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)
	Hearing Date: December 17, 2026 at 1:00 pm (ET) **Objection Deadline: November 30, 2026 at 4:00 pm (ET)**

DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) ENLARGING THE PERIOD WITHIN WHICH THE DEBTORS MAY REMOVE ACTIONS AND (II) GRANTING RELATED RELIEF

The debtors and debtors in possession in the above-captioned cases (collectively, the "Debtors") hereby move (this "Motion"), by and through their undersigned counsel, for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), (a) enlarging the period of time (the "Removal Period") set forth in Rule 9027(a)(2)(A) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") during which the Debtors may seek removal of actions (collectively, the "Actions") pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027, by 121 days, up to and including March 29, 2027, without prejudice to the Debtors' right to seek additional extensions of the Removal Period; and (b) granting related relief. In support of the Motion, the Debtors respectfully state as follows.[2]

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 The 120-day extension would expire on Sunday, March 28, 2027. Accordingly, pursuant to Bankruptcy Rule 9006(a)(1)(C), the Debtors request that the Removal Period be extended through and including Monday, March 29, 2027.

Jurisdiction and Venue

1. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the "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. The Debtors confirm their consent, pursuant to Rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), to the entry of a final order by the Court in connection with this Motion 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.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are 28 U.S.C. § 1452, Bankruptcy Rules 9006 and 9027 and Local Rule 9006-2.

Relevant Background

1. 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.

2. 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.[3] No trustee or examiner has been appointed in the Chapter 11 Cases.

3. The factual background regarding the Debtors, including their business operations, capital and debt structure, and the events leading to the filing of these Chapter 11 Cases, 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. 15].

The Actions

4. The Debtors currently are involved in certain civil actions commenced prepetition in various forums. The Debtors continue to review their books and records and are in the process of determining whether to remove any Actions pursuant to 28 U.S.C. § 1452. Since the Petition Date, the Debtors have worked diligently on a number of critical matters and have not yet decided whether there exist any Actions that they will seek to remove. Specifically, the Debtors and their professionals have been focused on, among other things:

- preparing for and attending the first day hearing and preparing for the second day hearing;
- preparing a number of "second day" motions and retention applications to enable the Debtors to continue operating their business in the ordinary course;
- obtaining relief that has enabled the Debtors to continue their operations and administration of these Chapter 11 Cases, including obtaining approval of "first day" motions, "second day" motions and retention applications;
- stabilizing the Debtors' business operations to maximize the value of the Debtors' estates;

3 The U.S. Trustee filed an amended notice appointing the Committee on September 24, 2026. *See* Docket No. 171.

- negotiating with the senior secured noteholders regarding the consensual use of cash collateral and obtaining interim Court approval of the same [Docket Nos. 73, 218, 338];

- continuing an extensive marketing process for the sale of substantially all of the Debtors' assets;

- obtaining entry of an order approving certain bidding procedures for the sale of the Debtors' assets [Docket No. 219];

- addressing numerous questions, concerns, and issues raised by employees, vendors, utility companies, customers, and other parties in interest;

- preparing the Debtors' schedules of assets and liabilities and statements of financial affairs, and holding a section 341 meeting of creditors;

- coordinating with the U.S. Trustee and the Committee to provide requested information on a variety of issues and to comply with reporting requirements under the Bankruptcy Code;

- negotiating and drafting the Debtors' chapter 11 plan and disclosure statement; and

- litigating significant claims with the Defense Logistics Agency, including by adversary proceeding and contested matters, some of which are presently on appeal.

5. As a result of the Debtors' focus on other key matters associated with these Chapter 11 Cases to this point, the Debtors are not yet in a position to undertake a thorough analysis of the Actions or develop a strategy with respect to whether any such Actions should be removed. The Debtors submit that an extension of the Removal Period is appropriate under the circumstances to provide the Debtors with sufficient time to make fully-informed decisions concerning the removal of any Actions.

6. It is also possible that the Debtors may become aware of Actions following their review of proofs of claim filed in these Chapter 11 Cases, at which point the Debtors will need to analyze such potential Actions to determine whether to remove any such Actions. Consequently,

the Debtors are seeking an extension of the Removal Period to provide them with sufficient time to decide whether to remove any such Actions.

7. In light of the Debtors' focus on time-critical operational matters, the Debtors need more time to conduct a fulsome analysis on which Actions, if any, to remove.

Basis for Relief

8. Section 1452 of title 28 of the United States Code and Bankruptcy Rule 9027 govern the removal of pending civil actions related to a chapter 11 case. Specifically, section 1452(a) provides:

> A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such government unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.

28 U.S.C. § 1452(a).

9. Bankruptcy Rule 9027 sets forth the time periods for filing notices to remove claims or causes of action. Specifically, Bankruptcy Rule 9027(a)(2) provides, in pertinent part:

> If the claim or cause of action in a civil action is pending when a bankruptcy case is commenced, the notice of removal must be filed within the longest of these periods: (A) 90 days after the order for relief in the bankruptcy case; (B) if the claim or cause of action has been stayed under § 362, 30 days after an order terminating the stay is entered; or (C) in a Chapter 11 case, 30 days after a trustee qualifies – but no later than 180 days after the order for relief.

FED. R. BANKR. P. 9027(a)(2).

10. Bankruptcy Rule 9006 permits the Court to extend the period to remove actions provided by Bankruptcy Rule 9027. Specifically, Bankruptcy Rule 9006(b)(1) provides, in pertinent part:

> [W]hen these rules, a notice given under these rules, or a court order requires or allows an act to be performed at or within a specified

> period. . . . the court may – at any time and for cause – extend the time to act if: (A) with or without a motion or notice, a request to extend is made before the period (or a previously extended period) expires. . . .

FED. R. BANKR. P. 9006(b)(1).

11. It is well-established that this Court has authority to extend the Removal Period. *See Pacor, Inc. v. Higgins*, 743 F.2d 984, 996 n.17 (3d Cir. 1984), *overruled on other grounds by Things Remembered, Inc. v. Petrarca*, 516 U.S. 124, 134-35 (1995) (holding that the bankruptcy court's power to grant an extension of the removal period pursuant to Bankruptcy Rule 9006(b) is "clear"); *see also Caperton v. A.T. Massey Coal Co., Inc.*, 251 B.R. 322, 325 (S.D. W. Va. 2000) (explaining that Bankruptcy Rule 9006(b) provides authority to enlarge time periods for removing actions under Bankruptcy Rule 9027).

12. Here, the Debtors seek to extend the Removal Period, which would otherwise expire on November 28, 2026,[4] to ensure that the Debtors' right to remove is preserved pending a thorough review of existing Actions and determination as to whether to remove any Actions. The Debtors believe they have additional time to remove the Actions under Bankruptcy Rule 9027(a)(2)(C), and, to the extent such Actions are subject to the automatic stay, under Bankruptcy Rule 9027(a)(2)(B), but the Debtors nevertheless seek the relief requested in this Motion out of an abundance of caution.

13. The Debtors' decision regarding whether to seek removal of any particular Action depends on a number of factors, including: (a) the importance of the Action to the expeditious

[4] Local Rule 9006-2 provides that "[u]nless otherwise provided in the [Bankruptcy] Code or in the [Bankruptcy Rules], if a motion to extend the time to take any action is filed before the expiration of the period prescribed by the [Bankruptcy] Code, the [Bankruptcy Rules], these Local Rules or Court order, the time is automatically extended until the Court acts on the motion, without the necessity for the entry of a bridge order." DEL. BANKR. L.R. 9006-2. Accordingly, under such circumstances, Local Rule 9006-2 would automatically extend the Removal Period until the Court acts on this Motion.

resolution of these Chapter 11 Cases; (b) the time required to complete the Action in its current venue; (c) the presence of federal subject matter jurisdiction in the proceeding that may allow for one or more aspects thereof to be heard by a federal court; (d) the relationship between the Action and matters to be considered in connection with a chapter 11 plan, the claims allowance process and the assumption or rejection of executory contracts and unexpired leases; and (e) the progress made to date in the Action. To make the appropriate determination, the Debtors must analyze each Action in light of such factors.

14. To date, the Debtors have not yet had an opportunity to determine conclusively which Actions, if any, they may seek to remove. The Debtors believe that the extension requested herein will provide the Debtors with the ability to make fully informed decisions concerning the removal of any such Actions and will ensure that the Debtors' rights provided by 28 U.S.C. § 1452 can be exercised in an appropriate manner.

15. Notably, the rights of parties to the Actions will not be unduly prejudiced by the Debtors' requested extension of the Removal Period. If the Debtors ultimately seek to remove any Actions pursuant to Bankruptcy Rule 9027, parties will retain their rights to have such Actions remanded pursuant to 28 U.S.C. § 1452(b). Moreover, inasmuch as section 362(a) of the Bankruptcy Code automatically stays actions against the Debtors, most of the Actions will not proceed in their respective courts during these Chapter 11 Cases, even absent the relief requested herein. Accordingly, the Debtors submit that cause exists for the relief requested herein.

16. The extension requested herein is consistent with the extensions granted by this and other courts in this district under similar circumstances. *See, e.g., In re BFG Supply Co., LLC*, No. 26-11284 (CTG) (Bankr. D. Del. Oct. 22, 2026) (granting a 120-day extension without prejudice to debtors' right to request a further extension); *In re Searles Valley Minerals Inc.* No. 26-10966

(BLS) (Bankr. D. Del. Oct. 8, 2026) (same); *In re Marelli Auto. Lighting USA, LLC*, No. 25-11034 (CTG) (Bankr. D. Del. Aug. 4, 2025) (same); *In re JOANN Inc.*, No. 25-10068 (CTG) (Bankr. D. Del. May 1, 2025) (same). Accordingly, the Debtors' requested extension is reasonable and should be granted.

Reservation of Rights

17. Nothing contained in this Motion or any actions taken pursuant to any order granting the relief requested by this Motion is intended or should be construed as: (a) an admission as to the validity of any particular claim against the Debtors, (b) a waiver of the Debtors' rights to dispute any particular claim on any grounds, (c) a promise or requirement to pay any particular claim, (d) an implication or admission that any particular claim is of a type specified or defined in this Motion or any order granting the relief requested by this Motion, or (e) a waiver or limitation of the Debtors' rights under the Bankruptcy Code or any other applicable law.

Notice

18. Notice of this Motion will be provided to: (i) the U.S. Trustee; (ii) counsel to the Prepetition ABL Agent; (iii) counsel to the Prepetition Term Loan Agent; (iv) counsel to the Prepetition Subordinated Note Agent; (v) counsel to the Prepetition Subordinated Note Holders; (vi) counsel to the Committee; and (vii) all parties that have requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that no other or further notice is required under the circumstances.

[*Remainder of Page Intentionally Left Blank*]

Conclusion

WHEREFORE, the Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: November 16, 2026
Wilmington, Delaware

/s/ Jack M. Dougherty

COLE SCHOTZ P.C.
Justin R. Alberto (No. 5126)
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
preilley@coleschotz.com
jdougherty@coleschotz.com

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

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: charles.sterrett@kirkland.com
patrick.nash@kirkland.com

Co-Counsel to the Debtors
and Debtors in Possession

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)
	Hearing Date: December 17, 2026 at 1:00 pm (ET) **Objection Deadline: November 30, 2026 at 4:00 pm (ET)**

NOTICE OF DEBTORS' MOTION ENTRY OF AN ORDER (I) ENLARGING THE PERIOD WITHIN WHICH THE DEBTORS MAY REMOVE ACTIONS AND (II) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE THAT on November 16, 2026, the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed the *Debtors' Motion for Entry of an Order (I) Enlarging the Period Within Which the Debtors May Remove Actions and (II) Granting Related Relief* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that a copy of the Motion is being served with this Notice. A copy of the Motion is also available on (i) the Court's website, www.deb.uscourts.gov and (ii) the website maintained by the Debtors' Claims and Noticing Agent, https://veritaglobal.net/noble.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **December 17, 2026 at 1:00 p.m. (prevailing Eastern Time) (the "Hearing")** before The Honorable Craig T. Goldblatt, United States Bankruptcy Judge, 824 Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that objections, if any, to approval of the Motion must be filed on or before **November 30, 2026 at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline")** with the Bankruptcy Court, 824 N. Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of the objection upon undersigned counsel for the Debtors so as to be actually received by the Objection Deadline. Only those objections made in writing and timely filed in accordance with the above procedures will be considered by the Bankruptcy Court at such hearing.

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 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 16, 2026
Wilmington, Delaware

/s/ Jack M. Dougherty

COLE SCHOTZ P.C.
Justin R. Alberto (No. 5126)
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
preilley@coleschotz.com
jdougherty@coleschotz.com

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

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: charles.sterrett@kirkland.com
patrick.nash@kirkland.com

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:	Chapter 11
Noble Supply & Logistics, LLC, *et al.*,	Case No. 26-11369 (CTG)
Debtors.[1]	(Jointly Administered)
	Re: Docket No. ___

ORDER (I) ENLARGING THE PERIOD WITHIN WHICH THE DEBTORS MAY REMOVE ACTIONS AND (II) GRANTING RELATED RELIEF

Upon the motion (the "Motion")[2] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") (a) enlarging the Removal Period for filing notices of removal of the Actions by 121 days, up to and including March 29, 2027, without prejudice to the Debtors' right to seek further extensions; and (b) granting related relief; all as set forth more fully in the Motion; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the 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 this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution;

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 otherwise defined herein shall have the meanings given to such terms in the Motion.

and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estate, its creditors and other parties in interest; and this Court having found that notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establishes 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. The time period within which the Debtors may seek removal of the Actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 is enlarged by 121 days, with a deadline for filing notices of removal on or before March 29, 2027.

3. This Order is without prejudice to the Debtors' right to request a further extension of time to file notices of removal of any or all of the Actions.

4. This Order shall be without prejudice to any position the Debtors may take regarding whether section 362 of the Bankruptcy Code applies to stay any Action.

5. Notice of the Motion as provided herein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

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

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