

**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

Re: D.I. 15, 189 & 190

**JOINDER OF EVERGREEN NATIONAL INDEMNITY COMPANY
TO OBJECTION OF CHESTERFIELD COUNTY, VIRGINIA TO
DEBTOR-IN-POSSESSION FINANCING MOTION**

Evergreen National Indemnity Company (“Evergreen”), a secured creditor, through counsel, joins in the *Objection of Chesterfield County, Virginia* (“Chesterfield”) to *Debtor-in-Possess Financing Motion* [Doc. No. 189], also joined by the Virginia Department of Environmental Quality (“DEQ”) [Doc. No. 190]. For the reasons respectively presented therein by Chesterfield and DEQ, conversion of the Debtors’ cases to Chapter 7 and a transfer of venue to the Bankruptcy Court for the Eastern District of Virginia, is in the best interests of all parties.

Wherefore, Evergreen respectfully requests that this Court sustain Chesterfield’s objection, and to the extent this matter is converted, transfer venue of this case to the United States Bankruptcy Court for the Eastern District of Virginia.

Dated: July 24, 2025

Respectfully submitted,

/s/ Frederick B. Rosner

Frederick B. Rosner (DE #3995)

The Rosner Law Group LLC

824 N. Market Street, Suite 810

Wilmington, DE 19801

Telephone: (302) 777-1111

Email: rosner@teamrosner.com

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.



251097925072400000000003

Counsel for Evergreen National Indemnity Co.

-and-

Chrisandrea L. Turner
William T. Gorton III
W. Blaine Early, III
STITES & HARBISON PLLC
250 W. Main St., Ste. 2300
Lexington, Kentucky 40507
Telephone: (859) 226-2300
Email: clturner@stites.com
wgorton@stites.com
bearly@stites.com

Co-Counsel for Evergreen National Indemnity Co.