

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

Re: D.I. 4

**CERTIFICATION OF COUNSEL REGARDING FINAL ORDER ON MOTION OF
DEBTORS FOR ENTRY OF INTERIM AND FINAL ORDERS AUTHORIZING
DEBTORS TO REDACT CERTAIN PERSONAL INFORMATION**

The undersigned counsel to the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby certifies as follows:

1. On June 1, 2025, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders Authorizing Debtors to Redact Certain Personal Information* [D.I. 4] (the “Motion”).

2. Pursuant to the *Interim Order Authorizing the Debtors to Redact Certain Personal Information* [D.I. 34] (the “Interim Order”) and Notice of Hearing [Docket No. 43], objections to the final relief requested in the Motion were to be filed and served no later than June 20, 2025 at 4:00 p.m. (ET).

3. The Debtors have revised the form of order granting the relief on a final basis requested in the Motion (the “Revised Proposed Final Order”) to incorporate the comments from the Court to the Interim Order. The Revised Proposed Final Order is attached hereto as **Exhibit A**.

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.



4. The Debtor has received no other objection or informal comments to the final relief requested by the Motion, and no objection or other responsive pleading to the final relief requested by the Motion appears on the Court's docket.

5. For convenience of the Court and all parties in interest, a blackline comparing the Revised Proposed Final Order against the form of final order attached to the Motion is attached hereto as **Exhibit B**.

WHEREFORE, the Debtor respectfully requests that Court enter the Revised Proposed Final Order substantially in the form attached here as **Exhibit A** at the earliest convenience of the Court.

Dated: June 23, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Richard W. Riley
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Proposed Counsel to the Debtors and Debtors in Possession

Exhibit "A"
Proposed Final Order

**IN THE UNITED STATES BANKRUPTCY COURT
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In re

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Chapter 11

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**FINAL ORDER AUTHORIZING THE DEBTORS
TO REDACT CERTAIN PERSONAL INFORMATION**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (the “Debtors”), for entry of a final order (this “Final Order”), (i) authorizing the Debtors to redact certain personal information and (ii) granting related relief; and upon the First Day Declaration; and this Court having found that it has jurisdiction to consider the Motion pursuant to 28 U.S.C. § 1334; and this Court having found that the Motion is a core proceeding pursuant to 28 U.S.C. § 157(b), and that the Debtors consent to entry of a final order under Article III of the United States Constitution; and this Court having found that venue of these Chapter 11 Cases and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and this Court having reviewed the Motion and having heard statements in support of the Motion at a hearing held before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Motion and the First Day Declaration and at the Hearing establish just

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² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion or First Day Declaration, as applicable.

cause for the relief granted herein; and any objections to the relief requested in the Motion having been withdrawn or overruled on the merits; and after due deliberation thereon and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED AND DECREED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. All objections to the entry of this Final Order, to the extent not withdrawn or settled, are overruled.
3. The Debtors are authorized to redact the home addresses, telephone numbers and the email addresses of individuals that are to be listed on the Equity Holder List, Creditor Matrix, claims register, affidavits of service, Schedules and Statements, or other documents filed by the Debtors with this Court (with the exception of filings in adversary proceedings) and file (i) a redacted version of the Equity Holder List, Creditor Matrix and any other filings redacted pursuant to this Final Order and (b) an unredacted version of the Equity Holder List Creditor Matrix and any other filings redacted pursuant to this Final Order under seal.
4. The unredacted version of the Equity Holder List, Creditor Matrix and any other filings redacted pursuant to this Final Order shall remain under seal and not made available to anyone, except that copies shall be provided to (a) this Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in the Chapter 11 Cases, (d) any party in interest upon a request to the Debtors (email being sufficient) that sets forth a reasonable basis for the request that is reasonably related to the Chapter 11 Cases, and (e) any party as ordered by the Court, subject to the restrictions of applicable privacy or data protection laws and regulations. The Debtors shall inform the U.S. Trustee and the Court after denying any request for an unredacted document pursuant to this Final Order. Parties in interest may also seek to obtain an unredacted version of

the Creditor Matrix, claims register, affidavits of service, Schedules and Statements, and any other applicable filed documents upon motion and order of the Court.

5. The Court will, and each other party receiving an unredacted version of the Creditor Matrix or the Equity Holder List shall, keep such information confidential.

6. Nothing in this Final Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual solely because such individual's PII is sealed or redacted pursuant to this Final Order. Service of all documents and notices upon individuals whose PII is sealed or redacted pursuant to this Final Order shall be confirmed in the corresponding certificate of service.

7. The Debtors are hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Final Order.

8. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Final Order.

Exhibit "B"
Blackline

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Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (the “Debtors”), for entry of a final order (this “Final Order”), (i) authorizing the Debtors to redact certain personal information and (ii) granting related relief; and upon the First Day Declaration; and this Court having found that it has jurisdiction to consider the Motion pursuant to 28 U.S.C. § 1334; and this Court having found that the Motion is a core proceeding pursuant to 28 U.S.C. § 157(b), and that the Debtors consent to entry of a final order under Article III of the United States Constitution; and this Court having found that venue of these Chapter 11 Cases and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and this Court having reviewed the Motion and having heard statements in support of the Motion at a hearing held before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Motion and the First Day

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² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion or First Day Declaration, as applicable.

Declaration and at the Hearing establish just cause for the relief granted herein; and any objections to the relief requested in the Motion having been withdrawn or overruled on the merits; and after due deliberation thereon and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED AND DECREED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. All objections to the entry of this Final Order, to the extent not withdrawn or settled, are overruled.
3. The Debtors are authorized to redact the home addresses, telephone numbers and the email addresses of individuals that are to be listed on the Equity Holder List, Creditor Matrix, claims register, affidavits of service, Schedules and Statements, or other documents filed by the Debtors with this Court (with the exception of filings in adversary proceedings) and file (i) a redacted version of the Equity Holder List, Creditor Matrix and any other filings redacted pursuant to this Final Order and (b) an unredacted version of the Equity Holder List Creditor Matrix and any other filings redacted pursuant to this Final Order under seal.
4. The unredacted version of the Equity Holder List, Creditor Matrix and any other filings redacted pursuant to this Final Order shall remain under seal and not made available to anyone, except that copies shall be provided to (a) this Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in the Chapter 11 Cases, (d) any party in interest upon a request to the Debtors (email being sufficient) that sets forth a reasonable basis for the request that is reasonably related to the Chapter 11 Cases, and (e) any party as ordered by the Court, subject to the restrictions of applicable privacy or data protection laws and regulations. The Debtors shall inform the U.S. Trustee and the Court after denying any request for an unredacted document pursuant to this Final Order. Parties in interest may also seek to obtain an unredacted version of

the Creditor Matrix, claims register, affidavits of service, Schedules and Statements, and any other applicable filed documents upon motion and order of the Court.

5. The Court will, and each other party receiving an unredacted version of the Creditor Matrix or the Equity Holder List shall, keep such information confidential.

6. Nothing in this Final Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual solely because such individual's PII is sealed or redacted pursuant to this Final Order. Service of all documents and notices upon individuals whose PII is sealed or redacted pursuant to this Final Order shall be confirmed in the corresponding certificate of service.

7. The Debtors are hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Final Order.

8. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Final Order.

Summary report: Litera Compare for Word 11.10.1.2 Document comparison done on 6/23/2025 2:58:54 PM	
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Table moves from	0
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