

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

VWS Holdco, Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10979 (JKS)

Jointly Administered

Obj. Deadline: June 20, 2025 at 4:00 p.m. (ET)

Hearing Date: July 2, 2025 at 11:00 a.m. (ET)

NOTICE OF HEARING REGARDING DEBTORS' MOTION
FOR ENTRY OF INTERIM AND FINAL ORDERS AUTHORIZING
DEBTORS TO REDACT CERTAIN PERSONAL INFORMATION

PLEASE TAKE NOTICE that on June 1, 2025, the above-captioned debtors and debtors in possession (the "Debtors") filed the *Debtor's Motion for Entry of Interim and Final Orders Authorizing Debtors to Redact Certain Personal Information* [D.I. 4] (the "Motion"), attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that, on June 4, 2025, the Bankruptcy Court entered the *Interim Order Authorizing the Debtors to Redact Certain Personal Information* [D.I. 34] (the "Interim Order"), attached hereto as Exhibit B.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the final approval of the Motion must (a) be in writing, (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **June 20, 2025 at 4:00 p.m. (ET)** (the "Objection Deadline"), and (c) served as to be received on or before the Objection Deadline upon (a) the Debtors, (b) proposed counsel to the Debtors, Pashman Stein Walder Hayden, P.C., 824 N. Market Street, Suite 800, Wilmington, Delaware 19801, Attn: John W. Weiss (jweiss@pashmanstein.com), Leah M. Eisenberg (leisenberg@pashmanstein.com), Richard W. Riley (rriley@pashmanstein.com) and David E. Sklar (dsklar@pashmanstein.com), (b) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware, 19801, Attn: Jane M. Leamy (jane.m.leafy@usdoj.gov), (c) counsel to the DIP Lenders, Cole Schotz P.C., 1325 Avenue of the Americas, New York, NY 10019, Attn: Daniel F. X. Geoghan (DGeoghan@coleschotz.com).

PLEASE TAKE FURTHER NOTICE that only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Bankruptcy Court at such hearing.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification numbers are as follows: VWS Holdco, Inc. (5412) and Shoosmith Bros., Inc. (6914). The Debtors' mailing address is P.O. Box 2770, Chesterfield, VA 23832.



PLEASE TAKE FURTHER NOTICE THAT A FINAL HEARING ON THE MOTION WILL BE HELD ON JULY 2, 2025 AT 11:00 A.M. (ET) BEFORE THE HONORABLE J. KATE STICKLES, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: June 4, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Richard W. Riley

John W. Weiss (No. 4160)
Richard W. Riley (No. 4052)
824 North Market Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 592-6496
Email: jweiss@pashmanstein.com
rriley@pashmanstein.com

-and-

Leah M. Eisenberg (*pro hac vice* forthcoming)
David E. Sklar (*pro hac vice* forthcoming)
Court Plaza South, East Wing
21 Main Street, Suite 200
Hackensack, NJ 07601
Telephone: (201) 488-8200
Email: leisenberg@pashmanstein.com
dsklar@pashmanstein.com

Proposed Counsel to the Debtors and Debtors in Possession

Exhibit A

Motion

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

VWS Holdco, Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10979 ()

Joint Administration Requested

**MOTION OF DEBTORS FOR ENTRY OF INTERIM AND FINAL ORDERS
AUTHORIZING DEBTORS TO REDACT CERTAIN PERSONAL INFORMATION**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby file this *Motion of Debtors for Entry of Interim and Final Orders Authorizing Debtors to Redact Certain Personal Information* (this “Motion”). This Motion is supported by the *Declaration of Steven F. Agran in Support of First Day Pleadings* (the “First Day Declaration”), filed contemporaneously herewith and incorporated herein by reference. In further support of this Motion, the Debtors respectfully state as follows:

RELIEF REQUESTED

1. By this Motion, and pursuant to sections 105(a), 107(c), and 521 of title 11 of the United States Code (the “Bankruptcy Code”) and rules 1007 and 2002 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Debtors seek entry of orders, substantially in the forms attached hereto as **Exhibit A** and **Exhibit B** (the “Proposed Orders”), authorizing the Debtors to redact certain personal information from documents filed with the Court (as defined

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification numbers are as follows: VWS Holdco, Inc. (5412) and Shoosmith Bros., Inc. (6914). The Debtors’ mailing address is P.O. Box 2770, Chesterfield, VA 23832.

below) in the Chapter 11 Cases (including any Equity Holder List, Creditor Matrix, Schedule, or Statement (each as defined below)).

JURISDICTION AND VENUE

2. The Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding and the Motion is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are sections 105(a), 107(c), and 521 of the Bankruptcy Code, Bankruptcy Rules 1007 and 2002.

4. Pursuant to Local Rule 9013-1(f), the Debtors consent to the entry of a final order by the Court if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

BACKGROUND

5. On June 1, 2025 (the “Petition Date”), the Debtors commenced the Chapter 11 Cases in this Court by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their businesses as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee, examiner or official committee has been appointed in these Chapter 11 Cases.

6. Additional detail regarding the Debtors, their businesses, the events leading to commencement of these Chapter 11 Cases, and the facts and circumstances supporting the relief requested herein is set forth in the First Day Declaration and is incorporated herein by reference.

BASIS FOR RELIEF

Redaction of Certain Personal Information is Warranted.

7. Section 107(c) of the Bankruptcy Code enables the Court to issue orders that protect parties from the potential harm that could result from disclosing personal identifiable information (“PII”):

(c)(1) The bankruptcy court, for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or unlawful injury to the individual or the individual’s property:

(A) Any means of identification (as defined in section 1028(d) of title 18) contained in a paper filed, or to be filed in a case under this title.

(B) Other information contained in a paper described in subparagraph (A).

11 U.S.C. § 107(c)(1).

8. Title 18 of the United States Code defines “means of identification” as:

any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, *including any—*

(A) name, social security number, date of birth, official State or government issued driver’s license or identification number, alien registration number, government passport number, employer or taxpayer identification number

18 U.S.C. § 1028(d)(7) (emphasis added).

9. While transparency is important to the judicial process, Congress recognized a counterbalancing interest in enacting section 107(c)(1) of the Bankruptcy Code: the need to protect the identities and privacy of individuals who have dealings with debtors. The language of both statutes cited above demonstrates Congress’s desire for courts to have flexibility to protect

individuals’ identities. Section 107(c)(1)(B) of the Bankruptcy Code allows a bankruptcy court to shield “[o]ther information” apart from “means of identification,” and the definition of “means of identification” is itself a non-exhaustive list of personal information. *See* 2 Collier on Bankruptcy P 107.04 (16th 2023). Accordingly, although an individual creditor’s home address is not explicitly enumerated as a “means of identification,” it is nevertheless within the broad scope of section 107(c)(1)(B) of the Bankruptcy Code and should be protected to avoid risks of, among other things, identity theft, domestic violence, harassment, stalking, or phishing scams.² *See* Hr’g Tr. at 37:25–38:5, *In re THG Holdings LLC*, No. 19-11689 (JTD) (Bankr. D. Del. Aug. 22, 2019) [D.I. 180] (“I think [that the list in 18 U.S.C. § 1028(d) is] an inclusive list. It wouldn’t seem to make much sense that I could order the names [of individuals] not to be disclosed, but [their] addresses had to be; that wouldn’t make any sense to me.”).

10. Courts in this jurisdiction have granted the relief requested herein in comparable chapter 11 cases. *See, e.g., In re Icon Aircraft, Inc.*, Case No. 24-10703 (CTG) (Bankr. D. Del. Apr. 5, 2024) [D.I. 51] (authorizing redaction of individual PII, including email addresses and home addresses); *In re Humanigen, Inc.*, Case No. 24-10003 (BLS) (Bankr. D. Del. Jan. 29, 2024) [D.I. 74] (authorizing same); *In re MVK Farmco LLC*, No. 23-11721 (LSS) (Bankr. D. Del. Nov. 15, 2023) [D.I. 244] (authorizing the debtors to redact the home and email addresses of natural persons on the Creditor Matrix, Schedules and Statements, affidavits of service, and any other documents filed with the court); *In re Am. Physician Partners, LLC*, No. 23-11469 (BLS) (Bankr.

² This risk in relation to section 107(c)(1) of the Bankruptcy Code is not speculative and has manifested in chapter 11 cases. For example, as described in the “creditor matrix motion” filed in *Charming Charlie Holdings Inc.*, No. 19-11534 (CSS) (Bankr. D. Del. Jul. 11, 2019) [D.I. 4], the abusive former partner of a debtor’s employee used the publicly accessible creditor and employee information filed in the case to track the employee at her new address, which had not been publicly available until then, forcing the employee to change addresses again. *See id.* In a more recent case, customers of a cryptocurrency company received phishing emails from purported legal advisors of the debtors. *See In re Celsius Network LLC*, No. 22-10964 (MG) (Bankr. S.D.N.Y. Nov. 30, 2022) [D.I. 1527].

D. Del. Oct. 27, 2023) [D.I. 295] (authorizing the debtors to anonymize or redact confidential information from the Creditor Matrix, equity holders list, Schedules and Statements, and any similar document); *In re Yellow Corp.*, No. 23-11069 (CTG) (Bankr. D. Del. Sept. 13, 2023) [D.I. 528] (same); *In re MD Helicopters, Inc.*, No. 22-10263 (KBO) (Bankr. D. Del. Apr. 1, 2022 [D.I. 97] (authorizing the debtors to redact personal information, including home address information, of individual creditors and interest holders listed on the creditor matrix, schedules and statements, or similar document filed with the court).

11. Courts in this district have not only granted the requested relief but have also expounded on the importance of authorizing debtors to redact individual creditors' personal information, including home addresses. In *Art Van Furniture*, Judge Sontchi overruled the objection of the U.S. Trustee to similar redaction relief proposed here, noting that the proposed redaction is not a "burden of proof" issue so "much as a common sense issue." Hr'g Tr. at 25:6–7, *In re Art Van Furniture, LLC*, No. 20-10533 (CSS) (Bankr. D. Del. Mar. 11, 2020) [D.I. 82].³ Judge Sontchi found that, "at this point and given the risks associated with having any kind of private information out on the internet, [redaction] has really become routine [and] I think obvious relief." *Id.* at 25:13–16. Similarly, in *Clover*, Judge Owens overruled the U.S. Trustee's objection, finding that "[t]he court can completely avoid contributing to the risk [of identity theft] by redacting" addresses. Hr'g Tr. at 25:9–10, *In re Clover Techs. Grp., LLC*, No. 19-12680 (KBO)

³ Judge Sontchi previously overruled the U.S. Trustee's objection to the redaction of individuals' information and found that "it's just plain common sense in 2019—soon-to-be 2020—to put as little information out as possible about people's personal lives to present [sic] scams. . . . [Identity theft] is a real-life issue, and, of course, the issue of domestic violence is extremely important." Hr'g Tr. at 48:20–22, 49:3–5, *In re Anna Holdings*, No. 19-12551 (CSS) (Bankr. D. Del. Dec. 4, 2019) [D.I. 112]. Judge Sontchi emphasized that "the world is very different from [the 1980s] when you and I started practice with the problems of identity theft." *Id.* at 45:25-46:2.

The Debtors reserve the right to supplement the record with respect to such risks insofar as they are not self-evident at this time.

(Bankr. D. Del. Jan. 24, 2020) [D.I. 146]. Judge Owens maintained that “it is common sense” that “names and/or addresses are a means of identification.” *Id.* 24:15–16. When it comes to such information, Judge Owens noted that “there is, at best, a risk of identity theft and worse a risk if personal injury from listing someone’s name and address on the internet by way of the court’s electronic case filing system and . . . the claims agent’s website.” *Id.* at 25:22–25. Recognizing that “there is, of course, an important right of access” to information, Judge Owens acknowledged that courts “routinely redact sensitive and confidential information for corporate entities and redact individual’s home addresses.” *Id.* at 25:10–13.

12. Finally, in *Forever 21*, Judge Gross overruled the U.S. Trustee’s objection, finding that “[w]e live in a new age in which the theft of personal identification is a real risk, as is injury to persons who, for personal reasons, seek to have their addresses withheld.” Hr’g Tr. at 60:22–25, *In re Forever 21, Inc.*, No. 19-12122 (KG) (Bankr. D. Del. Dec. 19, 2019) [D.I. 605]. Judge Gross also found that it was not necessary to the effective administration of the debtors’ estates to disclose the personal information of their stakeholders who are European Union member citizens due to the risk that debtors could be fined under the EU GDPR (as defined below) for unnecessary disclosures of personal information. *See id.* at 62:16–22; *Balance Point LLC*, No. 1-11279 (JKS) (Bankr. D. Del. Nov. 2, 2021) (redacting both the names and addresses of current and former employees); *Secure Home Holdings LLC*, No. 21-10745 (JKS) (Bankr. D. Del. Apr. 27, 2021) [D.I. Nos. 6, 54] (redacting both the names and addresses of customers and employees); *WB Supply LLC*, No. 21-10729 (BLS) (Bankr. D. Del. Apr. 22, 2021) [D.I. Nos. 5, 28] (same); *PBS Brand Co., LLC*, No. 20-13157 (JTD) (Bankr. D. Del. Jan. 26, 2021) [D.I. 183] (redacting both the names and addresses of individual creditors and employees).

13. In this case, the interest in public access to judicial records and papers is outweighed by the risk of identity theft to individuals including, without limitation, employees, independent contractors, individuals who are vendors and individual customers critical to the Debtors' operations, directors, officers and equity holders of the Debtors, whose personal information would otherwise be disclosed absent the relief sought herein. *See In re Motions Seeking Access to 2019 Statements*, 585 B.R. 733 (D. Del. 2018) (denying disclosure of personal information where "the risks of misuse and harm to individuals would greatly outweigh any value [such personal information] could possibly have"), *aff'd sub nom. In re A C & S Inc*, 775 F. App'x 78 (3d Cir. 2019). Here, there is minimal, if any, benefit to the public of publishing PII of such individuals. The public disclosure of PII would instead create an undue risk of identity theft for the affected individuals, as well as open the door to unrelentless harassment and other significant risks to such individuals' safety and welfare.

14. Recognizing the need for transparency, the Debtors propose to provide an unredacted version of any document filed by the Debtors or to be filed by the Debtors with the Court in the Chapter 11 Cases (including the list of equity security holders (the "Equity Holder List"), creditor matrix (the "Creditor Matrix") and any schedule of assets or liabilities (the "Schedules") or statement of financial affairs (the "Statements," together with the Schedules, collectively, the "Schedules and Statements")) to (a) the Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in the Chapter 11 Cases, (d) any party in interest upon a request to the Debtors (email being sufficient) that sets forth a reasonable basis for the request that is reasonably related to the Chapter 11 Cases, and (e) any party as ordered by the Court, subject to the restrictions of applicable privacy or data protection laws and regulations. Furthermore, to the extent notice and/or service by mail (as opposed to email) is required or requested, the Debtors

will serve individuals at their personal home addresses, ensuring that each individual will receive the same notices in the Chapter 11 Cases as all other creditors without the unnecessary public disclosure of their home address. Finally, nothing in the Proposed Orders should (x) preclude a party in interest's right to file a motion requesting that the Court unseal information redacted in accordance with the Proposed Orders or (y) waive or otherwise limit the service of any document upon, or the provision of any notice to, any individual whose personal information was sealed or redacted in accordance with the Proposed Orders. Accordingly, the privacy concerns at issue here outweigh the interest in public access to judicial proceedings and support entry of the Proposed Orders.

15. In light of the foregoing, the Debtors respectfully request that the Court permit the Debtors to redact personal information of any individual or other natural person from any document filed by the Debtors or to be filed by the Debtors with the Court in the Chapter 11 Cases (including any Equity Holder List, Creditor Matrix, Schedule, or Statement), as described herein, with unredacted copies to be provided in accordance with the Proposed Orders. Without such relief, the Debtors would unnecessarily cause individuals to be more susceptible to identity theft and harassment or otherwise jeopardize their safety by publishing their home addresses and email addresses.

NOTICE

16. Notice of this Motion will be provided to: (i) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware, 19801, Attn: Jane M. Leamy (jane.m.leafy@usdoj.gov); (ii) counsel to the DIP Lenders, Cole Schotz P.C., 1325 Avenue of the Americas, New York, NY 10019, Attn: Daniel F. X. Geoghan (DGeoghan@coleschotz.com); (iii) the Virginia Department

of Environmental Quality, Piedmont Regional Office, 4949-A Cox Road, Glen Allen, Virginia 23060, Attn: Russell Deppe (russell.deppe@deq.virginia.gov); (iv) the Internal Revenue Service; (v) the Securities and Exchange Commission; (vi) the Delaware Secretary of State; (vii) the Delaware State Treasury; (viii) the Debtors consolidated twenty (20) largest unsecured creditors; (ix) all parties requesting notice pursuant to Bankruptcy Rule 2002. Notice of this Motion and any order entered hereon will be served in accordance with Local Rule 9013-1(m). In light of the nature of the relief requested herein, the Debtors submit that no other or further notice is necessary.

NO PRIOR REQUEST

17. No prior motion for the relief requested herein has been made to this or any other court.

WHEREFORE, the Debtors respectfully request that the Court enter the Interim Order and the Final Order, substantially in the forms attached hereto as **Exhibit A** and **Exhibit B**, respectively, granting the relief requested in the Motion and such other and further relief as may be just and proper.

Dated: June 1, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Richard W. Riley

John W. Weiss (No. 4160)
Richard W. Riley (No. 4052)
824 North Market Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 592-6496
Email: jweiss@pashmanstein.com
rriley@pashmanstein.com

-and-

Leah M. Eisenberg (*pro hac vice* forthcoming)
David E. Sklar (*pro hac vice* forthcoming)
Court Plaza South, East Wing
21 Main Street, Suite 200
Hackensack, NJ 07601
Telephone: (201) 488-8200
Email: leisenberg@pashmanstein.com
dsklar@pashmanstein.com

Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT A

PROPOSED INTERIM ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

VWS Holdco, Inc., *et al.*,

Debtors.⁴

Chapter 11

Case No. 25-10979 ()

Joint Administration Requested

**INTERIM ORDER AUTHORIZING THE DEBTORS
TO REDACT CERTAIN PERSONAL INFORMATION**

Upon the motion (the “Motion”)⁵ of the above-captioned debtors and debtors in possession (the “Debtors”), for entry of an interim order (this “Interim Order”), (i) authorizing the Debtors to redact certain personal information and (ii) granting related relief; and upon the First Day Declaration; and this Court having found that it has jurisdiction to consider the Motion pursuant to 28 U.S.C. § 1334; and this Court having found that the Motion is a core proceeding pursuant to 28 U.S.C. § 157(b), and that the Debtors consent to entry of a final order under Article III of the United States Constitution; and this Court having found that venue of these Chapter 11 Cases and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and this Court having reviewed the Motion and having heard statements in support of the Motion at a hearing held before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Motion and the First Day Declaration and at the Hearing establish just cause for the relief granted herein; and any objections to the relief requested

⁴ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification numbers are as follows: VWS Holdco, Inc. (5412) and Shoosmith Bros., Inc. (6914). The Debtors’ mailing address is P.O. Box 2770, Chesterfield, VA 23832.

⁵ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion or First Day Declaration, as applicable.

in the Motion having been withdrawn or overruled on the merits; and after due deliberation thereon and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED AND DECREED THAT:

1. The Motion is **GRANTED**, on an interim basis, as set forth herein.
2. All objections to the entry of this Interim Order, to the extent not withdrawn or settled, are overruled.
3. The Debtors are authorized to redact the home addresses, telephone numbers and the email addresses of individuals that are to be listed on the Equity Holder List, Creditor Matrix, claims register, affidavits of service, Schedules and Statements, or other documents filed by the Debtors with this Court and file (i) a redacted version of the Equity Holder List, Creditor Matrix and any other filings redacted pursuant to this Interim Order and (b) an unredacted version of the Equity Holder List Creditor Matrix and any other filings redacted pursuant to this Interim Order under seal.
4. The unredacted version of the Equity Holder List, Creditor Matrix and any other filings redacted pursuant to this Interim Order shall remain under seal and not made available to anyone, except that copies shall be provided to (a) this Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in the Chapter 11 Cases, (d) any party in interest upon a request to the Debtors (email being sufficient) that sets forth a reasonable basis for the request that is reasonably related to the Chapter 11 Cases, and (e) any party as ordered by the Court, subject to the restrictions of applicable privacy or data protection laws and regulations. The Debtors shall inform the U.S. Trustee and the Court after denying any request for an unredacted document pursuant to this Interim Order. Parties in interest may also seek to obtain an unredacted version of

the Creditor Matrix, claims register, affidavits of service, Schedules and Statements, and any other applicable filed documents upon motion and order of the Court.

5. The Court will, and each other party receiving an unredacted version of the Creditor Matrix or the Equity Holder List shall, keep such information confidential.

6. Nothing in this Interim Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual solely because such individual's PII is sealed or redacted pursuant to this Interim Order. Service of all documents and notices upon individuals whose PII is sealed or redacted pursuant to this Interim Order shall be confirmed in the corresponding certificate of service.

7. The Debtors are hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Interim Order.

8. The final hearing (the "Final Hearing") to consider the entry order granting the relief requested in the Motion on a final basis (the "Final Order") shall be held on _____, 2025, at __: __.m. Prevailing Eastern Time.

9. Any objection to the entry of a Final Order granting the relief requested in the Motion shall be filed with the Court and served on the following parties no later than 4:00 p.m. Prevailing Eastern Time on _____, 2025: (a) proposed counsel to the Debtors, Pashman Stein Walder Hayden, P.C., 824 North Market Street, Suite 800, Wilmington, Delaware, 19801, Attn: John W. Weiss (jweiss@pashmanstein.com), Leah M. Eisenberg (leisenberg@pashmanstein.com), Richard W. Riley (rriley@pashmanstein.com), and David E. Sklar (dsklar@pashmanstein.com), (b) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware, 19801, Attn: Jane M. Leamy (jane.m.leafy@usdoj.gov) (c) counsel to the DIP Lenders,

Cole Schotz P.C., 1325 Avenue of the Americas, New York, NY 10019, Attn: Daniel F. X. Geoghan (DGeoghan@coleschotz.com) and (d) counsel to any official committee appointed in the Chapter 11 Cases (the “Notice Parties”).

10. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Interim Order.

EXHIBIT B

PROPOSED FINAL ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

VWS Holdco, Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10979 ()

Joint Administration Requested

**FINAL ORDER AUTHORIZING THE DEBTORS
TO REDACT CERTAIN PERSONAL INFORMATION**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (the “Debtors”), for entry of a final order (this “Final Order”), (i) authorizing the Debtors to redact certain personal information and (ii) granting related relief; and upon the First Day Declaration; and this Court having found that it has jurisdiction to consider the Motion pursuant to 28 U.S.C. § 1334; and this Court having found that the Motion is a core proceeding pursuant to 28 U.S.C. § 157(b), and that the Debtors consent to entry of a final order under Article III of the United States Constitution; and this Court having found that venue of these Chapter 11 Cases and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and this Court having reviewed the Motion and having heard statements in support of the Motion at a hearing held before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Motion and the First Day Declaration and at the Hearing establish just cause for the relief granted herein; and any objections to the relief requested in the Motion having

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification numbers are as follows: VWS Holdco, Inc. (5412) and Shoosmith Bros., Inc. (6914). The Debtors’ mailing address is P.O. Box 2770, Chesterfield, VA 23832.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion or First Day Declaration, as applicable.

been withdrawn or overruled on the merits; and after due deliberation thereon and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED AND DECREED THAT:

11. The Motion is **GRANTED** as set forth herein.

12. All objections to the entry of this Final Order, to the extent not withdrawn or settled, are overruled.

13. The Debtors are authorized to redact the home addresses, telephone numbers and the email addresses of individuals that are to be listed on the Equity Holder List, Creditor Matrix, claims register, affidavits of service, Schedules and Statements, or other documents filed by the Debtors with this Court and file (i) a redacted version of the Equity Holder List, Creditor Matrix and any other filings redacted pursuant to this Final Order and (b) an unredacted version of the Equity Holder List Creditor Matrix and any other filings redacted pursuant to this Final Order under seal.

14. The unredacted version of the Equity Holder List, Creditor Matrix and any other filings redacted pursuant to this Final Order shall remain under seal and not made available to anyone, except that copies shall be provided to (a) this Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in the Chapter 11 Cases, (d) any party in interest upon a request to the Debtors (email being sufficient) that sets forth a reasonable basis for the request that is reasonably related to the Chapter 11 Cases, and (e) any party as ordered by the Court, subject to the restrictions of applicable privacy or data protection laws and regulations. The Debtors shall inform the U.S. Trustee and the Court after denying any request for an unredacted document pursuant to this Final Order. Parties in interest may also seek to obtain an unredacted version of

the Creditor Matrix, claims register, affidavits of service, Schedules and Statements, and any other applicable filed documents upon motion and order of the Court.

15. The Court will, and each other party receiving an unredacted version of the Creditor Matrix or the Equity Holder List shall, keep such information confidential.

16. Nothing in this Final Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual solely because such individual's PII is sealed or redacted pursuant to this Final Order. Service of all documents and notices upon individuals whose PII is sealed or redacted pursuant to this Final Order shall be confirmed in the corresponding certificate of service.

17. The Debtors are hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Final Order.

18. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Final Order.

Exhibit B

Interim Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

VWS Holdco, Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10979 (JKS)

Jointly Administered

Related to D.I. 4

**INTERIM ORDER AUTHORIZING THE DEBTORS
TO REDACT CERTAIN PERSONAL INFORMATION**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (the “Debtors”), for entry of an interim order (this “Interim Order”), (i) authorizing the Debtors to redact certain personal information and (ii) granting related relief; and upon the First Day Declaration; and this Court having found that it has jurisdiction to consider the Motion pursuant to 28 U.S.C. § 1334; and this Court having found that the Motion is a core proceeding pursuant to 28 U.S.C. § 157(b), and that the Debtors consent to entry of a final order under Article III of the United States Constitution; and this Court having found that venue of these Chapter 11 Cases and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and this Court having reviewed the Motion and having heard statements in support of the Motion at a hearing held before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Motion and the First Day Declaration and at the Hearing establish just cause for the relief granted herein; and any objections to the relief requested

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification numbers are as follows: VWS Holdco, Inc. (5412) and Shoosmith Bros., Inc. (6914). The Debtors’ mailing address is P.O. Box 2770, Chesterfield, VA 23832.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion or First Day Declaration, as applicable.

in the Motion having been withdrawn or overruled on the merits; and after due deliberation thereon and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED AND DECREED THAT:

1. The Motion is **GRANTED**, on an interim basis, as set forth herein.
2. All objections to the entry of this Interim Order, to the extent not withdrawn or settled, are overruled.
3. The Debtors are authorized to redact the home addresses, telephone numbers and the email addresses of individuals that are to be listed on the Equity Holder List, Creditor Matrix, claims register, affidavits of service, Schedules and Statements, or other documents filed by the Debtors with this Court (with the exception of filings in adversary proceedings) and file (i) a redacted version of the Equity Holder List, Creditor Matrix and any other filings redacted pursuant to this Interim Order and (b) an unredacted version of the Equity Holder List Creditor Matrix and any other filings redacted pursuant to this Interim Order under seal.
4. The unredacted version of the Equity Holder List, Creditor Matrix and any other filings redacted pursuant to this Interim Order shall remain under seal and not made available to anyone, except that copies shall be provided to (a) this Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in the Chapter 11 Cases, (d) any party in interest upon a request to the Debtors (email being sufficient) that sets forth a reasonable basis for the request that is reasonably related to the Chapter 11 Cases, and (e) any party as ordered by the Court, subject to the restrictions of applicable privacy or data protection laws and regulations. The Debtors shall inform the U.S. Trustee and the Court after denying any request for an unredacted document pursuant to this Interim Order. Parties in interest may also seek to obtain an unredacted version of

the Creditor Matrix, claims register, affidavits of service, Schedules and Statements, and any other applicable filed documents upon motion and order of the Court.

5. The Court will, and each other party receiving an unredacted version of the Creditor Matrix or the Equity Holder List shall, keep such information confidential.

6. Nothing in this Interim Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual solely because such individual's PII is sealed or redacted pursuant to this Interim Order. Service of all documents and notices upon individuals whose PII is sealed or redacted pursuant to this Interim Order shall be confirmed in the corresponding certificate of service.

7. The Debtors are hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Interim Order.

8. The final hearing (the "Final Hearing") to consider the entry order granting the relief requested in the Motion on a final basis (the "Final Order") shall be held on July 2, 2025, at 11:00 a.m. Prevailing Eastern Time.

9. Any objection to the entry of a Final Order granting the relief requested in the Motion shall be filed with the Court and served on the following parties no later than 4:00 p.m. Prevailing Eastern Time on June 20, 2025: (a) proposed counsel to the Debtors, Pashman Stein Walder Hayden, P.C., 824 North Market Street, Suite 800, Wilmington, Delaware, 19801, Attn: John W. Weiss (jweiss@pashmanstein.com), Leah M. Eisenberg (leisenberg@pashmanstein.com), Richard W. Riley (rriley@pashmanstein.com), and David E. Sklar (dsklar@pashmanstein.com), (b) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware, 19801, Attn: Jane M. Leamy (jane.m.leafy@usdoj.gov) (c) counsel to the DIP Lenders,

Cole Schotz P.C., 1325 Avenue of the Americas, New York, NY 10019, Attn: Daniel F. X. Geoghan (DGeoghan@coleschotz.com) and (d) counsel to any official committee appointed in the Chapter 11 Cases (the “Notice Parties”).

10. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Interim Order.

Dated: June 4th, 2025
Wilmington, Delaware


J. KATE STICKLES
UNITED STATES BANKRUPTCY JUDGE