury questionnaire orders re potential next steps.	.40	244.00
7/13/22	Jennings, R.	Continue comparing discovery materials received from FCR re Debtors' prior settlements to materials already received.	.80	488.00
7/13/22	Parker, L.	Confer with team re status and strategy.	.80	448.00
7/13/22	Lloyd, M.	Draft summary of newly filed insurance-related pleadings.	1.30	260.00
7/13/22	Hubbard, B.	Confer with team re status and strategy.	.80	340.00
7/13/22	Hubbard, B.	Review personal injury questionnaire confirmation order (1.5); confer with B. Levey and R. Jennings re same (0.4).	1.90	807.50
7/13/22	Smith, S.	Confer with team re status and strategy.	.80	160.00

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August 31, 2022

Date	Name	Services	Hours	Amount
7/14/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	1.00	365.00
7/14/22	Seymour, S.	Continue initial review of incoming document production.	1.20	420.00
7/14/22	Seymour, S.	Continue reviewing Debtors' insurance listing for Aldrich re discrepancies in evidence re same.	1.60	560.00
7/14/22	Seymour, S.	Review Debtors' insurance listing for Murray re discrepancies in evidence re same.	3.70	1,295.00
7/14/22	Frazier, H.	Analyze claims handling issues under coverage-in-place agreements.	.80	600.00
7/14/22	Levey, B.	Confer with B. Hubbard re review of coverage-in-place agreements.	1.10	671.00
7/14/22	Levey, B.	Review coverage-in-place agreements and other documents produced by Debtors (1.6); draft summary of same re potential ongoing obligations of insurers and Debtors (0.9).	2.50	1,525.00
7/14/22	Levey, B.	Communicate with team re outstanding tasks re policy review (0.4); review information re same (0.3).	.70	427.00
7/14/22	Levey, B.	Confer with R. Jennings re status and strategy.	.40	244.00
7/14/22	Levey, B.	Review research re executory nature of coverage-in-place agreements.	.40	244.00
7/14/22	Jennings, R.	Review analysis of policy listings and documents provided by FCR.	.50	305.00
7/14/22	Jennings, R.	Communicate with team re discovery and review of new productions (0.4); confer with B. Levey re status and strategy (0.4); communicate with S. Seymour re next steps in analyzing documents provided by FCR (0.4).	1.20	732.00
7/14/22	Jennings, R.	Analyze coverage-in-place agreements for provisions re insurer rights in bankruptcy.	.50	305.00
7/14/22	Hubbard, B.	Review AIG coverage-in-place settlement agreement for claims handling responsibilities (4.1); draft analysis re same (0.7); research AIG claims handling agent and conflicts re same (1.2); confer with B. Levey re same (1.1).	7.10	3,017.50
7/15/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	1.00	365.00
7/15/22	Seymour, S.	Continue reviewing Debtors' insurance listing for Murray re discrepancies in evidence.	3.40	1,190.00
7/15/22	Seymour, S.	Revise evidence re missing policies for Murray.	2.90	1,015.00
7/15/22	Frazier, H.	Review analysis of missing policies.	.30	225.00
7/15/22	Bonesteel, A.	Create export of all Aldrich policies for comparison.	.70	262.50

Invoice Number: 11327452  
August 31, 2022

Date	Name	Services	Hours	Amount
7/15/22	Levey, B.	Analyze and supplement research re additional documents re policy listings (0.5); communicate with team re same (0.2).	.70	427.00
7/15/22	Levey, B.	Revise database spreadsheet re missing fields.	.60	366.00
7/18/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	1.00	365.00
7/18/22	Bonesteel, A.	Create export of non-Ingersoll-Rand policies for comparison.	1.30	487.50
7/18/22	Levey, B.	Review proposed settlement agreements and accompanying documents (0.6); draft summary of pertinent provisions (0.4).	1.00	610.00
7/18/22	Levey, B.	Confer with B. Hubbard re status and strategy.	.50	305.00
7/18/22	Levey, B.	Review export of non-Ingersoll-Rand policies re coverage.	.70	427.00
7/18/22	Levey, B.	Confer with R. Jennings re policy review and updated export of non-Ingersoll-Rand policies re gaps in review.	.30	183.00
7/18/22	Jennings, R.	Confer with B. Levey re policy review and recent export of non-Ingersoll-Rand policies re gaps in review.	.30	183.00
7/18/22	Jennings, R.	Analyze recent export of policies re gaps in review.	.40	244.00
7/18/22	Hubbard, B.	Research relationship between AIG and claims handler Resolute (2.0); confer with B. Levey re status and strategy (0.5).	2.50	1,062.50
7/19/22	Frazier, H.	Analyze potential revisions to revised order re Clark settlement.	.40	300.00
7/19/22	Frazier, H.	Confer with T. Phillips re insurance 2004 requests.	.20	150.00
7/19/22	Levey, B.	Confer with L. Parker to status and strategy.	.50	305.00
7/19/22	Parker, L.	Confer with B. Levey re status and strategy.	.50	280.00
7/20/22	Frazier, H.	Review status of various strategic issues.	.60	450.00
7/20/22	Frazier, H.	Analyze claims handling provisions of relevant insurer settlement agreements.	.30	225.00
7/20/22	Levey, B.	Confer with B. Hubbard and R. Jennings next steps in policy analysis.	.40	244.00
7/20/22	Levey, B.	Analyze non-Ingersoll-Rand policy export to identify next steps to fill in gaps (0.8); confer with R. Jennings re same (0.4).	1.20	732.00
7/20/22	Levey, B.	Communicate with R. Jennings and L. Parker re policy review issues re non-Ingersoll-Rand policies.	.60	366.00
7/20/22	Jennings, R.	Draft update re status of Debtors' requests to reduce 2004 discovery requests.	.30	183.00

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August 31, 2022

Date	Name	Services	Hours	Amount
7/20/22	Jennings, R.	Confer with B. Levey and B. Hubbard re next steps policy analysis.	.40	244.00
7/20/22	Jennings, R.	Analyze non-Ingersoll-Rand policy export to identify gaps.	.80	488.00
7/20/22	Jennings, R.	Confer with B. Levey re process for gap-filling missing entries from policy review of non-Ingersoll-Rand policies.	.40	244.00
7/20/22	Jennings, R.	Draft next steps for addressing missing information in non-Ingersoll-Rand policies from first-level review.	.60	366.00
7/20/22	Parker, L.	Review non-Ingersoll-Rand policies in database for missing entries.	.20	112.00
7/20/22	Lloyd, M.	Draft summary of newly filed insurance-related pleadings.	.50	100.00
7/20/22	Hubbard, B.	Draft summary of research re transactions between AIG, National Indemnity, and Resolute Management and AIG's claim handling responsibilities in bankruptcy (1.7); confer with B. Levey and R. Jennings re next steps in policy review (0.4).	2.10	892.50
7/21/22	Quinn, K.	Review research report re claims handling arrangement.	.30	375.00
7/21/22	Seymour, S.	Review Murray settlement agreements for lead carrier assignments.	1.60	560.00
7/21/22	Seymour, S.	Communicate with Winston Strawn re recent document production.	.30	105.00
7/21/22	Levey, B.	Analyze non-Ingersoll-Rand spreadsheet re evidence provisions in policy review (0.8); communicate with R. Jennings and L. Parker re same (0.4).	1.20	732.00
7/21/22	Levey, B.	Review previous coverage-in-place agreement between insurers re implications for insurance recovery (0.8); review list of other coverage-in-place agreements re same (0.2); draft summary of same (0.3).	1.30	793.00
7/21/22	Levey, B.	Analyze lists of missing coverage-in-place agreements and policies.	.70	427.00
7/21/22	Levey, B.	Confer with R. Jennings re ongoing tasks in case and next steps.	.50	305.00
7/21/22	Jennings, R.	Confer with B. Levey re current status of task list and next steps.	.50	305.00
7/21/22	Jennings, R.	Continue drafting summary of process for next round of review to fill in gaps from first-level review.	.20	122.00

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August 31, 2022

Date	Name	Services	Hours	Amount
7/21/22	Jennings, R.	Communicate with S. Seymour re status of incorporating new documents and policy listings into prior documents.	.50	305.00
7/21/22	Jennings, R.	Review documents and charts in preparation for policy review.	.30	183.00
7/21/22	Hubbard, B.	Review analysis of Murray coverage-in-place agreements re claims handling responsibilities.	.80	340.00
7/22/22	Seymour, S.	Continue reviewing recent document production for insurance-related information.	.80	280.00
7/22/22	Seymour, S.	Confer with R. Jennings and B. Levey re 2004 requests.	.50	175.00
7/22/22	Seymour, S.	Review new policy evidence for addition into policy management database.	.40	140.00
7/22/22	Frazier, H.	Confer with D. McGonigle and R. Horkovich re Highlands insurance.	.20	150.00
7/22/22	Frazier, H.	Review Highlands coverage.	.60	450.00
7/22/22	Levey, B.	Confer with S. Seymour and R. Jennings re 2004 requests.	.50	305.00
7/22/22	Levey, B.	Communicate with S. Seymour re next steps in policy review analysis.	.30	183.00
7/22/22	Levey, B.	Revise spreadsheet of Ingersoll-Rand policies re consistency for allocation.	.80	488.00
7/22/22	Jennings, R.	Confer with B. Levey and S. Seymour re 2004 requests.	.50	305.00
7/22/22	Jennings, R.	Communicate with B. Hubbard and S. Seymour re best practices for policy review.	.60	366.00
7/25/22	Seymour, S.	Continue review of new policy evidence for inclusion into policy management database.	2.10	735.00
7/25/22	Seymour, S.	Review new Ingersoll-Rand policy evidence (3.5); confer with R. Jennings and B. Levey re next steps in policy review (0.2).	3.70	1,295.00
7/25/22	Levey, B.	Revise policy export re Murray non-Ingersoll-Rand coverage.	.30	183.00
7/25/22	Levey, B.	Confer with R. Jennings and S. Seymour re next steps in policy review.	.20	122.00
7/25/22	Jennings, R.	Communicate with B. Levey and L. Parker re process for gap-filling missing entries from review of non-Ingersoll-Rand policies.	.30	183.00
7/25/22	Jennings, R.	Confer with B. Levey and S. Seymour re next steps in policy review.	.20	122.00
7/26/22	Seymour, S.	Revise missing policy evidence for Murray policies (3.4); confer with B. Levey and R. Jennings re additional coding of policy evidence (0.6).	4.00	1,400.00

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Date	Name	Services	Hours	Amount
7/26/22	Seymour, S.	Research policies with secondary evidence for Aldrich.	.30	105.00
7/26/22	Bonesteel, A.	Update policy information in review database.	2.40	900.00
7/26/22	Levey, B.	Review recent document production re insurance-related information (1.0); communicate with Winston Strawn re same (0.2)	1.20	732.00
7/26/22	Levey, B.	Confer with R. Jennings and S. Seymour re additional coding of policy evidence.	.60	366.00
7/26/22	Levey, B.	Confer with R. Jennings re analysis of policies and agreements.	.40	244.00
7/26/22	Jennings, R.	Confer with B. Levey and S. Seymour re coding of policy provisions for policies with missing policy evidence.	.60	366.00
7/26/22	Jennings, R.	Confer with B. Levey re analysis of policies and agreements.	.40	244.00
7/27/22	Seymour, S.	Review and organize key documents and filings.	.50	175.00
7/27/22	Seymour, S.	Draft index of missing Aldrich and Murray policy information for 2004 requests.	2.20	770.00
7/27/22	Seymour, S.	Confer with A. Bonesteel re additional policy evidence.	.50	175.00
7/27/22	Bonesteel, A.	Continue updating policy information in review database.	1.30	487.50
7/27/22	Bonesteel, A.	Confer with S. Seymour re searches of policy evidence.	.50	187.50
7/27/22	Levey, B.	Confer with R. Jennings and L. Parker re non-Ingersoll-Rand policy review (0.6); analyze next steps in policy review process (0.3).	.90	549.00
7/27/22	Levey, B.	Draft summary of case status and strategy (0.6); communicate with team re same (0.3).	.90	549.00
7/27/22	Levey, B.	Confer with M. Cody re Home/Clark settlement (0.1); review documents in preparation for same (0.2); communicate with team re same (0.3).	.60	366.00
7/27/22	Levey, B.	Draft list of issues for policy review training (0.6); review policies to identify issues re same (0.5).	1.10	671.00
7/27/22	Jennings, R.	Confer with B. Levey and L. Parker re non-Ingersoll-Rand policy review.	.60	366.00
7/27/22	Parker, L.	Analyze initial results non-Ingersoll-Rand policy review.	1.40	784.00
7/27/22	Parker, L.	Confer with R. Jennings and B. Levey re non-Ingersoll-Rand policy review.	.60	336.00
7/27/22	Lloyd, M.	Draft summary of newly filed insurance-related pleadings.	.50	100.00

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August 31, 2022

Date	Name	Services	Hours	Amount
7/28/22	Girgenti, J.	Continue reviewing and coding Aldrich policies re certain language and information.	.90	328.50
7/28/22	Girgenti, J.	Revise spreadsheet re produced and missing Aldrich and Murray coverage-in-place agreements.	.40	146.00
7/28/22	Seymour, S.	Draft index of missing settlement agreements in support of 2004 requests.	1.50	525.00
7/28/22	Seymour, S.	Revise evidence and related indices for new insurance settlement agreements.	.90	315.00
7/28/22	Frazier, H.	Review insurer response to mediation motion.	.30	225.00
7/28/22	Bonesteel, A.	Communicate with S. Seymour re searches of policy evidence.	.10	37.50
7/28/22	Levey, B.	Review insurer filing re mandatory mediation motion.	.30	183.00
7/28/22	Levey, B.	Review analysis of missing policies.	.40	244.00
7/28/22	Levey, B.	Confer with R. Jennings re status of policy review and instructions to reviewers re next steps.	.50	305.00
7/28/22	Jennings, R.	Confer with B. Levey re status of policy review and instructions to reviewers re next steps.	.50	305.00
7/29/22	Seymour, S.	Review and organize policy evidence for Aldrich.	3.00	1,050.00
7/29/22	Seymour, S.	Revise master policy index re revised policy information.	1.70	595.00
7/29/22	Bonesteel, A.	Continue updating policy information in review database.	.60	225.00
7/29/22	Levey, B.	Analyze policy review export.	.60	366.00
<b>TOTAL CHARGEABLE HOURS</b>			<b>186.90</b>	
<b>TOTAL FEES</b>				<b>\$ 87,095.50</b>



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August 31, 2022

#### TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Quinn, K.	2.40	1,250.00	3,000.00
Girgenti, J.	11.80	365.00	4,307.00
Seymour, S.	42.40	350.00	14,840.00
Frazier, H.	9.90	750.00	7,425.00
Bonesteel, A.	7.40	375.00	2,775.00
Levey, B.	40.80	610.00	24,888.00
Ogrey, S.	10.50	240.00	2,520.00
Jennings, R.	21.10	610.00	12,871.00
Parker, L.	5.20	560.00	2,912.00
Lloyd, M.	3.60	200.00	720.00
Hubbard, B.	19.90	425.00	8,457.50
Smith, S.	11.90	200.00	2,380.00
<b>TOTALS</b>	<b>186.90</b>		<b>\$ 87,095.50</b>

#### EXPENSE DETAILS

Date	Description	Task	Amount
5/31/22	Contracted Professional Fees / Aldebaran Group / Case Support / May 2022	E118	2,716.25
6/30/22	Contracted Professional Fees / Aldebaran Group / Case Support / June 2022	E118	1,564.56

**TOTAL EXPENSES** **\$ 4,280.81**

**TOTAL FEES AND EXPENSES FOR MATTER** **\$ 91,376.31**

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August 31, 2022

FOR PROFESSIONAL SERVICES RENDERED through July 31, 2022

**Retention / Fee Application**

Date	Name	Services	Hours	Amount
7/11/22	Hudgins, M.C.	Draft fifth interim fee application.	1.10	220.00
TOTAL CHARGEABLE HOURS			1.10	
TOTAL FEES				\$ 220.00

**TIMEKEEPER SUMMARY**

Timekeeper	Hours	Rate	Total
Hudgins, M.C.	1.10	200.00	220.00
TOTALS	1.10		\$ 220.00
TOTAL FEES AND EXPENSES FOR MATTER			\$ 220.00

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August 31, 2022

FOR PROFESSIONAL SERVICES RENDERED through July 31, 2022

**Hearings**

Date	Name	Services	Hours	Amount
7/07/22	Jennings, R.	Attend hearing re case management order.	.50	305.00
TOTAL CHARGEABLE HOURS			.50	
TOTAL FEES				\$ 305.00

**TIMEKEEPER SUMMARY**

Timekeeper	Hours	Rate	Total
Jennings, R.	.50	610.00	305.00
TOTALS	.50		\$ 305.00
TOTAL FEES AND EXPENSES FOR MATTER			\$ 305.00
TOTAL FEES AND EXPENSES			\$ 91,901.31

**EXHIBIT B-3**



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APICC for Aldrich Pump LLC, et al.  
c/o Kevin Maclay, Esq.  
Caplin & Drysdale, Chartered  
One Thomas Circle NW, Suite 1100  
Washington, DC 20005

September 30, 2022  
Invoice Number: 11327988  
Client Number: 1626

FOR PROFESSIONAL SERVICES RENDERED through August 31, 2022

**Re: APICC for Aldrich Pump LLC**

Matter Description	Fees	Costs	Total
Insurance Analysis & Recovery	40,673.00	455.80	41,128.80
<b>Total</b>	<b>40,673.00</b>	<b>455.80</b>	<b>41,128.80</b>
TOTAL FEES			\$ 40,673.00
TOTAL EXPENSES			<u>\$ 455.80</u>
<b>TOTAL FEES AND EXPENSES</b>			<b>\$ 41,128.80</b>

FOR PROFESSIONAL SERVICES RENDERED through August 31, 2022

**Insurance Analysis & Recovery**

Date	Name	Services	Hours	Amount
8/01/22	Levey, B.	Draft summary of insurance impact of FCR filing and other filings in case.	.60	366.00
8/01/22	Hubbard, B.	Review settlement agreement between Ingersoll-Rand and Home Insurance Company.	.50	212.50
8/02/22	Seymour, S.	Revise spreadsheet re insurance-related settlement agreements.	1.40	490.00
8/02/22	Levey, B.	Draft summary of Court estimation order.	.50	305.00
8/02/22	Levey, B.	Draft memorandum re next steps in policy review protocol.	1.00	610.00
8/02/22	Levey, B.	Review master policy spreadsheet re coding issues in preparation for drafting protocol memorandum.	.50	305.00
8/02/22	Levey, B.	Revise master policy review spreadsheet re coding issues.	.80	488.00
8/03/22	Seymour, S.	Continue revising spreadsheet re insurance-related settlement agreements.	1.80	630.00
8/03/22	Seymour, S.	Revise policy information in master policy spreadsheet.	3.40	1,190.00
8/03/22	Frazier, H.	Review order on estimation.	.40	300.00
8/03/22	Turner, C.	Review bankruptcy court docket for recently filed insurance-related pleadings.	.70	140.00
8/04/22	Seymour, S.	Continue revisions to policy information in master policy spreadsheet.	3.30	1,155.00
8/04/22	Frazier, H.	Confer with M. Cody re Clark settlement issues.	.20	150.00
8/04/22	Levey, B.	Review communication from Debtors' counsel and response re pending settlement agreement.	.20	122.00
8/04/22	Levey, B.	Draft protocol memorandum re policy review.	.80	488.00
8/04/22	Jennings, R.	Review and revise protocol re policy review in preparation for remaining policy review.	.90	549.00
8/04/22	Parker, L.	Analysis of inconsistent policy language coding.	1.00	560.00
8/05/22	Seymour, S.	Continue revising policy information in master policy spreadsheet.	1.50	525.00
8/05/22	Levey, B.	Revise policy review protocols (0.4); analyze first-level document review protocols (0.4).	.80	488.00
8/08/22	Levey, B.	Communicate with team re document review issues.	.50	305.00
8/09/22	Frazier, H.	Confer with M. Cody re Clark settlement issues.	.10	75.00

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September 30, 2022

Date	Name	Services	Hours	Amount
8/09/22	Levey, B.	Draft summary of documents referenced by co-counsel re Home/Clark settlement.	.60	366.00
8/09/22	Levey, B.	Review master policy spreadsheet re policy review issues.	1.30	793.00
8/09/22	Jennings, R.	Analyze issues for policy review protocol.	.70	427.00
8/09/22	Parker, L.	Analyze defense language provisions for inconsistencies.	2.00	1,120.00
8/09/22	Hubbard, B.	Draft correspondence re future cost estimation and AIG as claims handler.	.40	170.00
8/10/22	Levey, B.	Communicate with team re second-level coding of policy provisions.	1.00	610.00
8/10/22	Jennings, R.	Analyze plan for review of follows-form provisions in policies.	.40	244.00
8/10/22	Parker, L.	Continue analyzing defense language provisions for inconsistencies.	.50	280.00
8/10/22	Turner, C.	Review bankruptcy court docket for recently filed insurance-related pleadings.	.50	100.00
8/11/22	Levey, B.	Review recent filings and orders re estimation and insurance implications.	.30	183.00
8/12/22	Levey, B.	Review new production re insurance implications.	.60	366.00
8/15/22	Levey, B.	Review outstanding policy review-related items for revising review protocols.	.20	122.00
8/16/22	Frazier, H.	Analyze Clark settlement and release of coverage issued to Aldrich.	1.30	975.00
8/17/22	Frazier, H.	Analyze status of insurance-related issues.	.40	300.00
8/17/22	Frazier, H.	Review analysis of Clark settlement.	.30	225.00
8/17/22	Levey, B.	Confer with M. Cody and D. McGonigle re Home/Clark settlement (0.3); draft summary of same (0.5).	.80	488.00
8/18/22	Seymour, S.	Review Home insurance-related information in support of analyzing Clark/Home proposed settlement.	2.00	700.00
8/19/22	Girgenti, J.	Review and code Aldrich policies for certain language and information.	5.50	2,007.50
8/19/22	Levey, B.	Review information re insolvent coverage for recommendation re Clark/Home coverage.	.50	305.00
8/22/22	Girgenti, J.	Continue reviewing and coding Aldrich policies for certain language and information.	6.00	2,190.00
8/22/22	Levey, B.	Review updated Debtors' liability forecast.	.50	305.00
8/23/22	Girgenti, J.	Continue reviewing and coding Aldrich policies for certain language and information.	6.00	2,190.00
8/23/22	Seymour, S.	Confer with B. Levey and L. Parker re policy review.	.40	140.00

Invoice Number: 11327988  
September 30, 2022

Date	Name	Services	Hours	Amount
8/23/22	Seymour, S.	First-level review of additional Murray policies.	2.60	910.00
8/23/22	Levey, B.	Confer with L. Parker and S. Seymour re next steps in policy review (0.4); analyze issues re review of Ingersoll-Rand and non-Ingersoll-Rand policies (0.6).	1.00	610.00
8/23/22	Parker, L.	Confer with B. Levey and S. Seymour re policy review.	.40	224.00
8/24/22	Girgenti, J.	Continue reviewing and coding Aldrich policies for certain language and information.	4.80	1,752.00
8/24/22	Seymour, S.	Continue first-level review of additional Murray policies.	3.00	1,050.00
8/25/22	Girgenti, J.	Continue reviewing and coding Aldrich policies for certain language and information.	2.40	876.00
8/25/22	Seymour, S.	Continue first-level review of additional Murray policies.	5.30	1,855.00
8/25/22	Parker, L.	Analyze defense language provisions.	2.60	1,456.00
8/26/22	Frazier, H.	Analyze information provided in response to Clark issues and questions re settlement.	.30	225.00
8/26/22	Levey, B.	Revise summary of policy review issues.	.60	366.00
8/29/22	Girgenti, J.	Continue reviewing and coding Aldrich policies for certain language and information.	2.00	730.00
8/29/22	Seymour, S.	Continue first-level review of additional Murray policies.	3.90	1,365.00
8/29/22	Frazier, H.	Review proposed stipulation for estimation proceeding re insurance issues.	1.20	900.00
8/30/22	Seymour, S.	Continue first-level review of additional Murray policies.	1.40	490.00
8/30/22	Frazier, H.	Review issues re estimation and stipulation re insurance facts.	.70	525.00
8/30/22	Levey, B.	Review updated master policy spreadsheet.	.40	244.00
8/30/22	Levey, B.	Draft summary of non-Ingersoll-Rand (Murray) issues with coding of defense-related provisions.	.80	488.00
8/30/22	Parker, L.	Analyze draft disclosures re estimation matter.	.80	448.00
8/31/22	Levey, B.	Review draft of ACC initial disclosures (0.7); communicate with team re further review of same (0.4); review policies and policy spreadsheet re accuracy of insurer listing (0.6); summarize status of review (0.2).	1.90	1,159.00
8/31/22	Levey, B.	Communicate with L. Parker re status of policy review.	.30	183.00
8/31/22	Ogrey, S.	Review Committee's draft of initial disclosures for inconsistencies.	2.80	672.00



Invoice Number: 11327988  
September 30, 2022

Date	Name	Services	Hours	Amount
8/31/22	Hubbard, B.	Revise case status update with analytics-related matters.	.20	85.00
<b>TOTAL CHARGEABLE HOURS</b>			<b>92.50</b>	
<b>TOTAL FEES</b>				<b>\$ 40,673.00</b>

#### TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Girgenti, J.	26.70	365.00	9,745.50
Seymour, S.	30.00	350.00	10,500.00
Frazier, H.	4.90	750.00	3,675.00
Levey, B.	16.50	610.00	10,065.00
Ogrey, S.	2.80	240.00	672.00
Jennings, R.	2.00	610.00	1,220.00
Parker, L.	7.30	560.00	4,088.00
Turner, C.	1.20	200.00	240.00
Hubbard, B.	1.10	425.00	467.50
<b>TOTALS</b>	<b>92.50</b>		<b>\$ 40,673.00</b>

#### EXPENSE DETAILS

Date	Description	Task	Amount
7/31/22	Contracted Professional Fees - Aldebaran Group - Case Support - 07/01/22 - 07/31/22	E118	455.80
<b>TOTAL EXPENSES</b>			<b>\$ 455.80</b>
<b>TOTAL FEES AND EXPENSES FOR MATTER</b>			<b>\$ 41,128.80</b>
<b>TOTAL FEES AND EXPENSES</b>			<b>\$ 41,128.80</b>

**EXHIBIT B-4**

**GILBERT** LLP

700 Pennsylvania Avenue, SE  
Suite 400  
Washington, DC 20003  
O 202.772.2200  
F 202.772.3333  
GilbertLegal.com

APICC for Aldrich Pump LLC, et al.  
c/o Kevin Maclay, Esq.  
Caplin & Drysdale, Chartered  
One Thomas Circle NW, Suite 1100  
Washington, DC 20005

October 31, 2022  
Invoice Number: 11328264  
Client Number: 1626

FOR PROFESSIONAL SERVICES RENDERED through September 30, 2022

**Re: APICC for Aldrich Pump LLC**

Matter Description	Fees	Costs	Total
Insurance Analysis & Recovery	37,792.00	.00	37,792.00
<b>Total</b>	<b>37,792.00</b>	<b>.00</b>	<b>37,792.00</b>
TOTAL FEES			\$ 37,792.00
TOTAL EXPENSES			<u>\$ .00</u>
<b>TOTAL FEES AND EXPENSES</b>			<b>\$ 37,792.00</b>

FOR PROFESSIONAL SERVICES RENDERED through September 30, 2022

**Insurance Analysis & Recovery**

<b>Date</b>	<b>Name</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
9/01/22	Quinn, K.	Review draft discovery responses.	.30	375.00
9/02/22	Frazier, H.	Communicate with team re status of Clark settlement.	.20	150.00
9/02/22	Levey, B.	Revise policy review protocol.	.40	244.00
9/06/22	Frazier, H.	Communicate with B. Levey re Clark settlement issues.	.10	75.00
9/06/22	Levey, B.	Revise analysis re choice-of-law and defense clauses in Ingersoll-Rand policies.	.70	427.00
9/07/22	Levey, B.	Communicate with team re case status and strategy.	.30	183.00
9/08/22	Levey, B.	Continue revising analysis re choice-of-law and defense clauses in Ingersoll-Rand policies.	1.00	610.00
9/09/22	Seymour, S.	Continue first-level review of Murray entity policies.	.50	175.00
9/09/22	Sanchez, J.	Review revised liability estimation report.	2.30	1,092.50
9/09/22	Levey, B.	Revise policy review and analysis re choice-of-law clauses in policies.	.90	549.00
9/12/22	Seymour, S.	Research in support of potential settlement of Home coverage.	1.10	385.00
9/12/22	Seymour, S.	Continue first-level review of Murray entity policies.	1.40	490.00
9/12/22	Frazier, H.	Revise memorandum re Clark settlement.	.50	375.00
9/12/22	Levey, B.	Draft summary of Clark/Home issues with recommendation (1.0); review documents re same (0.8).	1.80	1,098.00
9/13/22	Seymour, S.	Continue first-level review of Murray entity policies.	.40	140.00
9/13/22	Frazier, H.	Communicate with K. Quinn and B. Levey re Clark issues.	.30	225.00
9/13/22	Levey, B.	Revise recommendation re Clark settlement.	.30	183.00
9/14/22	Quinn, K.	Review recommendation re Clark settlement.	.50	625.00
9/14/22	Quinn, K.	Review materials re settlement proposal.	.40	500.00
9/14/22	Sanchez, J.	Continue reviewing liability estimation report and compare to prior estimations.	2.80	1,330.00
9/14/22	Frazier, H.	Review protocol for estimation filings re insurance issues.	1.40	1,050.00
9/14/22	Levey, B.	Draft summary of choice-of-law designations in reviewed policies.	.90	549.00

Invoice Number: 11328264  
October 31, 2022

Date	Name	Services	Hours	Amount
9/15/22	Girgenti, J.	Review and code Murray policies for certain language and information.	6.00	2,190.00
9/16/22	Girgenti, J.	Continue reviewing and coding Murray policies for certain language and information.	7.50	2,737.50
9/16/22	Frazier, H.	Confer with T. Philips and B. Levey re Clark settlement.	.20	150.00
9/16/22	Levey, B.	Revise proposed settlement.	.40	244.00
9/16/22	Levey, B.	Revise protocol for choice-of-law provision coding in policies.	.80	488.00
9/19/22	Girgenti, J.	Continue reviewing and coding Murray policies for certain language and information.	7.50	2,737.50
9/19/22	Seymour, S.	Continue first-level review of Murray entity policies.	2.00	700.00
9/20/22	Girgenti, J.	Continue reviewing and coding Murray policies for certain language and information.	7.00	2,555.00
9/21/22	Girgenti, J.	Continue reviewing and coding Murray policies for certain language and information.	7.00	2,555.00
9/21/22	Frazier, H.	Review status updates for various items.	.30	225.00
9/21/22	Levey, B.	Review agendas for upcoming hearing.	.30	183.00
9/21/22	Levey, B.	Confer with co-counsel re Clark/Home settlement (0.1); review materials re same (0.2).	.30	183.00
9/22/22	Girgenti, J.	Continue reviewing and coding Murray policies for certain language and information.	7.00	2,555.00
9/22/22	Levey, B.	Revise protocol for second-level policy review.	.30	183.00
9/22/22	Levey, B.	Review status of additional discovery and list of outstanding questions re same.	.40	244.00
9/23/22	Girgenti, J.	Continue reviewing and coding Murray policies for certain language and information.	6.00	2,190.00
9/23/22	Frazier, H.	Confer with B Levey re Clark issues.	.30	225.00
9/23/22	Frazier, H.	Review estimation re disclosures re insurance issues.	1.20	900.00
9/23/22	Frazier, H.	Confer with T. Phillips, N. Miller, and B. Levey re Clark/Home proposed settlement.	.20	150.00
9/23/22	Levey, B.	Confer with T. Phillips, N. Miller, and H. Frazier re Clark/Home proposed settlement (0.2); confer with H. Frazier re same (0.3); draft summary re same (0.4).	.90	549.00
9/23/22	Levey, B.	Analyze Clark/Home discovery requests.	.70	427.00
9/26/22	Girgenti, J.	Continue reviewing and coding Murray policies for certain language and information.	1.50	547.50
9/26/22	Seymour, S.	Initial review of per-occurrence limits for Murray coverage.	2.30	805.00

Invoice Number: 11328264  
October 31, 2022

Date	Name	Services	Hours	Amount
9/26/22	Frazier, H.	Review revised liability estimate for purposes of insurance analysis.	.70	525.00
9/27/22	Levey, B.	Review documents in preparation for drafting memorandum for Committee re proposed settlement.	.60	366.00
9/29/22	Levey, B.	Draft memorandum for Committee re proposed settlement.	1.30	793.00
9/30/22	Seymour, S.	Research additional Home coverage issues.	2.00	700.00
9/30/22	Levey, B.	Revise draft memorandum re proposed settlement.	.80	488.00
9/30/22	Levey, B.	Revise policy spreadsheet re non-Ingersoll-Rand policies.	.60	366.00
<b>TOTAL CHARGEABLE HOURS</b>			<b>84.60</b>	
<b>TOTAL FEES</b>				<b>\$ 37,792.00</b>

#### TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Quinn, K.	1.20	1,250.00	1,500.00
Girgenti, J.	49.50	365.00	18,067.50
Seymour, S.	9.70	350.00	3,395.00
Sanchez, J.	5.10	475.00	2,422.50
Frazier, H.	5.40	750.00	4,050.00
Levey, B.	13.70	610.00	8,357.00
<b>TOTALS</b>	<b>84.60</b>		<b>\$ 37,792.00</b>
<b>TOTAL FEES AND EXPENSES FOR MATTER</b>			<b>\$ 37,792.00</b>
<b>TOTAL FEES AND EXPENSES</b>			<b>\$ 37,792.00</b>

**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
Debtors.	:	(Jointly Administrated)

**NOTICE OF FILING AND OPPORTUNITY FOR HEARING**

**(No Protest Notice – No Hearing Will be Held Unless a Request for Hearing is Filed)**

PLEASE TAKE NOTICE that the Official Committee of Asbestos Personal Injury Claimants (the “Committee”) filed the *Sixth Interim Application for Allowance of Compensation for Services Rendered and Reimbursement of Expenses of Gilbert LLP, Special Insurance Counsel to the Official Committee of Asbestos Personal Injury Claimants, for the Period June 1, 2022 Through September 30, 2022* (the “Application”).

If a copy of the Application is not included with this Notice, a copy may be viewed at the Court’s website, [www.ncwb.uscourts.gov](http://www.ncwb.uscourts.gov), under Debtor Aldrich Pump LLC’s name and case number; you may obtain a copy of the Application from the Debtors’ claims and noticing agent at [www.kccllc.net/aldrich](http://www.kccllc.net/aldrich); or you may request in writing a copy from the undersigned counsel to the Committee.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THESE BANKRUPTCY CASES. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)**

**IF YOU DO NOT WANT THE COURT TO GRANT THE RELIEF REQUESTED IN THE APPLICATION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE APPLICATION, THEN ON OR BEFORE NOVEMBER 29, 2022 YOU MUST:**

1. File a formal, written response with the Bankruptcy Court at:

Clerk, United States Bankruptcy Court  
Charles Jonas Federal Building  
401 West Trade Street  
Charlotte, NC 28202

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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.

2. Serve a copy of your response on all parties in interest, including:

- a) U.S. Bankruptcy Administrator  
402 West Trade Street  
Charlotte, NC 28202
- b) HAMILTON STEPHENS STEELE + MARTIN, PLLC  
Glenn C. Thompson  
525 North Tryon Street, Suite 1400  
Charlotte, NC 28202
- c) GILBERT LLP  
Kami E. Quinn  
700 Pennsylvania Avenue SE, Suite 400  
Washington, DC 20003

If you do not want the Court to grant the relief requested in the Application or if you want the Court to consider your views on the Application, then you or your attorney should attend the hearing on **December 14, 2022 at 9:30 a.m. (ET)** before the Honorable J. Craig Whitley at the United States Bankruptcy Court, Charles Jonas Federal Building, Courtroom 2B, 401 West Trade Street, Charlotte, North Carolina 28202.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought and may enter an Order granting the relief requested. If no objections are timely filed and served, the court may rule on the Application without a hearing. No further notice of that hearing will be given.

Dated: November 15, 2022  
Charlotte, North Carolina

HAMILTON STEPHENS  
STEELE + MARTIN, PLLC

/s/ Glenn C. Thompson

Glenn C. Thompson (Bar No. 37221)  
525 North Tryon Street, Suite 1400  
Charlotte, North Carolina 28202  
Telephone: (704) 344-1117  
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*Counsel to the Official Committee of Asbestos  
Personal Injury Claimants*