THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re NOBLE SUPPLY & LOGISTICS, LLC, *et al.*,[1] Debtors.	Chapter 11 Case No. 26-11369 (CTG), *et seq.* Jointly Administered **Related to: Doc. No. 325**

RESERVATION OF RIGHTS TO MOTION OF THE UNITED STATES FOR LIMITED RELIEF FROM THE AUTOMATIC STAY TO EXERCISE TERMINATION RIGHTS WITH RESPECT TO CERTAIN DLA CONTRACTS AND DELIVERY ORDERS

Thermo Scientific Portable Analytical Instruments Inc., *et al.* ("**Thermo**"), by their undersigned attorneys, file this Reservation of Rights ("**Reservation of Rights**") to the *Motion of the United States for Limited Relief from the Automatic Stay to Exercise Termination Rights with Respect to Certain DLA Contracts and Delivery Orders* ("**Motion**") [ECF No. 325], stating as follows.

BACKGROUND

1. Noble Supply & Logistics LLC, et al. (the "**Debtors**") filed voluntary petitions for relief under Chapter 11 of title 11 of the United States Code (the "**Bankruptcy Code**") on August 30, 2026 (the "**Petition Date**").

[1] Debtors, 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. Thermo and the Debtors are parties to a certain Distribution Agreement (the "**Contract**") pursuant to which Thermo sold to the Debtor, and in a number of instances shipped to end users, such as the Defense Logistics Agency (the "**DLA**"), certain goods and supplies.

3. On October 13, 2026, the United States on behalf of the DLA filed the Motion, which requests that the Court grant the DLA relief from stay to terminate certain contracts and delivery orders [ECF No. 325].

4. The Motion implicates certain purchase order(s) (the "**Purchase Order(s)**") from the Debtors to Thermo. Thermo had processed those Purchase Order(s) and incurred costs in doing so.

RESERVATION OF RIGHTS

5. Thermo does not take a position on the propriety of the Motion and relief sought.

6. However, Thermo reserves its rights with respect to all amounts owed to Thermo and any rights and remedies it has against the Debtors under its Contract and against the DLA with respect to the Purchase Order(s) under the Federal Acquisition Regulation, 48 C.F.R. § 1.101 *et seq.*, the Defense Federal Acquisition Regulation System, 48 C.F.R. § 201.101 *et seq.*, and all other applicable law.

7. Thermo reserves the right to amend or supplement the foregoing Reservation of Rights, to join in other pleadings filed and to further revise and/or amend the foregoing, or to enforce other rights and remedies under applicable law, or as otherwise authorized by the Court.

WHEREFORE, Thermo respectfully reserves all rights in connection with any relief granted upon the Court's consideration of the Motion.

Dated: October 21, 2026
Wilmington, Delaware

Respectfully submitted,

HILLER LAW, LLC

/s/ Adam Hiller

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Counsel for Thermo Scientific Portable Analytical Instruments Inc., Thermo Eberline LLC, and Thermo Environmental Instruments LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 21, 2026, I caused copies of the foregoing to be served via the Court's CM/ECF system on parties authorized to receive electronic notice in this case and the parties listed below via electronic mail:

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Dated: October 21, 2026
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