Docket #0108 Date Filed: 03/02/2026

**UNITED STATES BANKRUPTCY COURT**
**FOR THE NORTHERN DISTRICT OF NEW YORK**

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| In re: | Chapter 11 |
| Vanderbilt Minerals, LLC, | Case No. 26-60110 (WAK) |
| Debtor.[1] | |

**SUPPLEMENT TO MOTION OF THE DEBTOR AND DEBTOR IN POSSESSION FOR INTERIM AND FINAL ORDERS (I) AUTHORIZING THE DEBTOR TO PAY PREPETITION EMPLOYEE WAGES, BENEFITS AND RELATED ITEMS AND (II) GRANTING CERTAIN RELATED RELIEF**

The above-captioned debtor and debtor in possession (the "Debtor"), hereby files this supplement (this "Supplement") to its *Motion of the Debtor and Debtor in Possession for Interim and Final Orders (I) Authorizing the Debtor to Pay Prepetition Employee Wages, Benefits and Related Items and (II) Granting Certain Related Relief* [Docket No. 14] (the "Employees Motion"),[2] seeking authority, but not direction, to pay amounts owed under the Safety Recognition Program (defined below). In support of this Supplement, the Debtor respectfully states as follows:

**Background**

1. On February 16, 2026 (the "Petition Date"), the Debtor commenced a case under chapter 11 of the Bankruptcy Code (the "Chapter 11 Case"). The Debtor is authorized to continue to operate its business and manage its properties as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. The Debtor is a global supplier of mineral products, operating mines and processing facilities in six different states. The Debtor mines bentonite clay, kaolin clay, pyrophyllite and

[1] The Debtor is Vanderbilt Minerals, LLC (EIN 13-1432885). The Debtor's noticing address in this Chapter 11 Case is 33 Winfield Street, Norwalk, Connecticut 06855.

[2] Any capitalized term used but not defined herein shall have the meaning ascribed to such term in the Employees Motion.


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wollastonite and processes and sells products used in industrial applications (e.g., construction coatings, ceramics and refractories) and life sciences (e.g., pharmaceuticals, personal care, animal care, agriculture and horticulture). Prior to 2008, a predecessor in interest to the Debtor mined and sold talc for use in industrial applications, which is the source of the litigation and judgments that have led to the commencement of this Chapter 11 Case.

3. A comprehensive description of the Debtor's business and operations, capital structure and the events leading to the commencement of the Chapter 11 Case can be found in the *Declaration of Dean Vomero, Chief Restructuring Officer of Vanderbilt Minerals, LLC, in Support of First Day Motions of Debtor and Debtor in Possession* [Docket No. 3] (the "First Day Declaration"), filed on the Petition Date and incorporated herein by reference.

4. On February 17, 2026, the Court entered an interim order approving the relief requested in the Employees Motion on an interim basis [Docket No. 41] (the "First Interim Order").

5. On February 26, 2026, the Court entered an interim order approving the relief requested in the Employees Motion on a further interim basis [Docket No. 99] (the "Second Interim Order").

6. A further hearing to consider the relief requested in the Employees Motion, on a final basis, is scheduled to be held on March 18, 2026 (the "Final Hearing"). Contemporaneously herewith, the Debtor has made an application for an order reducing time, seeking to have the incremental relief sought pursuant to this Supplement heard at the Final Hearing.

**Safety Recognition Program**

7. Prior to the Petition Date, the Debtor maintained a safety recognition program (the "Safety Recognition Program") pursuant to which Employees at the Debtor's facilities are eligible to receive modest safety bonuses upon their facility achieving certain safety milestones. The Safety Recognition Program has three performance tiers based on the safety record achieved at

each facility: (i) "Safety Achievement," which requires no fatalities or lost time injuries and provides a bonus of $50 per eligible Employee; (ii) "Safety Honor," which requires the same performance as Safety Achievement plus no restricted duty cases and an overall recordable injury rate below industry average, providing a bonus of $75 per eligible Employee; and (iii) "Safety Excellence," which requires the same performance as Safety Honor plus an overall recordable injury rate below 1, providing a bonus of $100 per eligible Employee. Under the terms of the Safety Recognition Program, Employees who have been terminated or who voluntarily departed during the award year or before awards are distributed are not eligible to receive an award.

8. In 2025, prior to the Petition Date, no recordable injuries occurred at the Debtor's Western or Dixie facilities, entitling Employees at those facilities to bonuses under the Safety Excellence tier totaling, in the aggregate, approximately $7,000 (approximately $100 per eligible Employee). These amounts were earned prepetition but have not yet been paid.

9. No insider will receive any payments on account of the Safety Recognition Program.

10. Accordingly, in order to maintain morale and to promote and encourage employee safety, the Debtor seeks, in any final order granting the Employees Motion, authority, but not direction, to pay amounts owed under the Safety Recognition Program, in an amount not to exceed $7,500 in the aggregate, in accordance with the Approved Budget.

**WHEREFORE**, the Debtor respectfully requests that the Court enter an order (i) granting the relief requested in the Employees Motion on a final basis and authorizing the Debtor to pay amounts owed under the Safety Recognition Program as set forth herein; and (ii) granting such other and further relief as the Court may deem proper.

Dated: March 2, 2026
Syracuse, New York

Respectfully submitted,

*/s/ Charles J. Sullivan*

Charles J. Sullivan, Esq., Bar Roll No. 507717
Grayson T. Walter, Esq., Bar Roll No. 518237
Andrew S. Rivera, Esq., Bar Roll No. 700712
BOND, SCHOENECK & KING, PLLC
One Lincoln Center
Syracuse, NY 13202-1355
Telephone: (315) 218-8000
Emails: csullivan@bsk.com
gwalter@bsk.com
arivera@bsk.com

- and -

Heather Lennox, Esq. (*pro hac vice*)
Benjamin Rosenblum, Esq. (*pro hac vice*)
JONES DAY
250 Vesey Street
New York, NY 10281
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
Email: hlennox@jonesday.com
brosenblum@jonesday.com

- and -

T. Daniel Reynolds, Esq. (*pro hac vice*)
Nicholas Buchta, Esq. (*pro hac vice*)
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
Email: tdreynolds@jonesday.com
nbuchta@jonesday.com

*Proposed Counsel for the Debtor and Debtor in Possession*