

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)

Joint Administration Requested

NOTICE OF (I) FILING OF BANKRUPTCY PETITION AND
RELATED DOCUMENTS AND (II) **AMENDED**²AGENDA FOR HEARING ON FIRST
DAY PLEADINGS SCHEDULED FOR JUNE 3, 2025 AT 4:00 P.M. (ET) BEFORE THE
HONORABLE J. KATE STICKLES, UNITED STATES BANKRUPTCY
JUDGE FOR THE DISTRICT OF DELAWARE

THIS PROCEEDING WILL BE CONDUCTED HYBRID IN-PERSON/ZOOM.
PLEASE REFER TO JUDGE STICKLES' CHAMBERS PROCEDURES
([HTTPS://WWW.DEB.USCOURTS.GOV/CONTENT/JUDGE-J-KATE-STICKLES](https://www.deb.uscourts.gov/content/judge-j-kate-stickles)
AND THE COURT'S WEBSITE ([HTTP://WWW.DEB.USCOURTS.GOV/ECOURT-
APPEARANCES](http://www.deb.uscourts.gov/ecourt-appearances)) FOR INFORMATION ON THE METHOD OF ALLOWED
PARTICIPATION (VIDEO OR AUDIO), JUDGE STICKLES' EXPECTATIONS OF
REMOTE PARTICIPANTS, AND THE ADVANCE REGISTRATION
REQUIREMENTS.

REGISTRATION IS REQUIRED ONE-HOUR PRIOR TO THE FIRST-DAY
HEARING UNLESS OTHERWISE NOTICED USING THE
ECOURTAPPEARANCES TOOL AVAILABLE ON THE COURT'S WEBSITE
[HTTP://WWW.DEB.USCOURTS.GOV/ECOURT-APPEARANCES](http://www.deb.uscourts.gov/ecourt-appearances)

YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM
OR YOU WILL NOT BE ALLOWED INTO THE MEETING.
AFTER REGISTERING YOUR APPEARANCE,
YOU WILL RECEIVE A CONFIRMATION EMAIL. ZOOM
INFORMATION WILL BE SENT OUT PRIOR TO THE 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.

² Amended agenda items appear in bold.



PLEASE TAKE NOTICE that, on June 1, 2025, the above-captioned debtors and debtors in possession (the “Debtors”) filed the following voluntary petitions (the “Petitions”) and related motions and applications for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–532 (the “Bankruptcy Code”), with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors continue to operate their business as debtors in possession pursuant to section 1184 of the Bankruptcy Code.

PETITION AND RELATED PLEADINGS

1. Voluntary Petition of VWS Holdco, Inc. (Case Number: [25-10979](#))
2. Voluntary Petition of Shoosmith Bros., Inc (Case Number: [25-10980](#))
3. Declaration of Steven F. Agran in Support of First Day Relief. (Docket No. [12](#); filed 06/01/2025).

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the following first day motions (collectively, the “First Day Pleadings”), to the extent set forth below, is scheduled for **June 3, 2025 at 4:00 P.M. (ET)** (the “First Day Hearing”) before The Honorable J. Kate Stickles, United States Bankruptcy Judge for the District of Delaware

FIRST DAY PLEADINGS GOING FORWARD

4. Debtors’ Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases (Docket No. [3](#), filed 06/01/2025).

Status: This matter will be going forward.

5. Motion of Debtors for Entry of Interim and Final Orders Authorizing Debtors to Redact Certain Personal Information (Docket No. [4](#), filed 06/01/2025).

Status: This matter will be going forward on an interim basis.

6. Debtors Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Use their Cash Management System and (B) Continue to Use Existing Payment Methods, (II) Authorizing the Debtors to Maintain and Continue to Use Existing Business Forms without Reference to its Status as Debtors in Possession; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief (Docket No. [5](#), filed 06/01/2025).

Status: This matter will be going forward on an interim basis.

7. Debtors Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Wages, Benefits, and Other Compensation Obligations, (II) Authorizing Financial Institutions to Honor all Obligations Related thereto, and (III) Granting Related Relief (Docket No. [6](#), filed 06/01/2025).

Status: This matter will be going forward on an interim basis.

8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue (A) to Maintain Prepetition Insurance Policies, (B) to Maintain Prepetition Surety Bonds, and (C) to Use the Services of the Brokers, and (II) Granting Related Relief (Docket No. [7](#), filed 06/01/2025).

Status: This matter will be going forward on an interim basis.

9. Debtors Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Utility Services, (II) Approving Proposed Adequate Assurance of Payment to Utility Providers, and Authorizing Debtors to Provide Additional Assurance, (III) Establishing Procedures to Resolve Requests for Additional Assurance and (IV) Granting Related Relief (Docket No. [8](#), filed 06/01/2025).

Status: This matter will be going forward on an interim basis.

10. Debtors' Motion for Entry of Interim and Final Orders Authorizing, but not Directing, the Debtors to Pay Certain Taxes (Docket No. [9](#), filed 06/01/2025).

Status: This matter will be going forward on an interim basis.

11. Debtors' Motion for Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief (Docket No. [10](#), filed 06/01/2025).

Status: This matter will be going forward on an interim basis.

12. Debtors' Motion for Entry of an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs (Docket No. [11](#), filed 06/01/2025).

Status: This motion will go out on notice and be heard at the second day hearing.

13. Debtors' Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 AND 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting liens and Superpriority Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [15](#), filed 06/02/2025).

Status: This matter will be going forward on an interim basis.

14. Declaration of Steven Agran in Support of Debtors' Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 AND 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting liens and Superpriority

Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [16](#), filed 06/02/2025).

15. **Notice of Filing Revised Proposed Interim Order Regarding Debtors' Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting Liens and Superpriority Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief** (Docket No. [20](#), filed 06/03/2025).

PLEASE TAKE FURTHER NOTICE that parties who wish to attend the First Day Hearing may do so by registering for a remote appearance using the eCourt Appearance tool (a link to the eCourt Appearance tool is on the first page of this Agenda). After registering your appearance, you will receive an email confirmation containing information about joining the hearing.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Pleadings may be made at the First Day Hearing.

Dated: June 3, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

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Proposed Counsel to the Debtors and Debtors in Possession