

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

Hearing Date: July 31, 2025 at 1:00 p.m. (ET)

Objection Deadline: July 24, 2025 at 4:00 p.m. (ET)

Re: D.I. 15, 42 and 146

**NOTICE OF FINAL HEARING ON 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**

PLEASE TAKE NOTICE that on June 2, 2025, the Debtors filed *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* [D.I. 15] (the "Motion").²

PLEASE TAKE FURTHER NOTICE that on June 4, 2025, the Court entered the *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* [D.I. 42] (the "First Interim Order").

PLEASE TAKE FURTHER NOTICE that on July 2, 2025, the Court entered the *Second Interim Order Pursuant To Sections 105, 361, 362, 363, 364, 503, 506, 507 And 552 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.

² Capitalized terms used herein and not defined herein shall have the meaning given such terms in the Motion.



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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 [D.I. 146] (the “Second Interim Order”).

PLEASE TAKE FURTHER NOTICE that, pursuant to the Second Interim Order, the hearing to consider entry of an order granting the relief requested by the Motion on a final basis (the “Final Order”) is scheduled for **July 31, 2025 at 1:00 p.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Second Interim Order, the deadline for objecting to the Motion and entry of a Final Order is **July 24, 2025 at 4:00 p.m. (Eastern Time)** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion and entry of a Final Order must (a) be in writing, (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before the Objection Deadline, and (c) served as to be received on or before the Objection Deadline upon (a) the Debtors, (b) counsel to the Debtors, Pashman Stein Walder Hayden, P.C., 824 N. Market Street, Suite 800, Wilmington, Delaware 19801, Attn: John W. Weiss (jweiss@pashmanstein.com), Leah M. Eisenberg (leisenberg@pashmanstein.com), Richard W. Riley (rriley@pashmanstein.com) and David E. Sklar (dsklar@pashmanstein.com), (b) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware, 19801, Attn: Jane M. Leamy (jane.m.leafy@usdoj.gov), (c) counsel to the DIP Lenders, Cole Schotz P.C., 1325 Avenue of the Americas, New York, NY 10019, Attn: Daniel F. X. Geoghan (DGeoghan@coleschotz.com).

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION AND ENTRY OF A FINAL ORDER, IF NECESSARY, WILL BE HELD ON JULY 31, 2025, AT 1:00 P.M. (ET) BEFORE THE HONORABLE J. KATE STICKLES, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, WILMINGTON, DELAWARE 19801. IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 3, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Richard W. Riley

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