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) **Re: D.I. 3, 17, 23 & 43**

CERTIFICATION OF COUNSEL REGARDING ORDER (I) GRANTING IN PART AND DENYING IN PART MOTION OF NOBLE SUPPLY & LOGISTICS, LLC FOR PARTIAL SUMMARY JUDGMENT, (II) GRANTING IN PART AND DENYING IN PART THE UNITED STATES' MOTION TO DISMISS, AND (III) DENYING THE UNITED STATES' CROSS-MOTION FOR SUMMARY JUDGMENT

The undersigned counsel for Debtor Noble Supply & Logistics, LLC ("Noble"), hereby certifies as follows:

1. On October 6, 2026, Noble initiated the above-captioned adversary proceeding by filing the *Adversary Complaint* [Adv. D.I. 1] (the "Complaint") asserting claims for turnover

[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.

(Count I) and breach of contract (Count II) against the Defense Logistics Agency ("DLA") in the United States Bankruptcy Court for the District of Delaware (the "Court").

2. On October 6, 2026, Noble filed the *Motion of Noble Supply & Logistics, LLC for Partial Summary Judgment* [Adv. D.I. 3] (the "Summary Judgment Motion").

3. On October 20, 2026 and October 21, 2026, the United States of America, on behalf of the DLA (the "Government"), filed the (i) *United States' Motion to Dismiss the Complaint* [Adv. D.I. 17] (the "Motion to Dismiss") and (ii) *United States' Cross Motion for Summary Judgment* [Adv. D.I. 23] (the "Cross-Motion" and, together with the Summary Judgment Motion and the Motion to Dismiss, the "Motions").[2]

4. On October 28, 2026, the Court held a hearing on the Motions (the "Hearing").

5. On November 2, 2026, the Court issued an Opinion in connection with the Motions [Adv. D.I. 43] (the "Opinion"). In the Opinion, the Court: (i) granted in part and denied in part the Summary Judgment Motion as to Noble's claim for turnover asserted in Count I of the Complaint; (ii) granted the Motion to Dismiss without prejudice as to the breach of contract claims asserted in Count II of the Complaint; and (iii) directed the DLA to remit payment to Noble in the amount of $8,493,160.09[3] on or before November 9, 2026 (unless the Court's orders are stayed or reversed before then). The Court directed the parties to settle an Order consistent with the Opinion.

6. Attached hereto as **Exhibit A** is a proposed order (the "Proposed Order") resolving the Motions consistent with the Court's rulings in the Opinion. The Government has indicated

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

[3] The judgment set forth in the Proposed Order (defined below) in the amount of $8,458,217.45 was revised to reflect (i) certain "fast pay" amounts in Lines 7, 54, and 60-63 of the Schedule attached to the Opinion as Exhibit A that have already been paid to Noble and (ii) an agreed upon reduction of the amount due and owing to Noble on account of Line 10 of such Schedule.

that it has no objection to entry of the Proposed Order and does not waive any of its positions, including on appeal.

7. Accordingly, Noble requests entry of the Proposed Order attached hereto as **Exhibit A** at the Court's earliest convenience.

Dated: November 4, 2026
Wilmington, Delaware

/s/ G. David Dean

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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) **Re: Docket Nos. 3, 17, 23 & 43**

ORDER (I) GRANTING IN PART AND DENYING IN PART MOTION OF NOBLE SUPPLY & LOGISTICS, LLC FOR PARTIAL SUMMARY JUDGMENT, (II) GRANTING IN PART AND DENYING IN PART THE UNITED STATES' MOTION TO DISMISS, AND (III) DENYING THE UNITED STATES' CROSS-MOTION FOR SUMMARY JUDGMENT

This matter having come before this Court on the (i) *Motion of Noble Supply & Logistics, LLC for Partial Summary Judgment* [Adv. D.I. 3] (the "Summary Judgment Motion"), (ii) *United States' Motion to Dismiss the Complaint* [Adv. D.I. 17] (the "Motion to Dismiss"), and (iii) *United States' Cross-Motion for Summary Judgment* [Adv. D.I. 23] (the "Cross-Motion" and, together

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with the Summary Judgment Motion and the Motion to Dismiss, the "Motions");[2] and this Court having reviewed (a) the Summary Judgment Motion, (b) Noble's Brief in support thereof [Adv. D.I. 4], (c) the Albergotti Declaration and all exhibits attached thereto [Adv. D.I. 5], (d) the Motion to Dismiss, (e) the Cross-Motion, (f) the United States' Brief in opposition to the Summary Judgment Motion and in support of the Motion to Dismiss and Cross-Motion, the Cuorato Declaration submitted in support thereof, and all exhibits attached thereto [Adv. D.I. 19], (g) Noble's Reply Brief in further support of the Summary Judgment Motion and in opposition to the Motion to Dismiss and Cross-Motion [Adv. D.I. 35], (h) the supplemental Albergotti Declaration submitted in support of the Summary Judgment Motion [Adv. D.I. 36], (i) Noble's post-hearing Brief [Adv. D.I. 41], and (j) the United States' post-hearing brief [Adv. D.I. 42]; and this Court having heard oral argument regarding the Motions at a hearing before this Court on October 28, 2026; and this Court having issued an opinion in connection with the Motions [Adv. D.I. 43] (the "Opinion") on November 2, 2026; and this Court having found that notice of the Motions and opportunity for a hearing on the Motions were appropriate under the circumstances and no other or further notice need be provided; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT**:

1. The reasons stated in the Opinion are incorporated into this Order by reference.

2. The Summary Judgment Motion is **GRANTED** in part and **DENIED** in part as set forth herein and in the Opinion.

3. The Motion to Dismiss is **GRANTED** as to Count II of the Complaint, without prejudice and **GRANTED**, in part, as to Count I with regards to Lines 48, 79, 82–84, and 91–93, which are dismissed without prejudice, and otherwise **DENIED**.

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

4. The Cross-Motion is **DENIED**.

5. Summary judgment is granted in favor of Noble and against the DLA on Count I of the Complaint in the amount of $8,458,217.45 for Lines 1–6, 8–47, 49–53, 55–59, 63–78, 80–81, 85–90, and 94–108, as numbered in Exhibit A to the Opinion.[3] Count I is hereby dismissed without prejudice as to all other Accepted Delivery Orders (as defined in the Complaint), which resolves Count I in its entirety.

6. Unless this Order is earlier stayed or reversed, the DLA is hereby ordered to remit payment to Noble in the amount of $8,458,217.45 on or before November 9, 2026.

7. Nothing in this Order limits any party's right to appeal this Order or to seek a stay of this Order pending appeal.

8. This Order constitutes a final appealable order within the meaning of 28 U.S.C. §158(a)(1), as this Order fully resolves all claims in this Adversary Proceeding.

9. To the extent permitted by law, the Court shall retain jurisdiction to interpret and enforce this Order.

[3] The $8,458,217.45 judgment amount is calculated based on the "Total amount subject to turnover" referenced in Exhibit A of the Opinion in the amount of 8,493,160.09, *less* (a) $33,658.34 representing the sum total of Lines 7, 54, and 60–62, which have already been paid and (b) $1,284.30 representing the adjustment to Line 10 as discussed in footnote 4 of Exhibit B of the Opinion.