

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

<b>In re:</b>  <b>VWS HOLDCO., ET AL.,<sup>1</sup></b>  <b>Debtors.</b>	<b>§ CHAPTER 11</b> <b>§</b> <b>§ CASE No. 25-10979 (JKS)</b> <b>§</b> <b>§ Related to Docket Nos. 15, 42 and 50</b> <b>§</b> <b>§ Obj. Deadline: 7/30/25 by 4:00 pm (ET)</b> <b>§ Hearing Date: 7/31/25 at 1:00 pm (ET)</b>
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**JOINDER OF SWIFT CREEK RENEWABLES, LLC TO THE JOINT MOTION OF  
CHESTERFIELD COUNTY, VIRGINIA, AND THE VIRGINIA DEPARTMENT OF  
ENVIRONMENTAL QUALITY TO TRANSFER VENUE TO THE UNITED STATES  
BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA**

Swift Creek Renewables, LLC ("SCR") files this Joinder to the Joint Motion of Chesterfield County, Virginia ("Chesterfield"), and the Virginia Department of Environmental Quality ("VDEQ") to Transfer Venue to the United States Bankruptcy Court for the Eastern District of Virginia (the "Motion to Transfer") [ECF 198], which proposes to transfer the venue of this case from this Court to the United States Bankruptcy Court for the Eastern District of Virginia (the "Virginia Bankruptcy Court"), and would respectfully show the Court as follows:

**I. Joinder in Motion to Transfer**

1. For the reasons presented in the Motion to Transfer, following the conversion of the case to Chapter 7, a transfer of the case to the Virginia Bankruptcy Court is in the best interests of all parties. Specifically, the Virginia Bankruptcy Court is a much more convenient forum for all parties with an interest in what happens to the Debtors' landfill (the "Landfill"), including Chesterfield, VDEQ, Evergreen (the surety for the Landfill), SCR (which owns the processing plant that allows for High BTU gas to be processed at the Landfill), and the thousands

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<sup>1</sup> 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.



of residents of Chesterfield County who live near the Landfill. Following the conversion of the case to Chapter 7, it makes no sense for a Delaware chapter 7 trustee, residing approximately 240 miles away from the Landfill (and more than 4 hours away by car), to be appointed to address the urgent environmental issues pertaining to the Landfill. Transfer of this matter, by contrast, will conserve judicial resources, reduce expenses to the Debtors' estates, and allow a local chapter 7 trustee access to environmental consultants, the parties, and the site without the need for travel and scheduling delays in getting parties together in Virginia. Transferring the cases to the Virginia Bankruptcy Court benefits the administration of the Debtors' estates by making it more economical and efficient without prejudicing the Debtors. Thus, following conversion to chapter 7, the cases should immediately be transferred to the Virginia Bankruptcy Court so that a local chapter 7 trustee may be appointed.

#### **IV. Conclusion**

WHEREFORE, SCR respectfully requests the Court grant the Motion to Transfer and immediately transfer venue of this case to the United States Bankruptcy Court for the Eastern District of Virginia.

Dated: July 29, 2025

Respectfully submitted,

/s/ Brian J. McLaughlin

Brian J. McLaughlin (No. 2462)

**OFFIT KURMAN**

222 Delaware Avenue, Suite 1105

Wilmington, DE 19801

Tel: (302) 351-0900

Email: [Brian.McLaughlin@offitkurman.com](mailto:Brian.McLaughlin@offitkurman.com)

-and-

Suzanne K. Rosen (TX Bar No. 00798518)

Emily S. Chou (TX Bar No. 24006997)

**VARTABEDIAN HESTER & HAYNES  
LLP**

301 Commerce Street, Suite 2200  
Fort Worth, Texas 76102  
Tel: (817) 214-4990  
Email: [suki.rosen@vhh.law](mailto:suki.rosen@vhh.law)  
Email: [emily.chou@vhh.law](mailto:emily.chou@vhh.law)

-and-

Erin B. Ashwell, Esq.  
Christian E. Henneke, Esq.  
**MCGUIREWOODS LLP**  
Gateway Plaza  
800 East Canal Street  
Richmond, VA 23219  
(804) 775-1000  
[eashwell@mcguirewoods.com](mailto:eashwell@mcguirewoods.com)  
[chenneke@mcguirewoods.com](mailto:chenneke@mcguirewoods.com)

ATTORNEY FOR SWIFT CREEK  
RENEWABLES LLC

4925-1569-2633, v. 1