

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

In re:	§	Chapter 11
	§	
VWS HOLDCO, INC., <i>et al.</i> <sup>1</sup>	§	Case No. 25-10979
	§	
Debtors.	§	(Jointly Administered)
	§	

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE**

PLEASE TAKE NOTICE that the undersigned hereby enters her appearance pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 9010(b) in the above-captioned case as counsel to **SWIFT CREEK RENEWABLES, LLC**, creditor in the above-captioned case, and requests that, pursuant to Bankruptcy Rules 2002, 3017, 9007 and Rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) and sections 342 and 1109(b) of the Bankruptcy Code, all notices given or required to be given in this case be given and served upon:

Erin Boyd Ashwell  
McGuireWoods  
800 East Canal Street  
Richmond, VA 23219-3916  
Telephone: (804) 775.1002  
[eashwell@mcguirewoods.com](mailto:eashwell@mcguirewoods.com)

**PLEASE TAKE FURTHER NOTICE** that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes the notices and papers referred to in the Rules and sections cited above, and also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, facsimile, electronically or otherwise filed or served

---

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are as follows VWS Holdco, Inc. (5412) and Shoosmith Bros., Inc. (6914). The Debtors' mailing address is P.O. Box 2770, Chesterfield, VA 23832.



with regard to the referenced case and proceedings therein.

This Notice of Appearance shall not be deemed or construed to be a waiver of any rights, including, without limitation, the right (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) any consent to the exercise of the Court's jurisdiction, or (4) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or any other rights, claims, actions, defenses, setoffs, or recoupment in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupment are hereby expressly reserved.

DATED: July 28, 2025

Respectfully submitted,

/s/ Brian J. McLaughlin

Brian J. McLaughlin (DE#2462)

**OFFIT KURMAN, P.A.**

222 Delaware Avenue, Suite 1105

Wilmington, DE 19801

(302) 351.0916

[brian.mclaughlin@offitkurman.com](mailto:brian.mclaughlin@offitkurman.com)

-AND-

Erin Boyd Ashwell

Virginia Bar No. 79538

**MCGUIREWOODS**

**GATEWAY PLAZA**

800 East Canal Street

Richmond, VA 23219-3916

Telephone: (804) 775.1002

[eashwell@mcguirewoods.com](mailto:eashwell@mcguirewoods.com)

*Counsel for Swift Creek Renewables, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served via ECF electronic Notice on July 28, 2025.

/s/ Brian J. McLaughlin

Brian J. McLaughlin