Docket #0003 Date Filed: 10/6/2026

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 (CTG) (Jointly Administered)
NOBLE SUPPLY & LOGISTICS, LLC, Plaintiff, v. DEFENSE LOGISTICS AGENCY, Defendant.	Adv. Proc. No. 26-50885 (CTG)

MOTION OF NOBLE SUPPLY & LOGISTICS, LLC
FOR PARTIAL SUMMARY JUDGMENT

Noble Supply & Logistics, LLC ("Noble" and, collectively with its affiliated debtors and debtors in possession, the "Debtors"), a debtor and debtor in possession in the above-captioned chapter 11 cases and plaintiff in the above-captioned adversary proceeding, hereby moves (the "Motion"), pursuant to sections 105(a), 541(a), and 542 of title 11 of the United States Code, Rule 56 of the Federal Rules of Civil Procedure (made applicable to this Adversary Proceeding by Rule 7056 of the Federal Rules of Bankruptcy Procedure), and Rule 7056-1 of the Local Rules of the

[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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United States Bankruptcy Court for the District of Delaware, for entry of an Order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), granting partial summary judgment in favor of Noble on Counts I and II of the Adversary Complaint [Adv. D.I. 1] (the "Complaint"), solely with respect to the Pre-Termination Delivery Orders.[2] In support of this Motion, Noble incorporates and relies on its opening brief in support of the Motion and the *Declaration of Robert Albergotti, Chief Transformation Officer of Noble Equity Holdings, LLC, in Support of Motion of Noble Supply & Logistics, LLC for Partial Summary Judgment*, both filed contemporaneously herewith, and respectfully states as follows:

Noble consents to entry of a final order to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

WHEREFORE, for the reasons set forth in the accompanying brief, Noble respectfully requests entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting partial summary judgment in its favor and against the DLA, solely with respect to the Pre-Termination Delivery Orders, and granting such other and further relief as the Court deems just and proper.

[*Remainder of this page intentionally left blank.*]

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Complaint.

Dated: October 6, 2026
Wilmington, Delaware

/s/ G. David Dean

COLE SCHOTZ P.C.
Justin R. Alberto (No. 5126)
G. David Dean (No. 6403)
Patrick J. Reilley (No. 4451)
Jack M. Dougherty (No. 6784)
500 Delaware Avenue, Suite 600
Wilmington, DE 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: jalberto@coleschotz.com
ddean@coleschotz.com
preilley@coleschotz.com
jdougherty@coleschotz.com

-and-

Michael D. Sirota (admitted *pro hac vice*)
Seth Van Aalten (admitted *pro hac vice*)
Sarah A. Carnes (admitted *pro hac vice*)
Anthony De Leo (admitted *pro hac vice*)
1325 Avenue of the Americas, 19th Floor
New York, NY 10019
Telephone: (212) 752-8000
Facsimile: (212) 752-8393
Email: msirota@coleschotz.com
svanaalten@coleschotz.com
scarnes@coleschotz.com
adeleo@coleschotz.com

Proposed Co-Counsel to the Debtors and Debtors in Possession

KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: joshua.sussberg@kirkland.com

-and-

Patrick J. Nash, Jr., P.C. (admitted *pro hac vice*)
Charles B. Sterrett (admitted *pro hac vice*)
333 West Wolf Point Plaza
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: patrick.nash@kirkland.com
charles.sterrett@kirkland.com

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, *et al.*, Debtors.[1]	Chapter 11 Case No. 26-11369 (CTG) (Jointly Administered)
NOBLE SUPPLY & LOGISTICS, LLC, Plaintiff, v. DEFENSE LOGISTICS AGENCY, Defendant.	Adv. Proc. No. 26-50885 (CTG)

ORDER GRANTING MOTION OF NOBLE SUPPLY & LOGISTICS, LLC FOR PARTIAL SUMMARY JUDGMENT

This matter having come before this Court on the *Motion of Noble Supply & Logistics, LLC for Partial Summary Judgment* (the "Motion");[2] and this Court having reviewed the Motion, the Brief in support thereof, the Albergotti Declaration, and all exhibits attached thereto; and this Court having reviewed any responses and objections filed in connection with the Motion and having heard oral argument regarding the Motion at a hearing before this Court; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing*

[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.

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found this is a core proceeding under 28 U.S.C. § 157(b)(2); this Court having found it 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 under 28 U.S.C. §§ 1408 and 1409; and this Court having found that Noble's notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other or further notice need be provided; and this Court having determined that the legal and factual bases set forth in the Motion and at the hearing on the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT**:

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

2. Summary judgment is granted in favor of Noble and against the DLA on Counts I and II of the Complaint, solely with respect to the Pre-Termination Delivery Orders.

3. The Court finds that Noble delivered the goods and provided the services associated with the Pre-Termination Delivery Orders to the contractually required destinations and parties through the date of the August 27, 2026 Termination Notices, and that such goods and services were accepted or deemed accepted by the Government.

4. The Court further finds that all acts necessary to create Defendant's payment obligation with respect to the Pre-Termination Delivery Orders have occurred, that the DLA's payment obligation is matured and presently due and payable, and that Noble is entitled to recover all amounts due and owing on account of the Pre-Termination Delivery Orders.

5. Judgment is entered in favor of Noble and against the DLA in the amount of $14,566,268.02, representing the amount due and owing on account of the Pre-Termination Delivery Orders.

6. The DLA is hereby ordered to remit payment to Noble in the amount of $14,566,268.02 within three (3) business days of entry of this Order.

7. The terms and conditions of this Order shall be effective and enforceable immediately upon its entry.

8. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.