UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	Chapter 11
NOBLE SUPPLY & LOGISTICS, LLC, *et al*.,[1]	)	Case No. 26-11369 (CTG)
	)	(Jointly Administered)
	)	
Debtors.	)	**Hearing Date: October 16, 2026 at 10:00 a.m.**
	)	**Obj. Deadline: October 9, 2026 at 4:00 p.m.**

MOTION OF MIDWEST PRESSURE SYSTEMS, INC. FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM

Midwest Pressure Systems, Inc. ("Midwest"), by and through its undersigned counsel, as and for its motion (the "Motion") for entry of an Order, pursuant to §§ 105(a) and 503(b)(9) of title 11 of the United States Code (the "Bankruptcy Code"), substantially in the form attached hereto as Exhibit "A", granting Midwest an administrative expense claim in the above-captioned chapter 11 cases commenced by debtors Noble Supply & Logistics, LLC, *et al*. (collectively, the "Debtors") and directing payment thereof, respectfully represents and alleges as follows:

BACKGROUND

1. On August 30, 2026 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court and Orders for Relief were entered.

2. Midwest is a manufacturer of air and gas pressure booster systems.

3. Midwest delivered a custom built nitrogen generation booster system, including

[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.

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an air compressor, refrigeration air dryer, filteration, membrane generator, nitrogen purity analyzer, and booster, to the Debtors (collectively, the "503(b)(9) Goods") having a total agreed price of $39,530.26 that was actually received by Debtors within the twenty (20) days immediately preceding the Petition Date. A copy of Midwest's invoice for the 503(b)(9) Goods (i.e., Invoice No. 009157) for goods shipped on August 11, 2026 and delivered on or about August 12, 2026 is annexed hereto as Exhibit "B".

4. The 503(b)(9) Goods were sold and delivered to the Debtors in the ordinary course of the Debtors' business. None of the amounts invoiced by Midwest for the 503(b)(9) Goods have been paid, nor have any of the 503(b)(9) Goods been returned to Midwest, as of the date hereof. No protest or objection has been made by the Debtors with regard to the 503(b)(9) Goods. The amounts owed to Midwest on account of the 503(b)(9) Goods are not subject to any setoff or counterclaim.

JURISDICTION AND VENUE

5. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested herein are §§ 105(a) and 503(b) of the Bankruptcy Code.

RELIEF REQUESTED

6. By this Motion, Midwest respectfully requests the allowance and payment of the $39,530.26 owed to it on account of 503(b)(9) Goods as an administrative expense claim pursuant to §§ 105(a) and 503(b) of the Bankruptcy Code.

BASIS FOR RELIEF

7. Section 503(b)(9) of the Bankruptcy Code provides, in relevant part, that "the

value of any goods received by the debtor within 20 days before the date of commencement of the case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor's business" shall be allowed administrative expense claims against the estate. There should be no dispute that Midwest delivered the 503(b)(9) Goods to the Debtors in the ordinary course of business within the 20-day period immediately preceding the Petition Date. Accordingly, Midwest is entitled to an allowed administrative expense claim in the amount of $39,530.26.

8. Midwest further seeks immediate payment of its administrative expense claim. Although section 503(b) does not provide any date for the payment of an administrative expense claim, it is within the bankruptcy court's discretion to direct that such claims be paid immediately. *See*, *e.g., In re Continental Airlines, Inc.*, 146 B.R. 520, 531 (Bankr. D. Del. 1992). In determining whether such an exercise of discretion is appropriate, bankruptcy courts in this district typically weigh: (1) the prejudice to the debtor; (2) the hardship to the claimant; and (3) the potential detriment to other creditors. *See*, *e.g.*, *In re Garden Ridge Corp.*, 323 B.R. 136, 143 (Bankr. D. Del. 2005).

9. Upon information and belief, the Debtors are paying administrative expense obligations to suppliers and vendors (*See* Docket No. 211) and the Debtors have been authorized to use cash collateral to pay to pay their post-petition vendors and other administrative claimants (*See* Docket No. 218). As such, the likelihood of any prejudice to the Debtors in immediately paying the relatively small amount owed to Midwest as an administrative expense is minimal. To the contrary, Midwest will be harmed significantly if immediate payment is not received for the 503(b)(9) Goods which it, in good faith, delivered to the Debtors. Midwest is a small company with minimal liquid assets and, failure to receive payment from the Debtors in a timely

manner, will cause a great disruption to Midwest's business Finally, it is unlikely that the immediate payment of Midwest's administrative expense claim will harm other creditors since the amount at issue is relatively small and all of the Debtors' administrative expense claims will ultimately need to be paid by the Debtors. Accordingly, the Court should direct the Debtors to immediately pay Midwest the sum of $39,530.26.

RESERVATION OF RIGHTS

10. This Motion is submitted without prejudice to Midwest's right to file additional requests for allowance and/or proofs of claim for any additional claims against the Debtors of any kind or nature, including, without limitation, claims for administrative expenses, interest, late charges, attorneys' fees, costs and expenses, and any and all other charges and obligations reserved under the applicable agreements, instruments and other transaction documents, and claims for reimbursement in amounts that are not fully ascertainable at this time.[2]

WHEREFORE, Midwest respectfully requests that the Court grant the relief sought herein together with such other and further relief as may be just and proper.

Dated: Wilmington, DE
September 29, 2026

CROSS & SIMON, LLC

By: */s/ Kevin S. Mann*
Kevin S. Mann (No. 4576)
1105 North Market Street, Suite 901
Wilmington, Delaware 19801
Telephone: (302) 777-4200
E-mail: kmann@crosslaw.com

Counsel to Midwest Pressure Systems, Inc.

[2] The Debtors have also failed to pay Midwest for a small purchase in May of 2026. Midwest does not seek an administrative expense claim related to that purchase.

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	Chapter 11
NOBLE SUPPLY & LOGISTICS,	)	Case No. 26-11369 (CTG)
LLC, *et al*.,	)	(Jointly Administered)
	)	
Debtors.	)	**Hearing Date: October 16, 2026 at 10:00 a.m.**
	)	**Obj. Deadline: October 9, 2026 at 4:00 p.m.**

NOTICE OF MOTION OF MIDWEST PRESSURE SYSTEMS, INC. FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM

PLEASE TAKE NOTICE that Midwest Pressure Systems, Inc. filed the *Motion of Midwest Pressure Systems, Inc. for Allowance and Payment of Administrative Expense Claim* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be made in writing, filed with the Bankruptcy Court, 824 Market Street, Wilmington, DE 19801 and served upon undersigned counsel, so as to actually be received by the undersigned counsel, on or before **October 9, 2026 at 4:00 p.m.**

PLEASE TAKE FURTHER NOTICE that if an objection is properly filed in accordance with the above procedure, a hearing on the Motion will be held before the Honorable Craig T. Goldblatt on **October 16, 2026 at 10:00 a.m.** Only those objections made in response to the Motion will be heard.

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

Dated: September 29, 2026

CROSS & SIMON, LLC

/s/ Kevin S. Mann

Kevin S. Mann (No. 4576)
1105 N. Market Street, Suite 901
Wilmington, DE 19801
Telephone: (302) 777-4200
kmann@crosslaw.com

Counsel to Midwest Pressure Systems, Inc.

Exhibit “A”

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	Chapter 11
NOBLE SUPPLY & LOGISTICS,	)	Case No. 26-11369 (CTG)
LLC, *et al*.,	)	(Jointly Administered)
	)	
Debtors.	)	**Re: Docket No. ____**
	)	

ORDER GRANTING MOTION OF MIDWEST PRESSURE SYSTEMS, INC.
FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM

Upon consideration of the motion (the "Motion") of Midwest Pressure Systems, Inc. ("Midwest") for entry of an Order, pursuant to 11 U.S.C. §§ 105(a) and 503(b)(9), allowing and directing the payment of an administrative expense claim in its favor; and due and adequate notice of the Motion having been given; and the Court having reviewed the Motion and any responses thereto; it is hereby

IT IS HEREBY ORDERED THAT:

1. The Motion is granted.

2. Midwest shall have an allowed administrative expense claim pursuant to 11 U.S.C. § 503(b)(9) in the amount of $39,530.26.

3. The Debtors shall pay Midwest the sum of $39,530.26 within five (5) business days of the entry of this Order.

Exhibit “B”

MPS
MIDWEST PRESSURE SYSTEMS

Midwest Pressure Systems, Inc.
850 Transport Drive
Valparaiso, Indiana 46383-8432
Phone (219) 462-0070
www.midwestpressuresystems.com
Federal Tax ID 37-1831333

INVOICE 009157

Date 08/11/26

VISA MasterCard AMERICAN EXPRESS Cards

Bill to:	Ship To:
Noble Supply and Logistics *accountspayable@noble.com* Attn: Accounts Payable One Marina Park Drive Suite 220 Boston, MA 02210 U.S.A.	Noble Supply and Logistics c/o: Holloman Air Firce Base Attn: FB4802 635th. MMSS / FUELS 1273 Bear Path Road, Bldg. 902 Holloman Air Force Base, NM 88330-7901 U.S.A.

Ship Date	Ship Via	Terms	Purchase Order Number	Page
08/11/26	LTL/PPA	Net 30	P2017387	1

Qty	Item No.	Description	Unit Price	Amount
1	NGCF80-A	Nitrogen generation booster system 3HP Air Compressor, Refrigeration air dryer, Filteration, Membrane generator, N2 Purity analyzer, HL42-2500 series booster, 90 SCFH @ 99% N2 purity Voltage: 230VAC, 1-phase, 60Hz **w/o #09938; s/n: 200**	$38,160.00	$38,160.00
1	Freight	LTL Freight Charges via XPO **Per Quote #RFQ260319** **Requested delivery date: 8/18/2026** **MARK ALL PACKAGES:** **SPE8EJ21D0022** **XPO Logistics Pickup #BCH-11-38** **XPO Logistics PRO #367-203174** **1 Crate / 48"x 48" x 64" @ 710 Lbs** **1 Crate / 39" x 32" x 53" @ 493 Lbs** **1 Crate / 33" x 30" x 48" @ 332 Lbs**	$1,370.26	$1,370.26

LTL Drop Shipment

Sale Amount	$39,530.26
Freight	$0.00
Sales Tax	$0.00
TOTAL	$39,530.26

CERTIFICATE OF SERVICE

I, Kevin S. Mann, hereby certify that on September 29, 2026, a true and correct copy of the foregoing *Motion of Midwest Pressure Systems, Inc. for Allowance and Payment of Administrative Expense Claim* was served upon all interested parties via CM/ECF.

/s/ Kevin S. Mann
Kevin S. Mann (No. 4576)