

**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

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON JULY 2, 2025 at 11:00 A.M. (ET)**

THIS PROCEEDING WILL BE CONDUCTED IN-PERSON. ALL COUNSEL AND WITNESSES ARE EXPECTED TO ATTEND UNLESS PERMITTED TO APPEAR REMOTELY VIA ZOOM. PLEASE REFER TO JUDGE STICKLES' CHAMBERS PROCEDURES ([HTTPS://WWW.DEB.USCOURTS.GOV/CONTENT/JUDGE-J-KATE-STICKLES](https://www.deb.uscourts.gov/content/judge-j-kate-stickles)) AND THE COURT'S WEBSITE ([HTTP://WWW.DEB.USCOURTS.GOV/ECOURT-APPEARANCES](http://www.deb.uscourts.gov/ecourt-appearances)) FOR INFORMATION ON WHO MAY PARTICIPATE REMOTELY, THE METHOD OF ALLOWED PARTICIPATION (VIDEO OR AUDIO), JUDGE STICKLES' EXPECTATIONS OF REMOTE PARTICIPANTS, AND THE ADVANCE REGISTRATION REQUIREMENTS.

REGISTRATION IS REQUIRED BY 4:00 P.M. (PREVAILING EASTERN TIME) THE BUSINESS DAY BEFORE THE HEARING UNLESS OTHERWISE NOTICED USING THE ECOURTAPPEARANCES TOOL AVAILABLE ON THE COURT'S WEBSITE [HTTP://WWW.DEB.USCOURTS.GOV/ECOURT-APPEARANCES](http://www.deb.uscourts.gov/ecourt-appearances)

ADJOURNED MATTERS

1. Debtors' Motion for Entry of an Order (I) Authorizing the Rejection of Executory Contract with Swift Creek Renewables, LLC and (II) Granting Related Relief (Docket No. [85](#), filed 06/18/2025).

Objection Deadline: June 25, 2025, at 4:00 P.M. (ET)

Responses Received: None.

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.



Related Pleadings: None.

Status: This matter is adjourned to the hearing scheduled for July 31, 2025 at 11:00 a.m..

RESOLVED MATTERS

2. Motion of Debtors for Entry of Interim and Final Orders Authorizing Debtors to Redact Certain Personal Information (Docket No. [4](#), filed 06/01/2025).

Objection Deadline: June 20, 2025, at 4:00 P.M. (ET)

Responses Received: None.

Related Pleadings:

- i. Interim Order Authorizing the Debtors to Redact Personal Information (Docket No. [34](#), filed 06/04/2025).
- ii. Notice of Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Redact Certain Personal Information (Docket No. [43](#), filed 06/04/2025).
- iii. Certification of Counsel Regarding Final Order on Motion of Debtors for Entry of Interim and Final Orders Authorizing Debtors to Redact Certain Personal Information (Docket No. [89](#), filed 06/23/2025).
- iv. Final Order Authorizing the Debtors to Redact Certain Personal Information (Docket No. [93](#), filed 06/24/2025).

Status: On June 24, 2025, the Court entered a final order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

3. Debtors Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Use their Cash Management System and (B) Continue to Use Existing Payment Methods, (II) Authorizing the Debtors to Maintain and Continue to Use Existing Business Forms without Reference to its Status as Debtors in Possession; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief (Docket No. [5](#), filed 06/01/2025).

Objection Deadline: June 20, 2025, at 4:00 P.M. (ET)

Responses Received: None.

Related Pleadings:

- i. Interim Order (I) Authorizing the Debtors to (A) Continue to Use Their Cash Management System and (B) Continue to Use Existing Payment Methods; (II) Authorizing the Debtors to Maintain and Continue to Use Existing Business Forms Without Reference to Their Status as Debtors in Possession; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief (Docket No. [35](#), filed 06/04/2025)
- ii. Notice of Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to use their Cash Management System and (B) Continue to use Existing Payment Methods; (II) Authorizing the Debtors to Maintain and Continue to Use Existing Business Forms Without Reference to their Status as Debtors in Possession; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief (Docket No. [44](#), filed 06/04/2025).
- iii. Certification of Counsel Regarding Final Order on Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to use their Cash Management System and (B) Continue to use Existing Payment Methods; (II) Authorizing the Debtors to Maintain and Continue to Use Existing Business Forms Without Reference to their Status as Debtors in Possession; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief (Docket No. [109](#), Filed 06/26/25).
- iv. Final Order (I) Authorizing the Debtors to (A) Continue to use their Cash Management System and (B) Continue to use Existing Payment Methods; (II) Authorizing the Debtors to Maintain and Continue to Use Existing Business Forms Without Reference to their Status as Debtors in Possession; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief (Docket No. [117](#), filed 06/27/2025).

Status: On June 27, 2025, the Court entered a final order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

4. Debtors Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Wages, Benefits, and Other Compensation Obligations, (II) Authorizing Financial Institutions to Honor all Obligations Related thereto, and (III) Granting Related Relief (Docket No. [6](#), filed 06/01/2025).

Objection Deadline: June 20, 2025, at 4:00 P.M. (ET)

Responses Received: None.

Related Pleadings:

- i. Interim Order (I) Authorizing the Debtors to Pay Certain Prepetition Wages, Benefits, and Other Compensation Obligations, (II) Authorizing Financial Institutions to Honor All Obligations Related Thereto, and (III) Granting Related Relief (Docket No. [36](#), filed 06/04/2025).

- ii. Notice of Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Wages, Benefits, and Other Compensation Obligations, (II) Authorizing Financial Institutions to Honor all Obligations Related thereto, and (III) Granting Related Relief (Docket No. [45](#), filed 06/04/2025).
- iii. Certification of Counsel Regarding Final Order on Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Wages, Benefits, and Other Compensation Obligations, (II) Authorizing Financial Institutions to Honor all Obligations Related thereto, and (III) Granting Related Relief (Docket No. [90](#), filed 06/23/2025).
- iv. Final Order (I) Authorizing the Debtors to Pay Certain Prepetition Wages, Benefits, and Other Compensation Obligations, (II) Authorizing Financial Institutions to Honor all Obligations Related thereto, and (III) Granting Related Relief (Docket No. [94](#), filed 06/24/2025).

Status: On June 24, 2025, the Court entered a final order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

- 5. 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. [7](#), filed 06/01/2025).

Objection Deadline: June 20, 2025, at 4:00 P.M. (ET)

Responses Received: None.

Related Pleadings:

- i. Interim Order Interim Order (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. [37](#), filed 06/04/2025).
- ii. 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](#), filed 06/04/2025).
- iii. Certificate of No Objection 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. [91](#), filed 06/23/2025).

- iv. Final Order (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. [96](#), filed 06/24/2025).

Status: On June 24, 2025, the Court entered a final order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

- 6. Debtors Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Utility Services, (II) Approving Proposed Adequate Assurance of Payment to Utility Providers, and Authorizing Debtors to Provide Additional Assurance, (III) Establishing Procedures to Resolve Requests for Additional Assurance and (IV) Granting Related Relief (Docket No. [8](#), filed 06/01/2025).

Objection Deadline: June 20, 2025, at 4:00 P.M. (ET)

Responses Received: None.

Related Pleadings:

- i. Interim Order (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (II) Approving Proposed Adequate Assurance of Payment to Utility Providers and Authorizing Debtors to Provide Additional Assurance, (III) Establishing Procedures to Resolve Requests for Additional Assurance and (IV) Granting Related Relief (Docket No. [38](#), filed 06/04/2025).
- ii. Notice of Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Utility Services, (II) Approving Proposed Adequate Assurance of Payment to Utility Providers, and Authorizing Debtors to Provide Additional Assurance, (III) Establishing Procedures to Resolve Requests for Additional Assurance and (IV) Granting Related Relief (Docket No. [47](#), filed 06/04/2025).
- iii. Certification of Counsel Regarding Final Order on Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Utility Services, (II) Approving Proposed Adequate Assurance of Payment to Utility Providers, and Authorizing Debtors to Provide Additional Assurance, (III) Establishing Procedures to Resolve Requests for Additional Assurance and (IV) Granting Related Relief (Docket No. [98](#), filed 06/24/2025).

- iv. Final Order (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Utility Services, (II) Approving Proposed Adequate Assurance of Payment to Utility Providers, and Authorizing Debtors to Provide Additional Assurance, (III) Establishing Procedures to Resolve Requests for Additional Assurance and (IV) Granting Related Relief (Docket No. [100](#), filed 06/24/2025).

Status: On June 24, 2025, the Court entered a final order regarding this matter.

Accordingly, a hearing on this matter is no longer necessary.

- 7. Debtors' Motion for Entry of Interim and Final Orders Authorizing, but not Directing, the Debtors to Pay Certain Taxes (Docket No. [9](#), filed 06/01/2025).

Objection Deadline: June 20, 2025, at 4:00 P.M. (ET)

Responses Received: None.

Related Pleadings:

- i. Interim Order Authorizing, But Not Directing, the Debtors to Pay Certain Taxes (Docket No. [39](#), filed 06/04/2025).
- ii. 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](#), filed 06/04/2025).
- iii. Certificate of No Objection Regarding Debtors' Motion for Entry of Interim and Final Orders Authorizing, but Not Directing, the Debtors to Pay Certain Taxes (Docket No. [92](#), filed 06/23/2025).
- iv. Final Orders Authorizing, but not Directing, the Debtors to Pay Certain Taxes (Docket No. [95](#), filed 06/24/2025).

Status: On June 24, 2025, the Court entered a final order regarding this matter.

Accordingly, a hearing on this matter is no longer necessary.

- 8. Debtors' Motion for Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief (Docket No. [10](#), filed 06/01/2025).

Objection Deadline: June 20, 2025, at 4:00 P.M. (ET)

Responses Received: None.

Related Pleadings:

- i. Interim Order (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief (Docket No. [40](#), filed 06/04/2025).
- ii. Notice of Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors, and (II) Granting Related Relief (Docket No. [49](#), filed 06/04/2025).
- iii. Certification of Counsel Regarding Final Order on Debtors' Motion for Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief (Docket No. [97](#), filed 06/24/2025).
- iv. Final Order (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief (Docket No. [99](#), filed 06/24/2025).

Status: On June 24, 2025, the Court entered a final order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

9. 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 (Docket No. [60](#), filed 06/11/2025).

Objection Deadline: June 25, 2025, at 4:00 P.M. (ET)

Responses Received: None

Related Pleadings:

- i. Supplement to 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 (Docket No. [83](#), filed 06/18/2025).
- ii. 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 (Docket No. [108](#), filed 06/26/2025).

- iii. Order Under Sections 327(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 (Docket No. [116](#), filed 06/27/2025).

Status: On June 27, 2025, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

- 10. Debtors' Application for Entry of an Order Under Sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing the Retention and Employment of (I) Teneo Securities LLC as Investment Banker and (II) Teneo Capital LLC as Financial Advisor, Effective as of the Petition Date (Docket No. [63](#), filed 06/11/2025).

Objection Deadline: June 25, 2025, at 4:00 P.M. (ET)

Responses Received: None

Related Pleadings:

- i. Certification of Counsel Regarding Debtors' Application for Entry of an Order Under Sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing the Retention and Employment of (I) Teneo Securities LLC as Investment Banker and (II) Teneo Capital LLC as Financial Advisor, Effective as of the Petition Date (Docket No. [102](#), filed 06/26/2025).
- ii. Order Authorizing The Retention And Employment Of (I) Teneo Securities LLC As Investment Banker And (II) Teneo Capital LLC As Financial Advisor, Effective As Of The Petition Date (Docket No. [113](#), filed 06/27/2025).

Status: On June 27, 2025, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

- 11. Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date (Docket No. [65](#), filed 06/11/2025).

Objection Deadline: June 25, 2025, at 4:00 P.M. (ET)

Responses Received: None

Related Pleadings:

- i. Certificate of No Objection Regarding Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date (Docket No. [111](#), filed 06/26/2025).
- ii. Supplement to Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date (Docket No. [118](#), filed 06/27/2025).
- iii. Order Authorizing The Debtors To Employ And Retain Kurtzman Carson Consultants, LLC DBA Verita Global As Claims And Noticing Agent Effective As Claims And noticing Agent Effective As Of The Petition Date (Docket No. [120](#), filed 06/27, 2025)

Status: On June 27, 2025, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

12. Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date (Docket No. [66](#), filed 06/11/2025).

Objection Deadline: June 25, 2025, at 4:00 P.M. (ET)

Responses Received: None

Related Pleadings:

- i. Supplement to Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date (Docket No. [87](#), filed 06/19/2025).
- ii. Certificate of No Objection Regarding Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date (Docket No. [110](#), filed 06/26/2025).
- iii. Second Supplement to Debtors Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date (Docket No. [119](#), filed 06/27, 2025).

- iv. Order Authorizing the Debtors to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date (Docket No. [121](#), filed 06/27, 2025).

Status: On June 27, 2025, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

**MATTERS WITH CERTIFICATE OF NO OBJECTION
OR CERTIFICATION OF COUNSEL**

- 13. Debtors' Motion for Entry of an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs (Docket No. [11](#), filed 06/01/2025).

Objection Deadline: June 20, 2025, at 4:00 P.M. (ET)

Responses Received: None

Related Pleadings:

- i. Notice of Hearing Regarding Debtors' Motion for Entry of an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs (Docket No. [51](#), filed 06/05/2025).
- ii. Certificate of No Objection Regarding Debtors' Motion for Entry of an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs (Docket No. [124](#), filed 06/30/2025).

Status: A certificate of no objection has been filed. Accordingly, a hearing on this matter is only necessary to the extent the Court has questions or concerns

- 14. Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Employ and Retain Carl Marks Advisory Group LLC and (B) Designate Steven Agran as Chief Restructuring Officer for the Debtors Effective as of the Petition Date and (II) Granting Related Relief (Docket No. [64](#), filed 06/11/2025).

Objection Deadline: June 25, 2025, at 4:00 P.M. (ET)

Responses Received: None

Related Pleadings:

- i. Certification of Counsel Regarding Motion of Debtors for Entry of an Order (I) Authorizing the Debtors To (A) Employ and Retain Carl Marks Advisory Group LLC and (B) Designate Steven Agran as Chief Restructuring Officer for the

Debtors Effective as of the Petition Date And (II) Granting Related Relief (Docket No. [112](#), filed 06/26/2025).

- ii. Supplemental Certification of Counsel Regarding Motion of Debtors for Entry of an Order (I) Authorizing the Debtors To (A) Employ and Retain Carl Marks Advisory Group LLC and (B) Designate Steven Agran as Chief Restructuring Officer for the Debtors Effective as of the Petition Date And (II) Granting Related Relief (Docket No. [123](#), filed 06/27/2025).

Status: A certification of counsel submitted a revised proposed form of order has been filed. Accordingly, a hearing on this matter is only necessary to the extent the Court has questions or concerns.

15. Motion For Sale of Property Free and Clear of Liens(FEE) /Debtors' Motion for Entry of (I) an Order (A) Authorizing and Approving Bidding Procedures in Connection with the Sale of the Debtors' Assets, (B) Approving Certain BID Protections in Connection with the Debtors' Entry into a Stalking Horse Agreement, (C) Scheduling the Auction and Sale Hearing, (D) Approving the Form and Manner of Notice thereof, and (E) Granting Related Relief; and (II) an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of all Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases (Docket No. [67](#), filed 06/11/2025).

Objection Deadline: June 25, 2025, at 4:00 P.M. (ET)

Responses Received: None

Related Pleadings:

- i. Certification of Counsel Regarding Proposed Order on Debtors' Requested Bidding and Sale Procedures (Docket No. [122](#), filed 06/27/2025).

Status: A certification of counsel submitted a revised proposed form of order has been filed. Accordingly, a hearing on this matter is only necessary to the extent the Court has questions or concerns.

MATTERS GOING FORWARD

16. Debtors' Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 AND 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting liens and Superpriority Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [15](#), filed 06/02/2025).

Objection Deadline: June 20, 2025, at 4:00 P.M. (ET)

Responses Received:

- i. Limited Objection and Reservation of Rights in Response to Debtors Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 and 502 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting Liens and Superpriority Administrative Claims and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing and (IV) Granting Related Relief (Docket No. [57](#), filed 06/09/2025).
- ii. Informal response from the Official Committee of Unsecured Creditors.
- iii. Informal response from the Virginia Department of Environmental Quality and Chesterfield County, Virginia.

Related Pleadings:

- iv. Declaration of Steven Agran in Support of Debtors' Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 AND 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting liens and Superpriority Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [16](#), filed 06/02/2025).
- v. Interim Order Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting Liens and Superpriority Administrative Claims, and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [42](#), filed 06/04/2025).
- vi. Notice of Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552 of the Bankruptcy Code and Rules 2002, 4001, 6004 and 9014 of the Federal

Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Use Cash Collateral, (B) Obtain Senior Secured Superpriority Postpetition Financing and Granting Liens and Superpriority Administrative Claims and (C) Provide Adequate Protection, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (Docket No. [50](#), filed 06/04/2025).

Status: This matter is going forward on a further interim basis. The Debtors intend to submit an agreed proposed form of second interim order under certification of counsel prior to the hearing.

Dated: June 30, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

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