

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

In re:) Chapter 11
)
VWS Holdco, Inc., *et al.*,) Case No. 25-10979 (JKS)
)
Debtors.)

**NOTICE OF APPEARANCE OF COUNSEL AND
DEMAND FOR NOTICES AND PAPERS**

Please take notice that the undersigned firm of Sullivan Hazeltine Allinson LLC hereby enter its appearance as counsel for John Douglas Collins, II, Marilyn Orcutt, Sam M. Kelly, and W. Kent Durham (collectively, “the Clients”) in the above-captioned cases, pursuant to section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”); and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”); such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and sections 342 and 1109(b) of the Bankruptcy Code, that hard copies of all notices and pleadings given or filed in the above-captioned cases be given and served upon the following persons at the following addresses, telephone numbers, telecopy numbers, and e-mail addresses:

William A. Hazeltine, Esq.
SULLIVAN · HAZELTINE · ALLINSON LLC
919 North Market Street, Suite 420
Wilmington, DE 19801
Tel: (302) 428-8191
Fax: (302) 428-8195
Email: whazeltine@sha-llc.com

Please take further notice that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, any



2510979250619000000000001

notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, hand or overnight delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of (a) the Clients' rights (i) to have final orders in non-core matters and/or matters entitled to adjudication by a judge authorized under Article III of the U.S. Constitution entered only after *de novo* review by a District Court Judge, (ii) to trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, and (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (b) any other rights, claims, actions, setoffs, or recoupments to which the Clients is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Clients expressly reserves.

Dated: June 19, 2025
Wilmington, Delaware

SULLIVAN HAZELTINE ALLINSON LLC

/s/ William A. Hazeltine
William A. Hazeltine (No. 3294)
919 North Market St., Ste. 420
Wilmington, Delaware 19801
Tel: (302) 428-8191
Fax: (302) 428-8195
Email: whazeltine@sha-llc.com

*Attorneys for John Douglas Collins, II, Marilyn
Orcutt, Sam M. Kelly, and W. Kent Durham
(collectively, "the Clients")*