Case 25-10979-JKS Doc 78 Filed 06/16/25 Page 1 of 2 Docket #0078 Date Filed: 06/16/2025

)

)

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

VWS HOLDCO, INC., ET AL.,

Chapter 11

Debtors.

Case No. 25-10979 (JKS)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Greenberg Traurig, LLP hereby enters its appearance in the above-captioned cases as counsel for Industrial Power Generating Company, LLC c/o Archaea Energy ("Archaea") pursuant to 11 U.S.C. § 1109(b) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"); and such counsel hereby request, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and 11 U.S.C. § 342 and 1109(b), that further copies of all notices and pleadings given or filed in the above-captioned case be given to and served upon the following at the addresses listed below:

GREENBERG TRAURIG, LLP	GREENBERG TRAURIG, LLP
Dennis A. Meloro	Shari L. Heyen
222 Delaware Avenue	1000 Louisiana Street
Suite 1600	Suite 6700
Wilmington, DE 19801	Houston, TX 77002
Telephone: (302) 661-7000	Telephone: (713) 374-3535
Email: Dennis.Meloro@gtlaw.com	Email: Shari.Heyen@gtlaw.com

PLEASE TAKE FURTHER NOTICE that pursuant to 11 U.S.C. § 1109(b), the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in the above-referenced case and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit is intended nor shall be deemed to waive (i) any right to have final orders



Case 25-10979-JKS Doc 78 Filed 06/16/25 Page 2 of 2

in non-core matters entered only after de novo review; (ii) any right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) any right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which Archaea is or may be entitled under agreements, at law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments expressly are hereby reserved.

Dated: June 16, 2025

GREENBERG TRAURIG, LLP

<u>/s/ Dennis A. Meloro</u> Dennis A. Meloro (DE Bar No. 4435) 222 Delaware Avenue, Suite 1600 Wilmington, DE 19801 Telephone: (302) 661-7000 Email: Dennis.Meloro@gtlaw.com

Shari L. Heyen 1000 Louisiana Street Suite 6700 Houston, TX 77002 Telephone: (713) 374-3535 Email: Shari.Heyen@gtlaw.com

Counsel to Industrial Power Generating Company, LLC c/o Archaea Energy