

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

<p>In re</p> <p>ALDRICH PUMP LLC, <i>et al.</i>,¹</p> <p>Debtors.</p>	<p>Chapter 11</p> <p>Case No. 20-____ (___)</p> <p>(Joint Administration Requested)</p>
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EX PARTE APPLICATION TO EMPLOY RAYBURN COOPER & DURHAM, P.A., AS CO-COUNSEL FOR DEBTORS AND DEBTORS-IN-POSSESSION AS OF THE PETITION DATE

The above-captioned debtors (together, the "Debtors") apply to the Court for entry of an order pursuant to section 327 of title 11 of the United States Code (the "Bankruptcy Code") and Local Rule 2016-1(b) of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the "Local Rules"), authorizing the retention and employment of the law firm of Rayburn Cooper & Durham, P.A. ("RCD") effective as of the Petition Date (as hereinafter defined), as co-counsel for the Debtors (the "Application"). The facts and circumstances supporting this Application are set forth in the Declaration of John R. Miller, Jr. on Behalf of Rayburn Cooper & Durham, P.A., in Support of Application to Employ Rayburn Cooper & Durham, P.A., as Co-Counsel for Debtors and Debtors-in-Possession (the "Miller Declaration," attached hereto as Exhibit A). In further support of this Application, the Debtors respectfully show the Court as follows:

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.



JURISDICTION BACKGROUND AND BASIS FOR RELIEF

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this Application is a core proceeding pursuant to 28 U.S.C. § 157(b) (2). Venue is proper pursuant to 28 U.S.C. §§1408 and 1409.

2. On June 18, 2020 (the “Petition Date”), the Debtors each filed voluntary petitions under Chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). The Debtors are continuing in control of their businesses and manage their property as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

3. The statutory bases for the relief requested herein are sections 327, 328, 330, and 331 of the Bankruptcy Code and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure and Rule 2016-1(b) of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the “Local Rules”).

4. Under section 327(a) of the Bankruptcy Code, a debtor in possession may employ one or more attorneys to represent it in carrying out its duties under the Bankruptcy Code, provided that such attorneys are disinterested persons and do not hold or represent an interest adverse to the estate.

RETENTION OF RAYBURN COOPER & DURHAM, P.A.

5. The Debtors seek to retain RCD, as co-counsel for the Debtors because of RCD’s experience and knowledge in the field of debtors’ and creditors’ rights and business cases under Chapter 11 of the Bankruptcy Code and because of its expertise, experience, and knowledge in practicing before this Court, its proximity to the Court, and its ability to respond quickly to emergency hearings and other emergency matters in this Court.

6. The services of attorneys pursuant to the terms of this Application are necessary in order to enable the Debtors to execute their duties as debtors and debtors-in-possession. RCD has informed the Debtors that its billing rates for the year 2020 vary from \$365.00/hr. to \$695.00/hr. for partners, \$600.00 for a former partner now of counsel, \$225.00/hr. to \$275.00/hr. for associates and \$180.00/hr. for para-professionals. RCD will apply for fees on an hourly basis for its professionals based upon its current schedule of hourly rates for 2020 as shown on the schedule attached to the Miller Declaration and incorporated herein as Schedule A, plus reimbursement of actual, necessary expenses and other charges that RCD incurs in this representation. The 2020 hourly rates shown on Schedule A are consistent with the rates charged by RCD in bankruptcy and non-bankruptcy matters of this type. RCD adjusts its billing rates at least yearly in January of each year and will provide notice to the Debtors, the Bankruptcy Administrator and parties requesting notice of any adjusted hourly rates during the case. After any adjustment and notice, RCD will request compensation at the adjusted rates.

7. The Debtors agree and understand that RCD intends to apply for compensation for professional services in connection with its representation of the Debtors subject to approval of this Court and in compliance with the rules and orders of this Court. RCD has agreed to follow its policy of only charging one-half ($\frac{1}{2}$) time for non-working travel time incurred in providing services to the Debtors subject to a possible further reduction of the time charged to the Debtors if work is done on non-Debtors' files during the travel period. For the calendar year 2020, RCD will apply for fees on an hourly basis as set forth above and in the Miller Declaration. The Debtors are informed and believe that all of the hourly rates shown on Schedule A to the Miller Declaration are consistent with the rates charged by RCD in bankruptcy and non-bankruptcy matters of this type and are reasonable. The Debtors are informed that these hourly

rates are subject to periodic adjustment as circumstances warrant and as of January 1 of each calendar year. Subject to Court approval, in accordance with Section 330 of the Bankruptcy Code, compensation will be payable to RCD on an hourly basis based upon its hourly rates for any period of application as set forth herein and reimbursement of actual and necessary expenses incurred by the firm pursuant to RCD's normal policies for reimbursement for disbursements and other expenses.

8. The Debtors have been advised by RCD that RCD has a policy to charge its clients in all areas of practice for all other expenses incurred in connection with the clients' cases. The expenses to clients include, without limitation, photocopying, witness fees, travel expenses, filing and recordation fees, teleconference fees, postage, express mail and messenger charges, computerized legal research charges, expenses for working meals, and telecopier charges. RCD will charge the Debtors for expenses and costs incurred in a manner and at rates consistent with charges made generally to clients of RCD.

9. RCD provided legal services either directly or indirectly to the Debtors prior to the filing of the Debtors' petitions in bankruptcy. RCD has been paid for prepetition services and expenses owed by these Debtors prior to the Petition Date except for services rendered on June 17, 2020 specifically required for completion of the requirements and pleadings necessary for the Chapter 11 filings. The Debtors understand that RCD will seek the fees and expenses incurred on June 17, 2020 as part of its applications for compensation and reimbursement from the Court. RCD received pre-petition retainers, each in the amount of \$37,500 (the "Retainers") from each of the Debtors. RCD was paid a total of \$44,012.04 for professional services rendered and expenses incurred for the pre-petition period through June 16, 2020 by application against the Retainer. RCD still holds the aggregate sum of \$34,421.96 which it holds as a retainer for its

engagement as co-counsel to the Debtors for payment of professional services to be rendered and expenses incurred or to be incurred with respect to these Chapter 11 cases, including the bankruptcy case filing fee of \$1,717.00 for each debtor for a total of \$3,434.00.

10. It is necessary for the Debtors to employ attorneys under a general retainer to provide professional services to the Debtors. The amount of the retainer is neither a limit on fees and expenses that can be awarded to RCD nor does the existence of this retainer constitute an allowance of such fees and expenses, which remains subject to application to, and approval by, this Court.

11. The attorneys in RCD regularly practice in the Bankruptcy Court for the Western District of North Carolina.

12. Based upon the Miller Declaration, it does not appear to the Debtors that RCD has had or presently has any connection with any of the Debtors' creditors or any other party in interest in the above-captioned case or its respective attorneys except as is disclosed in the Miller Declaration.

13. Neither RCD nor any of its members hold any equity interest in the Debtors.

14. Based upon the foregoing, the Debtors do not believe that RCD or any member or associate thereof represents any interest adverse to the Debtors or the Debtors' estates in the matters upon which the law firm is to be engaged as co-counsel for the Debtors, and its employment would be to the best interest of these estates.

15. The Debtors have advised RCD that they do not believe that their relationship to each other poses any conflict of interest because of the general unity of interests among the Debtors. The Debtors have informed RCD that prior to the Petition filings, there were

intercompany transactions incurred in the normal course of business, resulting in intercompany debts, some of which may remain open as of the Petition Date.

16. Based upon the foregoing, the Debtors believe that RCD is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code and that RCD is eligible for employment by the Debtors pursuant to Sections 327, 330 and 331 of the Bankruptcy Code and applicable Bankruptcy Rules.

17. Contemporaneous with the filing of this Application, the Debtors are seeking to retain the law firm of Jones Day as co-counsel with RCD to the Debtors in these Chapter 11 cases.

18. The professional services RCD are to render as co-counsel to the Debtors include, without limitation:

- a. to provide the Debtors legal advice with respect to its powers and duties as debtors in possession in the continued operation of its business and management of their properties;
- b. to assist in taking all necessary action to protect and preserve the Debtors’ estates, including the prosecution of actions on the Debtors’ behalves, the defense of any actions commenced against the Debtors, the negotiation of disputes in which the Debtors are involved, and the preparation of objections to claims filed against the Debtors’ estates;
- c. to prepare or assist in preparing on behalf of the Debtors all necessary schedules, statements, applications, answers, orders, reports, motions and notices in connection with the administration of the estates of the Debtors;
- d. to appear before this Court to represent the interests of the Debtors in matters that require representation and to represent and assist the Debtors in negotiations with other parties in interests in the cases;
- e. to advise and assist in formulating and preparing a plan of reorganization on behalf of the Debtors, the related disclosure statement, and any revisions, amendments relating to such documents, and all related materials; and

- f. to perform other legal services for Debtors which may be necessary in the cases.

RCD and Jones Day have informed the Debtors that they will coordinate in order to ensure no unnecessary duplication of effort and to maximize efficiency in representing the Debtors in these Chapter 11 cases.

NOTICE

19. Pursuant to Local Bankruptcy Rule 9013-1(f), the Debtors seek approval of this Application on an *ex parte* basis. Nevertheless, the Debtors have served a copy of this Application on: (a) the Bankruptcy Administrator; (b) the parties on the list of 20 law firms with significant representations of asbestos claimants filed with the Debtors' chapter 11 petitions; and (c) counsel to Trane Technologies Company LLC and Trane U.S. Inc. The Debtors submit that, in light of the *ex parte* nature of the relief requested, no other or further notice need be provided.

20. No previous application for the relief sought herein has been made to this or any other court.

21. Attached hereto as Exhibit B is a proposed Order approving the engagement of RCD.

WHEREFORE, the Debtors respectfully request that the Court:

- (A) Enter an Order pursuant to sections 327, 328, 330 and 331 of the Bankruptcy Code authorizing the employment of RCD under the terms specified to represent it as co-counsel for the Debtors in these cases under chapter 11 of the Bankruptcy Code and approving their employment as set forth herein effective as of the Petition Date;
- (B) Grant the Debtors such other and further relief as is just and proper.

Dated: June 18, 2020
Charlotte, North Carolina

Respectfully submitted,
Aldrich Pump LLC & Murray Boiler LLC

By: /s/ Allan Tananbaum
Allan Tananbaum
Chief Legal Officer and Secretary

EXHIBIT A

DECLARATION OF JOHN R. MILLER, JR.

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

In re

ALDRICH PUMP LLC, *et al.*,²

Debtors.

Chapter 11

Case No. 20-____ (___)

(Joint Administration Requested)

**DECLARATION OF JOHN R. MILLER, JR. IN SUPPORT OF THE
APPLICATION TO EMPLOY RAYBURN COOPER & DURHAM, P.A.,
AS CO-COUNSEL FOR THE DEBTORS AND
DEBTORS-IN-POSSESSION AS OF THE PETITION DATE**

John R. Miller, Jr., being duly sworn, deposes and says:

1. I am an attorney at law duly admitted to practice in the State of North Carolina and before the United States Bankruptcy Courts of North Carolina, and a member of the firm of Rayburn Cooper & Durham, P.A. (“RCD”). My firm maintains offices for the practice of law at 227 West Trade Street, Suite 1200, Charlotte, North Carolina, 28202. I am authorized to make this declaration on RCD’s behalf.

2. I submit this declaration in support of the application (the “Application”) of the debtors and debtors in possession herein for an order approving the employment of RCD as of June 18, 2020 (the “Petition Date”) as its co-counsel in these bankruptcy cases filed by the Debtors, and in compliance with and to provide disclosure pursuant to Bankruptcy Code Section 328 and Rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). Unless otherwise stated in this declaration, I have personal knowledge of the facts hereinafter set forth. To the extent that any information disclosed herein may require amendment or modification upon RCD’s completion of further analysis or as additional creditor information becomes available to it

or if any new relevant facts or relationships are discovered by RCD or made known to us or arise herein, a supplemental declaration will be submitted to the Court.

3. The Debtors have requested that RCD agree to be employed and provide professional services to the Debtors subject to Court approval.

4. RCD has performed a conflicts check based on the information provided by the Debtors including the "Interested Parties" list attached hereto as Schedule B. Based upon such review, to the best of my knowledge, information and belief, neither I, my law firm, any member of the firm, nor associate thereof, insofar as I have been able to ascertain at this time, has any connection with the Debtors or any of its creditors, the United States Bankruptcy Administrator, or any other party in interest in the above-captioned case, or its respective attorneys except for the following:

- (a) RCD provided legal services either directly or indirectly to the Debtors prior to the filing of the Debtors' petitions in bankruptcy. RCD received two pre-petition retainers, each in the amount of \$37,500, from each of the Debtors. RCD was paid a total of \$44,006.50 for professional services rendered and expenses incurred for the pre-petition period through June 16, 2020 by application against the Retainer. RCD still holds the sum of \$34,421.96 which it holds as a retainer for its engagement as co-counsel to the Debtors for payment of professional services to be rendered and expenses to be incurred with respect to these Chapter 11 cases, including the bankruptcy case filing fee of \$1,717.00 for each Debtor, for a total of \$3,434.00. All of the payments made to RCD were from the Retainers. These fees and expenses include, without limitation, providing legal services to the Debtors in the preparation and commencement of the bankruptcy filings. RCD incurred some fees and expenses in preparation for the filing the voluntary petitions for the Debtors on June 17, 2020 which will be included in its first application for fees and expenses as a necessary preparation for the filings.
- (b) Further, that I or my law firm, through its attorneys:
 - (i) may have appeared in the past, and may appear in the future, in matters, cases or controversies where one or more of the parties in interest of the Debtors may be involved;

² 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.

(ii) may have represented certain of the Debtors' creditors, contract counterparties or lessors in matters unrelated to this case; and

(iii) may have, directly or indirectly, investments in publicly held business entities that may include various parties in interest.

5. Neither RCD nor any of its shareholders hold any direct equity interest in the Debtors.

6. I am informed and believe as follows that the Debtors are affiliates within the bankruptcy definition of such term.

7. The Debtors have advised RCD that they do not believe that their relationship to each other poses any conflict of interest because of the general unity of interests among the Debtors. RCD is informed that prior to the Petition filings, there were intercompany obligations between the Debtors incurred in the ordinary course of business, resulting in intercompany debts, some of which may remain open as of the Petition Date.

8. Based upon the foregoing, neither I, my law firm nor any of its attorneys, insofar as I have been able to ascertain, represents any interest adverse to the Debtors or to the Debtors' estates in the matters upon which the law firm is to be engaged.

9. Based upon the foregoing, I believe that RCD is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code. By reason of the foregoing, I believe that RCD is eligible for employment by the Debtors pursuant to sections 327, 328, 330, and 331 of the Bankruptcy Code and applicable Bankruptcy Rules.

10. Subject to approval of this Court and in compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules and the local rules and orders of this Court, RCD intends to apply for compensation for professional services in connection with its representation of the Debtor as co-counsel, plus reimbursement of actual, necessary expenses and other charges

incurred by RCD during this representation. For the calendar year 2020, RCD will apply for fees on an hourly basis for its professionals as shown on the schedule attached hereto and incorporated herein as Schedule A, plus reimbursement of actual, necessary expenses and other charges that RCD incurs in this representation. The 2020 hourly rates shown on Schedule A are consistent with the rates charged by RCD in bankruptcy and non-bankruptcy matters of this type. RCD will follow its policy of only charging one-half (½) time for non-working travel time incurred in providing services to the Debtors subject to a possible further reduction of the time charged to the Debtors if work is done on non-Debtors files during the travel period.

11. It is RCD's policy to charge its clients in all areas of practice for all other expenses incurred in connection with the clients' cases. The expenses to clients include, without limitation, photocopying, witness fees, travel expenses, filing and recordation fees, teleconference fees, postage, express mail and messenger charges, computerized legal research charges, and expenses for working meals. RCD will charge the Debtors for expenses and costs incurred in a manner and at rates consistent with charges made generally to clients of RCD.

12. No promises have been received by RCD as to compensation in connection with this case other than in accordance with the provisions of the Bankruptcy Code.

13. RCD further states pursuant to Bankruptcy Rule 2016(b) that it has not shared, nor agreed to share (a) any compensation it has received or may receive in this case with any other party or person, other than with partners, shareholders, counsel and associates of RCD or (b) any compensation another party or person has received or may receive.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on this the 18th day of June, 2020.

/s/ John R. Miller, Jr.

John R. Miller, Jr.

N.C. State Bar No.28689

Rayburn Cooper & Durham, P.A.

1200 Carillon, 227 W. Trade St.

Charlotte, NC 28202

Telephone: 704-334-0891

Schedule A

RAYBURN COOPER & DURHAM, P.A. 2020 HOURLY RATES

Attorneys

Rachel M. Buck	\$250
W. Scott Cooper	\$400
Albert F. Durham	\$600
Ross R. Fulton	\$365
G. Kirkland Hardymon	\$365
Natalie E. Kutcher	\$225
John R. Miller, Jr.	\$400
C. Richard Rayburn, Jr.	\$695
Luke G. Thomas	\$225
Matthew L. Tomsic	\$275

Paralegals

Mary E. Elvington	\$180
Kristy D. Godin	\$180
Tiffany N. Lindsay	\$180
Wendy S. Pope	\$180
Julia L. Robinson	\$180

Rayburn Cooper & Durham, P.A. adjusts its billing rates at least yearly in January of each year and more often as circumstances warrant.

Schedule B

INTERESTED PARTIES LIST

Aldrich Pump LLC, et al.

Interested Parties

Debtors

Aldrich Pump LLC
Murray Boiler LLC

Direct Equity Owner of Debtors

Murray Boiler Holdings LLC
Trane Technologies Holdco, Inc.

Debtors' Direct Non-Debtor Subsidiaries

200 Park, Inc.
ClimateLabs LLC

Other Non-Debtor Affiliates

Airco Limited
Alliance Compressors LLC
Amair Limited
Aro De Venezuela, C.A.
Artic Cool Chillers Limited
BEST MATIC INTERNATIONAL LIMITED
BEST MATIC VERMOGENSVERWALTUNGS GmbH
Best-Matic International AB
Calmac Corp.
Climate ETC Technology Services Private Limited
Compagnie Trane Technologies SAS
Cool Energy Limited
Dallah Trane for Manufacturing Air Conditioners
DiaSorin International B.V.
Dradnats, Inc.
EBB Holdings Limited
Filairco Technical Services Co., Inc.
Filairco, Inc.
Flowcool Limited
Frigoblock GmbH
FRIGOBLOCK UK LIMITED
Hermann Trane Harrisburg, Inc.
ICS Cool Energy (SAS)

ICS Cool Energy AG
ICS Cool Energy B.V.
ICS Cool Energy GmbH
ICS Cool Energy Investments Limited
ICS COOL ENERGY LIMITED
ICS GROUP HOLDINGS LIMITED
ICS Heat Pumps Limited
ICS RENEWABLE ENERGY LIMITED
ICS SERVICING LIMITED
Industrial Chill Servicing Private Ltd.
Ingersoll-Rand Climate Solutions Private Limited
Ingersoll-Rand Company of Peru S.A.C.
Ingersoll-Rand Latin America, S. de R.L. de C.V.
Ingersoll-Rand Manufactura, S. de R.L de C.V.
INGERSOLL-RAND ZIMBABWE (PRIVATE) LIMITED
Mitsubishi Electric Trane HVAC US LLC
Murray Boiler Holdings LLC
Nexia Intelligence LLC
Perfect Pitch, L.P.
Prime Air Limited
PT Trane Indonesia
R&O Immobilien GmbH
REFTRANS, S.A.
Société Trane SAS
SPANASHVIEW UNLIMITED COMPANY
Standard Centennial Property, LLC
Standard Compressors, Inc.
Standard Industrial Mineral Products Corp.
Standard Resources and Development Corporation
Standard Trane Insurance Company
Standard Trane Insurance Ireland Designated Activity Company
Standard Trane Warranty Company
T.I. Solutions (Israel) Ltd.
Tast Limited
The Trane Company
Thermo King (Hong Kong) Company Limited

Thermo King (Shanghai) Co., Ltd.
THERMO KING CONTAINER
TEMPERATURE CONTROL
(SUZHOU) CORPORATION LTD.
THERMO KING CONTAINER-
DENMARK A/S
Thermo King Corporation
Thermo King De Puerto Rico, Inc.
THERMO KING EUROPEAN
MANUFACTURING LIMITED
THERMO KING INDIA PRIVATE
LIMITED
THERMO KING IRELAND LIMITED
Thermo King Japan Limited
Thermo King Manufacturing s.r.o.
THERMO KING PUERTO RICO
MANUFACTURA, INC.
Thermo King Rodamientos, S.L.
THERMO KING SERVICES LIMITED
THERMO KING SOUTH AFRICA (PTY)
LTD.
Thermo King SVC, Inc.
Thermo King Sverige AB
Thermo King Trading Company
THERMO KING TRANSPORTKOELING
B.V.
TK Puerto Rico Aire, Inc.
TK Puerto Rico Comercial, Inc.
TK Puerto Rico Ensamblaje, Inc.
TK Puerto Rico Fabricacion, Inc.
TK Puerto Rico Logistica, Inc.
TK Puerto Rico Operaciones Industriales,
Inc.
TK Puerto Rico Produccion, Inc.
TK Puerto Rico Soluciones Climaticas, Inc.
TK Puerto Rico Tecnologias, Inc.
TM Air Conditioning Sdn. Bhd.
Trane (Europe) Limited
Trane (Ireland) Limited
Trane (Schweiz) GmbH / Trane (Suisse)
S.à.r.l.
Trane (Thailand) Limited
Trane Air Conditioning Products Limited
Trane Air Conditioning Systems (China) Co.
Ltd.

Trane Air Conditioning Systems and Service
Co., Limited
Trane AirConditioning Pte. Ltd.
Trane Aire Acondicionado S.L.
Trane Bermuda Ltd.
Trane Brands, Inc.
Trane Buford LLC
Trane BVBA
Trane Canada, L.P.
Trane Canada ULC
Trane Central America, Inc.
Trane China Holdings Limited
TRANE CLIMATE MANUFACTURING
S.R.L.
Trane CR Spol sro.
Trane Croatia d.o.o. za trgovinu
Trane de Argentina S.A.
Trane de Chile S.A.
Trane de Colombia S.A.
Trane Deutschland GmbH
Trane Distribution Pte. Ltd.
Trane do Brasil Indústria e Comércio de
Produtos para Condicionamento de Ar
Ltda.
Trane Dominicana, S.R.L.
Trane Egypt LLC
Trane Energy Choice LLC
Trane Energy Services LLC
Trane Energy-Saving Services (Shanghai)
Co., Ltd.
Trane Europe Holdings B.V.
Trane Export LLC
Trane Finance SPRL
Trane Foundation of New York
TRANE FRANCE SAS
Trane GmbH
Trane GP, Inc.
Trane Grid Services LLC
Trane Hellas S.A.
Trane Holding Co.
Trane Holding Limited
Trane Holdings Company YK
Trane Hungary KFT
Trane Inc.
Trane Inc. Of Delaware
Trane India Ltd.

Trane International, Inc.
Trane IP, Inc.
Trane Italia S.r.L
Trane Japan, Ltd.
Trane Klima Ticaret AS
Trane Korea, Inc.
Trane Kuwait Airconditioning Co. WLL
Trane Malaysia Sales & Services SDN.
BHD.
Trane Maroc S.A.R.L. AU
Trane Netherlands B.V.
Trane NY, Inc.
Trane Poland sp. z o.o.
Trane Portugal
Trane Puerto Rico LLC
Trane Qatar LLC
Trane Romania S.R.L.
Trane S.A.
Trane S.A.E.
Trane Servicefirst, C.A.
Trane Services Limited
Trane Singapore Enterprises Pte. Ltd.
Trane Sistemas Integrales, S. de R. L.
de C. V.
TRANE SUPPORT SAS
Trane Sweden AB
Trane Systems Solutions of Panama, Inc.
Trane Taiwan Distribution Ltd.
Trane Technologies Charitable Foundation
Trane Technologies Company LLC
Trane Technologies Costa Rica Sociedad
Anonima
Trane Technologies European Holding
Company B.V.
Trane Technologies Financial Services
Corporation
Trane Technologies Financing Limited
Trane Technologies Finland Oy
Trane Technologies Funding Ltd.
Trane Technologies Global Holding
Company Limited
Trane Technologies GmbH
Trane Technologies Holdco, Inc.
Trane Technologies Holdings B.V.

TRANE TECHNOLOGIES INDÚSTRIA,
COMÉRCIO E SERVIÇOS DE AR-
CONDICIONADO LTDA.
Trane Technologies International Finance
Limited
Trane Technologies International Limited
Trane Technologies Irish Holdings
Unlimited Company
Trane Technologies Latin America B.V.
Trane Technologies Lux Euro III Financing
S.à.r.l.
Trane Technologies Lux Holdings II
Company S.à.r.l.
Trane Technologies Lux International
Holding Company S.à.r.l.
Trane Technologies Luxembourg Finance
S.A.
Trane Technologies Luxembourg United
S.à.r.l.
Trane Technologies PLC
Trane Technologies Rus LLC
Trane Technologies S.A.
Trane Technologies s.r.o.
Trane Technologies Sales Company LLC
TRANE TECHNOLOGIES SERVIÇOS
LTDA.
Trane Technologies Worldwide Capital
S.à r.l.
Trane Thermo King (Shanghai) Enterprise
Management Co., Ltd.
Trane Thermo King Pty Ltd.
Trane U.S., Inc.
Trane UK Limited
Trane Vidalia LLC
Trane Vietnam Services Company Limited
Trane, S.A. de C.V.
TRICOOL THERMAL LIMITED
TSI Anstalt Ltd.
TUI Holdings Inc.
TwentyThreeC LLC
TYS Limited
World Standard Ltd.

Managers and Officers of the Debtors

Marc Dufour
Ray Pittard

Amy Roeder
Allan Tananbaum
Manlio Valdes
Robert Zafari

Major Current Business Affiliations of Debtors' Managers

200 Park, Inc.
Advent International Corp.
ClimateLabs LLC
Family Connections NJ
Thermo King India Private Limited
TK Corporation
Trane Technologies Charitable Foundation
Trane Technologies PLC

Depository and Disbursement Banks

JP Morgan Chase

Parties to Material Contracts, Unexpired Leases, and License Agreements with the Debtor

National Economic Research Associates, Inc. (NERA)
Navigant Consulting, Inc.
PACE Claim Services
The Claro Group

Debtors' Retained Professionals and Claims Agent

AlixPartners LLP
Bates White LLC
Evert Weathersby Houff
Jones Day
K&L Gates LLP
Kurtzman Carson Consultants LLC
Rayburn Cooper & Durham, P.A.

Debtors' Significant Ordinary Course Professionals, Consultants, and Service Providers

Adler Cohen Harvey Wakeman & Guekguezian LLP
Belin McCormick PC
Cardno Chemrisk
Christopher Shea Goodwin, Attorney at Law LLC
Courington Kiefer & Sommers LLC
Dentons Bingham Greenebaum LLP
Foley & Lardner LLP
Fox Rothschild LLP
Frantz McConnell and Seymour LLP
Frilot LLC
Gordon Rees Scully Mansukhani, LLP
Kemp Smith LLP
Kenny Shelton Liptak and Nowak LLP
Kitch, Drutchas, Wagner, Valitutti & Sherbrook
Kuchler Polk Weiner, LLC
Law Offices of Timothy Clark, P.A.
Litchfield Cavo LLP
Maron Marvel Bradley Anderson & Tardy LLC
Marshall Dennehey Warner Coleman and Goggin
McAfee & Taft
Meagher & Geer P.L.L.P.
Nelson Mullins Riley and Scarborough LLP
Parker Poe Adams & Bernstein LLP
Parsons Behle
Pascarella Divita PLLC
Prindle Goetz Barnes & Reinholtz
Rasmussen, Dickey & Moore LLC
Snell & Wilmer LLP
Spotts Fain, PC
The Roberts Litigation Group
Tucker Ellis LLP
Ugrin Alexander Zadick PC
Verrill Dana LLP

Known Professionals for Certain Non-Debtor Parties in Interest

McCarter & English, LLP

Contractually Indemnified Parties

Ansaldo S.p.A.

ASD Acquisition Corp.
Dresser-Rand Company
Flowserve Corporation
Flowserve Red Corporation
FRC Acquisitions LLC
Ideal Standard International Holding Sarl
Ingersoll-Dresser Pump Company
Ingersoll-Rand U.S. HoldCo., Inc
Murray Turbomachinery Corporation
Rail Acquisition Corp.
Tuthill Energy Systems
Tuthill Pump Company
WABCO Holdings Inc.
Westinghouse Air Brake Company (or
WABCO)

Major Suppliers of Goods and Services

Trane Technologies Company LLC
Trane U.S., Inc.

Law Firms with Significant Representations of Asbestos Claimants

Baron & Budd, PC
Bevan & Associates, LPA, Inc.
Brent Coon & Associates
Cooney & Conway
Early, Lucarelli, Sweeney & Meisenkothen
Goldberg, Persky White, P.C.
Howard & Reed
Law Offices of Peter G. Angelos, P.C.
Motley Rice LLC
Nix, Patterson, LLP
Provost Umphrey Law Firm, L.L.P.
Reaud, Morgan & Quinn, L.L.P.
Simmons Hanly Conroy LLC
SWMW Law, LLC
The Ferraro Law Firm, P.A.
The Gori Law Firm PC
The Lanier Law Firm, P.C.

The Law Offices of Peter T. Nicholl
Weitz & Luxenberg, PC
Wilentz, Goldman & Spitzer, P.A.

Material Insurers

Affiliated FM Insurance Company
AIG Property Casualty Company
AIU Insurance Company
Allianz Underwriters Insurance Company
Allstate Insurance Company
Employers Insurance Company of Wausau
Fireman's Fund Insurance Company
Granite State Insurance Company
Hudson Insurance Company
Landmark Insurance Company
Lexington Insurance Company
National Union Fire Insurance Company of
Pittsburgh, PA
TIG Insurance Company
Travelers Casualty and Surety Company

Employees of the Bankruptcy Administrator's Office for the Western District of North Carolina

Alexandria Kenny
Anne Whitley
David Shepherd
Katrina Adams
Sarah Scholz
Shelley K. Abel

Bankruptcy Judges for the Western District of North Carolina

Judge George Hodges
Judge J. Craig Whitley
Judge Laura T. Beyer

EXHIBIT B

PROPOSED ORDER

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

In re

ALDRICH PUMP LLC, *et al.*,³

Debtors.

Chapter 11

Case No. 20-____ (___)

(Joint Administration Requested)

**EX PARTE ORDER APPROVING EMPLOYMENT OF RAYBURN, COOPER
& DURHAM, P.A. AS ATTORNEYS FOR DEBTORS AND
DEBTORS -IN-POSSESSION AS OF THE PETITION DATE**

Upon the application (the “Application”) of the above-captioned, debtors and debtors-in-possession in the above-captioned cases (the “Debtors”), for entry of an order, pursuant to section 327 of title 11 of the United States Code (the “Bankruptcy Code”) and Local Rule 2016-1(b) of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the “Local Rules”), authorizing the retention and employment of the law firm of Rayburn Cooper & Durham, P.A. (“RCD”) as of the Petition Date (as defined in the Application), as co- counsel for the Debtors in accordance with its normal hourly rates and disbursement policies, as is more fully set forth in the Application; and upon the Declaration of John R. Miller, Jr., a shareholder and member of RCD (the “Miller Declaration”),

³ 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.

which is annexed to the Application as Exhibit A; and the Court being satisfied, based upon the representations made in the Application and the Miller Declaration, that RCD represents or holds no interest adverse to the Debtors or their estates as to the matters upon which it is to be engaged and that said firm is disinterested under the meaning of Section 101(14) of the Bankruptcy Code, and that the employment of RCD is necessary and would be in the best interests of the Debtors and the Debtors' estates; and it appearing that the Court has jurisdiction to consider the Application; and it appearing that notice of the Application has been properly given and such notice is adequate for the entry of this order, and it appearing that no other notice is required; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is granted;
2. The Debtors are authorized to retain RCD as their co-counsel under a general retainer in these chapter 11 cases effective as of the Petition Date; and
3. The compensation to be paid to RCD for professional services rendered and reimbursement for expenses incurred by it shall be as determined by this Court upon proper application pursuant to Bankruptcy Code, including, without limitation, Sections 328, 330 and 331, and such other procedures as may be fixed by order of this Court.
4. Pursuant to Rule 9013-1(f) of the Local Rules, any party shall be entitled to request a hearing or request that the Court reconsider entry of this Order by filing a Motion for Reconsideration within fourteen (14) days of service 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