

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
Charlotte Division**

IN RE:

GARLOCK SEALING TECHNOLOGIES  
LLC, et al.,

Debtors.<sup>1</sup>

Case No. 10-BK-31607

Chapter 11

Jointly Administered

**MOTION FOR ENTRY OF AN ORDER APPROVING  
DISCLOSURE STATEMENT FOR THE JOINT PLAN OF REORGANIZATION OF  
GARLOCK SEALING TECHNOLOGIES LLC, ET AL. AND OLDSCO, LLC,  
PROPOSED SUCCESSOR BY MERGER TO COLTEC INDUSTRIES INC**

Garlock Sealing Technologies LLC (“**Garlock**”), Garrison Litigation Management Group, Ltd. (“**Garrison**”), and The Anchor Packing Company (“**Anchor**”), file this motion (the “**Motion**”) seeking entry of an order approving the Disclosure Statement for the Joint Plan of Reorganization of Garlock Sealing Technologies LLC, et al. and OldCo, LLC, Proposed Successor by Merger to Coltec Industries Inc (the “**Disclosure Statement**”). In support of this Motion, Debtors show the following:

1. Debtors and their parent corporation Coltec Industries Inc (“**Coltec**”) have prepared the Disclosure Statement and Plan in order to implement the comprehensive settlement (the “**Comprehensive Settlement**”) among Debtors, Coltec, the Official Committee of Asbestos

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<sup>1</sup>The debtors in these jointly administered cases are Garlock Sealing Technologies LLC; Garrison Litigation Management Group, Ltd.; and The Anchor Packing Company. The solicitation proposed will be conducted by Coltec Industries Inc pursuant to Sections 1125(g) and 1126(b) of the Bankruptcy Code and Rule 3018(b) of the Bankruptcy Rules with respect to OldCo, LLC which, in the event this Plan is accepted by the requisite numbers of claimants in Class 5, will become a successor by merger to Coltec Industries Inc and commence a bankruptcy case that will be jointly administered under Case No. 10-BK-31607.

Personal Injury Claimants (the “**Committee**”), the Future Asbestos Claimants’ Representative (the “**FCR**”), the Ad Hoc Coltec Future Asbestos Claimants’ Representative (the “**Ad Hoc Coltec FCR**”), and the Ad Hoc Coltec Asbestos Claimants Committee (the “**Ad Hoc Coltec Committee**”) (together all the aforementioned parties, the “**Plan Proponents**”). A copy of the Comprehensive Settlement is attached as **Exhibit A** to the Disclosure Statement.

2. Debtors and Coltec believe the Plan accurately reflects the Comprehensive Settlement and the Disclosure Statement contains adequate information for Asbestos Claimants and other parties in interest to make informed judgments about whether to accept the Plan. While Debtors have obtained substantial input from the remaining Plan Proponents in drafting these documents, the Plan Proponents have not finally approved them.

3. The Committee and the FCR, as parties in interest, are entitled to be heard in connection with this Motion. Consistent with the terms of the Comprehensive Settlement, Debtors expect the Plan Proponents, upon the Court’s approval of the Disclosure Statement and related Confirmation Procedures, will join the Plan as Plan Proponents and jointly solicit its approval.

4. Debtors submit that the Disclosure Statement, filed contemporaneously herewith, provides adequate and sufficient information for the solicitation of holders of claims and equity interests to accept the Plan; and therefore, Debtors pray that the Court enter an Order approving the Disclosure Statement.

5. Debtors will file a further Motion for Entry of an Order Approving Solicitation and Confirmation Procedures and Schedule for Confirmation of the Joint Plan to be heard with this Motion and will submit a proposed order granting both the relief sought in that motion as well as the relief sought herein.

This 20th day of May, 2016.

Respectfully submitted,

/s/ Garland S. Cassada

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