

**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)

**ELEVENTH INTERIM APPLICATION OF K&L GATES LLP FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
FOR REIMBURSEMENT OF EXPENSES AS
SPECIAL INSURANCE COUNSEL TO THE DEBTORS
FOR THE PERIOD FROM OCTOBER 1, 2023 THROUGH JANUARY 31, 2024**

Name of Applicant:	K&L Gates LLP
Authorized to Provide Professional Services to:	The above-captioned Debtors and Debtors in Possession
Date of Order Approving Retention:	June 19, 2020 (as of the Petition Date), and amended on August 18, 2020
Petition Date:	June 18, 2020
Period for which compensation and reimbursement are sought:	October 1, 2023 through January 31, 2024
Amount of Compensation sought as actual, reasonable and necessary:	\$74,582.55
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$0.00
Total Compensation Approved by Interim Fee Order to Date:	\$3,074,720.84
Total Expenses Approved by Interim Fee Order to Date:	\$6,529.91

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.



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Total Allowed Compensation Paid to Date: \$3,074,720.84

Total Allowed Expenses Paid to Date: \$6,529.91

Compensation Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed: \$34,086.84

Expenses Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed: \$0.00

This is a(n): X interim final application

Prior Monthly Fee Statements Submitted:

Date Submitted	Month Covered	Fees	Expenses
November 30, 2023	Oct. 1 – Oct. 31, 2023	\$18,154.80	\$0.00
January 2, 2024	Nov. 1 – Nov. 30, 2023	\$19,719.45	\$0.00
January 30, 2024	Dec. 1 – Dec. 31, 2023	\$15,246.90	\$0.00
March 1, 2024	Jan. 1 – Jan. 31, 2024	\$21,461.40	\$0.00

To date, K&L Gates LLP has not received any objections to any prior monthly fee statements, provided that the objection deadline relating to the *Forty-Third Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period from January 1, 2024 Through January 31, 2024* has not yet passed.

SUMMARY OF HOURS AND COMPENSATION

Name	Position - Bar Year	Hourly Billing Rate¹	Total Hours Billed	Total Compensation
D. F. McGONIGLE	PARTNER (1988)	\$1,165.00	15.4	\$17,941.00
D. F. McGONIGLE	PARTNER (1988)	\$1,120.00	38.7	\$43,344.00
K. L. STEWART	PARTNER (1986)	\$1,090.00	0.4	\$436.00
J. C. SAFAR	PARTNER (1997)	\$995.00	1.2	\$1,194.00
J. C. SAFAR	PARTNER (1997)	\$955.00	7.7	\$7,353.50
M. WESTBROOK	PARTNER (1996)	\$815.00	0.4	\$326.00
M. WESTBROOK	PARTNER (1996)	\$765.00	2.3	\$1,759.50
D. M. ACETO	OF COUNSEL (1985)	\$850.00	2.8	\$2,380.00
E. STEELE	ASSOCIATE (2014)	\$695.00	1.0	\$695.00
E. STEELE	ASSOCIATE (2014)	\$645.00	4.7	\$3,031.50
K. G. HEGDE	ASSOCIATE (2021)	\$530.00	4.5	\$2,385.00
L. M. MARTINELLI	PARALEGAL	\$395.00	2.2	\$869.00
L. M. MARTINELLI	PARALEGAL	\$385.00	3.0	\$1,155.00
TOTAL			84.3	\$82,869.50
TOTAL w/ 10% DISC				\$74,582.55

¹ K&L Gates LLP increased its billing rates in January 2024. Where professionals billed during the subject time period, both the 2023 and 2024 billable rates are shown.

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
Aldrich Asbestos Insurance Advice	41	\$37,736.55
Aldrich Chapter 11 Retention & Compensation	7.6	\$5,683.95
Murray Asbestos Insurance Advice	31	\$27,655.65
Murray Chapter 11 Retention and Compensation	4.7	\$3,506.40
TOTAL	84.3	\$74,582.55

EXPENSE SUMMARY

Expense Category	Service Provider (if applicable)	Total Expenses
N/A	N/A	N/A
TOTAL		\$0.00

**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)

**ELEVENTH INTERIM APPLICATION OF K&L GATES LLP FOR ALLOWANCE
OF COMPENSATION FOR SERVICES RENDERED AND FOR
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SPECIAL INSURANCE COUNSEL TO THE DEBTORS FOR
THE PERIOD FROM OCTOBER 1, 2023 THROUGH JANUARY 31, 2024**

K&L Gates LLP, special insurance counsel to the above-captioned debtors and debtors in possession (the "Debtors"), makes its eleventh interim application for allowance of compensation of \$74,582.55 and reimbursement of expenses of \$0.00 for the period from October 1, 2023 through January 31, 2024 (the "Compensation Period") in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals*, dated July 15, 2020 [Dkt. 171] (the "Interim Compensation Order").

In support of this Application, K&L Gates LLP respectfully represents as follows:

Overview

1. K&L Gates LLP attorneys and paraprofessionals expended a total of 84.3 hours during the Compensation Period for which compensation is requested.
2. During the Compensation Period, K&L Gates LLP did not receive any payments or promises of payment from any source other than the Debtors for services rendered

¹ 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.

or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. No agreement or understanding exists between K&L Gates LLP or any third person for the sharing of compensation, except as allowed by section 504(b) of the Bankruptcy Code and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") with respect to the sharing of compensation between and among partners of K&L Gates LLP.

3. Pursuant to the Interim Compensation Order, included with this Application is: (a) a schedule identifying all K&L Gates LLP professionals and paraprofessionals who have performed services in these chapter 11 cases during the Compensation Period, the capacities in which each individual is employed by K&L Gates LLP, the hourly billing rate charged by K&L Gates LLP for the services performed by each such individual, the aggregate number of hours expended in this case during the Compensation Period for each professional and paraprofessional, the total fees billed therefor, and the year in which each professional was first licensed to practice law; (b) a summary of services by billing category for services rendered by K&L Gates LLP during the Compensation Period; and (c) a schedule summarizing, by category, the actual and necessary disbursements that K&L Gates LLP incurred during the Compensation Period in connection with the performance of professional services for the Debtors and for which it seeks reimbursement.

4. Attached hereto collectively as part of Exhibit A are K&L Gates LLP's itemized monthly time records for professionals and paraprofessionals performing services for the Debtors during the Compensation Period and K&L Gates LLP's itemized records detailing any expenses incurred on behalf of the Debtors during the Compensation Period.

5. This Application complies with sections 330 and 331 of title 11 of the United States Code (the "Bankruptcy Code"), the Bankruptcy Rules, the Interim

Compensation Order, the *Guidelines for Compensation and Expense Reimbursement of Professionals* issued by this Court (the "Compensation Guidelines"), and the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the "Local Rules").

Background

6. On June 18, 2020 (the "Petition Date"), the Debtors commenced their reorganization cases (the "Chapter 11 Cases") by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. These Chapter 11 Cases have been consolidated for procedural purposes only and are being administered jointly.

7. On June 18, 2020, the Debtors filed the *Ex Parte Application of the Debtors for an Order Authorizing Them to Retain and Employ K&L Gates LLP as Special Insurance Counsel as of the Petition Date* [Dkt. 25] (the "Retention Application"), by which the Debtors sought authority to retain and employ K&L Gates LLP as special insurance counsel in the Chapter 11 Cases. On June 19, 2020, the Court entered an order [Dkt. 75] (the "Original Retention Order") authorizing the retention of K&L Gates LLP as the Debtors' special insurance counsel as of the Petition Date.

8. On July 7, 2020, the Court entered an order [Dkt. 147] appointing the official committee of asbestos personal injury claimants (the "Asbestos Committee") in these Chapter 11 Cases.

9. On July 8, 2020, and August 17, 2020, K&L Gates LLP filed its first and second supplemental declarations, respectively, providing additional disclosures related to its role in representation of the predecessor of one of the Debtors and the pre-petition restructuring involving the Debtors [Dkt. 149 and 256]. In addition, the Debtors and the Asbestos Committee agreed on an amendment to the Original Retention Order to reserve certain rights of the Asbestos

Committee. On August 18, 2020, the Court entered the amended retention order agreed upon by the Debtors and the Asbestos Committee [Dkt. 263] (the "K&L Gates Retention Order"), which superseded the Original Retention Order.

10. On November 9, 2020, K&L Gates LLP filed the *First Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 18, 2020 Through September 30, 2020* [Dkt. 425] (the "First Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 18, 2020 through September 30, 2020, in accordance with the Interim Compensation Order.

11. On November 25, 2020, K&L Gates LLP filed its third supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 440].

12. On December 2, 2020, the Court entered an order [Dkt. 453] (the "First Interim Approval Order") granting the First Interim Application.

13. On March 12, 2021, K&L Gates LLP filed the *Second Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2020 Through January 31, 2021* [Dkt. 623] (the "Second Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2020 through January 31, 2021, in accordance with the Interim Compensation Order.

14. On April 5, 2021, the Court entered an order [Dkt. 664] (the "Second Interim Approval Order") granting the Second Interim Application.

15. On July 9, 2021, K&L Gates LLP filed the *Third Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2021 Through May 31, 2021* [Dkt. 768] (the "Third Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2021 through May 31, 2021, in accordance with the Interim Compensation Order.

16. On July 28, 2021, the Court entered an order [Dkt. 791] (the "Third Interim Approval Order") granting the Third Interim Application.

17. On September 30, 2021, K&L Gates LLP filed its fourth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 836].

18. On November 9, 2021, K&L Gates LLP filed its *Fourth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2021 Through September 30, 2021* [Dkt. 878] (the "Fourth Interim Application"), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2021 through September 30, 2021, in accordance with the Interim Compensation Order.

19. On December 8, 2021, the Court entered an order [Dkt. 933] (the "Fourth Interim Approval Order") granting the Fourth Interim Application.

20. On March 11, 2022, K&L Gates LLP filed its *Fifth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2021 Through January 31, 2022* [Dkt. 1039] (the “Fifth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2021 through January 31, 2022, in accordance with the Interim Compensation Order.

21. On April 6, 2022, the Court entered an order [Dkt. 1110] (the “Fifth Interim Approval Order”) granting the Fifth Interim Application.

22. On May 19, 2022, K&L Gates LLP filed its fifth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1181].

23. On June 22, 2022, K&L Gates LLP filed its sixth supplemental declaration providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1218].

24. On July 11, 2022, K&L Gates LLP filed its *Sixth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2022 Through May 31, 2022* [Dkt. 1267] (the “Sixth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2022 through May 31, 2022, in accordance with the Interim Compensation Order.

25. On July 29, 2022, the Court entered an order [Dkt. 1296] (the “Sixth Interim Approval Order”) granting the Sixth Interim Application.

26. On November 9, 2022, K&L Gates LLP filed its *Seventh Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2022 Through September 30, 2022* [Dkt. 1404] (the “Seventh Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2022 through September 30, 2022, in accordance with the Interim Compensation Order.

27. On December 14, 2022, the Court entered an order [Dkt. 1472] (the “Seventh Interim Approval Order”) granting the Seventh Interim Application.

28. On March 9, 2023, K&L Gates LLP filed its seventh supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1637].

29. On March 13, 2023, K&L Gates LLP filed its *Eighth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from October 1, 2022 Through January 31, 2023* [Dkt. 1644] (the “Eighth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from October 1, 2022 through January 31, 2023, in accordance with the Interim Compensation Order.

30. On March 31, 2023, the Court entered an order [Dkt. 1693] (the “Eighth Interim Approval Order”) granting the Eighth Interim Application.

31. On April 28, 2023, K&L Gates LLP filed its eighth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1727].

32. On July 10, 2023, K&L Gates LLP filed its *Ninth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from February 1, 2023 Through May 31, 2023* [Dkt. 1853] (the “Ninth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from February 1, 2023 through May 31, 2023, in accordance with the Interim Compensation Order.

33. On August 28, 2023, the Court entered an order [Dkt. 1933] (the “Ninth Interim Approval Order”) granting the Ninth Interim Application.

34. On October 10, 2023, K&L Gates LLP filed its ninth supplemental declaration, providing additional disclosures related to its role in representation of potentially interested parties in matters unrelated to the Debtors [Dkt. 1969].

35. On November 9, 2023, K&L Gates LLP filed its *Tenth Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period from June 1, 2023 Through September 30, 2023* [Dkt. 1998] (the “Tenth Interim Application”), by which K&L Gates LLP sought allowance of compensation and reimbursement of expenses for the period from June 1, 2023 through September 30, 2023, in accordance with the Interim Compensation Order.

36. On November 29, 2023, the Court entered an order [Dkt. 2022] (the “Tenth Interim Approval Order”) granting the Tenth Interim Application.

Jurisdiction

37. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for this matter is proper in this district pursuant to 28 U.S.C. § 1409.

Summary of Services

38. The professional services performed by K&L Gates LLP were necessary and appropriate to the administration of the Debtors' Chapter 11 Cases, as described in detail below and in Exhibit A. These services were in the best interests of the Debtors and other parties in interest. The compensation requested is commensurate with the complexity and nature of the issues and tasks involved.

39. All of the services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Debtors, and not on behalf of any other entity.

Prior Monthly Fee Statements

40. Pursuant to the Interim Compensation Order, K&L Gates LLP has submitted the following monthly fee statements (collectively, the "Prior Monthly Fee Statements") to the Debtors for the four months comprising the Compensation Period, each of which is incorporated herein by reference in its entirety:²

Date Submitted	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
November 30, 2023	Oct. 1 – Oct. 31, 2023	\$18,154.80	\$0.00	\$16,339.33	\$1,815.47
January 2, 2024	Nov. 1 – Nov. 30, 2023	\$19,719.45	\$0.00	\$17,747.51	\$1,971.94

² Copies of the Prior Monthly Fee Statements are attached hereto collectively as Exhibit A.

Date Submitted	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
January 30, 2024	Dec. 1 – Dec. 31, 2023	\$15,246.90	\$0.00	N/A	\$15,246.90
March 1, 2024	Jan. 1 – Jan. 31, 2024	\$21,461.40	\$0.00	N/A	\$21,461.40

41. In total, K&L Gates LLP has submitted the Prior Monthly Fee Statements during the Compensation Period for total fees of \$74,582.55 and total expenses of \$0.00. As of the date of this Application, no party has objected to any of K&L Gates LLP's Prior Monthly Fee Statements.³

Compensation by Project Category

The following is a summary of the activities performed by K&L Gates LLP professionals and paraprofessionals during the Compensation Period, organized by project billing category.⁴

42. **Asbestos Insurance Advice (Combined for Both Debtors) — 72 hours — \$65,392.20**

During the Compensation Period, K&L Gates LLP professionals and paraprofessionals counseled and represented the Debtors on insurance coverage issues,

³ The objection deadline relating to the *Forty-Third Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period from January 1, 2024 Through January 31, 2024* has not yet passed.

⁴ The summary set forth below is qualified in its entirety by reference to the time and services detail attached to each Prior Monthly Fee Statement. Project billing categories for which no time was charged during the Compensation Period are not listed below.

particularly in relation to the Debtors' asbestos liabilities. The work performed by K&L Gates LLP included the following activities, among others:

- a) Analyzing and reporting on information relating to the Debtors' historical insurance coverage and related agreements, including working with the Debtors' insurance consultants, and generating work product related thereto;
- b) Assisting the Debtors in addressing requests for insurance-related information from various interested parties in relation to the Chapter 11 Cases;
- c) Reporting to and interacting with the Debtors' insurers in connection with matters relating to the Chapter 11 Cases;
- d) Assisting the Debtors in addressing discovery issues in connection with matters relating to the Chapter 11 Cases;
- e) Participating in strategy and update conferences with the Debtors, general bankruptcy counsel, and special asbestos counsel in relation to the forgoing; and
- f) Attending hearings in connection with the Chapter 11 Cases.

43. Chapter 11 Retention & Compensation (Combined for Both Debtors)

— 12.3 hours — \$9,190.35

During the Compensation Period, K&L Gates LLP professionals and paraprofessionals devoted limited time to (a) reviewing and revising the August 2023, September 2023, October 2023, November 2023 and December 2023 invoices for privilege, to preserve client confidentiality, and to ensure compliance with the Local Rules, (b) drafting, revising and submitting the Thirty Eighth, Thirty Ninth, Fortieth, Forty First and Forty Second Monthly Fee Statements, and (c) drafting, revising and submitting the Tenth Interim Application and the Tenth Interim Approval Order. K&L Gates LLP intends to seek compensation in connection with reviewing and revising the January 2024 invoices, drafting, revising and submitting the Forty Third Monthly Fee Statement, and preparing this Application at a later date.

Expenses Incurred by K&L Gates LLP

44. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by professionals employed in a chapter 11 case. K&L Gates LLP does not seek reimbursement for any expenses ("Expenses") incurred in rendering services to the Debtors during the Compensation Period. As K&L Gates LLP is not seeking reimbursement for any Expenses during the Compensation Period, there are no itemized records detailing any such Expenses attached to the Prior Monthly Fee Statements.

Retainer Disclosure

45. Prior to the Petition Date, the Debtors paid K&L Gates LLP retainer amounts totaling \$605,000 for professional services and expenses (together, the "Retainer"). Prior to the commencement of the Chapter 11 Cases, \$324,451.40 of the Retainer was applied to actual and estimated fees and expenses incurred prior to June 18, 2020. As of the Petition Date, the Retainer balance was \$280,922.03, subject to reconciliation of prepetition fees and expenses. Following K&L Gates LLP's final reconciliation of its prepetition fees and expenses in connection with the First Interim Application, at the time of entry of the First Interim Approval Order, the Retainer balance was \$30,484.16.

46. Following the entry of the First Interim Approval Order by the Court, and consistent with paragraph 2(f) of the Interim Compensation Order, the remaining Retainer balance has been applied to payments sought in connection with the First Interim Application (collectively, the "Interim Amounts"). Specifically, K&L Gates LLP applied \$30,484.16 of the Retainer balance to the Interim Amount sought in connection with the September 2020 Monthly Fee Statement. Following the application of this amount, the remaining Retainer balance now is \$0.00. Accordingly, K&L Gates LLP did not apply any Retainer amounts to the Prior Monthly Fee Statements that are the subject of this Application.

Conclusion

47. The fees and expenses requested herein by K&L Gates LLP are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable nonbankruptcy cases in a competitive national legal market and should be approved on an interim basis pursuant to sections 330 and 331 of the Bankruptcy Code, the Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules.

Notice

48. This Application has been served in accordance with the Interim Compensation Order on the Notice Parties, as defined therein. In accordance with the Interim Compensation Order, a notice of opportunity for hearing on this Application in accordance with Local Rule 9013-1(e)(7) has been served on the Notice Parties and all parties that have filed a notice of appearance with the Clerk of this Court and requested such notice. K&L Gates LLP submits that, in light of the nature of the relief requested, no other or further notice need be provided.

No Prior Request

49. No prior request for the relief sought in this Application has been made to this or any other court.

WHEREFORE, K&L Gates LLP respectfully requests that, pursuant to sections 330 and 331 of the Bankruptcy Code, the Interim Compensation Order, and applicable Bankruptcy Rules and Local Rules, the Court (a) enter an order substantially in the form attached hereto as Exhibit B granting the relief requested herein and (b) grant such other and further relief to K&L Gates LLP as the Court may deem just and proper.

Dated: March 11, 2024
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

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(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR
DEBTORS AND DEBTORS IN POSSESSION

EXHIBIT A

Prior Monthly Fee Statements

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)

**FORTIETH MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS FOR
THE PERIOD FROM OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Fortieth Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From October 1, 2023 Through October 31, 2023* (the "Monthly Fee Statement").

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period October 1, 2023 through October 31, 2023 (the "Statement Period").

¹

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.

Total Fees and Expenses for the Statement Period

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$18,154.80
Total Expenses	\$0.00
TOTAL	\$18,154.80

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$16,339.32 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

Notice and Objection Procedures

4. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoamccarter.com), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and

Phillip S. Pavlick, Esq., ppavlick@mccarter.com), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@burtcordeslaw.com, (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com and Todd E. Phillips, Esq., tphillips@capdale.com) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., jgrier@grierlaw.com, A. Cotton Wright, Esq., cwright@grierlaw.com), and (II) Orrick, Herrington & Sutcliffe LLP, 1152 15th Street N.W., Washington, DC 20005 (Jonathan P. Guy, Esq., jguy@orrick.com, Debra L. Felder, Esq., dfelder@orrick.com).

5. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the affected Retained Professional, and upon the other Notice Parties no later than December 14, 2023 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100%

of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: November 30, 2023
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR
DEBTORS AND DEBTORS IN POSSESSION

EXHIBIT A

Invoices

K&L GATES

K&L GATES LLP
K&L GATES CENTER
210 SIXTH AVENUE
PITTSBURGH, PA 15222-2613
T +1 412 355 6500 F +1 412 355 6501 klgates.com
Tax ID No. 25 0921018

Aldrich Pump LLC
Allan Tananbaum, Esquire
800-E Beatty Street
Davidson, North Carolina 28036

Invoice Date : November 1, 2023
Invoice Number : 4256968
Services Through : October 31, 2023
Our File Number : 0246802

INVOICE SUMMARY BY MATTER

Asbestos Insurance Advice (00001)

Fees	\$	8,123.00	
10% Discount	\$	<u>(812.30)</u>	
Total Fees	\$	7,310.70	
Total Amount Due This Matter			\$ 7,310.70

Chapter 11 Retention and Compensation (00002)

Fees	\$	4,211.50	
10% Discount	\$	<u>(421.15)</u>	
Total Fees	\$	3,790.35	
Total Amount Due This Matter			\$ 3,790.35

CURRENT INVOICE DUE - All Matters	\$ <u>11,101.05</u>
--	----------------------------

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Road - Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

PLEASE NOTE CHANGES to Mail-To and Overnight addresses

K&L GATES

Invoice # 4256968
0246802
Page 2 of 8

Asbestos Insurance Advice (00001) \$7,310.70

Your Ref. No.: ASB-12750660-Aldrich Bankrupt

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
10/02/23	D. F. McGonigle	0.10	L120	Emails with B. Erens regarding status (0.1)	112.00
10/03/23	D. F. McGonigle	0.10	L120	Emails with M. Uddin regarding work product status (0.1)	112.00
10/09/23	L. M. Martinelli	0.10	L120	Review email, documents for case library for use by team attorneys (0.1) (0.2/2)	38.50
10/09/23	D. F. McGonigle	0.70	L120	Emails with S. Canup and insurer representative regarding updated insurer contact information (0.2); conference with insurer representative regarding information requests (0.2); emails with A. Tananbaum regarding insurer information request (0.3)	784.00
10/10/23	D. F. McGonigle	0.10	L120	Correspondence to insurer representative regarding insolvency claim (0.1)	112.00
10/11/23	D. F. McGonigle	1.40	L120	Review and analysis of email correspondence from M. Evert regarding estimation discovery (0.4) (0.7/2); attention to insurer contact update (0.1) (0.2/2); conference and emails with J. Safar regarding estimation discovery issues (0.4) (0.8/2); emails and conference with A. Tananbaum regarding estimation discovery issues (0.3) (0.6/2); emails with team regarding follow-up estimation discovery discussions (0.2) (0.3/2)	1,568.00

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Invoice # 4256968
0246802
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DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
10/11/23	J. C. Safar	0.40	L120	Conference with D. McGonigle regarding estimation discovery insurance issues (0.4) (0.7/2)	382.00
10/12/23	D. F. McGonigle	0.90	L120	Conference with J. Safar regarding estimation and discovery matters (0.3) (0.5/2); conference with A. Tananbaum, B. Erens, M. Hirst, M. Evert, C. Maisano and J. Safar regarding estimation and discovery matters (0.4) (0.8/2); conference with insurer representative regarding status (0.1); email to team regarding discovery planning meeting (0.1)	1,008.00
10/12/23	J. C. Safar	0.80	L120	Conference with D. McGonigle regarding estimation discovery insurance issues (0.3) (0.5/2); conference with Debtors counsel regarding estimation discovery issues (0.5) (1.0/2)	764.00
10/13/23	D. F. McGonigle	0.30	L120	Participate in works-in-process call (0.3) (0.6/2)	336.00
10/13/23	J. C. Safar	0.30	L120	Attend works-in-process call (0.3) (0.6/2)	286.50
10/19/23	D. F. McGonigle	0.10	L120	Emails with M. Evert regarding status and communications with insurer representative (0.1)	112.00
10/20/23	D. F. McGonigle	0.30	L120	E-mails with insurer representative regarding status and planning (0.1) (0.2/2); planning for follow-up regarding discovery issues (0.1) (0.2/2); e-mails with team regarding planning for follow-up regarding discovery issues (0.1) (0.2/2)	336.00
10/24/23	D. F. McGonigle	0.50	L120	Emails with team regarding status and planning (0.1) (0.2/2); emails with M. Uddin regarding modeling	560.00

K&L GATES

Invoice # 4256968
0246802
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DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
				question (0.1); emails with M. Evert regarding Stout/Claro inquiries regarding insurance matters (0.1); conference with B. Erens, M. Hirst and M. Evert regarding estimation discovery issues and preparation for conference with insurer representatives (0.2) (0.4/2)	
10/25/23	D. F. McGonigle	0.60	L120	Conference with insurer representatives, M. Evert, B. Erens and M. Hirst regarding discovery matters (0.6) (1.2/2)	672.00
10/30/23	D. F. McGonigle	0.30	L120	Review Stout/Claro invoices for confidentiality and privilege (0.1) (0.2/2); emails with B. Fern regarding invoices (0.1); emails with M. Uddin regarding follow-up call regarding insurance work product (0.1)	336.00
10/30/23	J. C. Safar	0.20	L120	Review recent decision relevant to coverage analysis (0.2) (0.3/2)	191.00
10/31/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
10/31/23	D. F. McGonigle	0.30	L120	Review Debtors' amici curiae brief in Purdue Pharma (0.3) (0.5/2)	336.00
TOTAL FEES				7.70 hrs	\$ <u>8,123.00</u>

TIMEKEEPER SUMMARY

L. M. Martinelli	0.30 hrs at	\$ 385.00 / hr	115.50
D. F. McGonigle	5.70 hrs at	\$ 1,120.00 / hr	6,384.00
J. C. Safar	1.70 hrs at	\$ 955.00 / hr	1,623.50
TOTAL FEES			\$ <u>8,123.00</u>

K&L GATES

Invoice # 4256968
0246802
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TASK CODE SUMMARY

L120	Analysis/Strategy	7.70 hrs	8,123.00
	TOTAL FEES	7.70 hrs	\$ <u>8,123.00</u>

MATTER SUMMARY

Fees	\$ 8,123.00
10% Discount	\$ <u>(812.30)</u>
Total Fees	\$ <u>7,310.70</u>
MATTER TOTAL	\$ <u>7,310.70</u>

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Invoice # 4256968
0246802
Page 6 of 8

Chapter 11 Retention and Compensation (00002)

\$3,790.35

Your Ref. No.: ASB-12750660-Aldrich Bankrupt

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
10/02/23	D. F. McGonigle	0.20	B160	Review and finalize fee application (0.2) (0.4/2)	224.00
10/02/23	E. Steele	0.10	B160	Correspondence with debtors' counsel regarding monthly fee statement (August 2023) (0.1)	64.50
10/02/23	M. Westbrook	0.20	B160	Review monthly fee application (0.2) (0.4/2)	153.00
10/07/23	E. Steele	0.10	B160	Analyze and correspond regarding ongoing disclosure obligations	64.50
10/09/23	D. F. McGonigle	0.30	B160	Review prior supplemental disclosures (0.2); review and approve ninth supplemental disclosure (0.1)	336.00
10/09/23	E. Steele	0.40	B160	Draft supplemental declaration in support of retention and correspondence regarding same	258.00
10/10/23	D. F. McGonigle	0.20	B160	Prepare monthly fee statement (0.2) (0.3/2)	224.00
10/10/23	M. Westbrook	0.20	B160	Review invoices for privilege (0.2) (0.4/2)	153.00
10/25/23	D. F. McGonigle	0.20	B160	Review and comment on draft fee statement (0.2) (0.3/2)	224.00
10/25/23	E. Steele	0.20	B160	Draft September 2023 monthly fee statement (0.2) (0.3/2)	129.00
10/25/23	E. Steele	0.50	B160	Begin drafting tenth interim fee application (June-Sept. '23) (0.5) (1.0/2)	322.50
10/25/23	M. Westbrook	0.30	B160	Review invoices for privilege (0.3) (0.5/2)	229.50
10/26/23	D. F. McGonigle	0.10	B160	Emails with E. Steele and K. Simmons regarding upcoming interim fee application (0.1)	112.00
10/26/23	E. Steele	0.10	B160	Analysis and advice regarding descriptions in	64.50

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Invoice # 4256968
0246802
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DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
10/26/23	E. Steele	0.40	B160	September invoices (0.1) Further revise interim fee application and correspondence with accounting regarding same (0.4) (0.8/2)	258.00
10/27/23	D. F. McGonigle	0.10	B160	Emails with E. Steele and K. Simmons regarding interim fee application (0.1)	112.00
10/27/23	E. Steele	0.30	B160	Continue drafting interim fee application	193.50
10/30/23	D. F. McGonigle	0.10	B160	Emails with E. Steele regarding finalized fee statement (0.1)	112.00
10/30/23	E. Steele	0.10	B160	Finalize, compile and circulate monthly fee statement (September 2023) (0.1) (0.2/2)	64.50
10/31/23	D. F. McGonigle	0.70	B160	Review and revise draft Tenth Interim Fee Application (0.3) (0.6/2); emails with E. Steele regarding draft Tenth Interim Fee Application (0.1); review, revise and finalize draft fee approval correspondence to A. Tananbaum (0.3) (0.6/2)	784.00
10/31/23	E. Steele	0.20	B160	Further review and revise tenth interim fee application and correspondence regarding same (0.2) (0.3/2)	129.00
TOTAL FEES				5.00 hrs	\$ <u><u>4,211.50</u></u>

TIMEKEEPER SUMMARY

D. F. McGonigle	1.90	hrs at	\$ 1,120.00 / hr	2,128.00
E. Steele	2.40	hrs at	\$ 645.00 / hr	1,548.00
M. Westbrook	0.70	hrs at	\$ 765.00 / hr	535.50
TOTAL FEES	5.00	hrs		\$ <u><u>4,211.50</u></u>

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Invoice # 4256968
0246802
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TASK CODE SUMMARY

B160	Fee/Employment Applications	5.00 hrs	4,211.50
	TOTAL FEES	5.00 hrs	\$ <u>4,211.50</u>

MATTER SUMMARY

Fees	\$ 4,211.50
10% Discount	\$ <u>(421.15)</u>
Total Fees	\$ <u>3,790.35</u>
MATTER TOTAL	\$ <u>3,790.35</u>

K&L GATES

K&L GATES LLP
K&L GATES CENTER
210 SIXTH AVENUE
PITTSBURGH, PA 15222-2613
T +1 412 355 6500 F +1 412 355 6501 klgates.com
Tax ID No. 25 0921018

Murray Boiler LLC
Allan Tananbaum, Esquire
800-E Beaty Street
Davidson, NC 28036

Invoice Date : November 1, 2023
Invoice Number : 4256971
Services Through : October 31, 2023
Our File Number : 0246801

INVOICE SUMMARY BY MATTER

Asbestos Insurance Advice (00001)

Fees	\$	5,484.50	
10% Discount	\$	(548.45)	
Total Fees	\$	4,936.05	
Total Amount Due This Matter			\$ 4,936.05

Chapter 11 Retention and Compensation (00002)

Fees	\$	2,353.00	
10% Discount	\$	(235.30)	
Total Fees	\$	2,117.70	
Total Amount Due This Matter			\$ 2,117.70

CURRENT INVOICE DUE - All Matters

\$ 7,053.75

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Road - Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

PLEASE NOTE CHANGES to Mail-To and Overnight addresses

K&L GATES

Invoice # 4256971
0246801
Page 2 of 6

Asbestos Insurance Advice (00001) \$4,936.05

Your Ref. No.: ASB-12750662-Murray Bankruptc

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
10/09/23	L. M. Martinelli	0.10	L120	Review email, documents for case library for use by team attorneys (0.1) (0.2/2)	38.50
10/11/23	D. F. McGonigle	1.20	L120	Review and analysis of email correspondence from M. Evert regarding estimation discovery (0.3) (0.7/2); attention to insurer contact update (0.1) (0.2/2); conference and emails with J. Safar regarding estimation discovery issues (0.4) (0.8/2); emails and conference with A. Tananbaum regarding estimation discovery issues (0.3) (0.6/2); emails with team regarding follow-up estimation discovery discussions (0.1) (0.3/2)	1,344.00
10/11/23	J. C. Safar	0.30	L120	Conference with D. McGonigle regarding estimation discovery insurance issues (0.3) (0.7/2)	286.50
10/12/23	D. F. McGonigle	0.60	L120	Conference with J. Safar regarding estimation and discovery matters (0.2) (0.5/2); conference with A. Tananbaum, B. Erens, M. Hirst, M. Evert, C. Maisano and J. Safar regarding estimation and discovery matters (0.4) (0.8/2)	672.00
10/12/23	J. C. Safar	0.70	L120	Conference with D. McGonigle regarding estimation discovery insurance issues (0.2)	668.50

K&L GATES

Invoice # 4256971
0246801
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DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
				(0.5/2); conference with Debtors counsel regarding estimation discovery issues (0.5) (1.0/2)	
10/13/23	D. F. McGonigle	0.30	L120	Participate in works-in-process call (0.3) (0.6/2)	336.00
10/13/23	J. C. Safar	0.30	L120	Attend works-in-process call (0.3) (0.6/2)	286.50
10/20/23	D. F. McGonigle	0.30	L120	E-mails with insurer representative regarding status and planning (0.1) (0.2/2); planning for follow-up regarding discovery issues (0.1) (0.2/2); e-mails with team regarding planning for follow-up regarding discovery issues (0.1) (0.2/2)	336.00
10/24/23	D. F. McGonigle	0.30	L120	Emails with team regarding status and planning (0.1) (0.2/2); conference with B. Erens, M. Hirst and M. Evert regarding estimation discovery issues and preparation for conference with insurer representatives (0.2) (0.4/2)	336.00
10/25/23	D. F. McGonigle	0.60	L120	Conference with insurer representatives, M. Evert, B. Erens and M. Hirst regarding discovery matters (0.6) (1.2/2)	672.00
10/30/23	D. F. McGonigle	0.10	L120	Review Stout/Claro invoices for confidentiality and privilege (0.1) (0.2/2)	112.00
10/30/23	J. C. Safar	0.10	L120	Review recent decision relevant to coverage analysis (0.1) (0.3/2)	95.50
10/31/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
10/31/23	D. F. McGonigle	0.20	L120	Review Debtors' amici curiae brief in Purdue Pharma (0.2) (0.5/2)	224.00
TOTAL FEES				5.30 hrs	\$ <u>5,484.50</u>

K&L GATES

Invoice # 4256971
0246801
Page 4 of 6

TIMEKEEPER SUMMARY

L. M. Martinelli	0.30 hrs at	\$ 385.00 / hr	115.50
D. F. McGonigle	3.60 hrs at	\$ 1,120.00 / hr	4,032.00
J. C. Safar	1.40 hrs at	\$ 955.00 / hr	1,337.00
TOTAL FEES	5.30 hrs		\$ <u>5,484.50</u>

TASK CODE SUMMARY

L120	Analysis/Strategy	5.30 hrs	5,484.50
	TOTAL FEES	5.30 hrs	\$ <u>5,484.50</u>

MATTER SUMMARY

Fees	\$ 5,484.50
10% Discount	\$ <u>(548.45)</u>
Total Fees	\$ <u>4,936.05</u>
MATTER TOTAL	\$ <u>4,936.05</u>

K&L GATES

Invoice # 4256971
0246801
Page 5 of 6

Chapter 11 Retention and Compensation (00002) \$2,117.70

Your Ref. No.: ASB-12750662-Murray Bankruptc

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
10/02/23	D. F. McGonigle	0.20	B160	Review and finalize fee application (0.2) (0.4/2)	224.00
10/02/23	M. Westbrook	0.20	B160	Review monthly fee application (0.2) (0.4/2)	153.00
10/10/23	D. F. McGonigle	0.10	B160	Prepare monthly fee statement (0.1) (0.3/2)	112.00
10/10/23	M. Westbrook	0.20	B160	Review invoices for privilege (0.2) (0.4/2)	153.00
10/25/23	D. F. McGonigle	0.10	B160	Review and comment on draft fee statement (0.1) (0.3/2)	112.00
10/25/23	E. Steele	0.10	B160	Draft September 2023 monthly fee statement (0.1) (0.3/2)	64.50
10/25/23	E. Steele	0.50	B160	Begin drafting tenth interim fee application (June-Sept. '23) (0.5) (1.0/2)	322.50
10/25/23	M. Westbrook	0.20	B160	Review invoices for privilege (0.2) (0.5/2)	153.00
10/26/23	E. Steele	0.40	B160	Further revise interim fee application and correspondence with accounting regarding same (0.4) (0.8/2)	258.00
10/30/23	E. Steele	0.10	B160	Finalize, compile and circulate monthly fee statement (September 2023) (0.1) (0.2/2)	64.50
10/31/23	D. F. McGonigle	0.60	B160	Review and revise draft Tenth Interim Fee Application (0.3) (0.6/2); review, revise and finalize draft fee approval correspondence to A. Tananbaum (0.3) (0.6/2)	672.00
10/31/23	E. Steele	0.10	B160	Further review and revise tenth interim fee application and correspondence regarding same (0.1) (0.3/2)	64.50
TOTAL FEES				2.80 hrs	\$ <u>2,353.00</u>

K&L GATES

Invoice # 4256971
0246801
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TIMEKEEPER SUMMARY

D. F. McGonigle	1.00 hrs at	\$ 1,120.00 / hr	1,120.00
E. Steele	1.20 hrs at	\$ 645.00 / hr	774.00
M. Westbrook	0.60 hrs at	\$ 765.00 / hr	459.00
TOTAL FEES	2.80 hrs		\$ <u><u>2,353.00</u></u>

TASK CODE SUMMARY

B160	Fee/Employment Applications	2.80 hrs	2,353.00
	TOTAL FEES	2.80 hrs	\$ <u><u>2,353.00</u></u>

MATTER SUMMARY

Fees	\$ 2,353.00
10% Discount	\$ <u>(235.30)</u>
Total Fees	\$ <u>2,117.70</u>
MATTER TOTAL	\$ <u><u>2,117.70</u></u>

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)

**FORTY-FIRST MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS FOR
THE PERIOD FROM NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Forty-First Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From November 1, 2023 Through November 30, 2023* (the "Monthly Fee Statement").

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period November 1, 2023 through November 30, 2023 (the "Statement Period").

¹ 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.

Total Fees and Expenses for the Statement Period

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$19,719.45
Total Expenses	\$0.00
TOTAL	\$19,719.45

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$17,747.50 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

Billing Adjustments

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$112.00 in fees will not be charged to the Debtors.

Notice and Objection Procedures

5. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy

Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoa@mccarter.com), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and Phillip S. Pavlick, Esq., ppavlick@mccarter.com), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@burtcordeslaw.com, (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., namsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com and Todd E. Phillips, Esq., tphillips@capdale.com) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., jgrier@grierlaw.com, A. Cotton Wright, Esq., cwright@grierlaw.com), and (II) Orrick, Herrington & Sutcliffe LLP, 1152 15th Street N.W., Washington, DC 20005 (Jonathan P. Guy, Esq., jguy@orrick.com, Debra L. Felder, Esq., dfelder@orrick.com).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the

affected Retained Professional, and upon the other Notice Parties no later than January 16, 2024 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

7. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

8. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: January 2, 2024
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR
DEBTORS AND DEBTORS IN POSSESSION

EXHIBIT A

Invoices

K&L GATES

K&L GATES LLP

K&L GATES CENTER
210 SIXTH AVENUE
PITTSBURGH, PA 15222-2613
T +1 412 355 6500 F +1 412 355 6501 klgates.com
Tax ID No. 25 0921018

Aldrich Pump LLC
Allan Tananbaum, Esquire
800-E Beatty Street
Davidson, North Carolina 28036

Invoice Date : December 1, 2023
Invoice Number : 4279923
Services Through : November 30, 2023
Our File Number : 0246802

INVOICE SUMMARY BY MATTER

Asbestos Insurance Advice (00001)

Fees	\$ 11,354.00	
10% Discount	\$ (1,135.40)	
Total Fees	\$ 10,218.60	
Total Amount Due This Matter		\$ 10,218.60

Chapter 11 Retention and Compensation (00002)

Fees	\$ 817.00	
10% Discount	\$ (81.70)	
Total Fees	\$ 735.30	
Total Amount Due This Matter		\$ 735.30

CURRENT INVOICE DUE - All Matters	\$ <u>10,953.90</u>
--	----------------------------

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Road - Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

PLEASE NOTE CHANGES to Mail-To and Overnight addresses

K&L GATES

Invoice # 4279923
0246802
Page 2 of 7

Asbestos Insurance Advice (00001) \$10,218.60

Your Ref. No.: ASB-12750660-Aldrich Bankrupt

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
11/01/23	D. F. McGonigle	0.50	L120	Conference with M. Uddin regarding status and planning (0.5) (1.0/2)	560.00
11/03/23	D. F. McGonigle	0.30	L120	Attention to insurer information request (0.1) (0.2/2); email to and conference with insurer representative regarding information request (0.1) (0.2/2); emails with M. Evert regarding insurer information request (0.1)	336.00
11/06/23	D. F. McGonigle	0.40	L120	Attention to insolvent insurer matters (0.1); review and analysis of recent Bestwall ruling (0.3) (0.5/2)	448.00
11/06/23	J. C. Safar	0.20	L120	Review Bestwall decision (0.2) (0.3/2)	191.00
11/07/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
11/07/23	D. F. McGonigle	0.10	L120	Emails with A. Tananbaum and M. Uddin regarding supplemental distributions from The Home (0.1) (0.2/2)	112.00
11/09/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
11/09/23	D. F. McGonigle	0.10	L120	Emails with A. Tananbaum and M. Uddin regarding Home insolvency status (0.1)	112.00
11/13/23	D. F. McGonigle	0.20	L120	Review ACC fee petitions (0.1); conference and emails with B. Erens regarding discovery matters	224.00

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Invoice # 4279923
0246802
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DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
11/14/23	L. M. Martinelli	0.20	L120	(0.1) Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
11/14/23	D. F. McGonigle	1.80	L120	Conference with J. Safar regarding discovery matters (0.1); review and analysis of ACC discovery requests in derivative and substantive consolidation litigation (0.7) (1.4/2); review correspondence and work product regarding privilege and work product protections for underlying documents (1.0) (1.9/2)	2,016.00
11/15/23	D. F. McGonigle	0.30	L120	Conference with J. Safar regarding discovery matters (0.3) (0.5/2)	336.00
11/15/23	J. C. Safar	0.50	L120	Conference with D. McGonigle regarding discovery requests (0.3) (0.5/2); review discovery requests and prepare for same (0.2) (0.4/2)	477.50
11/15/23	J. C. Safar	0.20	L120	Preliminary review of discovery requests (0.2) (0.4/2)	191.00
11/17/23	D. F. McGonigle	1.00	L120	Prepare for conference on discovery matters (0.1) (0.2/2); conference with A. Tananbaum, R. Sands, EWH and Jones Day regarding discovery matters and planning (0.5) (1.0/2); emails with insurer representative regarding status (0.1) (0.2/2); review and analysis of adversary actions dockets and complaints (0.2) (0.4/2); communication to insurers regarding status (0.1) (0.2/2)	1,120.00
11/22/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
11/22/23	D. F. McGonigle	0.20	L120	Email to A. Tananabum, B. Erens, M. Evert and M.	224.00

K&L GATES

Invoice # 4279923
0246802
Page 4 of 7

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
11/27/23	D. F. McGonigle	0.80	L120	Hirst regarding status (0.1) (0.2/2); conference with A. Tananbaum regarding status and planning (0.1) Attention to draft sub con discovery (0.4) (0.8/2); email with team regarding draft discovery (0.3) (0.6/2); conference with B. Erens regarding discovery matters (0.1)	896.00
11/29/23	D. F. McGonigle	1.70	L120	Conference with C. Maisano and J. Safar regarding discovery issues (0.2) (0.3/2); follow-up conference with J. Safar (0.1); research and review work product in in connection with estimation discovery inquiries (1.2) (2.4/2); emails with C. Maisano regarding estimation discovery issues (0.2) (0.3/2)	1,904.00
11/29/23	J. C. Safar	0.50	L120	Conference with D. McGonigle and Debtors counsel regarding discovery (0.2) (0.3/2); conference with M. Urick and L. Martinelli regarding documents (0.1) (0.2/2); review documents regarding same (0.2) (0.4/2)	477.50
11/30/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00

K&L GATES

Invoice # 4279923
0246802
Page 5 of 7

11/30/23	D. F. McGonigle	1.20	L120	Review and analysis of work product and team emails regarding discovery and privilege issues (0.7) (1.4/2); emails to client team regarding draft work product regarding privilege issues (0.2) (0.3/2); conference with B. Erens regarding status and planning (0.2) (0.3/2); email to D. Aceto regarding status (0.1)	1,344.00
TOTAL FEES				11.00 hrs	\$ <u>11,354.00</u>

TIMEKEEPER SUMMARY

L. M. Martinelli	1.00	hrs at	\$ 385.00 / hr	385.00
D. F. McGonigle	8.60	hrs at	\$ 1,120.00 / hr	9,632.00
J. C. Safar	1.40	hrs at	\$ 955.00 / hr	1,337.00
TOTAL FEES				\$ <u>11,354.00</u>

TASK CODE SUMMARY

L120	Analysis/Strategy	11.00	hrs	11,354.00
TOTAL FEES				\$ <u>11,354.00</u>

MATTER SUMMARY

Fees	\$ 11,354.00
10% Discount	\$ <u>(1,135.40)</u>
Total Fees	\$ <u>10,218.60</u>
MATTER TOTAL	\$ <u>10,218.60</u>

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Invoice # 4279923
0246802
Page 6 of 7

Chapter 11 Retention and Compensation (00002) \$735.30

Your Ref. No.: ASB-12750660-Aldrich Bankrupt

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
11/01/23	M. Westbrook	0.30	B160	Review 10th Interim Fee Application (0.3) (0.6/2)	229.50
11/02/23	D. F. McGonigle	0.10	B160	Prepare monthly fee statement (0.1)	112.00
11/05/23	M. Westbrook	0.20	B160	Review invoices for privilege (0.2) (0.4/2)	153.00
11/07/23	E. Steele	0.20	B160	Finalize and circulate tenth interim fee application to bankruptcy counsel (0.2) (0.3/2)	129.00
11/28/23	E. Steele	0.20	B160	Draft fortieth monthly fee statement (October 2023) and finalize and circulate proposed order allowing tenth interim fee application (0.2) (0.3/2)	129.00
11/30/23	E. Steele	0.10	B160	Finalize and serve monthly fee statement (0.1) (0.2/2)	64.50
TOTAL FEES				1.10 hrs	\$ <u>817.00</u>

TIMEKEEPER SUMMARY

D. F. McGonigle	0.10 hrs at	\$ 1,120.00 / hr	112.00
E. Steele	0.50 hrs at	\$ 645.00 / hr	322.50
M. Westbrook	0.50 hrs at	\$ 765.00 / hr	382.50
TOTAL FEES			\$ <u>817.00</u>

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0246802
Page 7 of 7

TASK CODE SUMMARY

B160	Fee/Employment Applications	1.10 hrs	817.00
	TOTAL FEES	1.10 hrs	\$ <u>817.00</u>

MATTER SUMMARY

Fees	\$ 817.00
10% Discount	\$ <u>(81.70)</u>
Total Fees	\$ <u>735.30</u>
MATTER TOTAL	\$ <u>735.30</u>

K&L GATES

K&L GATES LLP
K&L GATES CENTER
210 SIXTH AVENUE
PITTSBURGH, PA 15222-2613
T +1 412 355 6500 F +1 412 355 6501 klgates.com
Tax ID No. 25 0921018

Murray Boiler LLC
Allan Tananbaum, Esquire
800-E Beaty Street
Davidson, NC 28036

Invoice Date : December 1, 2023
Invoice Number : 4279922
Services Through : November 30, 2023
Our File Number : 0246801

INVOICE SUMMARY BY MATTER

Asbestos Insurance Advice (00001)

Fees	\$	9,163.50	
10% Discount	\$	<u>(916.35)</u>	
Total Fees	\$	8,247.15	
Total Amount Due This Matter			\$ 8,247.15

Chapter 11 Retention and Compensation (00002)

Fees	\$	576.00	
10% Discount	\$	<u>(57.60)</u>	
Total Fees	\$	518.40	
Total Amount Due This Matter			\$ 518.40

CURRENT INVOICE DUE - All Matters

\$ 8,765.55

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Road - Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

PLEASE NOTE CHANGES to Mail-To and Overnight addresses

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Invoice # 4279922
0246801
Page 2 of 6

Asbestos Insurance Advice (00001) \$8,247.15

Your Ref. No.: ASB-12750662-Murray Bankruptc

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
11/01/23	D. F. McGonigle	0.50	L120	Conference with M. Uddin regarding status and planning (0.5) (1.0/2)	560.00
11/03/23	D. F. McGonigle	0.20	L120	Attention to insurer information request (0.1) (0.2/2); email to and conference with insurer representative regarding information request (0.1) (0.2/2)	224.00
11/06/23	D. F. McGonigle	0.20	L120	Review and analysis of recent Bestwall ruling (0.2) (0.5/2)	224.00
11/06/23	J. C. Safar	0.10	L120	Review Bestwall decision (0.1) (0.3/2)	95.50
11/07/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
11/07/23	D. F. McGonigle	0.10	L120	Emails with A. Tananbaum and M. Uddin regarding supplemental distributions from The Home (0.1) (0.2/2)	112.00
11/09/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
11/14/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
11/14/23	D. F. McGonigle	1.60	L120	Review and analysis of ACC discovery requests in derivative and substantive consolidation litigation (0.7) (1.4/2); review correspondence and work product regarding privilege and work product protections for underlying	1,792.00

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Invoice # 4279922
0246801
Page 3 of 6

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
11/15/23	D. F. McGonigle	0.20	L120	documents (0.9) (1.9/2) Conference with J. Safar regarding discovery matter (0.2) (0.5/2)	224.00
11/15/23	J. C. Safar	0.40	L120	Conference with D. McGonigle regarding discovery requests (0.2) (0.5/2); review discovery requests and prepare for same (0.2) (0.4/2)	382.00
11/15/23	J. C. Safar	0.20	L120	Preliminary review of discovery requests (0.2) (0.4/2)	191.00
11/17/23	D. F. McGonigle	1.00	L120	Prepare for conference on discovery matters (0.1) (0.2/2); conference with A. Tananbaum, R. Sands, EWH and Jones Day regarding discovery matters and planning (0.5) (1.0/2); emails with insurer representative regarding status (0.1) (0.2/2); review and analysis of adversary actions dockets and complaints (0.2) (0.4/2); communication to insurers regarding status (0.1) (0.2/2)	1,120.00
11/22/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
11/22/23	D. F. McGonigle	0.10	L120	Email to A. Tananabum, B. Erens, M. Evert and M. Hirst regarding status (0.1) (0.2/2)	112.00
11/27/23	D. F. McGonigle	0.70	L120	Attention to draft sub con discovery (0.4) (0.8/2); email with team regarding draft discovery (0.3) (0.6/2)	784.00
11/29/23	D. F. McGonigle	1.40	L120	Conference with C. Maisano and J. Safar regarding discovery issues (0.1) (0.3/2); research and review work product in in connection with estimation discovery inquiries (1.2) (2.4/2); emails with C. Maisano regarding	1,568.00

K&L GATES

Invoice # 4279922
0246801
Page 4 of 6

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
11/29/23	J. C. Safar	0.40	L120	estimation discovery issues (0.1) (0.3/2) Conference with D. McGonigle and Debtors counsel regarding discovery (0.1) (0.3/2); conference with M. Urick and L. Martinelli regarding documents (0.1) (0.2/2); review documents regarding same (0.2) (0.4/2)	382.00
11/30/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
11/30/23	D. F. McGonigle	0.90	L120	Review and analysis of work product and team emails regarding discovery and privilege issues (0.7) (1.4/2); emails to client team regarding draft work product regarding privilege issues (0.1) (0.3/2); conference with B. Erens regarding status and planning (0.1) (0.3/2)	1,008.00
TOTAL FEES				9.00 hrs	\$ <u>9,163.50</u>

TIMEKEEPER SUMMARY

L. M. Martinelli	1.00	hrs at	\$ 385.00 / hr	385.00
D. F. McGonigle	6.90	hrs at	\$ 1,120.00 / hr	7,728.00
J. C. Safar	1.10	hrs at	\$ 955.00 / hr	1,050.50
TOTAL FEES	9.00	hrs		\$ <u>9,163.50</u>

K&L GATES

Invoice # 4279922
0246801
Page 5 of 6

TASK CODE SUMMARY

L120	Analysis/Strategy	9.00 hrs	9,163.50
	TOTAL FEES	9.00 hrs	\$ <u>9,163.50</u>

MATTER SUMMARY

Fees	\$ 9,163.50
10% Discount	\$ <u>(916.35)</u>
Total Fees	\$ <u>8,247.15</u>
MATTER TOTAL	\$ <u>8,247.15</u>

K&L GATES

Invoice # 4279922
0246801
Page 6 of 6

Chapter 11 Retention and Compensation (00002) \$518.40

Your Ref. No.: ASB-12750662-Murray Bankruptc

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
11/01/23	M. Westbrook	0.30	B160	Review 10th Interim Fee Application (0.3) (0.6/2)	229.50
11/05/23	M. Westbrook	0.20	B160	Review invoices for privilege (0.2) (0.4/2)	153.00
11/07/23	E. Steele	0.10	B160	Finalize and circulate tenth interim fee application to bankruptcy counsel (0.1) (0.3/2)	64.50
11/28/23	E. Steele	0.10	B160	Draft fortieth monthly fee statement (October 2023) and finalize and circulate proposed order allowing tenth interim fee application (0.1) (0.3/2)	64.50
11/30/23	E. Steele	0.10	B160	Finalize and serve monthly fee statement (0.1) (0.2/2)	64.50
TOTAL FEES				0.80 hrs	\$ <u>576.00</u>

TIMEKEEPER SUMMARY

E. Steele	0.30 hrs at	\$ 645.00 / hr	193.50
M. Westbrook	0.50 hrs at	\$ 765.00 / hr	382.50
TOTAL FEES			\$ <u>576.00</u>

TASK CODE SUMMARY

B160	Fee/Employment Applications	0.80 hrs	576.00
TOTAL FEES			\$ <u>576.00</u>

MATTER SUMMARY

Fees	\$ 576.00
10% Discount	\$ <u>(57.60)</u>
Total Fees	\$ <u>518.40</u>
MATTER TOTAL	\$ <u>518.40</u>

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)

**FORTY-SECOND MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED
BY K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS
FOR THE PERIOD FROM DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Forty-Second Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From December 1, 2023 Through December 31, 2023* (the "Monthly Fee Statement").

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period December 1, 2023 through December 31, 2023 (the "Statement Period").

¹

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.

Total Fees and Expenses for the Statement Period

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$15,246.90
Total Expenses	\$0.00
TOTAL	\$15,246.90

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$13,722.21 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

Billing Adjustments

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$573.00 in fees will not be charged to the Debtors.

Notice and Objection Procedures

5. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beatty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmiller@rcdlaw.net); (c) the office of the United States Bankruptcy

Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamo@mcarter.com), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mcarter.com and Phillip S. Pavlick, Esq., ppavlick@mcarter.com), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mcarter.com) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@burtcordeslaw.com, (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., nramsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com and Todd E. Phillips, Esq., tphillips@capdale.com) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., jgrier@grierlaw.com, A. Cotton Wright, Esq., cwright@grierlaw.com), and (II) Orrick, Herrington & Sutcliffe LLP, 1152 15th Street N.W., Washington, DC 20005 (Jonathan P. Guy, Esq., jguy@orrick.com, Debra L. Felder, Esq., dfelder@orrick.com).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the

affected Retained Professional, and upon the other Notice Parties no later than February 13, 2024 (the "Objection Deadline"). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

7. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

8. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: January 30, 2024
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR
DEBTORS AND DEBTORS IN POSSESSION

EXHIBIT A

Invoices

K&L GATES

K&L GATES LLP
K&L GATES CENTER
210 SIXTH AVENUE
PITTSBURGH, PA 15222-2613
T +1 412 355 6500 F +1 412 355 6501 klgates.com
Tax ID No. 25 0921018

Aldrich Pump LLC
Allan Tananbaum, Esquire
800-E Beatty Street
Davidson, North Carolina 28036

Invoice Date : January 1, 2024
Invoice Number : 4289932
Services Through : December 31, 2023
Our File Number : 0246802

INVOICE SUMMARY BY MATTER

Asbestos Insurance Advice (00001)

Fees	\$	9,149.50	
10% Discount	\$	(914.95)	
Total Fees	\$	8,234.55	
Total Amount Due This Matter			\$ 8,234.55

Chapter 11 Retention and Compensation (00002)

Fees	\$	241.00	
10% Discount	\$	(24.10)	
Total Fees	\$	216.90	
Total Amount Due This Matter			\$ 216.90

CURRENT INVOICE DUE - All Matters

\$ 8,451.45

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Road - Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

PLEASE NOTE CHANGES to Mail-To and Overnight addresses

K&L GATES

Invoice # 4289932
0246802
Page 2 of 5

Asbestos Insurance Advice (00001) \$8,234.55

Your Ref. No.: ASB-12750660-Aldrich Bankrupt

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
12/01/23	D. F. McGonigle	1.40	L120	Emails with M. Hirst and team regarding discovery matters (0.1) (0.2/2); participate in works-in-process call (0.5) (1.0/2); conference with J. Safar regarding status and planning (0.1); review work product regarding strategy matters (0.2) (0.4/2); email to D. Aceto regarding strategic planning matters (0.5) (0.9/2)	1,568.00
12/01/23	J. C. Safar	0.50	L120	Attend works-in-process call (0.5) (1.0/2)	477.50
12/04/23	D. F. McGonigle	0.30	L120	Emails with C. Maisano and J. Safar regarding discovery matters (0.1); review strategy memorandum (0.2) (0.3/2)	336.00
12/04/23	J. C. Safar	0.10	L120	E-mail with D. McGonigle, L. Martinelli and M. Urlick team regarding estimation discovery (0.1) (0.2/2)	95.50
12/05/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
12/06/23	D. M. Aceto	1.20	L120	Review and prepare for strategy meeting with D. McGonigle (0.4) (0.8/2); conference with D. McGonigle (0.8) (1.6/2)	1,020.00
12/06/23	D. F. McGonigle	1.00	L120	Prepare for conference with D. Aceto regarding strategic options (0.1) (0.2/2); conference with D. Aceto regarding strategic planning (0.8) (1.6/2);	1,120.00

K&L GATES

Invoice # 4289932
0246802
Page 3 of 5

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
12/07/23	D. F. McGonigle	0.80	L120	communications with insurer representative regarding status (0.1) Communications with insurer representative regarding status and planning (0.2) (0.3/2); email to and conference with A. Tananbaum and team regarding discovery issues and planning (0.6) (1.1/2)	896.00
12/08/23	D. F. McGonigle	0.30	L120	Participate in works-in-process call (0.2) (0.3/2); email to A. Tananbaum and team regarding discovery issues (0.1)	336.00
12/08/23	J. C. Safar	0.20	L120	Attend works-in-process call (0.2) (0.3/2)	191.00
12/14/23	D. M. Aceto	0.20	L120	Conference with D. McGonigle regarding strategic issues (0.2) (0.4/2)	170.00
12/14/23	D. F. McGonigle	0.20	L120	Conference with D. Aceto regarding status and strategy (0.2) (0.4/2)	224.00
12/15/23	D. F. McGonigle	0.40	L120	Participate in works-in-process call (0.2) (0.4/2); email to insurer representative regarding status (0.1); conference and emails with J. Safar regarding strategy matters (0.1) (0.2/2)	448.00
12/15/23	J. C. Safar	0.30	L120	Participate in works-in-process call (0.2) (0.4/2); participate in strategy call with D. McGonigle (0.1) (0.2/2)	286.50
12/18/23	D. F. McGonigle	0.20	L120	Emails with team regarding status (0.1); communications with insurer representative regarding status and planning (0.1) (0.2/2)	224.00
12/19/23	D. F. McGonigle	0.30	L120	Emails with team regarding planning for update call (0.1) (0.2/2); review Claro/Stout invoices for privilege and confidentiality (0.1); prepare for update	336.00

K&L GATES

Invoice # 4289932
0246802
Page 4 of 5

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
12/21/23	D. F. McGonigle	0.60	L120	call with insurer representative regarding discovery matters (0.1) (0.2/2) Prepare for conference regarding discovery issues (0.1) (0.2/2); conference with insurer representatives, M. Evert, B. Erens and M. Hirst regarding discovery matters (0.4) (0.7/2); follow-up emails with insurer representative (0.1)	672.00
12/28/23	D. F. McGonigle	0.60	L120	Attend virtual omnibus hearing (0.3) (0.5/2); preliminary review of ruling on motions to dismiss (0.3) (0.5/2)	672.00
TOTAL FEES				8.80 hrs	\$ <u>9,149.50</u>

TIMEKEEPER SUMMARY

D. M. Aceto	1.40	hrs at	\$	850.00 / hr	1,190.00
L. M. Martinelli	0.20	hrs at	\$	385.00 / hr	77.00
D. F. McGonigle	6.10	hrs at	\$	1,120.00 / hr	6,832.00
J. C. Safar	1.10	hrs at	\$	955.00 / hr	1,050.50
TOTAL FEES		8.80	hrs	\$	<u>9,149.50</u>

TASK CODE SUMMARY

L120	Analysis/Strategy	8.80	hrs	9,149.50
	TOTAL FEES	8.80	hrs	\$ <u>9,149.50</u>

MATTER SUMMARY

Fees	\$ 9,149.50
10% Discount	\$ (914.95)
Total Fees	\$ <u>8,234.55</u>
MATTER TOTAL	\$ <u>8,234.55</u>

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Invoice # 4289932
0246802
Page 5 of 5

Chapter 11 Retention and Compensation (00002) \$216.90

Your Ref. No.: ASB-12750660-Aldrich Bankrupt

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
12/28/23	D. F. McGonigle	0.10	B160	Prepare monthly fee statements (0.1) (0.2/2)	112.00
12/28/23	E. Steele	0.10	B160	Correspondence regarding November 2023 monthly fee statement (0.1)	64.50
12/28/23	E. Steele	0.10	B160	Draft monthly fee statement for November 2023 (0.1) (0.2/2)	64.50
TOTAL FEES				0.30 hrs	\$ <u>241.00</u>

TIMEKEEPER SUMMARY

D. F. McGonigle	0.10 hrs at	\$ 1,120.00 / hr	112.00
E. Steele	0.20 hrs at	\$ 645.00 / hr	129.00
TOTAL FEES			\$ <u>241.00</u>

TASK CODE SUMMARY

B160	Fee/Employment Applications	0.30 hrs	241.00
TOTAL FEES			\$ <u>241.00</u>

MATTER SUMMARY

Fees	\$ 241.00
10% Discount	\$ <u>(24.10)</u>
Total Fees	\$ <u>216.90</u>
MATTER TOTAL	\$ <u>216.90</u>

K&L GATES

K&L GATES LLP
K&L GATES CENTER
210 SIXTH AVENUE
PITTSBURGH, PA 15222-2613
T +1 412 355 6500 F +1 412 355 6501 klgates.com
Tax ID No. 25 0921018

Murray Boiler LLC
Allan Tananbaum, Esquire
800-E Beaty Street
Davidson, NC 28036

Invoice Date : January 1, 2024
Invoice Number : 4289924
Services Through : December 31, 2023
Our File Number : 0246801

INVOICE SUMMARY BY MATTER

Asbestos Insurance Advice (00001)

Fees	\$	7,374.00	
10% Discount	\$	(737.40)	
Total Fees	\$	6,636.60	
Total Amount Due This Matter			\$ 6,636.60

Chapter 11 Retention and Compensation (00002)

Fees	\$	176.50	
10% Discount	\$	(17.65)	
Total Fees	\$	158.85	
Total Amount Due This Matter			\$ 158.85

CURRENT INVOICE DUE - All Matters

\$ 6,795.45

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Road - Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

PLEASE NOTE CHANGES to Mail-To and Overnight addresses

K&L GATES

Invoice # 4289924
0246801
Page 2 of 5

Asbestos Insurance Advice (00001) \$6,636.60

Your Ref. No.: ASB-12750662-Murray Bankruptc

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
12/01/23	D. F. McGonigle	1.20	L120	Emails with M. Hirst and team regarding discovery matters (0.1) (0.2/2); participate in works-in-process call (0.5) (1.0/2); review work product regarding strategy matters (0.2) (0.4/2); email to D. Aceto regarding strategic planning matters (0.4) (0.9/2)	1,344.00
12/01/23	J. C. Safar	0.50	L120	Attend works-in-process call (0.5) (1.0/2)	477.50
12/04/23	D. F. McGonigle	0.20	L120	Emails with C. Maisano and J. Safar regarding discovery matters (0.1); review strategy memorandum (0.1) (0.3/2)	224.00
12/04/23	J. C. Safar	0.10	L120	E-mail with D. McGonigle, L. Martinelli and M. Urlick team regarding estimation discovery (0.1) (0.2/2)	95.50
12/05/23	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	77.00
12/06/23	D. M. Aceto	1.20	L120	Review and prepare for strategy meeting with D. McGonigle (0.4) (0.8/2); conference with D. McGonigle (0.8) (1.6/2)	1,020.00
12/06/23	D. F. McGonigle	0.90	L120	Prepare for conference with D. Aceto regarding strategic options (0.1) (0.2/2); conference with D. Aceto regarding strategic planning (0.8) (1.6/2)	1,008.00
12/07/23	D. F. McGonigle	0.60	L120	Communications with insurer representative	672.00

K&L GATES

Invoice # 4289924
0246801
Page 3 of 5

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
				regarding status and planning (0.1) (0.3/2); email to and conference with A. Tananbaum and team regarding discovery issues and planning (0.5) (1.1/2)	
12/08/23	D. F. McGonigle	0.10	L120	Participate in works-in-process call (0.1) (0.3/2)	112.00
12/08/23	J. C. Safar	0.10	L120	Attend works-in-process call (0.1) (0.3/2)	95.50
12/14/23	D. M. Aceto	0.20	L120	Conference with D. McGonigle regarding strategic issues (0.2) (0.4/2)	170.00
12/14/23	D. F. McGonigle	0.20	L120	Conference with D. Aceto regarding status and strategy (0.2) (0.4/2)	224.00
12/15/23	D. F. McGonigle	0.30	L120	Participate in works-in-process call (0.2) (0.4/2); conference and emails with J. Safar regarding strategy matters (0.1) (0.2/2)	336.00
12/15/23	J. C. Safar	0.30	L120	Participate in works-in-process call (0.2) (0.4/2); participate in strategy call with D. McGonigle (0.1) (0.2/2)	286.50
12/18/23	D. F. McGonigle	0.10	L120	Communications with insurer representative regarding status and planning (0.1) (0.2/2)	112.00
12/19/23	D. F. McGonigle	0.20	L120	Emails with team regarding planning for update call (0.1) (0.2/2); prepare for update call with insurer representative regarding discovery matters (0.1) (0.2/2)	224.00
12/21/23	D. F. McGonigle	0.40	L120	Prepare for conference regarding discovery issues (0.1) (0.2/2); conference with insurer representatives, M. Evert, B. Erens and M. Hirst regarding discovery matters (0.3) (0.7/2)	448.00

K&L GATES

Invoice # 4289924
0246801
Page 4 of 5

12/28/23	D. F. McGonigle	0.40	L120	Attend virtual omnibus hearing (0.2) (0.5/2); preliminary review of ruling on motions to dismiss (0.2) (0.5/2)	448.00
TOTAL FEES				7.20 hrs	\$ <u>7,374.00</u>

TIMEKEEPER SUMMARY

D. M. Aceto	1.40	hrs at	\$ 850.00 / hr	1,190.00
L. M. Martinelli	0.20	hrs at	\$ 385.00 / hr	77.00
D. F. McGonigle	4.60	hrs at	\$ 1,120.00 / hr	5,152.00
J. C. Safar	1.00	hrs at	\$ 955.00 / hr	955.00
TOTAL FEES				7.20 hrs \$ <u>7,374.00</u>

TASK CODE SUMMARY

L120	Analysis/Strategy	7.20 hrs	7,374.00
TOTAL FEES			\$ <u>7,374.00</u>

MATTER SUMMARY

Fees	\$ 7,374.00
10% Discount	\$ <u>(737.40)</u>
Total Fees	\$ <u>6,636.60</u>
MATTER TOTAL	\$ <u>6,636.60</u>

K&L GATES

Invoice # 4289924
0246801
Page 5 of 5

Chapter 11 Retention and Compensation (00002) \$158.85

Your Ref. No.: ASB-12750662-Murray Bankruptc

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
12/28/23	D. F. McGonigle	0.10	B160	Prepare monthly fee statements (0.1) (0.2/2)	112.00
12/28/23	E. Steele	0.10	B160	Draft monthly fee statement for November 2023 (0.1) (0.2/2)	64.50
TOTAL FEES				0.20 hrs	\$ <u>176.50</u>

TIMEKEEPER SUMMARY

D. F. McGonigle	0.10 hrs at	\$ 1,120.00 / hr	112.00
E. Steele	0.10 hrs at	\$ 645.00 / hr	64.50
TOTAL FEES			\$ <u>176.50</u>

TASK CODE SUMMARY

B160	Fee/Employment Applications	0.20 hrs	176.50
TOTAL FEES			\$ <u>176.50</u>

MATTER SUMMARY

Fees	\$ 176.50
10% Discount	\$ <u>(17.65)</u>
Total Fees	\$ <u>158.85</u>
MATTER TOTAL	\$ <u>158.85</u>

**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)

**FORTY-THIRD MONTHLY STATEMENT OF FEES AND EXPENSES INCURRED BY
K&L GATES LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTORS FOR
THE PERIOD FROM JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 171] (the "Interim Compensation Order"), K&L Gates LLP, special insurance counsel to Aldrich Pump LLC and Murray Boiler LLC as debtors and debtors in possession (together, the "Debtors"), submits its *Forty-Third Monthly Statement of Fees and Expenses Incurred by K&L Gates LLP as Special Insurance Counsel for the Debtors for the Period From January 1, 2024 Through January 31, 2024* (the "Monthly Fee Statement").

Itemization of Services Rendered and Expenses Incurred

1. Attached hereto as Exhibit A are K&L Gates LLP's invoices for the period January 1, 2024 through January 31, 2024 (the "Statement Period").

¹

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.

Total Fees and Expenses for the Statement Period

2. The total amounts of fees and expenses incurred by K&L Gates LLP during the Statement Period are as follows:

Total Fees	\$21,461.40
Total Expenses	\$0.00
TOTAL	\$21,461.40

3. Pursuant to the Interim Compensation Order, K&L Gates LLP seeks payment of \$19,315.26 from the Debtors for the Statement Period (the "Interim Amount"), representing (a) 90% of K&L Gates LLP's fees and (b) 100% of its incurred expenses.

Billing Adjustments

4. Consistent with its own internal policies and to comply with the "reasonableness" requirements of section 330 of the Bankruptcy Code, K&L Gates LLP has reviewed its monthly service descriptions and has determined that certain fees and expenses should not be charged to the Debtors. In particular, K&L Gates LLP has voluntarily determined that \$1,645.00 in fees will not be charged to the Debtors.

Notice and Objection Procedures

5. In accordance with the Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtors, 800-E Beaty Street, Davidson, North Carolina 28036 (Attn: Allan Tananbaum, Esq., atananbaum@tranetechnologies.com); (b) counsel to the Debtors (I) Jones Day, 77 West Wacker, Chicago, IL 60601 (Attn: Brad B. Erens, Esq., bberens@jonesday.com, Mark A. Cody, Esq., macody@jonesday.com, Caitlin K. Cahow, Esq., ckcahow@jonesday.com), and (II) Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, NC 28202 (Attn: C. Richard Rayburn, Jr., Esq., rrayburn@rcdlaw.net and John R. Miller, Jr., Esq., jmillerr@rcdlaw.net); (c) the office of the United States Bankruptcy

Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., feeapplications@ncwba.uscourts.gov); (d) counsel to the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc., (I) McCarter & English, LLP, 1600 Market Street, Suite 3900, Philadelphia, Pennsylvania 19103 (Attn: Philip D. Amoa, Esq., pamoa@mccarter.com), (II) McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102 (Attn: Anthony Bartell, Esq., abartell@mccarter.com and Phillip S. Pavlick, Esq., ppavlick@mccarter.com), (III) McCarter & English, LLP, Worldwide Plaza, 825 Eighth Ave, 31st Floor, New York, New York 10019 (Attn: Gregory J. Mascitti, Esq., gmascitti@mccarter.com) and (IV) Burt & Cordes, PLLC, 122 Cherokee Road, Suite 1, Charlotte, North Carolina 28207 (Attn: Stacy C. Cordes, Esq., scordes@burtcordeslaw.com, (e) counsel to the Official Asbestos Claimants' Committee, (I) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey, Esq., namsey@rc.com and Davis Lee Wright, Esq., dwright@rc.com), (II) Caplin & Drysdale, Chartered, One Thomas Circle, NW, Suite 1100 Washington, DC 20005 (Attn: Kevin C. Maclay, Esq., kmaclay@capdale.com, James P. Wehner, Esq., jwehner@capdale.com and Todd E. Phillips, Esq., tphillips@capdale.com) and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com), and (f) counsel to the Future Claims Representative, (I) Grier Wright Martinez PA, 521 E. Morehead Street, Suite 440, Charlotte, NC 28202 (Attn: Joseph W. Grier III, Esq., jgrier@grierlaw.com, A. Cotton Wright, Esq., cwright@grierlaw.com), and (II) Orrick, Herrington & Sutcliffe LLP, 2100 Pennsylvania Avenue, NW, Washington, D.C. 20037 (Jonathan P. Guy, Esq., jguy@orrick.com, Debra L. Felder, Esq., dfelder@orrick.com).

6. Pursuant to the Interim Compensation Order, objections to this Monthly Fee Statement (each, an "Objection"), if any, must be served upon K&L Gates LLP, as the

affected Retained Professional, and upon the other Notice Parties no later than March 15, 2024 (the “Objection Deadline”). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

7. Upon the expiration of the Objection Deadline, the Debtors will be authorized to pay K&L Gates LLP an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection.

8. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by K&L Gates LLP at a later date.

Dated: March 1, 2024
Pittsburgh, PA

Respectfully submitted,

/s/ David F. McGonigle

David McGonigle

K&L Gates LLP

210 Sixth Avenue

Pittsburgh, PA 15222

Telephone: (412) 355-6233

Facsimile: (412) 355-6501

E-mail: david.mcgonigle@klgates.com

(Admitted *pro hac vice*)

SPECIAL INSURANCE COUNSEL FOR
DEBTORS AND DEBTORS IN POSSESSION

EXHIBIT A

Invoices

K&L GATES

K&L GATES LLP
K&L GATES CENTER
210 SIXTH AVENUE
PITTSBURGH, PA 15222-2613
T +1 412 355 6500 F +1 412 355 6501 klgates.com
Tax ID No. 25 0921018

Aldrich Pump LLC
Allan Tananbaum, Esquire
800-E Beatty Street
Davidson, North Carolina 28036

Invoice Date : February 1, 2024
Invoice Number : 4301354
Services Through : January 31, 2024
Our File Number : 0246802

INVOICE SUMMARY BY MATTER

Asbestos Insurance Advice (00001)

Fees	\$ 13,303.00	
10% Discount	\$ (1,330.30)	
Total Fees	\$ 11,972.70	
Total Amount Due This Matter		\$ 11,972.70

Chapter 11 Retention and Compensation (00002)

Fees	\$ 1,046.00	
10% Discount	\$ (104.60)	
Total Fees	\$ 941.40	
Total Amount Due This Matter		\$ 941.40

CURRENT INVOICE DUE - All Matters	\$ <u>12,914.10</u>
--	----------------------------

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Road - Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

PLEASE NOTE CHANGES to Mail-To and Overnight addresses

K&L GATES

Invoice # 4301354
0246802
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Asbestos Insurance Advice (00001) \$11,972.70

Your Ref. No.: ASB-12750660-Aldrich Bankrupt

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
01/02/24	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	79.00
01/02/24	D. F. McGonigle	1.60	L120	Planning for and communications regarding insurer update call (0.1) (0.2/2); review docket and recent orders (0.2) (0.3/2); emails with team regarding insurer update call (0.1) (0.2/2); conference with L. Martinelli regarding counsel list updates (0.1) (0.2/2); further review and analysis of ruling on motions to dismiss and to withdraw derivative standing (1.1) (2.2/2)	1,864.00
01/03/24	D. F. McGonigle	0.70	L120	Participate in strategy call with Debtor and Affiliates teams (0.5) (1.0/2); conference with J. Safar regarding recent rulings and strategy (0.2) (0.4/2)	815.50
01/03/24	J. C. Safar	0.50	L120	Conference with client and bankruptcy team regarding strategy (0.5) (1.0/2)	497.50
01/04/24	D. F. McGonigle	0.10	L120	Conference with insurance representative regarding status (0.1)	116.50
01/05/24	D. F. McGonigle	0.50	L120	Participate in works-in-process call with Debtors and Affiliates (0.5) (1.0/2)	582.50
01/08/24	D. F. McGonigle	0.70	L120	Prepare for insurer update call (0.3) (0.5/2); conference with A. Tananbaum, B. Erens and M. Evert regarding insurer	815.50

K&L GATES

Invoice # 4301354
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DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
				update call and status (0.2) (0.4/2); participate in insurer update call (0.2) (0.3/2)	
01/10/24	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	79.00
01/11/24	L. M. Martinelli	0.30	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2); update, circulate counsel lists (0.1) (0.2/2)	118.50
01/11/24	D. F. McGonigle	0.10	L120	Email from D. Torborg regarding discovery issues (0.1) (0.2/2)	116.50
01/12/24	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	79.00
01/15/24	D. F. McGonigle	0.10	L120	Attention to audit inquiry letter (0.1) (0.2/2)	116.50
01/16/24	D. F. McGonigle	0.40	L120	Conference with A. Tananbaum regarding discovery and information request (0.2); emails to K. Hegde regarding audit inquiry letter (0.1); emails and conference with K. Stewart regarding audit inquiry letter (0.1) (0.2/2)	466.00
01/16/24	K. L. Stewart	0.20	L120	Consider audit response matters and discuss with D. McGonigle (0.2) (0.4/2)	218.00
01/18/24	K. G. Hegde	0.50	L120	Review audit letter and sample (0.2) (0.4/2); conference with D. McGonigle on letter (0.1); review and analyze prior correspondence on audits (0.2) (0.4/2)	265.00
01/18/24	D. F. McGonigle	0.10	L120	Conference with K. Hegde regarding audit inquiry letter response (0.1) (0.2/2)	116.50
01/19/24	K. G. Hegde	0.10	L120	Correspond with D. McGonigle on audit response after reviewing prior audits (0.1) (0.2/2)	53.00
01/19/24	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by	79.00

K&L GATES

Invoice # 4301354
0246802
Page 4 of 7

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
01/19/24	D. F. McGonigle	0.20	L120	team attorneys (0.2) (0.4/2) Attention to audit inquiry letter (0.1); review Claro/Stout bills for privilege and confidentiality (0.1) (0.2/2)	233.00
01/21/24	D. F. McGonigle	0.70	L120	Review and comment on draft interrogatory responses (0.7) (1.3/2)	815.50
01/22/24	D. F. McGonigle	0.10	L120	Emails with team and conference with A. Tananbaum regarding discovery responses (0.1)	116.50
01/25/24	D. F. McGonigle	0.20	L120	Communications with insurer representative regarding status (0.1); emails with M. Evert and team regarding discovery issues (0.1)	233.00
01/26/24	D. F. McGonigle	0.60	L120	Conference with insurer representative regarding status and planning (0.2) (0.3/2); participate in works-in-process call (0.4) (0.7/2)	699.00
01/28/24	K. G. Hegde	0.10	L120	Compile materials for audit report request and submit (0.1) (0.2/2)	53.00
01/29/24	K. G. Hegde	0.30	L120	Correspond with timekeepers and obtain audit reports (0.3) (0.6/2)	159.00
01/29/24	D. F. McGonigle	0.10	L120	Conference with K. Hegde regarding audit inquiry letter (0.1)	116.50
01/30/24	K. G. Hegde	0.40	L120	Draft request for audit opinion report and request for responses to D. McGonigle (0.4) (0.8/2)	212.00
01/30/24	D. F. McGonigle	0.10	L120	Emails with A. Tananbaum and M. Hirst regarding discovery issues (0.1) (0.2/2)	116.50
01/31/24	K. G. Hegde	0.30	L120	Review and analyze audit materials for drafting audit letter (0.3) (0.6/2)	159.00
01/31/24	K. G. Hegde	0.60	L120	Correspond with timekeepers to collect all responses for audit letter (0.6) (1.2/2)	318.00

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Invoice # 4301354
0246802
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DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
01/31/24	D. F. McGonigle	3.00	L120	Research work product and course of dealings file in response to A. Tananbaum inquiry (2.4); conference with J. Safar regarding discovery issue (0.1) (0.2/2); communications with insurer representative regarding status (0.1) (0.2/2); analysis of discovery status and report to team regarding same (0.4) (0.8/2)	3,495.00
01/31/24	J. C. Safar	0.10	L120	Conference with D. McGonigle regarding insurer communications and strategy (0.1) (0.2/2)	99.50
TOTAL FEES				13.50 hrs	\$ <u>13,303.00</u>

TIMEKEEPER SUMMARY

K. G. Hegde	2.30	hrs at	\$	530.00	/ hr	1,219.00
L. M. Martinelli	1.10	hrs at	\$	395.00	/ hr	434.50
D. F. McGonigle	9.30	hrs at	\$	1,165.00	/ hr	10,834.50
J. C. Safar	0.60	hrs at	\$	995.00	/ hr	597.00
K. L. Stewart	0.20	hrs at	\$	1,090.00	/ hr	218.00
TOTAL FEES				13.50	hrs	\$ <u>13,303.00</u>

TASK CODE SUMMARY

L120	Analysis/Strategy	13.50	hrs	13,303.00
	TOTAL FEES	13.50	hrs	\$ <u>13,303.00</u>

MATTER SUMMARY

Fees	\$ 13,303.00
10% Discount	\$ <u>(1,330.30)</u>
Total Fees	\$ <u>11,972.70</u>
MATTER TOTAL	\$ <u>11,972.70</u>

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Invoice # 4301354
0246802
Page 6 of 7

Chapter 11 Retention and Compensation (00002)**\$941.40**

Your Ref. No.: ASB-12750660-Aldrich Bankrupt

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
01/02/24	D. F. McGonigle	0.20	B160	Review and comment on draft monthly fee statement (0.2) (0.4/2)	233.00
01/02/24	E. Steele	0.20	B160	Revise, finalize and circulate November 2023 monthly fee statement (0.2) (0.3/2)	139.00
01/02/24	M. Westbrook	0.10	B160	Review and approve monthly fee application (0.1) (0.2/2)	81.50
01/25/24	E. Steele	0.20	B160	Begin drafting December 2023 monthly fee statement and correspondence with Jones Day regarding same (0.2) (0.4/2)	139.00
01/25/24	M. Westbrook	0.10	B160	Review timing for monthly fee app (0.1) (0.2/2)	81.50
01/29/24	D. F. McGonigle	0.10	B160	Prepare monthly fee statement (0.1) (0.2/2)	116.50
01/30/24	D. F. McGonigle	0.10	B160	Review and comment on draft fee statements (0.1)	116.50
01/30/24	E. Steele	0.20	B160	Continue drafting December 2023 fee application and circulate same (0.2) (0.3/2)	139.00
TOTAL FEES				1.20 hrs	\$ <u><u>1,046.00</u></u>

TIMEKEEPER SUMMARY

D. F. McGonigle	0.40 hrs at	\$ 1,165.00 / hr	466.00
E. Steele	0.60 hrs at	\$ 695.00 / hr	417.00
M. Westbrook	0.20 hrs at	\$ 815.00 / hr	163.00
TOTAL FEES			\$ <u><u>1,046.00</u></u>

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Invoice # 4301354
0246802
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TASK CODE SUMMARY

B160	Fee/Employment Applications	1.20 hrs	1,046.00
	TOTAL FEES	1.20 hrs	\$ <u>1,046.00</u>

MATTER SUMMARY

Fees	\$ 1,046.00
10% Discount	\$ <u>(104.60)</u>
Total Fees	\$ <u>941.40</u>
MATTER TOTAL	\$ <u>941.40</u>

K&L GATES

K&L GATES LLP
K&L GATES CENTER
210 SIXTH AVENUE
PITTSBURGH, PA 15222-2613
T +1 412 355 6500 F +1 412 355 6501 klgates.com
Tax ID No. 25 0921018

Murray Boiler LLC
Allan Tananbaum, Esquire
800-E Beaty Street
Davidson, NC 28036

Invoice Date : February 1, 2024
Invoice Number : 4301352
Services Through : January 31, 2024
Our File Number : 0246801

INVOICE SUMMARY BY MATTER

Asbestos Insurance Advice (00001)

Fees	\$	8,706.50	
10% Discount	\$	(870.65)	
Total Fees	\$	7,835.85	
Total Amount Due This Matter			\$ 7,835.85

Chapter 11 Retention and Compensation (00002)

Fees	\$	790.50	
10% Discount	\$	(79.05)	
Total Fees	\$	711.45	
Total Amount Due This Matter			\$ 711.45

CURRENT INVOICE DUE - All Matters

\$ 8,547.30

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Road - Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N A,
500 First Ave 92
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP
Acct No.: 1077692783

Routing/ABA: 043000096
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to AccountsReceivableSEA@klgates.com with invoice number(s) and amounts.

PLEASE NOTE CHANGES to Mail-To and Overnight addresses

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Invoice # 4301352
0246801
Page 2 of 7

Asbestos Insurance Advice (00001) \$7,835.85

Your Ref. No.: ASB-12750662-Murray Bankruptc

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
01/02/24	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	79.00
01/02/24	D. F. McGonigle	1.50	L120	Planning for and communications regarding insurer update call (0.1) (0.2/2); review docket and recent orders (0.1) (0.3/2); emails with team regarding insurer update call (0.1) (0.2/2); conference with L. Martinelli regarding counsel list updates (0.1) (0.2/2); further review and analysis of ruling on motions to dismiss and to withdraw derivative standing (1.1) (2.2/2)	1,747.50
01/03/24	D. F. McGonigle	0.70	L120	Participate in strategy call with Debtor and Affiliates teams (0.5) (1.0/2); conference with J. Safar regarding recent rulings and strategy (0.2) (0.4/2)	815.50
01/03/24	J. C. Safar	0.50	L120	Conference with client and bankruptcy team regarding strategy (0.5) (1.0/2)	497.50
01/05/24	D. F. McGonigle	0.50	L120	Participate in works-in-process call with Debtors and Affiliates (0.5) (1.0/2)	582.50
01/08/24	D. F. McGonigle	0.50	L120	Prepare for insurer update call (0.2) (0.5/2); conference with A. Tananbaum, B. Erens and M. Evert regarding insurer update call and status (0.2) (0.4/2); participate in insurer update call (0.1)	582.50

K&L GATES

Invoice # 4301352
0246801
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DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
01/10/24	L. M. Martinelli	0.20	L120	(0.3/2) Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	79.00
01/11/24	L. M. Martinelli	0.30	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2); update, circulate counsel lists (0.1) (0.2/2)	118.50
01/11/24	D. F. McGonigle	0.10	L120	Email from D. Torborg regarding discovery issues (0.1) (0.2/2)	116.50
01/12/24	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	79.00
01/15/24	D. F. McGonigle	0.10	L120	Attention to audit inquiry letter (0.1) (0.2/2)	116.50
01/16/24	D. F. McGonigle	0.10	L120	Emails and conference with K. Stewart regarding audit inquiry letter (0.1) (0.2/2)	116.50
01/16/24	K. L. Stewart	0.20	L120	Consider audit response matters and discuss with D. McGonigle (0.2) (0.4/2)	218.00
01/18/24	K. G. Hegde	0.40	L120	Review audit letter and sample (0.2) (0.4/2); review and analyze prior correspondence on audits (0.2) (0.4/2)	212.00
01/18/24	D. F. McGonigle	0.10	L120	Conference with K. Hegde regarding audit inquiry letter response (0.1) (0.2/2)	116.50
01/19/24	K. G. Hegde	0.10	L120	Correspond with D. McGonigle on audit response after reviewing prior audits (0.1) (0.2/2)	53.00
01/19/24	L. M. Martinelli	0.20	L120	Review email, documents for case library for use by team attorneys (0.2) (0.4/2)	79.00
01/19/24	D. F. McGonigle	0.10	L120	Review Claro/Stout bills for privilege and confidentiality (0.1) (0.2/2)	116.50
01/21/24	D. F. McGonigle	0.60	L120	Review and comment on draft interrogatory responses (0.6) (1.3/2)	699.00
01/26/24	D. F. McGonigle	0.40	L120	Conference with insurer representative regarding status and planning (0.1) (0.3/2); participate in works-	466.00

K&L GATES

Invoice # 4301352
0246801
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DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
01/28/24	K. G. Hegde	0.10	L120	in-process call (0.3) (0.7/2) Compile materials for audit report request and submit (0.1) (0.2/2)	53.00
01/29/24	K. G. Hegde	0.30	L120	Correspond with timekeepers and obtain audit reports (0.3) (0.6/2)	159.00
01/30/24	K. G. Hegde	0.40	L120	Draft request for audit opinion report and request for responses to D. McGonigle (0.4) (0.8/2)	212.00
01/30/24	D. F. McGonigle	0.10	L120	Emails with A. Tananbaum and M. Hirst regarding discovery issues (0.1) (0.2/2)	116.50
01/31/24	K. G. Hegde	0.60	L120	Correspond with timekeepers to collect all responses for audit letter (0.6) (1.2/2)	318.00
01/31/24	K. G. Hegde	0.30	L120	Review and analyze audit materials for drafting audit letter (0.3) (0.6/2)	159.00
01/31/24	D. F. McGonigle	0.60	L120	Conference with J. Safar regarding discovery issue (0.1) (0.2/2); communications with insurer representative regarding status (0.1) (0.2/2); analysis of discovery status and report to team regarding same (0.4) (0.8/2)	699.00
01/31/24	J. C. Safar	0.10	L120	Conference with D. McGonigle regarding insurer communications and strategy (0.1) (0.2/2)	99.50
TOTAL FEES				9.50 hrs	\$ <u>8,706.50</u>

K&L GATES

Invoice # 4301352
0246801
Page 5 of 7

TIMEKEEPER SUMMARY

K. G. Hegde	2.20 hrs at	\$ 530.00 / hr	1,166.00
L. M. Martinelli	1.10 hrs at	\$ 395.00 / hr	434.50
D. F. McGonigle	5.40 hrs at	\$ 1,165.00 / hr	6,291.00
J. C. Safar	0.60 hrs at	\$ 995.00 / hr	597.00
K. L. Stewart	0.20 hrs at	\$ 1,090.00 / hr	218.00
TOTAL FEES	9.50 hrs		\$ <u>8,706.50</u>

TASK CODE SUMMARY

L120	Analysis/Strategy	9.50 hrs	8,706.50
	TOTAL FEES	9.50 hrs	\$ <u>8,706.50</u>

MATTER SUMMARY

Fees	\$ 8,706.50
10% Discount	\$ <u>(870.65)</u>
Total Fees	\$ <u>7,835.85</u>
MATTER TOTAL	\$ <u>7,835.85</u>

K&L GATES

Invoice # 4301352
0246801
Page 6 of 7

Chapter 11 Retention and Compensation (00002)

\$711.45

Your Ref. No.: ASB-12750662-Murray Bankruptc

FEES

DATE	NAME	HRS	TASK	DESCRIPTION	AMOUNT
01/02/24	D. F. McGonigle	0.20	B160	Review and comment on draft monthly fee statement (0.2) (0.4/2)	233.00
01/02/24	E. Steele	0.10	B160	Revise, finalize and circulate November 2023 monthly fee statement (0.1) (0.3/2)	69.50
01/02/24	M. Westbrook	0.10	B160	Review and approve monthly fee application (0.1) (0.2/2)	81.50
01/25/24	E. Steele	0.20	B160	Begin drafting December 2023 monthly fee statement and correspondence with Jones Day regarding same (0.2) (0.4/2)	139.00
01/25/24	M. Westbrook	0.10	B160	Review timing for monthly fee app (0.1) (0.2/2)	81.50
01/29/24	D. F. McGonigle	0.10	B160	Prepare monthly fee statement (0.1) (0.2/2)	116.50
01/30/24	E. Steele	0.10	B160	Continue drafting December 2023 fee application and circulate same (0.1) (0.3/2)	69.50
TOTAL FEES				0.90 hrs	\$ <u><u>790.50</u></u>

TIMEKEEPER SUMMARY

D. F. McGonigle	0.30 hrs at	\$ 1,165.00 / hr	349.50
E. Steele	0.40 hrs at	\$ 695.00 / hr	278.00
M. Westbrook	0.20 hrs at	\$ 815.00 / hr	163.00
TOTAL FEES	0.90 hrs		\$ <u><u>790.50</u></u>

K&L GATES

Invoice # 4301352
0246801
Page 7 of 7

TASK CODE SUMMARY

B160	Fee/Employment Applications	0.90 hrs	790.50
	TOTAL FEES	0.90 hrs	\$ <u>790.50</u>

MATTER SUMMARY

Fees	\$ 790.50
10% Discount	\$ <u>(79.05)</u>
Total Fees	\$ <u>711.45</u>
MATTER TOTAL	\$ <u>711.45</u>

EXHIBIT B

Proposed Order

**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 ELEVENTH INTERIM APPLICATION OF K&L GATES
LLP FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES
AS SPECIAL INSURANCE COUNSEL TO THE DEBTORS
FOR THE PERIOD FROM OCTOBER 1, 2023 THROUGH JANUARY 31, 2024**

This matter coming before the Court on the *Eleventh Interim Application of K&L Gates LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses as Special Insurance Counsel to the Debtors for the Period From October 1, 2023 Through January 31, 2024* (the "Interim Fee Application")² filed by K&L Gates LLP

¹ 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 Capitalized terms not otherwise defined herein have the meanings given to them in the Interim Fee Application.

as special insurance counsel to the above-captioned debtors and debtor in possession (the "Debtors"); the Court having reviewed the Interim Fee Application; the Court having found that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (iii) notice of the Interim Fee Application and the notice of an opportunity for hearing were served upon the parties required by Local Rule 2002-1(g) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. 171] (the "Interim Compensation Order") and no other or further notice is required, (iv) the compensation requested in the Interim Fee Application is reasonable and for actual and necessary services rendered by K&L Gates LLP on behalf of the Debtors during the period from October 1, 2023 through January 31, 2024 (the "Compensation Period"), (v) the expenses for which reimbursement is sought in the Interim Fee Application are actual and necessary expenses incurred by K&L Gates LLP during the Compensation Period on behalf of the Debtors, and (vi) the Interim Fee Application fully complies with the Interim Compensation Order, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Compensation Guidelines; and the Court having determined that the legal and factual bases set forth in the Interim Fee Application establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Interim Fee Application is GRANTED.
2. K&L Gates LLP is awarded, on an interim basis, compensation for professional services rendered during the Compensation Period in the amount of \$74,582.55 and reimbursement for actual and necessary expenses incurred by K&L Gates LLP during the Compensation Period in the amount of \$0.00.

3. The Debtors are authorized and directed to pay promptly to K&L Gates LLP the amount of fees and expenses approved by this Order, to the extent that such amounts have not previously been paid by the Debtors.

4. The Debtors and K&L Gates LLP 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