

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

In re

VWS Holdco, Inc., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-10979 (JKS)

(Jointly Administered)

**CERTIFICATE OF NO OBJECTION**

The undersigned proposed counsel for the Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned cases, hereby certifies as follows:

1. On July 10, 2025, the Committee filed the *Application of the Official Committee of Unsecured Creditors of VWS Holdco, Inc., et al. for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel Effective as of June 16, 2025* [Docket No. 156] (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. Objections to the Application were due on July 24, 2025. As of the date hereof, the undersigned counsel has not received any answers, objections or other responsive pleadings to the Application.

3. Therefore, I respectfully request that the Court enter the proposed form of order granting the Application which is attached hereto as Exhibit A at its earliest convenience. Counsel is available at the request of the Court.

<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.



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Dated: July 30, 2025

**GREENBERG TRAURIG, LLP**

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*Proposed Counsel for the Official  
Committee of Unsecured Creditors*

**Exhibit A**

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

In re

VWS Holdco, Inc., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-10979 (JKS)

(Jointly Administered)

Ref. Docket No. 156

**ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF  
GREENBERG TRAURIG, LLP AS COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS OF VWS HOLDCO INC.,  
ET AL. EFFECTIVE AS OF JUNE 16, 2025**

Upon the application (the “Application”)<sup>2</sup> of the Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases (the “Cases”) of VWS Holdco, Inc., *et al.* (collectively, the “Debtors”) for entry of an Order, pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code and Bankruptcy Rules 2014(a) and 2016(b), authorizing the retention and employment of Greenberg Traurig, LLP as counsel for the Committee, effective as of June 16, 2025; and upon reviewing and considering the Application, the Meloro Declaration and the Rule 2016 Statement; and it appearing that the Court has jurisdiction over the Application pursuant to 28 U.S.C. § 1334; and this being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A); and due and adequate notice of the Application having been given; and it appearing that no other or further notice need be given; and this Court having determined that based upon the representations in the Application and the Meloro Declaration, Greenberg Traurig neither holds nor represents any interest adverse to the Debtors’ estates or their creditors, Greenberg Traurig is a disinterested

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<sup>2</sup> All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

person as that term is defined under section 101(14) of the Bankruptcy Code, and Greenberg Traurig's employment is in the best interests of the Debtors' estates and creditors; and after due deliberation and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The Application shall be, and hereby is, GRANTED as set forth herein.
2. The Committee is authorized to retain and employ Greenberg Traurig as counsel, pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, effective as of June 16, 2025, to perform the services set forth in the Application.
3. Greenberg Traurig shall be compensated under the fee arrangement set forth in this Application and in accordance with sections 330 and 331 of the Bankruptcy Code, any applicable Bankruptcy Rules, Local Rules and any orders of this Court.
4. Prior to applying any increases in its hourly rates beyond the rates set forth in the Application, Greenberg Traurig shall provide ten days' notice of any such increases to the Debtors, the U.S. Trustee, and the Committee. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including, but not limited to, the reasonableness standard provided for in section 330 of the Bankruptcy Code, and this Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.
5. Greenberg Traurig shall use its best efforts to avoid any duplication of services provided by any of the Committee's other retained professionals in the Cases.
6. Greenberg Traurig shall not seek reimbursement of fees or costs arising from the defense of any of Greenberg Traurig's fee applications in the Cases, except as and to the extent otherwise permitted under applicable law and the decisions of this Court.

7. The Committee and Greenberg Traurig are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Application.

8. Notice of the Application as provided therein is deemed to be good and sufficient notice of such Application, and the requirements of the Bankruptcy Local Rules are satisfied by the contents of the Application.

9. Notwithstanding any Bankruptcy Rule to the contrary, this Order shall be immediately effective and enforceable upon its entry.

10. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.