IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	
Noble Supply & Logistics, LLC, *et al.*,	)	Chapter 11
	)	Case No. 26-11369 (CTG)
	)	
Debtors.[1]	)	(Jointly Administered)
	)	
	)	Re: D.I. 327, 366, 395
_____	)	

CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER DENYING THE UNITED STATES' MOTION FOR ADEQUATE PROTECTION

The undersigned counsel for the United States of America certifies as follows:

1. On October 13, 2026, the United States filed its motion for entry of an order (i) granting adequate protection under sections 361, 363(e), and 553 of the Bankruptcy Code and (ii) granting related relief [D.I. 327] (the "Motion").

2. On October 21, 2026, the Debtors filed an objection to the Motion [D.I. 366]. On October 23, 2026, the United States filed a reply [D.I. 395].

3. On October 28, 2026, the Court held a hearing on the Motion. At the hearing, the Court denied the Motion for the reasons stated on the record and directed the United States to submit an order denying the Motion under certification of counsel.

4. A proposed order denying the Motion (the "Proposed Order") is attached as Exhibit A.

[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).

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5. On October 29, 2026, the United States circulated the Proposed Order to counsel for the Debtors. Counsel for the Debtors has advised that the Debtors do not object to entry of the Proposed Order.

WHEREFORE, the United States respectfully requests that the Court enter the Proposed Order at its earliest convenience.

Dated: November 2, 2026

Respectfully submitted,

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Attorneys for the United States

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Noble Supply & Logistics, LLC, *et al*.,	)	Case No. 26-11369 (CTG)
	)	
	)	Chapter 11
Debtors.[1]	)	(Jointly Administered)
	)	
_____	)	Related Docket No. 327, 366, 395

ORDER ON THE UNITED STATES' MOTION FOR ADEQUATE PROTECTION

Upon the motion of the United States [Docket No. 327], on behalf of its agencies, departments, and instrumentalities, including the Defense Logistics Agency ("DLA"), for entry of an order pursuant to sections 361, 363(e), and 553, of title 11 of the United States Code (the "Bankruptcy Code") (the "Motion")[2]; and the Court having jurisdiction over the Motion under 28 U.S.C. §§ 157 and 1334; and the Motion being a core proceeding under 28 U.S.C. § 157(b)(2); and venue being proper under 28 U.S.C. §§ 1408 and 1409; and the Court having considered the Motion, the declarations filed in support of it, and any responses thereto at a hearing before this Court (the "Hearing"); and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary, except as otherwise ordered herein; and after due deliberation and sufficient cause appearing therefor:

[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).

[2] Capitalized terms used but not defined in this Order have the meanings given them in the Motion.

IT IS HEREBY ORDERED THAT:

1. The Motion is **DENIED** for the reasons set forth on the record at the Hearing.