IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Noble Supply & Logistics, LLC, *et al.*,	Case No. 26-11369 (CTG)
Debtors.[1]	(Jointly Administered)
	Objection Deadline: November 27, 2026 at 4:00 p.m. (ET) **Hearing Date: December 17, 2026 at 1:00 p.m. (ET)**

DEBTORS' MOTION FOR ORDER AUTHORIZING DEBTORS TO REDACT AND FILE UNDER SEAL CERTAIN INFORMATION IN THE DEBTORS' SUPPLEMENTAL MOTION FOR ENTRY OF AN ORDER AUTHORIZING ADDITIONAL PARTICIPANTS IN THE PREVIOUSLY APPROVED KEY EMPLOYEE RETENTION PLAN AND KEY EXECUTIVE INCENTIVE PLAN

Noble Supply & Logistics, LLC and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the "Debtors"), hereby file this motion (the "Motion to Seal") seeking entry of an order substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), pursuant to sections 105(a) and 107(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), Rule 9018 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 9018-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), authorizing the Debtors to redact and file under seal certain information in the *Debtors' Supplemental Motion for Entry of an Order Authorizing Additional Participants in the Previously Approved Key Employee Retention Plan and Key Executive*

[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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Incentive Plan [Docket No. 457] (the "Supplemental Employee Programs Motion"),[2] filed on November 11, 2026. In support of the Motion to Seal, the Debtors respectfully state as follows:

RELIEF REQUESTED

1. By this Motion to Seal, the Debtors seek entry of an order substantially in the form attached hereto as **Exhibit A**, authorizing the Debtors to redact and file under seal Schedule 1 to the Supplemental Employee Programs Motion, which contains confidential employee compensation information (the "Confidential Information").

JURISDICTION AND VENUE

2. This Court has jurisdiction to consider this Motion under 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012. This is a core proceeding under 28 U.S.C. § 157(b). Pursuant to Local Rule 9013-1(f), the Debtors confirm their consent to the entry of a final order or judgment by the Court with respect to this Motion if it is determined that this Court, absent consent of the parties, cannot enter a final order or judgment consistent with Article III of the United States Constitution.

3. Venue of this case and this Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

4. The basis for the relief requested herein are sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1.

[2] Capitalized terms used but not otherwise defined herein shall have those meanings ascribed to them in the Supplemental Employee Programs Motion.

BACKGROUND

5. On August 30, 2026 (the "Petition Date"), each Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (collectively, the "Chapter 11 Cases"). These Chapter 11 Cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b). *See* Docket No. 68.

6. The Debtors continue to manage and operate their businesses as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. On September 16, 2026, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an Official Committee of Unsecured Creditors (the "Committee") in these Chapter 11 Cases. *See* Docket No. 128.

7. Additional information regarding the circumstances leading to the commencement of these Chapter 11 Cases and information regarding the Debtors' business and capital structure is set forth in detail in the *Declaration of Robert Albergotti, Chief Transformation Officer of Noble Equity Holdings, LLC, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 14] (the "First Day Declaration"), which is incorporated herein by reference.

8. On September 25, 2026, the Debtors filed the *Debtors' Motion for Order Approving (I) Key Employee Retention Plan and (II) Key Executive Incentive Plan* [Docket No. 195] (the "Employees Programs Motion"), seeking approval of a KERP Plan and a KEIP Plan (together, the "Employee Programs"). Certain exhibits to the Employee Programs Motion contained confidential information related to each Participant's compensation, including the Participant's names, annual salary, and individual award opportunities under the Employee Programs. The Debtors filed a motion seeking to seal such confidential information [Docket No. 249] and the Court entered an order granting the motion [Docket No. 321].

9. On November 11, 2026, the Debtors filed the Supplemental Employee Programs Motion. The Supplemental Employee Programs Motion seeks authority to add six Additional Participants to the previously approved Employee Programs. Schedule 1 to the Supplemental Employee Programs Motion contains Confidential Information related to each Additional Participant's compensation, including the Additional Participant's names, annual salary, and individual award opportunities under the Employee Programs—the same type of information the Court previously authorized the Debtors to seal.

BASIS FOR RELIEF REQUESTED

10. The Bankruptcy Code, Bankruptcy Rules, and Local Rules authorize the Court to limit the disclosure of certain confidential information to protect entities from potential harm. Section 107(b) of the Bankruptcy Code provides, in relevant part, as follows:

> On request of a party in interest, the bankruptcy court shall. . . (1) protect an entity with respect to a trade secret or confidential research, development, or commercial information. . .

11 U.S.C. § 107(b)(1). Section 105(a) of the Bankruptcy Code codifies the Court's inherent equitable powers and empowers it to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a).

11. Bankruptcy Rule 9018 defines the procedures by which a party may move for relief under section 107(b), providing that:

> [o]n motion or on its own initiative, with or without notice, the court may make any order which justice requires (1) to protect the estate or any entity in respect of a trade secret or other confidential research, development, or commercial information.

Fed. R. Bankr. P. 9018.

12. Further, Local Rule 9018-1(d) provides that:

> Any filer seeking to file a document (a "Proposed Sealed Document") under seal must file a motion requesting such relief (a

> "Sealing Motion") no later than 3 business days after the filing of the Proposed Sealed Document.

Local Rule 9018-1(d).

13. Unlike its counterpart in Rule 26(c) of the Federal Rules of Civil Procedure, section 107(b) of the Bankruptcy Code does not require an entity seeking such protection to demonstrate "good cause." *See, e.g.*, *Video Software Dealers Ass'n v. Orion Pictures Corp. (In re Orion Pictures Corp.)*, 21 F.3d 24, 28 (2d Cir. 1994) (holding that a license agreement authorizing a licensee "to reproduce, manufacture, distribute, and sell videocassettes" of three films contained confidential information). Rather, if the material sought to be protected satisfies one of the categories identified in section 107(b), "the court is *required* to protect a requesting party and has no discretion to deny the application." *Orion Pictures*, 21 F.3d at 27. Moreover, the resulting order should be broad (*i.e.*, "any order which justice requires"). *In re Global Crossing, Ltd.*, 295 B.R. 720, 724 (Bankr. S.D.N.Y. 2003); Fed. R. Bankr. P. 9018. Courts are required to provide such protections "generally where open inspection may be used as a vehicle for improper purposes." *Orion Pictures*, 21 F.3d at 27. Indeed, the "authority goes not just to the protection of confidential documents, but to other confidentiality restrictions that are warranted in the interests of justice." *Global Crossing*, 295 B.R. 724.

14. Courts have also found that such relief should be granted if the information sought to be protected is "commercial information," which is defined as "information which would result in 'an unfair advantage to competitors by providing them information as to the commercial operations of the debtor.'" *In re Alterra Healthcare Corp.*, 353 B.R. 66, 75 (Bankr. D. Del. 2006). However, commercial information does not have to rise to the level of a trade secret to be protected under section 107(b) of the Bankruptcy Code. *See Orion Pictures*, 21 F.3d at 28 (finding that section 107(b)(1) creates an exception to the general rule that court records are open to examination

by the public and, under this exception, an interested party has to show only that the information it wishes to seal is "confidential and commercial" in nature).

15. Here, the Debtors seek to seal Confidential Information contained in Schedule 1 to the Supplemental Employee Programs Motion, including the Additional Participants' names, positions, and salary information of the Additional Participants. Importantly, the Court already granted similar relief in connection with the original Employee Programs Motion. *See* Docket No. 321.

16. The Confidential Information is commercially sensitive and is not otherwise publicly available**.** If such information were to be made public via PACER, the Confidential Information would be disclosed to the detriment of the Debtors, their estates, and the Debtors' employees. In particular, the Debtors submit that the disclosure of such Confidential Information could provide competitors and other potential employers with information concerning the identities of key personnel and the compensation and incentive opportunities associated with those employees, thereby facilitating targeted recruitment of the very employees whose continued services are critical to preserving the value of the Debtors' estates. Such disclosure could undermine the purposes of the Employee Programs and impair the Debtors' ability to retain and incentivize key personnel during these Chapter 11 Cases. Accordingly, the Debtors believe that the Confidential Information contained in the Employee Programs Motion should be subject to the protections of section 107(b) of the Bankruptcy Code.

17. The requested relief is narrowly tailored. The Debtors do not seek to seal the Supplemental Employee Programs Motion or the material terms of the Employee Programs generally. Rather, the Debtors seek only to protect the limited employee-specific Confidential Information contained in Schedule 1.

18. The Debtors will share the Confidential Information with the Court, the U.S. Trustee, the Prepetition ABL Agent, the Prepetition Term Loan Agent, the Prepetition Subordinated Note Agent, and counsel to the Committee.

19. Bankruptcy Courts in this District routinely have authorized debtors in other chapter 11 cases to file under seal sensitive employee and personal information. *See e.g., In re American Virtual Cloud Technologies, Inc.,* Case No. 23-10020 (MFW) (Bankr. D. Del. Mar. 12, 2023) [Docket No. 187] (authorizing debtors to file under seal and redact KEIP/KERP motion which contain confidential details regarding key employee incentive plan and key employee retention plan); *In re First Guarantee Mortgage Corporation*, Case No. 22-10584 (CTG) (Bankr. D. Del. Aug. 2, 2022) [Docket No. 278] (authorizing debtors to file under seal and redact KEIP/KERP motion, order, and declarations which contain confidential details regarding key employee incentive plan and key employee retention plan); *In re Alamo Drafthouse Cinemas Holdings, LLC*, Case No. 21-10474 (MFW) (Bankr. D. Del. Apr. 29, 2021) (authorizing debtors to redact (i) lists of participants, along with sensitive information pertaining to their salaries and the potential payments under the key employee incentive plan and key employee retention plan and (ii) metrics related to the key employee incentive plan); *In re True Religion Apparel, Inc.*, Case No. 20-10941 (CTG) (Bankr. D. Del. June 22, 2020) (authorizing debtors to file certain exhibits with information related to debtors' key employee incentive and retention plans under seal); *In re Valeritas Holdings, Inc.*, No. 20-10290 (LSS) (Bankr D. Del. March 11, 2020) [Docket No. 164] (authorizing debtors to redact and file under seal certain confidential information related to debtors key employee incentive plan and key employee retention plan); *In re iPic-Gold Class Entertainment, LLC*, Case No. 19-11739 (LSS) (Bankr. D. Del. Sept. 11, 2019) [Docket No. 257]

(authorizing debtors to file certain exhibits with information related to debtors' key employee incentive and retention plans under seal).

20. Accordingly, the Debtors submit that it is appropriate for the Court to grant the requested relief.

NOTICE

21. Notice of this Motion will be given to: (a) the U.S. Trustee; (b) counsel to the Committee; and (c) all parties that have requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice is required.

NO PRIOR REQUEST

22. No previous request for the relief sought herein has been made to this or any other court.

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order substantially in the form attached hereto, granting the relief requested in this Motion and such other and further relief as may be just and proper.

Dated: November 12, 2026
Wilmington, Delaware

/s/ Justin R. Alberto

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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) **Objection Deadline: November 27, 2026 at 4:00 p.m. (ET)** **Hearing Date: December 17, 2026 at 1:00 p.m. (ET)**

NOTICE OF MOTION

PLEASE TAKE NOTICE that, on November 12, 2026, the above-captioned debtors and debtors in possession (collectively, the "Debtors"), by and through their undersigned proposed counsel, filed with the United States Bankruptcy Court for the District of Delaware (the "Court") the *Debtors' Motion for Order Authorizing Debtors to Redact and File Under Seal Certain Information in the Debtors' Supplemental Motion for Entry of an Order Authorizing Additional Participants in the Previously Approved Key Employee Retention Plan and Key Executive Incentive Plan* (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief sought in the Motion will be held on **December 17, 2026 at 1:00 p.m. (ET)** before The Honorable Craig T. Goldblatt, United States Bankruptcy Court for the District of Delaware, 5th Floor, Courtroom No. 5, 824 North Market Street, Wilmington, Delaware 19801.

[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.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the entry of an order granting the relief sought in the Motion must be made in writing and filed with the Court on or before **November 27, 2026 at 4:00 p.m. (ET)** (the "Objection Deadline"). At the same time, you must serve a copy of the response or objection upon the undersigned proposed counsel to the Debtors so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO PROPERLY FILE AND SERVE A RESPONSE ON OR BEFORE THE OBJECTION DEADLINE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: November 12, 2026
Wilmington, Delaware

/s/ Justin R. Alberto

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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) **Re: Docket No. __**

ORDER AUTHORIZING DEBTORS TO REDACT AND FILE UNDER SEAL CERTAIN INFORMATION IN THE DEBTORS' SUPPLEMENTAL MOTION FOR ENTRY OF AN ORDER AUTHORIZING ADDITIONAL PARTICIPANTS IN THE PREVIOUSLY APPROVED KEY EMPLOYEE RETENTION PLAN AND KEY EXECUTIVE INCENTIVE PLAN

Upon consideration of the motion to seal (the "Motion to Seal")[2] of Noble Supply & Logistics, LLC and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the "Debtors"), for entry of an order (the "Order"), pursuant to sections 105(a) and 107(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), Rule 9018 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 9018-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), authorizing the Debtors to redact and file under seal certain information in the *Debtors' Supplemental Motion for Entry of an Order Authorizing Additional Participants in the Previously Approved Key Employee Retention*

[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 to Seal.

Plan and Key Executive Incentive Plan (the "Supplemental Employee Programs Motion"); all as more fully set forth in the Motion to Seal; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion to Seal in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion to Seal is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having found that the Debtors' Notice of the Motion to Seal and opportunity for a hearing on the Motion to Seal were appropriate under the circumstances and no other notice need be provided; and the Court having reviewed and considered the Motion to Seal; and the Court having determined that the legal and factual bases set forth in the Motion to Seal establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

ORDERED, ADJUDGED, AND DECREED that:

1. The Motion to Seal is GRANTED as set forth herein.

2. Pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1(d), the Debtors are authorized to redact and file under seal the Confidential Information in Schedule 1 to the Supplemental Employee Programs Motion.

3. The Confidential Information shall remain confidential and not be disseminated to anyone other than (a) the Court; (b) the U.S. Trustee; (c) the Prepetition ABL Agent, (d) the

Prepetition Term Loan Agent, (e) the Prepetition Subordinated Note Agent, and (f) counsel to the Committee, without either: (i) the express consent of the Debtors; or (ii) further order of the Court, which order shall not be granted without notice and an opportunity to object being provided to the Debtors.

4. Each of the parties in the preceding paragraphs receiving an unsealed copy of the Supplemental Employee Programs Motion shall keep such information confidential.

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

6. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion to Seal.

7. The Court retains jurisdiction with respect to all matters arising from or relating to the implementation, interpretation, and enforcement of this Order.