

**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

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the below hereby appear on behalf of the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned bankruptcy cases and such proposed counsel hereby request, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of title 11 of the United States Code, 11 U.S.C. §101, *et seq.* (the “Bankruptcy Code”), that copies of all notices and pleadings given or filed in these cases be given and served upon the below at the following addresses, telephone numbers, and e-mail addresses indicated below:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request,

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.



whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced cases and all proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive (1) any right to have final orders in non-core matters entered only after *de novo* review, (2) any right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) any right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdraw, or (4) any other rights, claims, or actions, to which the Committee is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, or otherwise are expressly reserved.

Dated: June 17, 2025

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

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- and -

Shari L. Heyen (application for admission
pro hac vice forthcoming)

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*Proposed Counsel for the Official Committee
of Unsecured Creditors*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Notice of Appearance and Request for Service of Papers* has been served upon the parties listed on the Court's CM/ECF transmission list in these cases via CM/ECF on June 17, 2025.

/s/ Dennis A. Meloro
Dennis A. Meloro (DE Bar No. 4435)