

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

VWS Holdco, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10979-JKS

Jointly Administered

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Evergreen National Indemnity Company (“Evergreen”), pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and section 1109(b) of the Bankruptcy Code, requests that all notices given or required to be given and all papers served in these cases be delivered to and served upon the counsels identified below at the following addresses and further request to be added to the Master Service List:

Frederick B. Rosner, Esq.

Chan Dong, Esq.

THE ROSNER LAW GROUP LLC

824 N. Market St., Suite 810

Wilmington, DE 19801

rosner@teamrosner.com

dong@teamrosner.com

Chrisandrea L. Turner, Esq.

William T. Gorton III, Esq.

W. Blaine Early III, Esq.

Stites & Harbison, PLLC

250 West Main Street, Suite 2300

Lexington, KY 40507-1758

Email: clturner@stites.com

wgorton@stites.com

BEARLY@stites.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in this case.

¹The 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.



PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers shall not be deemed or construed to be a waiver of Evergreen's (a) right to (i) have final orders in non-core matters entered only after *de novo* review by a District Court Judge, (ii) trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, and (iii) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (b) rights, claims, actions, defenses, setoffs, or recoupments to which Evergreen may be entitled under agreements, at law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Evergreen expressly reserved.

Respectfully submitted,

Dated: July 18, 2025
Wilmington, Delaware

THE ROSNER LAW GROUP LLC

/s/ Frederick B. Rosner

Frederick B. Rosner (DE 3995)
824 N. Market Street, Suite 810
Wilmington, DE 19801
(302) 777-1111
rosner@teamrosner.com

Counsel for Evergreen National Indemnity Company