

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

In re:

VWS Holdco, Inc., et al.<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10979 (JKS)

(Jointly Administered)

Hearing Date: TBD

Obj. Deadline: TBD

Related D. I. No. 198

**JOINT MOTION TO SHORTEN NOTICE OF HEARING ON  
THE JOINT MOTION OF CHESTERFIELD COUNTY, VA AND THE VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL QUALITY TO  
TRANSFER VENUE TO THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

Chesterfield County, Virginia (“Chesterfield”) and the Virginia Department of Environmental Quality (“DEQ”) respectfully move (“Motion to Shorten Notice”) this Honorable Court for the entry of an order, pursuant to Rule 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 9006-1(e) of the Delaware Bankruptcy Local Rules (“Local Rules”) shortening the notice period for the Joint Motion of Chesterfield County, VA and the Virginia Department of Environmental Quality to Transfer Venue to the United States Bankruptcy Court for the Eastern District of Virginia (the “Venue Motion”) and, in support of hereof, respectfully state as follows:

**RELIEF REQUESTED**

1. By this Motion, Chesterfield and the DEQ seek entry of an order (the “Proposed Order”), substantially in the form attached hereto as Exhibit A, pursuant to section 105(a) of title

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the 1st four digits of each Debtor’s federal tax identification number are as follows: VWS Holdco, Inc (5412) and Shoosmith Bros., Inc. (6914).



11 of the United States Code (the “Bankruptcy Code”), Rule 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 9006-1(e) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), shortening the notice required for a hearing (the “Hearing”) on the Venue Motion so that it may be heard on July 31, 2025 at 1:00 p.m. (EST), or as soon thereafter as the Court’s schedule permits, with any objections to be filed no later than 4:00 p.m. EST on July 30, 2025.

### **JURISDICTION AND VENUE**

2. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the “Court”) under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and Movant confirms its consent pursuant to Local Rule 9013-1(f) to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue in this district is proper pursuant to 11 U.S.C. §§ 1408 and 1409.

4. The bases for the relief sought herein are sections 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006, and Local Rule 9006-1(e).

### **BASIS FOR RELIEF**

5. Del. Bankr. LR 9006-1(c) governs the timing for service and filing of motions and objections and provides that all motion papers must be filed and served at least 14 days prior to the hearing date and, generally, objection deadlines must be at least seven days prior to the hearing.

Pursuant to Del. Bankr. LR 9006-1(e) provides, in pertinent part, that “no motion will be scheduled on less notice than required by these Rules or the Fed. R. Bankr. P. except by order of the court, on written motion specifying the exigencies justifying shortened notice.”

6. Expedited consideration of the Venue Motion is appropriate and prudent in these Chapter 11 cases. By the very nature of the relief sought in the Venue Motion, the sooner the Venue Motion is heard the better, so as to preserve judicial resources and avoid any potential conflict with procedural or substantive rulings by this Court.

**LOCAL RULE 9006-1(e) AVERMENT**

7. On July 24, 2025, Chesterfield counsel contacted the counsel to the Debtors and the Office of the United States Trustee (the “UST”) and the proposed counsel to the Official Committee of Unsecured Creditors (the “OCUC”) regarding the relief sought herein. Counsel to the UST and Debtors have informed Chesterfield that neither party takes a position on the Motion to Shorten; proposed counsel to the OCUC does not agree to the relief sought herein.

**NOTICE**

8. Notice of this Motion will be provided to the following parties, or their respective counsel, if known: the Debtors; the UST; the OCUC; and all parties entitled to notice pursuant to Bankruptcy Rule 2002. Chesterfield submits that, in light of the nature of the relief requested, no other or further notice need be given.

**NO PRIOR REQUEST**

9. No prior request for the relief sought herein has been made to this Court or any other court.

**PRAYER FOR RELIEF**

Wherefore, Chesterfield respectfully requests that this Court enter an order shortening notice of hearing date on the Venue Motion and schedule it for hearing July 31, 2025 at 1:00 p.m. EST with objections, if any, to be filed not later than 4:00 p.m. (EST) on July 30, 2025.

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## **EXHIBIT A**

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

In re:

VWS Holdco, Inc., et al.<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10979 (JKS)

(Jointly Administered)

Related DI No. \_\_\_\_

**ORDER GRANTING JOINT MOTION TO SHORTEN NOTICE OF HEARING  
ON THE JOINT MOTION OF CHESTERFIELD COUNTY, VA AND THE VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL QUALITY TO  
TRANSFER VENUE TO THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

Upon the Joint Motion (the “Motion”)<sup>2</sup> of Chesterfield County, VA and the Virginia Department of Environmental Quality for entry of an order, pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006, and Rule 9006-1(e) of the Local Rules, shortening notice and scheduling a hearing on the *Joint Motion of Chesterfield County, VA and the Virginia Department of Environmental Quality to Transfer Venue to the United States Bankruptcy Court for the Eastern District of Virginia* (the “Venue Motion”); and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the 1st four digits of each Debtor’s federal tax identification number are as follows: VWS Holdco, Inc (5412) and Shoosmith Bros., Inc. (6914).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that due, sufficient, and proper notice of the Motion having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and the Court having found cause for the relief requested in the Motion pursuant to Local Rule 9006-1(e); and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, creditors, stakeholders and all other parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

The Motion is GRANTED as set forth herein.

1. The Venue Motion will be considered at the hearing scheduled before the Court on **July 31, 2025 at 1:00 p.m. (EST).**
2. Objections, if any, to the Motion shall be filed **by 4:00 p.m. (EST) on July 30, 2025.**