Docket #0003 Date Filed: 8/30/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Noble Supply & Logistics, LLC, Debtor.	Chapter 11 Case No. 26-11369 (___) Tax I.D. No. 04-2767926
In re: COTS Solutions, LLC, Debtor.	Chapter 11 Case No. 26-11370 (___) Tax I.D. No. 45-2674477
In re: Federal Resources Supply Company, LLC, Debtor.	Chapter 11 Case No. 26-11371 (___) Tax I.D. No. 52-2133636
In re: FRS Holdings, LLC, Debtor.	Chapter 11 Case No. 26-11372 (___) Tax I.D. No. 80-0782327
In re: K.D. Analytical Consulting, LLC, Debtor.	Chapter 11 Case No. 26-11373 (___) Tax I.D. No. 20-4796637
In re: KDA Acquisition, LLC, Debtor.	Chapter 11 Case No. 26-11374 (___) Tax I.D. No. 81-1805870

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In re: Noble Defense Corporation, Debtor.	Chapter 11 Case No. 26-11375 (___) Tax I.D. No. N/A
In re: Noble Equity Holdings, LLC, Debtor.	Chapter 11 Case No. 26-11376 (___) Tax I.D. No. 87-2890851
In re: Noble.com, LLC, Debtor.	Chapter 11 Case No. 26-11377 (___) Tax I.D. No. 87-2544712
In re: Noble Mission Support, LLC, Debtor.	Chapter 11 Case No. 26-11378 (___) Tax I.D. No. 87-0827908
In re: Tactical & Survival Specialties, LLC, Debtor.	Chapter 11 Case No. 26-11379 (___) Tax I.D. No. 54-1542266

DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF

The above-captioned debtors and debtors in possession (collectively, the "Debtors"), hereby move (this "Motion") this Court for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), pursuant to sections 105(a) and 342(c)(1) of title 11 of the United States Code (the "Bankruptcy Code"), Rules 1005, 1015(b), and 2002(o) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rules 1015-1 and 9013-1

of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), granting the relief described below. In support of this Motion, the Debtors incorporate the contemporaneously filed *Declaration of Robert Albergotti, Chief Transformation Officer of Noble Equity Holdings, LLC, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* (the "First Day Declaration")[1] and further represent as follows:

Relief Requested

1. The Debtors respectfully request entry of an order: (i) directing the joint administration of the Chapter 11 Cases (as defined below) for procedural purposes only, (ii) waiving the requirement that notices provided in the Chapter 11 Cases strictly comply with Bankruptcy Rule 2002(o) and implementing a simplified caption to be used in all case pleadings, and (iii) granting related relief.

2. In particular, the Debtors request that the official caption be used by all parties in all papers in the jointly administered cases be as follows:

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Noble Supply & Logistics, LLC, *et al.*, Debtors.[1]	Chapter 11 Case No. 26-11369 (___) (Jointly Administered)

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Noble Supply & Logistics, LLC (7926); COTS Solutions, LLC (4477); Federal Resources Supply Company, LLC (3636); FRS Holdings, LLC (2327); K.D. Analytical Consulting, LLC (6637); KDA Acquisition, LLC (5870); Noble Defense Corporation (N/A); Noble Equity Holdings, LLC (0851); Noble.com, LLC (4712); Noble Mission Support, LLC (7908); and Tactical & Survival Specialties, LLC (2266). The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is 1 Marina Park Drive, Suite 220, Boston, MA 02210.

[1] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

3. In addition, the Debtors request that the Court make a separate docket entry, substantially similar to the following, on the docket of each of the Debtors' Chapter 11 Cases other than the case of Noble Supply & Logistics, LLC to reflect the joint administration of these Chapter 11 Cases:

> An order has been entered in this case in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware directing joint administration of the chapter 11 cases of Noble Supply & Logistics, LLC, Case No. 26-11369 (___); COTS Solutions, LLC, Case No. 26-11370 (___); Federal Resources Supply Company, LLC, Case No. 26-11371 (___); FRS Holdings, LLC, Case No. 26-11372 (___); K.D. Analytical Consulting, LLC, Case No. 26-11373 (___); KDA Acquisition, LLC, Case No. 26-11374 (___); Noble Defense Corporation, Case No. 26-11375 (___); Noble Equity Holdings, LLC, Case No. 26-11376 (___); Noble.com, LLC, Case No. 26-11377 (___); Noble Mission Support, LLC, Case No. 26-11378 (___); and Tactical & Survival Specialties, LLC, Case No. 26-11379 (___). The docket in Case No. 26-11369 (___) should be consulted for all matters affecting this case. All further pleadings and other papers shall be filed in and all further docket entries shall be made on the docket of Noble Supply & Logistics, LLC, Case No. 26-11369 (___).

Jurisdiction and Venue

4. The United States District Court for the District of Delaware has jurisdiction to consider this Motion under 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the "Court") under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding under 28 U.S.C. § 157(b) and, pursuant to Local Rule 9013-1(f), the Debtors consent to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

5. Venue of these cases and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

6. The bases for the relief requested herein are sections 105(a) and 342(c)(1) of the Bankruptcy Code, Bankruptcy Rules 1005, 1015(b), and 2002(o), and Local Rules 1015-1 and 9013-1.

Background

7. On the date hereof (the "Petition Date"), each Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (collectively, the "Chapter 11 Cases"). The factual background regarding the Debtors, including their business operations, their capital and debt structures, and the events leading to the filing of the Chapter 11 Cases, is set forth in the First Day Declaration.

8. The Debtors continue to manage and operate their businesses as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

9. To date, no creditors' committee has been appointed in the Chapter 11 Cases by the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee"). No trustee or examiner has been appointed in the Chapter 11 Cases.

Basis for Relief Requested and Applicable Authority

10. If two or more petitions are pending in the same court by or against a debtor and an affiliate, the court may order the joint administration of the estates of the debtor and such affiliates. FED. R. BANKR. P. 1015(b). Local Rule 1015-1 provides that an order of joint administration may be entered, without notice and an opportunity for hearing, upon the filing of a motion for joint administration pursuant to Bankruptcy Rule 1015, supported by an affidavit, declaration, or verification which establishes that the joint administration of two or more cases pending in this

Court is warranted and will ease the administrative burden for the Court and the Parties. DEL. BANKR. L.R. 1015-1.

11. The Debtors are all "affiliates" as that term is defined in section 101(2) of the Bankruptcy Code. Thus, joint administration of the Debtors' Chapter 11 Cases is appropriate under Bankruptcy Rule 1015(b).

12. The joint administration of the Chapter 11 Cases will promote efficiency by permitting the Clerk of the Court to use a single, general docket for the Chapter 11 Cases and to combine notice to creditors and other parties-in-interest of the Debtors' respective estates. The Debtors anticipate that almost all of the papers, hearings, and orders in the Chapter 11 Cases will relate to all of the Debtors. Moreover, the use of the simplified caption set forth above will eliminate cumbersome and confusing procedures and ensure a uniformity of pleading identification.

13. The rights of the respective creditors and stakeholders of each of the Debtors will not be adversely affected by the joint administration of these Chapter 11 Cases because the relief sought is purely procedural and will not affect parties' substantive rights.

14. The Debtors also seek a waiver of certain requirements of Bankruptcy Rule 2002(o), which incorporates Bankruptcy Rule 1005 and provides that notices under Bankruptcy Rule 2002 contain certain information, including any other names used by the Debtors in the previous eight years. FED. R. BANKR. P. 2002(o). The Debtors submit that use of the proposed simplified caption—which contains most, but not all, of the information required by Bankruptcy Rule 2002(o)—will provide sufficient information to parties-in-interest and ensure a uniformity of pleading identification. In particular, all pleadings filed and each notice mailed by the Debtors will include a footnote listing all of the Debtors, the last four digits of their tax identification numbers, and the service address in these Chapter 11 Cases. Moreover, the full tax identification

numbers and all prior names used by the Debtors will be listed in the petitions filed by each Debtor, and such petitions are publicly available to all parties-in-interest, including on a website to be maintained by the Debtors' proposed claims and noticing agent, and will be provided by the Debtors upon request. Therefore, the Debtors submit that the policies behind the requirements of Bankruptcy Rule 2002(o) have been satisfied.

15. Courts in this district have granted similar relief in other cases. *See, e.g.*, *In re BFG Supply Co., LLC*, Case No. 26-11284 (CTG) (Bankr. D. Del. Aug. 20, 2026) [Docket No. 53]; *In re West Marine, Inc.*, Case No. 26-10794 (KBO) (Bankr. D. Del. May 18, 2026) [Docket No. 43]; *In re America's Gardening Resource, Inc.*, Case No. 25-11180 (BLS) (Bankr. D. Del. June 25, 2025) [Docket No. 39]; *In re JOANN Inc.*, Case No. 25-10068 (CTG) (Bankr. D. Del. Jan. 16, 2025) [Docket No. 103]; *In re Ligado Networks LLC*, Case No. 25-10006 (TMH) (Bankr. D. Del. Jan. 7, 2025) [Docket No. 89].

Notice

16. Notice of this Motion will be provided to: (i) the U.S. Trustee; (ii) counsel to the Prepetition ABL Agent; (iii) counsel to the Prepetition Term Loan Agent; (iv) counsel to the Prepetition Subordinated Note Agent; (v) counsel to the Prepetition Subordinated Note Holders; (vi) the creditors listed on the Debtors' consolidated list of thirty (30) creditors holding the largest unsecured claims; (vii) the United States Attorney for the District of Delaware; (viii) the Internal Revenue Service; (ix) the state attorneys general for states in which the Debtors conduct business; and (x) any party that is entitled to notice pursuant to Bankruptcy Rule 2002. As this Motion is seeking "first day" relief, the Debtors will serve this Motion and any order entered with respect to this Motion as required by Local Rule 9013-1(m). The Debtors submit that no other or further notice is required under the circumstances.

No Prior Request

17. No prior request for the relief sought in this Motion has been made to this or any other court.

WHEREFORE, the Debtors request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Dated: August 30, 2026
Wilmington, Delaware

/s/ Justin R. Alberto

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Proposed Co-Counsel to the Debtors and Debtors in Possession

Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Noble Supply & Logistics, LLC, Debtor.	Chapter 11 Case No. 26-11369 (___) Tax I.D. No. 04-2767926
In re: COTS Solutions, LLC, Debtor.	Chapter 11 Case No. 26-11370 (___) Tax I.D. No. 45-2674477
In re: Federal Resources Supply Company, LLC, Debtor.	Chapter 11 Case No. 26-11371 (___) Tax I.D. No. 52-2133636
In re: FRS Holdings, LLC, Debtor.	Chapter 11 Case No. 26-11372 (___) Tax I.D. No. 80-0782327
In re: K.D. Analytical Consulting, LLC, Debtor.	Chapter 11 Case No. 26-11373 (___) Tax I.D. No. 20-4796637
In re: KDA Acquisition, LLC, Debtor.	Chapter 11 Case No. 26-11374 (___) Tax I.D. No. 81-1805870

In re: Noble Defense Corporation, Debtor.	Chapter 11 Case No. 26-11375 (___) Tax I.D. No. N/A
In re: Noble Equity Holdings, LLC, Debtor.	Chapter 11 Case No. 26-11376 (___) Tax I.D. No. 87-2890851
In re: Noble.com, LLC, Debtor.	Chapter 11 Case No. 26-11377 (___) Tax I.D. No. 87-2544712
In re: Noble Mission Support, LLC, Debtor.	Chapter 11 Case No. 26-11378 (___) Tax I.D. No. 87-0827908
In re: Tactical & Survival Specialties, LLC, Debtor.	Chapter 11 Case No. 26-11379 (___) Tax I.D. No. 54-1542266

ORDER (I) DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF

Upon consideration of the motion (the "Motion")[1] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") (i) directing the joint administration of the Chapter 11 Cases for procedural purposes only, (ii) waiving the

[1] Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to such terms in the Motion.

requirement that notices provided in the Chapter 11 Cases strictly comply with Bankruptcy Rule 2002(o) and implementing a simplified caption to be used in all case pleadings, and (iii) granting related relief, all as more fully set forth in the Motion; and upon consideration of the First Day Declaration; and the United States District Court for the District of Delaware having jurisdiction to consider this Motion under 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and that no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor; it is **HEREBY ORDERED THAT**:

1. The Motion is **GRANTED** as set forth herein.

2. The above-captioned Chapter 11 Cases are consolidated for procedural purposes only and shall be jointly administered by the Court under the docket for Debtor Noble Supply & Logistics, LLC, Case No. 26-11369.

3. The caption of the jointly administered cases should read as follows:

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Noble Supply & Logistics, LLC, *et al.*,	Case No. 26-11369 (___)
Debtors.[1]	(Jointly Administered)

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Noble Supply & Logistics, LLC (7926); COTS Solutions, LLC (4477); Federal Resources Supply Company, LLC (3636); FRS Holdings, LLC (2327); K.D. Analytical Consulting, LLC (6637); KDA Acquisition, LLC (5870); Noble Defense Corporation (N/A); Noble Equity Holdings, LLC (0851); Noble.com, LLC (4712); Noble Mission Support, LLC (7908); and Tactical & Survival Specialties, LLC (2266). The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is 1 Marina Park Drive, Suite 220, Boston, MA 02210.

4. The foregoing caption fully satisfies the policies behind the requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(o).

5. A docket entry, substantially similar to the following, shall be entered on the docket of each of the Debtors, other than Noble Supply & Logistics, LLC, to reflect the joint administration of these Chapter 11 Cases:

> An order has been entered in this case in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware directing joint administration of the chapter 11 cases of Noble Supply & Logistics, LLC, Case No. 26-11369 (___); COTS Solutions, LLC, Case No. 26-11370 (___); Federal Resources Supply Company, LLC, Case No. 26-11371 (___); FRS Holdings, LLC, Case No. 26-11372 (___); K.D. Analytical Consulting, LLC, Case No. 26-11373 (___); KDA Acquisition, LLC, Case No. 26-11374 (___); Noble Defense Corporation, Case No. 26-11375 (___); Noble Equity Holdings, LLC, Case No. 26-11376 (___); Noble.com, LLC, Case No. 26-11377 (___); Noble Mission Support, LLC, Case No. 26-11378 (___); and Tactical & Survival Specialties, LLC, Case No. 26-11379 (___). The docket in Case No. 26-11369 (___) should be consulted for all matters affecting this case. All further pleadings and other

papers shall be filed in and all further docket entries shall be made on the docket of Noble Supply & Logistics, LLC, Case No. 26-11369 (___).

6. The Debtors shall maintain, and the Clerk of the United States Bankruptcy Court for the District of Delaware shall keep, one consolidated docket, one file, and one consolidated service list.

7. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these Chapter 11 Cases and this Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating these Chapter 11 Cases.

8. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and such notice satisfies the requirements of the Bankruptcy Rules and the Local Rules.

9. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

10. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.