Docket #0058 Date Filed: 11/20/2026

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)
	)	
Noble Supply & Logistics, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Adv. Proc. No. 26-50885 (CTG)
	)	
Defense Logistics Agency,	)	**Related Docket Nos: Adv. 48, 50, 51, 55**
	)	
Defendant.	)	

STATEMENT OF THE ISSUES TO BE PRESENTED ON APPEAL

Appellant United States of America, on behalf of the Defense Logistics Agency ("DLA"), intends to present the following issues in its appeal from the *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* [D.I. 50], entered by the United States Bankruptcy Court for the District of Delaware ("Bankruptcy Court"), Honorable

[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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Craig T. Goldblatt, on November 6, 2026, in the above-captioned adversary proceeding filed by debtor Noble Supply & Logistics, LLC ("Noble"):

1. Whether the Bankruptcy Court erred in granting, in part, Noble's motion for partial summary judgment, denying, in part, the United States' motion to dismiss, and denying the United States' cross-motion for summary judgment.
2. Whether the Bankruptcy Court erred in concluding DLA waived sovereign immunity with respect to Noble's claims for payments allegedly due and owing under federal procurement contracts.
3. Whether the Bankruptcy Court erred in exercising jurisdiction over Noble's claims against DLA for payments allegedly due and owing under federal procurement contracts.
4. Whether the Bankruptcy Court erred in awarding turnover and ordering DLA to pay Noble $8,458,217.45 for amounts due and owing under federal procurement contracts pursuant to section 542 of title 11 of the United States Code.
5. Any issues arising from (or related to) the above-stated issues.

RESERVATION OF RIGHTS

The Appellant reserves and does not waive its right to supplement the foregoing *Statement of the Issues to be Presented on Appeal* and/or to incorporate by reference, object to, or otherwise supplement, counter-designate, or move to strike or modify any additional statements of issues on appeal by other parties. This filing is made subject to and without waiver of any rights, remedies, challenges, and objections.

Dated: November 20, 2026

Respectfully submitted,

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