

**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

**DEBTORS' WITNESS LIST FOR HEARING
SCHEDULED FOR JULY 31, 2025, AT 1:00 p.m. (ET)**

The debtors and debtors in possession (the “Debtors”) in the above-captioned cases hereby submit this witness list identifying the witnesses they may call at the hearing scheduled for July 31, 2025, at 11:00 p.m. (ET) (the “Hearing”).

WITNESSES

The Debtor have filed *Debtors Motion to Convert these Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code* (Docket No. 194, filed 07/24/2025) (the “Motion to Convert”).

The Debtors designate the following individuals as witnesses whose live testimony may be relied upon during the Hearing in connection with the Motion to Convert:

- Steven Agran, Carl Marks Advisors, Chief Restructuring Officer of the Debtors

RESERVATION OF RIGHTS

The Debtors reserve the right to amend or supplement this witness list at any time prior to or at the Hearing. The Debtors further reserve the right to (i) cross-designate all witnesses

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.



designated by any other party for the Hearing, (ii) call any rebuttal and/or impeachment witnesses as necessary, (iii) cross-examine any witness called by any other party at the Hearing, and (iv) not call any witness identified herein.

Dated: July 29, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Richard W. Riley

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