

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

In re:

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

**SUMMARY OF THE SIXTH INTERIM FEE APPLICATION OF
LEGAL ANALYSIS SYSTEMS, INC., AS ASBESTOS CONSULTANTS TO THE
OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS FOR
PAYMENT OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES
INCURRED FOR THE PERIOD JUNE 1, 2023 THROUGH SEPTEMBER 30, 2023**

Name of applicant:	Legal Analysis Systems, Inc.
Authorized to provide professional services to:	The Official Committee of Asbestos Personal Injury Claimants
Date retention approved:	November 24, 2021, effective as of October 27, 2021
Period for which compensation and reimbursement is sought:	June 1, 2023 through September 30, 2023
Amount of compensation sought as actual, reasonable, and necessary:	\$124,785.00
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$0.00
Amount of compensation paid as actual, reasonable and necessary for applicable period:	\$66,624.75
Amount of expenses reimbursed as actual, reasonable and necessary for applicable period:	\$0.00
Total amount of unpaid fees and expenses sought for applicable period:	\$58,160.25

This is a(n): ___ Monthly X Interim ___ Final Application.

This is the Sixth Interim Fee Application for Compensation and Reimbursement of Expenses.

¹ The Debtors are the following entities (the last four digits of the Debtors' 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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Prior Monthly Fee Statements submitted for this Interim Period:

Date Submitted	Month Covered	Fees	Expenses
8/2/2023	6/1/2023 - 6/30/2023	\$22,847.50	\$0.00
10/12/2023	7/1/2023 - 7/31/2023	\$15,862.50	\$0.00
10/12/2023	8/1/2023 - 8/31/2023	\$34,895.00	\$0.00
11/17/2023	9/1/2023 - 9/30/2023	\$51,180.00	\$0.00
	TOTAL:	124,785.00	\$0.00

**SUMMARY OF LEGAL ANALYSIS SYSTEMS, INC. FEES BY PROFESSIONAL
JUNE 1, 2023 THROUGH SEPTEMBER 30, 2023**

The LAS employees who rendered professional services in the case during the fee period are:

Professional	Position of the Applicant and Year of Obtaining License to Practice	Billing Rate	Total Hours in Fee Period	Total Fees in Fee Period	Total Hours Billed from Date of Retention	Total Compensation from the Date of Retention
James Dertouzos	Economist 1980	\$760.00	0	\$0.00	0.6	\$420.00
Patricia Ebener	Survey Research Specialist 1978	\$550.00	75.3	\$41,415.00	92.2	\$50,710.00
Mark A. Peterson	Attorney/Social Scientist 1976	\$1,085.00	0	\$0.00	84.8	\$88,387.00
Dan Relles	Statistician 1968	\$760.00	0	\$0.00	96.0	\$68,676.00
Daniel Rourke	Statistician 1975	\$675.00	24	\$16,200.00	307.4	\$184,725.00
Andrew Sackett	Attorney/Social Scientist J.D. rec'd 2005	\$700.00	18.6	\$13,020.00	252.6	\$165,885.00
Cord Thomas	Data Systems Architect and Manager 1996	\$500.00	87.3	\$43,650.00	103.3	\$79,595.00
Mark Totten	Statistician 2020	\$525.00	20	\$10,500.00	104.2	\$22,147.50
TOTAL:			225.2	\$124,785.00	1,041.1	\$660,545.50

**SUMMARY OF LEGAL ANALYSIS SYSTEMS, INC.
COMPENSATION BY PROJECT CATEGORY
JUNE 1, 2023 THROUGH SEPTEMBER 30, 2023**

Project Category	Hours in Fee Period	Amount	Total Hours from Date of Retention	Total Amount Since Date of Retention
Analysis (An)	14.1	\$9,495.00	367.2	\$245,756.50
Client Communication (Cl)	5	\$3,342.50	41.2	\$31,365.00
Data Analysis (Da)	12.3	\$7,320.00	222.6	\$144,348.00
Data Gathering & Processing (Dg)	169.2	\$89,897.50	286	\$159,317.50
Fee Request Preparation (Fe)	3.1	\$2,170.00	28.9	\$19,465.00
Project Management (Pr)	20.3	\$11,720.00	79.7	\$50,341.00
Research (Re)	1.2	\$840.00	15.5	\$9,952.50
Travel (Tr)	0	\$0.00	0	\$0.00
Total:	225.2	\$124,785.00	1041.1	\$660,545.50

**LEGAL ANALYSIS SYSTEMS, INC.
CUMULATIVE EXPENSE SUMMARY
JUNE 1, 2023 THROUGH SEPTEMBER 30, 2023**

Service Description	Total Expenses for Fee Period	Total Expenses from Date of Retention
Photocopying (External Provider)	\$0.00	\$0.00
Federal Express	\$0.00	\$0.00
Transportation-Local While on Business Total	\$0.00	\$0.00
Travel - Air Fare Total	\$0.00	\$0.00
Travel - Lodging Total	\$0.00	\$0.00
Travel - Meals, etc. Total	\$0.00	\$0.00
Parking & Tolls Total	\$0.00	\$0.00
Search Engine Subscription	\$0.00	\$0.00
Deposition Room Rental	\$0.00	\$0.00
Audio/Visual Equipment Costs	\$0.00	\$0.00
Total	\$0.00	\$0.00

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
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In re:

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

**SIXTH INTERIM FEE APPLICATION OF LEGAL ANALYSIS SYSTEMS, INC., AS
ASBESTOS CONSULTANTS TO THE OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS FOR PAYMENT OF INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD OF
JUNE 1, 2023 THROUGH SEPTEMBER 30, 2023**

Legal Analysis Systems, Inc. (“LAS”), asbestos consultants 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 Fee Application”) for allowance of compensation for professional services rendered and reimbursement of actual and necessary expenses incurred for the period June 1, 2023 through September 30, 2023.

INTRODUCTION

1. On June 18, 2020 (the “Petition Date”), the Debtors commenced this proceeding (the “Chapter 11 Case”) by filing a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”).

¹ The Debtors are the following entities (the last four digits of the Debtors’ 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. Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, the Debtors have continued as a debtor-in-possession since the Petition Date. No trustee or examiner has been appointed in the Chapter 11 Case.

3. On June 30, 2020, the Bankruptcy Administrator moved the appointment of the Official Committee of Asbestos Personal Injury Claimants in the Debtors' case pursuant section 1102 of the Bankruptcy Code [Dkt. No. 126]. The Bankruptcy Court orally granted the motion at a hearing on July 6, 2020 and entered an order memorializing its ruling on July 7, 2020. *See* [Dkt. No. 147].

4. On July 15, 2020, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Fee Order"). Pursuant to the Interim Fee Order, the Court established a procedure for interim compensation and reimbursement of disbursements for professionals appointed in this case. In particular, the Court authorized the service to certain notice parties of monthly fee statements by professionals appointed in this case (including professionals employed by the Committee) and payment by the Debtors of 90% of fees and 100% of expenses, in the absence of an objection made within fourteen (14) days of service of the pertinent fee statement.

RETENTION OF LAS

5. The Committee retained LAS as a consultant in the Chapter 11 Case. By order dated November 24, 2021, LAS was appointed as asbestos consultants for the Committee, to perform certain tasks set forth in greater detail in the underlying retention application, effective as of October 27, 2021. *See* [Dkt. No. 901].

6. As set forth in the in the application to retain LAS, LAS was engaged to perform the following services:

- (a) development of oversight methods and procedures so as to enable the Committee to fulfill its responsibilities of reviewing and analyzing any proposed disclosure statement, plan, and other similar documents in this reorganization proceeding;
- (b) review and analysis of the Debtors' asbestos claims database and related information concerning the Aggregate Asbestos Claims and review and analysis of the resolution of various Aggregate Asbestos Claims;
- (c) estimation of the present and future Aggregate Asbestos Liability;
- (d) quantitative analyses of alternative claims resolution procedures including estimation of payments that would be made to various types of Aggregate Asbestos Claims under those alternatives and development of cash flow analyses of an asbestos compensation trust under alternative procedures;
- (e) evaluation of reports and opinions of experts and consultants retained by other parties-in-interest to the bankruptcy proceeding;
- (f) evaluations and analyses of proposed proofs of claim, bar dates, discovery and other information and sources of information obtained in the bankruptcy case, and analyses of data from proofs of claim and other information and forms concerning Aggregate Asbestos Claims;
- (g) quantitative analyses of other matters related to Aggregate Asbestos Claims as may be requested by the Committee; and
- (h) testimony on such matters as is required by the Committee.

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LAS'S FEE STATEMENTS DURING THE FEE PERIOD

7. During the period covered by the Sixth Interim Fee Application (the “Fee Period”), LAS provided the Notice Parties with the following monthly fee statements in accordance with the Interim Fee Order and the Guidelines for Compensation (the “Compensation Guidelines”) referred to therein:

- For June 1, 2023 through June 30, 2023 – fees of \$22,847.50 and expenses of \$0.00 (the “June Monthly Fee Statement”). A copy of the revised June Monthly Fee Statement is attached hereto as Schedule A-1;
- For July 1, 2023 through July 31, 2023 – fees of \$15,862.50 and expenses of \$0.00 (the “July Monthly Fee Statement”). A copy of the July Monthly Fee Statement is attached hereto as Schedule A-2;
- For August 1, 2023 through August 31, 2023 – fees of \$34,895.00 and expenses of \$0.00 (the “August Monthly Fee Statement”). A copy of the August Monthly Fee Statement is attached hereto as Schedule A-3;
- For September 1, 2023 through September 30, 2023 – fees of \$51,180.00 and expenses of \$0.00 (the “September Monthly Fee Statement”). A copy of the September Monthly Fee Statement is attached hereto as Schedule A-4.

8. In total, LAS submitted monthly fee statements during the Fee Period for fees of \$124,785.00 and expenses of \$0.00. A chart summarizing the monthly statements submitted during this Fee Period is below:

Service Date	Application Period	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses	10% Fee Holdback	Total Sought to be Paid (including 10% Holdback)
8/2/23	6/1/23-6/30/23	\$22,847.50	\$0.00	\$20,562.75	\$0.00	\$2,284.75	\$22,847.50
10/12/23	7/1/23-7/31/23	\$15,862.50	\$0.00	\$14,276.25	\$0.00	\$1,586.25	\$15,862.50
10/12/23	8/1/23-8/31/23	\$34,895.00	\$0.00	\$31,405.50	\$0.00	\$3,489.50	\$34,895.00
11/17/23	9/1/23-9/30/23	\$51,180.00	\$0.00	\$46,062.00	\$0.00	\$5,118.00	\$51,180.00
TOTAL		\$124,785.00	\$0.00	\$112,306.50	\$0.00	\$12,478.50	\$124,785.00

SUMMARY OF SERVICES

9. The professional services performed by LAS were necessary and appropriate to the administration of the Debtor's chapter 11 case. These services were in the best interests of the Debtor, its estate, and creditors. The compensation requested is commensurate with the complexity and nature of the issues and tasks involved.

PROGRESS OF THE CHAPTER 11 CASE TO DATE

10. Since its engagement in these cases, LAS has reviewed and analyzed the Debtors' asbestos claims data, reviewed and commented on a proposed form of personal injury questionnaire, reviewed and analyzed asbestos settlement and trial data, and begun developing an estimate of the Debtors' aggregate asbestos-related personal injury liability. In addition, during

the Fee Period, LAS worked towards the identification of a sampling protocol for resolved mesothelioma claims.

11. LAS has not previously applied for payment of any fees or reimbursement of any disbursement during this Chapter 11 Case except as authorized pursuant to the Interim Fee Order including monthly submissions of fee statements. LAS does not hold a retainer in respect of its services as an asbestos consultant to the Committee.

LEGAL BASIS FOR REQUESTED RELIEF

12. 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).

13. 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).

14. The foregoing professional services performed by LAS were appropriate and necessary to the effective administration of the Chapter 11 Case. 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.

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

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

THE REQUESTED COMPENSATION SHOULD BE ALLOWED

17. The services for which LAS seeks compensation in this Sixth Interim Fee 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 LAS 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 LAS 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

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

NOTICE

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

CONCLUSION

WHEREFORE, LAS respectfully requests that the Court: (i) enter the order attached as Exhibit A granting the Sixth Interim Fee Application and authorizing interim allowance of compensation in the amount of \$124,785.00 for professional services rendered on behalf of the Official Committee of Asbestos Personal Injury Claimants of and reimbursement for actual and necessary expenses in the amount of \$0.00; (ii) direct payment by the Debtors of the foregoing amounts less any amount already paid pursuant to the Interim Fee Order; and (iii) grant such other and further relief as the Court deems just and proper.

Dated: February 5, 2024
Charlotte, North Carolina

HAMILTON STEPHENS STEELE
+ MARTIN, PLLC

/s/ Glenn C. Thompson

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EXHIBIT A

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

In re:

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

**ORDER GRANTING THE SIXTH INTERIM FEE APPLICATION OF LEGAL
ANALYSIS SYSTEMS, INC., AS ASBESTOS CONSULTANTS TO THE OFFICIAL
COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS FOR PAYMENT OF
INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD JUNE 1, 2023 THROUGH SEPTEMBER 30, 2023**

This matter coming before the Court on the *Sixth Interim Fee Application of Legal Analysis Systems, Inc., as Asbestos Consultants to the Official Committee of Asbestos Personal Injury Claimants for Payment of Interim Compensation and Reimbursement of Expenses Incurred for the Period June 1, 2023 through September 30, 2023* (the “Sixth Interim Fee Application”) filed by Legal Analysis Systems, Inc. (“LAS”), asbestos consultants to the Official Committee of Asbestos Personal Injury Claimants (the “Committee”); the Court having reviewed the Sixth Interim Fee 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 Fee 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* [Dkt. No. 171] (the “Interim Fee Order”) and no other or further notice is required; (d) the compensation requested in the Sixth Interim Fee Application is reasonable and for actual and necessary services rendered by LAS on behalf of the Committee during the period

¹ The Debtors are the following entities (the last four digits of the Debtors’ 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.

of June 1, 2023 through September 30, 2023 (the “Fee Period”); (e) the expenses for which reimbursement is sought in the Sixth Interim Fee Application are actual and necessary expenses incurred by LAS during the Fee Period on behalf of the Committee; and (f) the Sixth Interim Fee Application fully complies with the Interim Fee 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 Fee Application establish just cause for the relief granted herein:

1. The Sixth Interim Fee Application is GRANTED.
2. LAS is awarded, on an interim basis, compensation for professional services rendered during the Fee Period in the amount of \$124,785.00 and reimbursement for actual and necessary expenses incurred by LAS during the Fee Period in the amount of \$0.00.
3. The Debtors are authorized and directed to pay LAS 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 LAS 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

SCHEDULE A-1

LEGAL ANALYSIS SYSTEMS, INC.

Mark A. Peterson
970 Calle Arroyo
Thousand Oaks, CA 91360
TEL: (805) 208-8595
mark.peterson.las@gmail.com

August 2, 2023

VIA EMAIL TO DEBTOR & NOTICE PARTIES IDENTIFIED BY COURT ORDER

Re: LAS Monthly Fee Statement (June 2023)
In re Aldrich Pump LLC, et al., No. 20-30608 (Bankr. W.D.N.C.)

Dear Counsel and Ms. Abel:

Pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 171], I am enclosing the monthly statement for Legal Analysis Systems, Inc.'s fees and expenses for June 1, 2023, through June 30, 2023.

For that period, Legal Analysis Systems' fees are \$22,847.50, and it had no expenses. Subject to and without waiver of such rights, Legal Analysis Systems requests that Debtors pay 90% of these total fees for a total now due and owing of \$ \$20,562.75.

Very truly yours,

/s/ Mark A. Peterson
Mark A. Peterson

Enclosures

cc: Allan Tananbaum (atananbaum@tranetechnologies.com)
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**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
June 2023**

Monthly Fee Statement, *In re Aldrich Pump LLC*, No. 20-30608 (Bankr. W.D.N.C.)

For professional services rendered by Legal Analysis Systems, Inc.
June 1, 2023, through June 30, 2023.

Total fees: **\$22,847.50**

Total expenses: \$0.00

Summary of fees by professional

Professional	Hours	Rate	Amount
Dertouzos, James	0.0	\$760	\$0.00
Ebener, Patricia	1.8	\$550	\$990.00
Peterson, Mark	0.0	\$1,085	\$0.00
Relles, Daniel	0.0	\$760	\$0.00
Rourke, Daniel	12.1	\$675	\$8,167.50
Sackett, Andrew	2.9	\$700	\$2,030.00
Thomas, Cord	20.8	\$500	\$10,400.00
Totten, Mark	2.4	\$525	\$1,260.00
Total	40.0		\$22,847.50

Summary of fees by task

Task	Hours	Amount
Analysis	12.1	\$8,167.50
Client communications		
Data analysis		
Data Gathering & Processing	22.3	\$11,347.50
Fee request preparation	0.2	\$140.00
Project management	5.4	\$3,192.50
Research		
Total	40.0	\$22,847.50

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
June 2023**

Date	Professional	Narrative	Time	Rate	Amount
Analysis					
6/7/23	Daniel Rourke	Prepare graphs (and supporting tables) illustrating alternate forecasts	5.2	\$675.00	\$3,510.00
6/17/23	Daniel Rourke	Prepare memo presenting alternate forecasts	6.9	\$675.00	\$4,657.50
Totals For Analysis			12.1		\$8,167.50
Data Gathering & Processing					
6/3/23	Cord Thomas	Prepare claims file repository; migrate claims files and prep for production	2.2	\$500.00	\$1,100.00
6/5/23	Cord Thomas	Prepare environment for Aldrich claims file processing and migrate all received claims files.	1.8	\$500.00	\$900.00
6/12/23	Mark Totten	Download, process, & upload to SharePoint latest PIQ archive file.	0.1	\$525.00	\$52.50
6/16/23	Cord Thomas	Review state of claims file text extraction and frequency of certain documents.	0.4	\$500.00	\$200.00
6/17/23	Cord Thomas	Update script to ingest claims files submissions into LAS database for further analysis	2.2	\$500.00	\$1,100.00
6/17/23	Cord Thomas	Write script to extract Part 1 data from the personal injury questionnaires	3.5	\$500.00	\$1,750.00
6/18/23	Cord Thomas	Check in on script processing Part 1 questionnaire information	0.4	\$500.00	\$200.00
6/18/23	Cord Thomas	Check in on script ingesting the claims files into LAS database	0.3	\$500.00	\$150.00
6/21/23	Cord Thomas	Review and QA Part 1 questionnaire - research why some form fields are not being correctly interpreted.	1.2	\$500.00	\$600.00
6/23/23	Cord Thomas	Reorganize claims files to optimize PIQ processing.	0.7	\$500.00	\$350.00
6/24/23	Cord Thomas	Download and extract claims files for re-processing	1.0	\$500.00	\$500.00
6/25/23	Cord Thomas	Download and extract claims files for re-processing	0.5	\$500.00	\$250.00
6/26/23	Cord Thomas	Reengineer and reprocess the Part 1 section of the claim questionnaires.	1.2	\$500.00	\$600.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
June 2023**

6/26/23	Cord Thomas	Provide Ebener and Totten summary information on PIQ response rates and data on responses.	0.4	\$500.00	\$200.00
6/26/23	Cord Thomas	Download and extract claims files for re-processing	0.7	\$500.00	\$350.00
6/26/23	Cord Thomas	Generate script to upload all claims files to file management system	1.5	\$500.00	\$750.00
6/27/23	Cord Thomas	Check in on script to ensure working to upload claims files	0.2	\$500.00	\$100.00
6/29/23	Cord Thomas	Meet with Ebener, Sackett, RC and Verus to kick off data gathering efforts.	0.7	\$500.00	\$350.00
6/29/23	Cord Thomas	Collect and prepare summary statistics for the claim information in preparation for meeting with Verus & RC	0.3	\$500.00	\$150.00
6/29/23	Andrew Sackett	Call re PIQ processing with Wright, Smith, Thomas, Ebener, and Verus personnel	0.7	\$700.00	\$490.00
6/29/23	Patricia Ebener	Participate in PIQ processing operations call with Verus and LAS	0.8	\$550.00	\$440.00
6/30/23	Mark Totten	Share PIQ crosswalk with Thomas & Ebener. Share debtors database & claimant crosswalk with same.	0.6	\$525.00	\$315.00
6/30/23	Cord Thomas	Discuss strategy with Ebener, Sackett and Totten about Verus priorities for claim document review	0.9	\$500.00	\$450.00
Totals For Data Gathering & Processing			22.3		\$11,347.50
Fee request preparation					
6/26/23	Andrew Sackett	Prep of monthly bills	0.2	\$700.00	\$140.00
Totals For Fee request preparation			0.2		\$140.00
Project management					
6/16/23	Andrew Sackett	Call with Thomas, Ebener, Totten, & Verus about Aldrich PIQ & closed claim process.	0.8	\$700.00	\$560.00
6/16/23	Mark Totten	Join call with Thomas, Ebener, Sackett, & Verus about Aldrich PIQ & closed claim process.	0.8	\$525.00	\$420.00
6/16/23	Cord Thomas	Meet with Verus, Ebener, Sackett and Totten to review status of claims files and the data we need to collect	0.7	\$500.00	\$350.00
6/16/23	Patricia Ebener	Prepare for call with Verus	0.3	\$550.00	\$165.00
6/16/23	Patricia Ebener	Discuss PIQ processing on Zoom conference call with Verus	0.7	\$550.00	\$385.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
June 2023**

6/29/23	Andrew Sackett	Prep and review of emails to and from Ebener, Thomas, Totten re: call re case status	0.1	\$700.00	\$70.00
6/29/23	Andrew Sackett	Review of email from Thomas re: PIQs	0.2	\$700.00	\$140.00
6/30/23	Andrew Sackett	Call with Totten, Thomas, Ebener re: PIQs	0.9	\$700.00	\$630.00
6/30/23	Mark Totten	Talk with Ebener, Thomas, & Sackett about Aldrich PIQ process & division of work.	0.9	\$525.00	\$472.50
Totals For Project management			5.4		\$3,192.50
Grand Total			40.0		\$22,847.50

SCHEDULE A-2

LEGAL ANALYSIS SYSTEMS, INC.

Mark A. Peterson
970 Calle Arroyo
Thousand Oaks, CA 91360
TEL: (805) 208-8595
mark.peterson.las@gmail.com

October 12, 2023

VIA EMAIL TO DEBTOR & NOTICE PARTIES IDENTIFIED BY COURT ORDER

Re: LAS Monthly Fee Statement (June 2023)
In re Aldrich Pump LLC, et al., No. 20-30608 (Bankr. W.D.N.C.)

Dear Counsel and Ms. Abel:

Pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 171], I am enclosing the monthly statement for Legal Analysis Systems, Inc.'s fees and expenses for July 1, 2023, through June 31, 2023.

For that period, Legal Analysis Systems' fees are **\$15,862.50**, and it had no expenses. Subject to and without waiver of such rights, Legal Analysis Systems requests that Debtors pay 90% of these total fees for a total now due and owing of \$ **\$14,276.25**.

Very truly yours,

/s/ Mark A. Peterson
Mark A. Peterson

Enclosures

cc: Allan Tananbaum (atananbaum@tranetechnologies.com)
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Shelley K. Abel, Esq. (feeapplications@ncwba.uscourts.gov)

In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
July 2023

Monthly Fee Statement, *In re Aldrich Pump LLC*, No. 20-30608 (Bankr. W.D.N.C.)

For professional services rendered by Legal Analysis Systems, Inc.
July 1, 2023, through July 31, 2023.

Total fees: **\$15,862.50**

Total expenses: \$0.00

Summary of fees by professional

Professional	Hours	Rate	Amount
Dertouzos, James	0.0	\$760	\$0.00
Ebener, Patricia	4.9	\$550	\$2,695.00
Peterson, Mark	0.0	\$1,085	\$0.00
Relles, Daniel	0.0	\$760	\$0.00
Rourke, Daniel	1.7	\$675	\$1,147.50
Sackett, Andrew	6.2	\$700	\$4,340.00
Thomas, Cord	9.9	\$500	\$4,950.00
Totten, Mark	5.2	\$525	\$2,730.00
Total	27.9		\$15,862.50

Summary of fees by task

Task	Hours	Amount
Analysis	2.0	\$1,327.50
Client communications	2.0	\$1,295.00
Data analysis	0.8	\$555.00
Data Gathering & Processing	15.4	\$8,020.00
Fee request preparation	1.7	\$1,190.00
Project management	6.0	\$3,475.00
Research	0.0	\$0.00
Total	27.9	\$15,862.50

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
July 2023**

Date	Professional	Narrative	Time	Rate	Amount
Analysis					
7/13/23	Mark Totten	Read & make first comments on renewed closed claim sampling strategy.	0.2	\$525	\$105.00
7/19/23	Daniel Rourke	Review debtor's "new" proposal for a sample of Aldrich and Murray resolved claims	1.5	\$675	\$1,012.50
7/27/23	Andrew Sackett	Prep and review of emails to and from Totten and Thomas re: PIQs	0.3	\$700	\$210.00
Totals For Analysis			2.0		\$1,327.50
Client communications					
7/13/23	Andrew Sackett	Prep of email to Wright re: document coding	0.2	\$700	\$140.00
7/13/23	Andrew Sackett	Prep and review of emails to and from Ramsey re: sampling	0.2	\$700	\$140.00
7/19/23	Andrew Sackett	Prep and review of emails to and from Ramsey re: sampling protocol	0.2	\$700	\$140.00
7/21/23	Andrew Sackett	Call with counsel re: sampling and related issues	0.6	\$700	\$420.00
7/21/23	Mark Totten	Call with RC regarding sampling	0.6	\$525	\$315.00
7/24/23	Andrew Sackett	Prep of email to Wehner re: estimation question	0.2	\$700	\$140.00
Totals For Client communications			2.0		\$1,295.00
Data analysis					
7/13/23	Andrew Sackett	Prep and review of emails to and from Totten re: sampling	0.2	\$700	\$140.00
7/19/23	Andrew Sackett	Prep and review of emails to and from Totten and Rourke re: sampling protocol	0.2	\$700	\$140.00
7/21/23	Andrew Sackett	Call with Rourke re: sampling	0.2	\$700	\$140.00
7/21/23	Daniel Rourke	Call with Sackett re: sampling	0.2	\$675	\$135.00
Totals For Data analysis			0.8		\$555.00
Data Gathering & Processing					
7/1/23	Cord Thomas	Prepare template and start to populate Part 1 information for entire claim population.	1.0	\$500	\$500.00
7/1/23	Andrew Sackett	Review of emails from Totten and Thomas re database files	0.2	\$700	\$140.00
7/1/23	Cord Thomas	Begin processing debtor database into system	1.2	\$500	\$600.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
July 2023**

7/2/23	Cord Thomas	Manually extract Part 1 information from injury questionnaires that could not be extracted by code.	0.7	\$500	\$350.00
7/3/23	Cord Thomas	Manually extract Part 1 information from injury questionnaires that could not be extracted by code.	2.0	\$500	\$1,000.00
7/13/23	Patricia Ebener	Participate in Teams Conference call to discuss PIQ operations with Verus, LAS and RC.	0.5	\$550	\$275.00
7/13/23	Cord Thomas	Review document categories with Sackett for possible release from work product status	0.2	\$500	\$100.00
7/13/23	Andrew Sackett	Prep and review of emails to and from Totten, Thomas, Ebener re: document coding	0.2	\$700	\$140.00
7/14/23	Cord Thomas	Establish secure data sharing facility for Verus' access to claims files.	1.7	\$500	\$850.00
7/14/23	Mark Totten	Download/verify/upload Donlin archives in advance of Verus access.	0.2	\$525	\$105.00
7/14/23	Patricia Ebener	Review and revise document type codes for Verus	0.5	\$550	\$275.00
7/17/23	Mark Totten	Download/verify/upload latest submission archive for 1 submission	0.1	\$525	\$52.50
7/17/23	Cord Thomas	Review and refine security for data sharing platform.	0.4	\$500	\$200.00
7/17/23	Patricia Ebener	Update document code list for Verus	0.3	\$550	\$165.00
7/18/23	Patricia Ebener	Prepare and send email to Gasson with document code list.	0.4	\$550	\$220.00
7/19/23	Cord Thomas	Exchange with Verus to ensure they have access to claims files.	0.2	\$500	\$100.00
7/19/23	Patricia Ebener	Review and reply to email from Thomas regarding PIQ processing	0.4	\$550	\$220.00
7/20/23	Patricia Ebener	Participate in weekly PIQ operations call with Verus and RC	1.0	\$550	\$550.00
7/20/23	Patricia Ebener	Prepare, sign and email protective order to RC.	0.2	\$550	\$110.00
7/20/23	Cord Thomas	Meeting with Ebener, Totten and Verus to discuss PIQ and claims files processing priorities and procedures	0.5	\$500	\$250.00
7/20/23	Cord Thomas	Review claims submissions for claimants with numerous submissions for Ebener.	0.3	\$500	\$150.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
July 2023**

7/21/23	Cord Thomas	Review data sharing, methods, priorities and technical approaches to claims files processing with Totten and Verus.	0.8	\$500	\$400.00
7/21/23	Patricia Ebener	Participate in Teams conference call with LAS to plan Aldrich PIQ operations	0.2	\$550	\$110.00
7/24/23	Mark Totten	Download Aldrich/Paddock matched claims & share with LAS team.	0.3	\$525	\$157.50
7/27/23	Cord Thomas	Explore how to scan and extract information about withdrawn claims from the court docket system.	0.5	\$500	\$250.00
7/27/23	Patricia Ebener	Review emails in Thomas and Totten exchange related to PIQ counts and status of claims.	0.3	\$550	\$165.00
7/27/23	Mark Totten	Look at the withdrawals of claims, PIQ responses, & earlier estimates of pending claims.	0.8	\$525	\$420.00
7/27/23	Patricia Ebener	Review email from Leineek containing meeting notes and respond regarding schedule.	0.3	\$550	\$165.00
Totals For Data Gathering & Processing			15.4		\$8,020.00

Fee request preparation

7/6/23	Andrew Sackett	Prep of monthly fee applications	0.2	\$700	\$140.00
7/7/23	Andrew Sackett	Prep of monthly fee applications	0.6	\$700	\$420.00
7/10/23	Andrew Sackett	Prep of monthly fee statements	0.2	\$700	\$140.00
7/10/23	Andrew Sackett	Prep of email to counsel re: monthly fee statements	0.1	\$700	\$70.00
7/10/23	Andrew Sackett	Prep of interim fee application	0.1	\$700	\$70.00
7/31/23	Andrew Sackett	Prep of monthly bills	0.5	\$700	\$350.00
Totals For Fee request preparation			1.7		\$1,190.00

Project management

7/10/23	Andrew Sackett	Review of emails from Smith and Eveland re meeting schedule and access to PIQ portal	0.2	\$700	\$140.00
7/13/23	Mark Totten	Join call with Ebener, Thomas, RC, & Verus about data access & outline of data processing steps.	0.5	\$525	\$262.50

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
July 2023**

7/13/23	Patricia Ebener	Prepare and email meeting notes regarding scope of work to Sackett	0.3	\$550	\$165.00
7/14/23	Andrew Sackett	Prep and review of emails to and from Ebener re: Verus scope of work	0.2	\$700	\$140.00
7/14/23	Patricia Ebener	Review and resend statement of work task to Sackett	0.3	\$550	\$165.00
7/19/23	Andrew Sackett	Prep and review of emails to and from Thomas re Verus access to PIQ data	0.2	\$700	\$140.00
7/20/23	Mark Totten	Join call with Ebener, Thomas, & Verus about document processing.	1.0	\$525	\$525.00
7/20/23	Andrew Sackett	Prep and review of emails to and from Smith and Merkey re: confidentiality orders	0.2	\$700	\$140.00
7/20/23	Andrew Sackett	Prep and review of emails to and from Totten and Thomas re: Paddock data	0.2	\$700	\$140.00
7/20/23	Andrew Sackett	Prep and review of emails to and from Ebener and Thomas re: call with Verus re PIQs	0.2	\$700	\$140.00
7/21/23	Cord Thomas	Meet with Ebener, Sackett, and Totten to review Aldrich priorities and timelines.	0.2	\$500	\$100.00
7/21/23	Andrew Sackett	Call with Ebener, Thomas, Totten re: case status	0.2	\$700	\$140.00
7/21/23	Mark Totten	Join call with Thomas and Verus to review data sharing, methods, priorities, and technical approaches to claims files processing.	0.8	\$525	\$420.00
7/21/23	Mark Totten	Join call with Thomas, Ebener, & Sackett about PIQ processing.	0.2	\$525	\$105.00
7/27/23	Mark Totten	Join call with Verus & RC about PIQ ramp up.	0.3	\$525	\$157.50
7/28/23	Cord Thomas	Meeting with Ebener, Sackett and Totten to review status and priorities.	0.2	\$500	\$100.00
7/28/23	Patricia Ebener	Participate in LAS Teams conference call to discuss PIQ processing	0.2	\$550	\$110.00
7/28/23	Andrew Sackett	Prep and review of emails to and from LAS and Verus personnel re weekly calls	0.2	\$700	\$140.00
7/28/23	Mark Totten	Join call with Thomas, Ebener, & Sackett to discuss PIQ processing.	0.2	\$525	\$105.00
7/28/23	Andrew Sackett	Call with Totten, Thomas, Ebener re: PIQs	0.2	\$700	\$140.00
Totals For Project management			6.0		\$3,475.00
Grand Total			27.9		\$15,862.50

SCHEDULE A-3

LEGAL ANALYSIS SYSTEMS, INC.

Mark A. Peterson
970 Calle Arroyo
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TEL: (805) 208-8595
mark.peterson.las@gmail.com

October 12, 2023

VIA EMAIL TO DEBTOR & NOTICE PARTIES IDENTIFIED BY COURT ORDER

Re: LAS Monthly Fee Statement (June 2023)
In re Aldrich Pump LLC, et al., No. 20-30608 (Bankr. W.D.N.C.)

Dear Counsel and Ms. Abel:

Pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 171], I am enclosing the monthly statement for Legal Analysis Systems, Inc.'s fees and expenses for August 1, 2023, through August 31, 2023.

For that period, Legal Analysis Systems' fees are **\$34,895.00**, and it had no expenses. Subject to and without waiver of such rights, Legal Analysis Systems requests that Debtors pay 90% of these total fees for a total now due and owing of **\$31,405.50**.

Very truly yours,

/s/ Mark A. Peterson
Mark A. Peterson

Enclosures

cc: Allan Tananbaum (atananbaum@tranetechnologies.com)
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In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
August 2023

Monthly Fee Statement, *In re Aldrich Pump LLC*, No. 20-30608 (Bankr. W.D.N.C.)

For professional services rendered by Legal Analysis Systems, Inc.
August 1, 2023, through August 31, 2023.

Total fees: **\$34,895.00**

Total expenses: \$0.00

Summary of fees by professional

Professional	Hours	Rate	Amount
Dertouzos, James		\$760	\$0.00
Ebener, Patricia	19.6	\$550	\$10,780.00
Peterson, Mark		\$1,085	\$0.00
Relles, Daniel		\$760	\$0.00
Rourke, Daniel	10.2	\$675	\$6,885.00
Sackett, Andrew	7.1	\$700	\$4,970.00
Thomas, Cord	13.6	\$500	\$6,800.00
Totten, Mark	10.4	\$525	\$5,460.00
Total	60.9		\$34,895.00

Summary of fees by task

Task	Hours	Amount
Analysis	0.0	\$0.00
Client communications	2.5	\$1,697.50
Data analysis	11.5	\$6,765.00
Data Gathering & Processing	40.4	\$22,490.00
Fee request preparation	0.2	\$140.00
Project management	5.1	\$2,962.50
Research	1.2	\$840.00
Total	60.9	\$34,895.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
August 2023**

Date	Professional	Narrative	Time	Rate	Amount
Client communications					
08/01/2023	Andrew Sackett	Prep of email to Wehner and Guerrero re: monthly fee applications	0.2	\$700	\$140.00
08/01/2023	Andrew Sackett	Call with counsel re: forecast	1.0	\$700	\$700.00
08/03/2023	Andrew Sackett	Review of email from Wright re: settlement history	0.2	\$700	\$140.00
08/04/2023	Andrew Sackett	Prep and review of emails to and from Totten and Rourke re: settlement history	0.2	\$700	\$140.00
08/04/2023	Andrew Sackett	Prep and review of emails to and from Ramsey and Wright re: claims history	0.2	\$700	\$140.00
08/07/2023	Andrew Sackett	Prep of email to Ramsey re: claims history spreadsheets	0.2	\$700	\$140.00
08/15/2023	Mark Totten	Email with Annecca Smith at RC re data matching	0.3	\$525	\$157.50
08/15/2023	Andrew Sackett	Review of emails from Totten and Smith re: data analysis	0.2	\$700	\$140.00
Totals For Client communications			2.5		\$1,697.50
Data analysis					
08/04/2023	Mark Totten	Find cases in settlement history at request of counsel	1.9	\$525	\$997.50
08/04/2023	Daniel Rourke	Prepare meso settlement history table	3.8	\$675	\$2,565.00
08/04/2023	Andrew Sackett	Prep and review of emails to and from Totten re: claims history	0.2	\$700	\$140.00
08/04/2023	Andrew Sackett	Review and analysis of claims history tables	0.5	\$700	\$350.00
08/07/2023	Andrew Sackett	Review claims history spreadsheets	0.2	\$700	\$140.00
08/14/2023	Mark Totten	Examine debtor's database for duplicate PIQs	4.3	\$525	\$2,257.50
08/24/2023	Mark Totten	Define logical ranges for Verus.	0.6	\$525	\$315.00
Totals For Data analysis			11.5		\$6,765.00
Data Gathering & Processing					
08/01/2023	Patricia Ebener	Research document file names for coding	1.6	\$550	\$880.00
08/03/2023	Andrew Sackett	Prep and review of emails to and from Totten re: database access	0.2	\$700	\$140.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
August 2023**

08/07/2023	Patricia Ebener	Participate in weekly PIQ processing conference call with Verus	0.7	\$550	\$385.00
08/07/2023	Daniel Rourke	Prepare spreadsheet with data on closed mesos	6.4	\$675	\$4,320.00
08/07/2023	Mark Totten	Get latest PIQ updates from Donlin & share with LAS & Verus	0.2	\$525	\$105.00
08/10/2023	Patricia Ebener	Prepare for meeting with Verus to discuss user interface.	0.4	\$550	\$220.00
08/10/2023	Patricia Ebener	Participate in Zoom conference call with Verus to discuss PIQ data user interface requirements	0.9	\$550	\$495.00
08/13/2023	Patricia Ebener	Review file of possible duplicate PIQs	0.3	\$550	\$165.00
08/13/2023	Patricia Ebener	Prepare file of possible duplicates for Totten to check in master file	0.4	\$550	\$220.00
08/14/2023	Mark Totten	Download/upload latest Donlin archive for LAS & Verus.	0.2	\$525	\$105.00
08/14/2023	Patricia Ebener	Participate in weekly conference call with Verus to discuss PIQ processing	0.4	\$550	\$220.00
08/14/2023	Andrew Sackett	Prep and review of emails to and from Ebener re: case background and debtor history	0.5	\$700	\$350.00
08/14/2023	Patricia Ebener	Email Sackett, Totten, and Thomas regarding file transfers.	0.2	\$550	\$110.00
08/14/2023	Patricia Ebener	Email Thomas and Totten regarding document type coding	0.3	\$550	\$165.00
08/14/2023	Patricia Ebener	Email Totten regarding PIQ duplicates	0.3	\$550	\$165.00
08/14/2023	Patricia Ebener	Email Totten regarding protocol for processing PIQs	0.3	\$550	\$165.00
08/14/2023	Patricia Ebener	Exchange emails with Sackett regarding litigation history	0.4	\$550	\$220.00
08/15/2023	Patricia Ebener	Discuss PIQ document type coding with Totten and Thomas on Teams call	1.0	\$550	\$550.00
08/15/2023	Cord Thomas	Provide Ebener with code snippet and file list to facilitate identifying document names for LAS coding.	0.2	\$500	\$100.00
08/15/2023	Cord Thomas	Meet with Ebener and Totten to discuss strategy for coding pending claims documents.	1.0	\$500	\$500.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
August 2023**

08/17/2023	Cord Thomas	Further distribute document text extraction for model development.	1.2	\$500	\$600.00
08/20/2023	Cord Thomas	Train model for claims document classification.	2.5	\$500	\$1,250.00
08/21/2023	Patricia Ebener	Participated in weekly conference call with Verus to discuss PIQ processing	0.8	\$550	\$440.00
08/21/2023	Cord Thomas	Continue OCR of all claims documents for model fitting.	0.7	\$500	\$350.00
08/22/2023	Cord Thomas	Train model for claims document classification.	1.1	\$500	\$550.00
08/23/2023	Patricia Ebener	Preparation for PIQ processing requirements conference call	1.2	\$550	\$660.00
08/23/2023	Cord Thomas	Train model for claims document classification.	1.4	\$500	\$700.00
08/23/2023	Cord Thomas	Continue OCR of all claims documents for model fitting.	0.5	\$500	\$250.00
08/24/2023	Cord Thomas	Train model for claims document classification.	1.5	\$500	\$750.00
08/25/2023	Patricia Ebener	Discuss PIQ processing and data coding with LAS on weekly operations Teams conference call.	0.4	\$550	\$220.00
08/25/2023	Cord Thomas	Summarize differences in plaintiff firm name standards.	0.2	\$500	\$100.00
08/26/2023	Patricia Ebener	Search document archive for files	0.3	\$550	\$165.00
08/26/2023	Patricia Ebener	Email Totten and Thomas regarding file search resource	0.2	\$550	\$110.00
08/26/2023	Patricia Ebener	Locate various document types for data processors	0.5	\$550	\$275.00
08/27/2023	Patricia Ebener	Research PIQ file names for document type coding	1.4	\$550	\$770.00
08/28/2023	Patricia Ebener	Confer via conference call with Verus regarding PIQ processing	1.1	\$550	\$605.00
08/28/2023	Patricia Ebener	Email Verus with document type crosswalk for PIQ	0.3	\$550	\$165.00
08/28/2023	Mark Totten	Download & share Donlin archive data. Explore if "new", non-amended PIQs are actually new.	0.4	\$525	\$210.00
08/28/2023	Patricia Ebener	Prepare and email document type coding specs to Thomas	1.0	\$550	\$550.00
08/28/2023	Patricia Ebener	Edit coding logic for training specs for Verus	1.0	\$550	\$550.00
08/29/2023	Andrew Sackett	Prep and review of emails to and from Ebener re: trust list for PIQ analysis	0.2	\$700	\$140.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
August 2023**

08/29/2023	Cord Thomas	Extract equipment, occupation, and activity from PIQ for standardized tables	0.7	\$500	\$350.00
08/29/2023	Cord Thomas	Update LAS coding algorithm to accommodate new requirements from Ebener	1.3	\$500	\$650.00
08/29/2023	Cord Thomas	Describe and summarize algorithm issues to Ebener and Totten	0.3	\$500	\$150.00
08/31/2023	Patricia Ebener	Review and reply to email from Thomas regarding specs for document coding	0.7	\$550	\$385.00
08/31/2023	Cord Thomas	Review and respond to Ebener's updated LAS document coding logic.	0.3	\$500	\$150.00
08/31/2023	Patricia Ebener	Review documents and revise specs for document coding script	3.3	\$550	\$1,815.00
Totals For Data Gathering & Processing			40.4		\$22,490.00
Fee request preparation					
08/02/2023	Andrew Sackett	Finalize and distribute monthly fee application	0.2	\$700	\$140.00
Totals For Fee request preparation			0.2		\$140.00
Project management					
08/02/2023	Andrew Sackett	Prep and review of emails to and from Wehner re: editing bills for privilege issues	0.2	\$700	\$140.00
08/04/2023	Andrew Sackett	Prep of email to Rourke re: settlement history research	0.2	\$700	\$140.00
08/07/2023	Mark Totten	Join call with Ebener, RC, & Verus about PIQ processing	0.7	\$525	\$367.50
08/14/2023	Patricia Ebener	Email meeting notes to Totten and Thomas	0.2	\$550	\$110.00
08/15/2023	Mark Totten	Meet with Ebener and Thomas to discuss strategy for coding pending claims documents.	1.0	\$525	\$525.00
08/15/2023	Andrew Sackett	Prep and review of emails to and from Ebener re: case background and review of closed claims	0.2	\$700	\$140.00
08/21/2023	Mark Totten	Join call with RC & Verus about PIQ & document processing	0.8	\$525	\$420.00
08/21/2023	Andrew Sackett	Review of emails from Leiton, Totten and Thomas re PIQ processing	0.2	\$700	\$140.00
08/22/2023	Andrew Sackett	Review of email from Leineek re PIQ timeline and prep of email to Leineek re same	0.2	\$700	\$140.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
August 2023**

08/25/2023	Andrew Sackett	Meeting w/ Totten, Ebener, Thomas re: PIQ processing and related issues	0.7	\$700	\$490.00
08/25/2023	Cord Thomas	Meeting w/ Totten, Ebener, Sackett re: PIQ processing and related issues	0.7	\$500	\$350.00
Totals For Project management			5.1		\$2,962.50
<hr/> Research					
08/29/2023	Andrew Sackett	Research existing asbestos trusts	1.2	\$700	\$840.00
Totals For Research			1.2		\$840.00
Grand Total			60.9		\$34,895.00

SCHEDULE A-4

LEGAL ANALYSIS SYSTEMS, INC.

Mark A. Peterson
970 Calle Arroyo
Thousand Oaks, CA 91360
TEL: (805) 208-8595
mark.peterson.las@gmail.com

November 17, 2023

VIA EMAIL TO DEBTOR & NOTICE PARTIES IDENTIFIED BY COURT ORDER

Re: LAS Monthly Fee Statement (September 2023)
In re Aldrich Pump LLC, et al., No. 20-30608 (Bankr. W.D.N.C.)

Dear Counsel and Ms. Abel:

Pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 171], I am enclosing the monthly statement for Legal Analysis Systems, Inc.'s fees and expenses for September 1, 2023, through September 30, 2023.

For that period, Legal Analysis Systems' fees are **\$51,180.00**, and it had no expenses. Subject to and without waiver of such rights, Legal Analysis Systems requests that Debtors pay 90% of these total fees for a total now due and owing of **\$46,062.00**.

Very truly yours,

/s/ Mark A. Peterson
Mark A. Peterson

Enclosures

cc: Allan Tananbaum (atananbaum@tranetechnologies.com)
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**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
September 2023**

Monthly Fee Statement, *In re Aldrich Pump LLC*, No. 20-30608 (Bankr. W.D.N.C.)

For professional services rendered by Legal Analysis Systems, Inc.
September 1, 2023, through September 30, 2023.

Total fees: **\$51,180.00**

Total expenses: \$0.00

Summary of fees by professional

Professional	Hours	Rate	Amount
Dertouzos, James		\$760	\$0.00
Ebener, Patricia	49.0	\$550	\$26,950.00
Peterson, Mark		\$1,085	\$0.00
Relles, Daniel		\$760	\$0.00
Rourke, Daniel		\$675	\$0.00
Sackett, Andrew	2.4	\$700	\$1,680.00
Thomas, Cord	43.0	\$500	\$21,500.00
Totten, Mark	2.0	\$525	\$1,050.00
Total	96.4		\$51,180.00

Summary of fees by task

Task	Hours	Amount
Analysis		
Client communications	0.5	\$350.00
Data analysis		
Data Gathering & Processing	91.1	\$48,040.00
Fee request preparation	1.0	\$700.00
Project management	3.8	\$2,090.00
Research		
Total	96.4	\$51,180.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
September 2023**

Date	Professional	Narrative	Time	Rate	Amount
Client communications					
9/22/23	Andrew Sackett	Prep and review of emails to and from Smith re fee apps	0.2	\$700	\$140.00
9/28/23	Andrew Sackett	Prep of email to Wehner re: monthly fee apps	0.1	\$700	\$70.00
9/29/23	Andrew Sackett	Prep and review of emails to and from Wehner re: monthly fee apps	0.2	\$700	\$140.00
Totals For Client communications			0.5		\$350.00
Data Gathering & Processing					
9/1/23	Patricia Ebener	Exchange email with Thomas regarding document coding	0.3	\$550	\$165.00
9/1/23	Patricia Ebener	Review and comment on preliminary document coding output	1.3	\$550	\$715.00
9/1/23	Cord Thomas	Summarize a collection of clarifying questions about document coding to Ebener	0.3	\$500	\$150.00
9/1/23	Cord Thomas	Run script to determine LAS code for all claims documents	0.5	\$500	\$250.00
9/1/23	Cord Thomas	Update claims document coding logic to incorporate Ebener's logic.	1.7	\$500	\$850.00
9/1/23	Cord Thomas	Adjust script to better handle some edge cases and rerun.	0.7	\$500	\$350.00
9/1/23	Cord Thomas	Export results of first LAS coding of claims files, summarize and share with Ebener..	0.5	\$500	\$250.00
9/2/23	Patricia Ebener	Continue to review preliminary document type coding output.	1.7	\$550	\$935.00
9/2/23	Patricia Ebener	Review and comment on document coding logic	0.3	\$550	\$165.00
9/2/23	Patricia Ebener	Email Thomas regarding his questions and next steps in document type coding	0.2	\$550	\$110.00
9/5/23	Mark Totten	Download archive files & share within LAS & for Verus. Examine those that don't appear to be amended.	0.5	\$525	\$262.50
9/5/23	Cord Thomas	Review state of text extraction and confirm continued operation	0.4	\$500	\$200.00
9/6/23	Patricia Ebener	Review document coding output from Thomas	1.3	\$550	\$715.00
9/7/23	Patricia Ebener	Review and reply to email from Thomas regarding coding specs	0.3	\$550	\$165.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
September 2023**

9/8/23	Cord Thomas	Reviewed comments from Ebener and incorporated updates to LAS claim file coding.	0.7	\$500	\$350.00
9/8/23	Cord Thomas	Completed first phase of claims file processing and exported results for review.	1.2	\$500	\$600.00
9/8/23	Cord Thomas	Shared results of complete LAS coding with Ebener with additional clarifying questions.	0.4	\$500	\$200.00
9/10/23	Cord Thomas	Review updates on document coding logic and implement into code.	1.2	\$500	\$600.00
9/10/23	Cord Thomas	Summarize remaining undetermined coding logic to Ebener	0.3	\$500	\$150.00
9/11/23	Cord Thomas	Meeting with Ebener and Verus and RC on status of document coding and PIQs	0.5	\$500	\$250.00
9/11/23	Patricia Ebener	Exchange emails with Leineek and DeGeronimo at Verus regarding document review	0.4	\$550	\$220.00
9/11/23	Patricia Ebener	Participate in Verus conference call to discuss PIQ processing	0.7	\$550	\$385.00
9/11/23	Mark Totten	Download & share the Donlin archive	0.2	\$525	\$105.00
9/11/23	Patricia Ebener	Review document coding output	1.0	\$550	\$550.00
9/11/23	Patricia Ebener	Discuss document type coding with Thomas on conference call	0.8	\$550	\$440.00
9/11/23	Cord Thomas	Update coding logic and rerun document codes	1.5	\$500	\$750.00
9/11/23	Cord Thomas	Review document coding logic with Ebener	0.8	\$500	\$400.00
9/12/23	Patricia Ebener	Revise coding for 0 code PIQ documents	2.8	\$550	\$1,540.00
9/12/23	Andrew Sackett	Prep and review of emails to and from Ebener re data processings (PIQs)	0.2	\$700	\$140.00
9/12/23	Cord Thomas	Perform review / QA of text extraction of claims files.	0.5	\$500	\$250.00
9/12/23	Cord Thomas	Update text extraction from claims files with strange file name characters	0.7	\$500	\$350.00
9/12/23	Cord Thomas	Send Ebener clarifying question on remaining uncertainty on coding.	0.2	\$500	\$100.00
9/12/23	Cord Thomas	Continue to incorporate updates from Ebener's 9/8 coding logic updates.	0.9	\$500	\$450.00
9/12/23	Patricia Ebener	Review and revise document codes output from Thomas	3.3	\$550	\$1,815.00
9/13/23	Patricia Ebener	Review and revise document type coding output	3.7	\$550	\$2,035.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
September 2023**

9/13/23	Patricia Ebener	Discuss document coding with Verus on Zoom conference call	0.7	\$550	\$385.00
9/13/23	Patricia Ebener	Prepare document file for Verus	3.0	\$550	\$1,650.00
9/13/23	Patricia Ebener	Exchange emails with Thomas regarding document coding	0.4	\$550	\$220.00
9/14/23	Patricia Ebener	Develop and share coding specs with Verus	0.9	\$550	\$495.00
9/14/23	Patricia Ebener	Prep for call with Verus to discuss document type coding	0.4	\$550	\$220.00
9/14/23	Patricia Ebener	Brief Verus supervisory staff on document coding	0.9	\$550	\$495.00
9/14/23	Patricia Ebener	Exchange email with Thomas regarding document ID anomalies	0.3	\$550	\$165.00
9/14/23	Patricia Ebener	Review email from Thomas regarding document coding status	0.2	\$550	\$110.00
9/14/23	Cord Thomas	Work on scaling up text processing infrastructure	2.1	\$500	\$1,050.00
9/14/23	Cord Thomas	Run another LAS document coding round, review and share with Ebener.	0.7	\$500	\$350.00
9/14/23	Cord Thomas	Continue editing document coding logic based on updated specifications from Ebener.	1.3	\$500	\$650.00
9/14/23	Patricia Ebener	Review revised output from Thomas and comment	1.6	\$550	\$880.00
9/14/23	Patricia Ebener	Revise document type code list specs for Verus and email.	0.3	\$550	\$165.00
9/14/23	Patricia Ebener	Email changes for specs and summary of comments in document type output.	0.3	\$550	\$165.00
9/14/23	Patricia Ebener	Review medical document coding output for trust documents and other documents	1.3	\$550	\$715.00
9/15/23	Patricia Ebener	Review output from Thomas with predicted codes for documents	2.7	\$550	\$1,485.00
9/15/23	Patricia Ebener	Participate in Zoom conference call with Verus to train document coding trainers and QC supervisor	0.9	\$550	\$495.00
9/15/23	Patricia Ebener	Confer with Thomas by phone regarding revised coding for trusts	0.2	\$550	\$110.00
9/15/23	Cord Thomas	Review Ebener specification updates for document coding and incorporate into processing script	0.6	\$500	\$300.00
9/15/23	Cord Thomas	Complete review of and reprocessing failed text extracts for claims documents	1.7	\$500	\$850.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
September 2023**

9/16/23	Cord Thomas	Research modeling alternatives to produce better claims files analysis	2.5	\$500	\$1,250.00
9/17/23	Patricia Ebener	Exchange emails with Thomas regarding changes in coding document type	0.3	\$550	\$165.00
9/17/23	Patricia Ebener	Email Thomas regarding schedule for next round of document coding output	0.2	\$550	\$110.00
9/18/23	Patricia Ebener	Participate in weekly PIQ processing Zoom call with Verus	0.9	\$550	\$495.00
9/18/23	Cord Thomas	Clean up main LAS coding specifications document to share with Ebener	0.8	\$500	\$400.00
9/18/23	Cord Thomas	Extract trust abbreviations / alternative spellings from claims file names and store for processing.	1.5	\$500	\$750.00
9/18/23	Cord Thomas	Update LAS coding logic to address PIQ and PIQ-related priority document coding.	1.3	\$500	\$650.00
9/18/23	Patricia Ebener	review and reply to email from Thomas re Trust names	0.4	\$550	\$220.00
9/19/23	Cord Thomas	Continue to clean up main LAS coding specifications document to share with Ebener	0.7	\$500	\$350.00
9/19/23	Cord Thomas	Update code and rerun LAS coding on claims documents.	0.5	\$500	\$250.00
9/19/23	Cord Thomas	Review results of coding and share with Ebener.	0.5	\$500	\$250.00
9/20/23	Patricia Ebener	Review coding output for PIQ related documents	1.1	\$550	\$605.00
9/20/23	Patricia Ebener	Review and comment on Verus document coding crosswalk	0.4	\$550	\$220.00
9/20/23	Patricia Ebener	Exchange emails with Thomas related to document type coding	0.4	\$550	\$220.00
9/20/23	Patricia Ebener	Review additional document coding updates from Thomas	1.3	\$550	\$715.00
9/20/23	Cord Thomas	Export results for PIQ and PIQ-related documents for Ebener.	0.4	\$500	\$200.00
9/20/23	Cord Thomas	Continue updates to LAS coding logic	1.9	\$500	\$950.00
9/20/23	Cord Thomas	Update specifications document for LAS coding	0.5	\$500	\$250.00
9/21/23	Patricia Ebener	Exchange emails with Thomas regarding document coding	0.4	\$550	\$220.00
9/21/23	Patricia Ebener	Review and reply to Verus email regarding 36 missing documents	0.2	\$550	\$110.00
9/21/23	Patricia Ebener	Locate and research documents cited by Verus	0.9	\$550	\$495.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
September 2023**

9/21/23	Patricia Ebener	Email Thomas regarding documents needed by Verus	0.2	\$550	\$110.00
9/21/23	Cord Thomas	Locate files missing by Verus and record their archive date.	0.3	\$500	\$150.00
9/21/23	Cord Thomas	Revise file name parsing coding logic, verify and get clarifying information from Ebener.	1.1	\$500	\$550.00
9/21/23	Cord Thomas	Revise specifications of claims files LAS Code per Ebener comments on 9.20	1.3	\$500	\$650.00
9/21/23	Patricia Ebener	Check revised coding output for document types	1.7	\$550	\$935.00
9/22/23	Patricia Ebener	Prepare and upload coded documents file for Verus	0.8	\$550	\$440.00
9/22/23	Patricia Ebener	Email Verus and Totten and Thomas regarding PIQ documents file transfer	0.3	\$550	\$165.00
9/22/23	Cord Thomas	Revise file name parsing coding logic, verify and get clarifying information from Ebener.	0.8	\$500	\$400.00
9/23/23	Cord Thomas	Create new LAS code extract and share with Ebener.	0.3	\$500	\$150.00
9/23/23	Cord Thomas	Review additional LAS coding changes per Ebener comments and incorporate into coding.	1.7	\$500	\$850.00
9/23/23	Cord Thomas	Create list of medical professional surnames to identify claims documents as medical-related.	0.6	\$500	\$300.00
9/23/23	Cord Thomas	Create list of medical facility names (e.g., hospitals) to identify claims documents as medical-related.	0.4	\$500	\$200.00
9/23/23	Patricia Ebener	Exchange email with Thomas regarding document coding schedule and updated output	0.2	\$550	\$110.00
9/24/23	Patricia Ebener	Review and update revised coding specs from Thomas	0.6	\$550	\$330.00
9/24/23	Patricia Ebener	Review coded documents and flag rows for updating	2.4	\$550	\$1,320.00
9/24/23	Patricia Ebener	Prepare and send emails to Thomas with summary of comments on updated coding output	0.4	\$550	\$220.00
9/25/23	Mark Totten	Download/summarize/share the Donlin archive.	0.3	\$525	\$157.50
9/25/23	Patricia Ebener	Participate in LAS operations call to discuss Aldrich claims processing at Verus	0.5	\$550	\$275.00
9/25/23	Patricia Ebener	Participate with Verus in weekly PIQ processing call updates	0.2	\$550	\$110.00
9/26/23	Patricia Ebener	Review Verus email regarding document coding and reply to comments and include meeting follow-up.	0.4	\$550	\$220.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
September 2023**

9/26/23	Cord Thomas	Reviewed Ebener's latest comments on LAS code specifications and replied with clarifying questions.	0.3	\$500	\$150.00
9/26/23	Patricia Ebener	Review and rely to Thomas email regarding updates to specs.	0.2	\$550	\$110.00
9/26/23	Patricia Ebener	Review coding specs from Verus.	0.3	\$550	\$165.00
9/27/23	Cord Thomas	Incorporate updates to coding logic and specifications based on Ebener review comments.	1.7	\$500	\$850.00
9/27/23	Cord Thomas	Identify additional abbreviations and alternatives to trust names to support LAS docs coding	0.3	\$500	\$150.00
9/27/23	Cord Thomas	Send Ebener additional questions about coding logic for edge cases.	0.2	\$500	\$100.00
9/27/23	Cord Thomas	Identify additional medical professionals and facilities to support LAS docs coding	0.4	\$500	\$200.00
9/28/23	Patricia Ebener	Review questions from Thomas and reply.	0.5	\$550	\$275.00
9/28/23	Patricia Ebener	Review and revise coding specs.	0.5	\$550	\$275.00
9/28/23	Patricia Ebener	Exchange email with Thomas to schedule meeting	0.2	\$550	\$110.00
9/29/23	Patricia Ebener	Discuss document coding logic on Teams conference call with Thomas	0.4	\$550	\$220.00
9/29/23	Cord Thomas	Meeting with Ebener to review remaining coding logic	0.4	\$500	\$200.00
9/30/23	Cord Thomas	Continue review of Ebener logic for document coding and incorporate into model.	1.4	\$500	\$700.00
9/30/23	Cord Thomas	Provide summary of latest coding to Ebener	0.2	\$500	\$100.00
Totals For Data Gathering & Processing			91.1		\$48,040.00
Fee request preparation					
9/1/23	Andrew Sackett	Collection of data re interim fee apps and prep and review of emails to and from Shaw re: same	0.3	\$700	\$210.00
9/22/23	Andrew Sackett	Revision of monthly fee app	0.2	\$700	\$140.00
9/28/23	Andrew Sackett	Prep of monthly fee apps	0.5	\$700	\$350.00
Totals For Fee request preparation			1.0		\$700.00
Project management					
9/11/23	Patricia Ebener	Prep for weekly call with Verus regarding PIQ processing	0.3	\$550	\$165.00

**In re Aldrich Pump LLC
Legal Analysis Systems, Inc.
September 2023**

9/25/23	Andrew Sackett	Talk with Ebener, Thomas, & Totten re PIQ processing & document tagging.	0.5	\$700	\$350.00
9/25/23	Mark Totten	Talk with Ebener, Thomas, & Sackett about PIQ processing & document tagging.	0.5	\$525	\$262.50
9/25/23	Mark Totten	Join call with Verus about PIQ coding.	0.3	\$525	\$157.50
9/25/23	Cord Thomas	Collect all document inventory, troubleshoot missing records and provide Verus with full inventory.	0.6	\$500	\$300.00
9/25/23	Cord Thomas	Call with Verus about PIQ coding and the document inventory	0.3	\$500	\$150.00
9/25/23	Cord Thomas	Talk with Ebener, Totten, & Sackett about PIQ processing & document tagging.	0.5	\$500	\$250.00
9/29/23	Patricia Ebener	Discuss data processing and security on Teams conference call with LAS	0.2	\$550	\$110.00
9/29/23	Mark Totten	Join LAS meeting re: data processing and security.	0.2	\$525	\$105.00
9/29/23	Cord Thomas	Meeting with Ebener, Sackett and Totten to discuss data processing and security	0.2	\$500	\$100.00
9/29/23	Andrew Sackett	Call with Ebener, Thomas, Totten re: data processing and security	0.2	\$700	\$140.00
Totals For Project management			3.8		\$2,090.00
Grand Total			96.4		\$51,180.00