

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re

VWS Holdco, Inc., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-10979 (JKS)

Jointly Administered

Re: D.I. 9

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' MOTION  
FOR ENTRY OF INTERIM AND FINAL ORDERS AUTHORIZING, BUT  
NOT DIRECTING, THE DEBTORS TO PAY CERTAIN TAXES**

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 Authorizing, but Not Directing, the Debtors to Pay Certain Taxes* [D.I. 9] (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 Authorizing, but not Directing the Debtors to Pay Certain Taxes* [Docket No.48], responses 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) (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.

<sup>1</sup> 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.



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*