

**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

**DEBTORS' AMENDED WITNESS LIST FOR HEARING
SCHEDULED FOR JULY 2, 2025, AT 11:00 (ET)**

The debtors and debtors in possession (the “Debtors”) in the above-captioned cases hereby submit this amended witness list identifying the witnesses they may call at the hearing scheduled for July 2, 2025, at 11:00 a.m. (ET) (the “Hearing”).

WITNESSES

The Debtors have filed, or will file, certifications of counsel on the following matters. To the extent orders are not entered based on the certifications of counsel, the following matters may go forward at the Hearing:

- *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]*
- *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*

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.



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]

The Debtors designate the following individuals as witnesses whose live testimony may be relied upon during the Hearing in connection with the above matters:

- Steven Agran, Carl Marks Advisors, Chief Restructuring Officer of the Debtors
- Jim Silverwood, Senior Director, Teneo
- Charles Boguslaski, Senior Managing Director, Teneo

RESERVATION OF RIGHTS

The Debtors reserve the right to amend or supplement the foregoing at any time prior to or at the Hearing. The Debtors further reserve the right to (i) cross-designate all witnesses designated by any other party for the Hearing, (ii) call any rebuttal and/or impeachment witnesses as necessary, (iii) cross-examine any witness called by any other party at the Hearing, and (iv) not call any witness identified herein.

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Dated: July 1, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Richard W. Riley

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