

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. 60

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' APPLICATION FOR
ENTRY OF AN ORDER UNDER SECTIONS 327(A), 328(A), AND 1107(B) OF THE
BANKRUPTCY CODE, BANKRUPTCY RULES 2014 AND 2016 AND LOCAL RULES
2014-1 AND 2016-1 AUTHORIZING RETENTION AND EMPLOYMENT OF
PASHMAN STEIN WALDER HAYDEN, P.C. AS COUNSEL FOR THE DEBTORS
NUNC PRO TUNC TO THE PETITION DATE**

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 relief requested in the *Debtors' Application for Entry of an Order Under Sections 327(a), 328(a), and 1107(b) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016 and Local Rules 2014-1 and 2016-1 Authorizing Retention and Employment of Pashman Stein Walder Hayden, P.C. as Counsel for the Debtors Nunc Pro Tunc to the Petition Date* [D.I. 60] (the "Application"), which was filed on June 11, 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 filed with the Application, responses to the relief requested in the Application were to be filed and served no later than June 25, 2025, at 4:00 p.m. (ET) (the "Objection Deadline").

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.



WHEREFORE, the Debtors respectfully request that the Order attached to the Application be entered at the earliest convenience of the Court.

Dated: June 26, 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