

Katherine E. Kulbok
Virginia Office of the Attorney General
202 N. 9th Street
Richmond, Virginia 23210
Telephone: (804) 225-3643
Facsimile: (804) 786-2650
kkulbok@oag.state.va.us

*Co-Counsel for the Virginia Department
of Environmental Quality*

Jeremy S. Williams (VA 77469)
KUTAK ROCK LLP
1021 East Cary Street, Suite 810
Richmond, Virginia 23219-4071
Telephone: (804) 644-1700
Facsimile: (804) 783-6192
jeremy.williams@kutakrock.com

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

In re:)	Chapter 11
)	
VWS HOLDCO, INC., <i>et al.</i> , ¹)	Case No. 25-10979 (JKS)
)	
Debtors.)	(Jointly Administered)
)	

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

PLEASE TAKE NOTICE that, pursuant to Rule 9010 of the Federal Rules of Bankruptcy Procedure (the “Rules”), the attorneys set forth below hereby appear as co-counsel for the Virginia Department of Environmental Quality. Request is hereby made, pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure, that all notices and pleadings given or required to be given, and all papers served or required to be served, be given and served upon the following persons at the mailing address and email address indicated below:

Katherine E. Kulbok
Virginia Office of the Attorney General
202 N. 9th Street
Richmond, Virginia 23210
Telephone: (804) 225-3643
Facsimile: (804) 786-2650
kkulbok@oag.state.va.us

Jeremy S. Williams (VA 77469)
KUTAK ROCK LLP
1021 East Cary Street, Suite 810
Richmond, Virginia 23219-4071
Telephone: (804) 644-1700
Facsimile: (804) 783-6192
jeremy.williams@kutakrock.com

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, the foregoing request includes, not only notices and papers referred to in Rule 2002 of the Federal Rules of Bankruptcy Procedure, but also includes, without limitation, all orders and notices of any applications, petitions, motions, complaints, requests or demands, hearings, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document (including, without limitation, operating reports, statements of affairs, schedules of assets and liabilities, disclosure statements and/or plans of reorganization) filed with, or otherwise brought before, this Court with respect to the above-captioned cases, whether formally or informally, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex or otherwise.

This Notice of Appearance and Request for Service of Documents shall not be deemed or construed as a waiver of the rights (1) to have final orders in non-core matters entered only after de novo review by a District Court Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, defenses, setoffs, or recoupments to which the above-named entities are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: June 20, 2025

/s/ Katherine E. Kulbok
Katherine E. Kulbok
Virginia Office of the Attorney General
202 N. 9th Street
Richmond, Virginia 23210
Telephone: (804) 225-3643
Facsimile: (804) 786-2650
kkulbok@oag.state.va.us

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court, I hereby certify under penalty of perjury that on June 20, 2025, a true and correct copy of the foregoing was served via the Court's ECF system to all registered participants, which includes counsel for the debtors and the U.S. Trustee.

/s/ Katherine E. Kulbok

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

In Re: VWS HOLDCO, INC., et al., Chapter 11

Case No. 25 - 10979 (JKS)

GOVERNMENT ATTORNEY CERTIFICATION

Pursuant to the requirement of Local Rule 9010-1(e) for admittance of Government counsel to represent the United States of America (or any officer or agency thereof) or any state or local government (or any officer or agency thereof), the undersigned counsel hereby certifies the following in order to satisfy the requirement to appear to represent the Virginia Department of Environmental Quality, a state agency, in this action: I am admitted to practice law in (court(s))

the United States District Court for the Eastern and Western Districts of Virginia;

I am in good standing in all jurisdictions to which I have been admitted; and, further, I consent to be bound by the Local Rules of the Bankruptcy Court-District of Delaware and submit to the jurisdiction of this court for disciplinary purposes.

/s/ Katherine E. Kulbok

Agency/Organization

Name: Katherine E. Kulbok

Address: Virginia Office of the Attorney General
202 N 9th Street, Richmond VA 23219

Phone: 804-225-3643

Email: kkulbok@oag.state.va.us