

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. 7

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS'
MOTION ENTRY OF INTERIM AND FINAL ORDERS (I) AUTHORIZING THE
DEBTORS TO CONTINUE (A) TO MAINTAIN PREPETITION INSURANCE
POLICIES, (B) TO MAINTAIN PREPETITION SURETY BONDS, AND (C) TO USE
THE SERVICES OF THE BROKERS, AND (II) GRANTING RELATED RELIEF**

The undersigned hereby certifies that, as of the date hereof, Pashman Stein Walder Hayden, P.C. ("Pashman") has received no answer, objection or other responsive pleading to the final relief requested in the *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue (A) to Maintain Prepetition Insurance Policies, (B) to Maintain Prepetition Surety Bonds, and (C) to Use the Services of the Brokers, and (II) Granting Related Relief* [D.I. 7] (the "Motion"), which was filed on June 1, 2025.

The undersigned further certifies that Pashman has reviewed the Court's docket in this case and that no answer, objection or other responsive pleading to the final relief requested in the Motion appears thereon. Pursuant to the *Notice of Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue (A) to Maintain Prepetition Insurance Policies, (B) to Maintain Prepetition Surety Bonds, and (C) to Use the Services of the Brokers, and (II) Granting Related Relief* [Docket No.46], responses to the final relief requested

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.



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in the Motion were to be filed and served no later than June 20, 2025, at 4:00 p.m. (ET) (the “Objection Deadline”).

WHEREFORE, the Debtors respectfully request that the Order granting the final relief attached to the Motion be entered at the earliest convenience of the Court.

Dated: June 23, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

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Proposed Counsel to the Debtors and Debtors in Possession