IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re

Chapter 11

VWS Holdco, Inc., et al.,

Case No. 25-10979 (JKS)

Jointly Administered

Hearing Date: July 31, 2025 at 1:00 p.m. (ET)
Objection Deadline: July 30, 2025 at 12:00 p.m. (ET)

Re: D.I. 194

NOTICE OF HEARING ON DEBTORS' MOTION TO CONVERT THESE CHAPTER 11 CASES TO CASES UNDER CHAPTER 7 OF THE BANKRUPTCY CODE

PLEASE TAKE NOTICE that on July 24, 2025, the above-captioned debtors (the "Debtors") filed *Debtors' Motion to Convert These Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code* [D.I. 194] (the "Motion to Convert"). Copies of the Motion to Convert and related filings are available for download from the Debtors' claims agent's case website at https://www.veritaglobal.net/vwsholdco.

PLEASE TAKE FURTHER NOTICE that on June 24, 2025, the Debtors also filed a *Motion to Shorten Notice and Objection Periods Regarding Debtors' Motion to Convert These Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code* [D.I. 196] (the "Motion to Shorten").

PLEASE TAKE FURTHER NOTICE that on June 24, 2025, the Court entered the *Order Shortening Notice and Objection Periods Regarding Debtors' Motion to Convert These Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code* [Docket No. 199] (the "Order Shortening Notice").

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order Shortening Notice, the hearing on the Motion to Convert is scheduled for July 31, 2025 at 1:00 p.m. (Eastern Time).

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order Shortening Notice, the deadline to object to the relief requested by the Motion to Convert is **July 30, 2025 at 12:00 p.m.** (Eastern Time) (the "Objection Deadline").

² Capitalized terms used herein and not defined herein shall have the meaning given such terms in the Motion to Convert.



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.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion to Convert must (a) be in writing, (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before the Objection Deadline, and (c) served as to be received on or before the Objection Deadline upon the undersigned counsel to the Debtors.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION TO CONVERT WILL BE HELD ON JULY 31, 2025, AT 1:00 P.M. (ET) BEFORE THE HONORABLE J. KATE STICKLES, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, WILMINGTON, DELAWARE 19801, 5TH FLOOR, COURTROOM 6.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION TO CONVERT WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 25, 2025 Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Richard W. Riley

John W. Weiss (No. 4160)
Richard W. Riley (No. 4052)
824 North Market Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 592-6496
Email: jweiss@pashmanstein.com

-and-

Leah M. Eisenberg (admitted *pro hac vice*)
David E. Sklar (admitted *pro hac vice*)
Court Plaza South, East Wing
21 Main Street, Suite 200
Hackensack, NJ 07601
Telephone: (201) 488-8200
Email: leisenberg@pashmanstein.com
dsklar@pashmanstein.com

rrilev@pashmanstein.com

Counsel to the Debtors and Debtors in Possession