Docket #0004 Date Filed: 2/16/2026

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

In re:	Chapter 11
Vanderbilt Minerals, LLC,	Case No. 26-60110 (WAK)
Debtor.[1]	

MOTION OF THE DEBTOR AND DEBTOR IN POSSESSION FOR CASE MANAGEMENT ORDER (I) DESIGNATING SYRACUSE AS THE VENUE FOR ALL FUTURE HEARINGS AND (II) ESTABLISHING CERTAIN OMNIBUS HEARING DATES

The above-captioned debtor and debtor in possession (the "Debtor"), hereby moves (this "Motion") for entry of an order in substantially the form attached hereto as **Exhibit A** (the "Case Management Order"), (i) directing that, for the convenience of the parties, after the initial First Day Hearings (defined below), all hearings in this chapter 11 case will be held at the United States Bankruptcy Court, Northern District of New York, James M. Hanley Federal Building, 100 South Clinton Street, Syracuse, New York 13261 (the "Syracuse Courthouse"), and (ii) establishing certain omnibus hearing dates and times (the "Omnibus Hearing Dates"). In support of this Motion, the Debtor respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Northern District of New York has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

2. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A).

3. Venue is proper in the Northern District of New York pursuant to 28 U.S.C. §§ 1408 and 1409.

[1] The Debtor is Vanderbilt Minerals, LLC (EIN 13-1432885). The Debtor's noticing address in this Chapter 11 Case is 33 Winfield Street, Norwalk, Connecticut 06855.

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4. The statutory basis for the relief requested herein is section 105(a) of title 11 of the United States Code (11 U.S.C. § 101 *et seq*., as amended, the "Bankruptcy Code"); 28 U.S.C. § 1404(b); Rule 1073-1 of the Local Bankruptcy Rules for the Northern District of New York (the "Local Rules"); and the Court's inherent authority to manage its own proceedings.

BACKGROUND

5. On the Petition Date,[2] the Debtor commenced a case under chapter 11 of the Bankruptcy Code (the "Chapter 11 Case"). The Debtor is authorized to continue to operate its business and manage its properties as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. The Debtor is a global supplier of mineral products, operating mines and processing facilities in six different states. The Debtor mines bentonite clay, kaolin clay, pyrophyllite and wollastonite and processes and sells products used in industrial applications (e.g., construction coatings, ceramics and refractories) and life sciences (e.g., pharmaceuticals, personal care, animal care, agriculture and horticulture). Prior to 2008, a predecessor in interest to the Debtor mined and sold talc for use in industrial applications, which is the source of the litigation and judgments that have led to the commencement of this Chapter 11 Case.

7. Concurrently with the filing of this Motion, the Debtor has also filed the Bidding Procedures Motion by which the Debtor seeks to sell substantially all of its assets to one or more bidders through an in-court sale process.

[2] Capitalized terms otherwise undefined herein shall have the meanings ascribed to them in the First Day Declaration.

8. Also concurrently with the filing of this Motion, the Debtor has filed the DIP Financing Motion seeking approval of postpetition financing, the proceeds of which the Debtor will utilize to fund the Chapter 11 Case and to continue to operate as a debtor in possession.

9. In addition, the Debtor filed the Settlement Motion contemporaneously herewith, pursuant to which the Debtor seeks authority to enter into the Settlement Agreement with certain of its non-debtor affiliates.

10. A comprehensive description of the Debtor's business and operations, capital structure and the events leading to the commencement of the Chapter 11 Case can be found in the *Declaration of Dean Vomero, Chief Restructuring Officer of Vanderbilt Minerals, LLC, in Support of First Day Motions of Debtor and Debtor in Possession* (the "First Day Declaration"), which was filed contemporaneously herewith and is incorporated by reference.

RELIEF REQUESTED

11. As of the filing of this Motion, the DIP Financing Motion, Bidding Procedures Motion, and certain other "First Day Motions", are scheduled to be heard February 17, 2026, at 12:00 noon prevailing Eastern Time (the "First Day Hearings"), or as soon thereafter as counsel may be heard, before the Honorable Wendy A. Kinsella, Chief Bankruptcy Judge, or such other judge as may be sitting in her stead, at the United States Bankruptcy Court for the Northern District of New York, Alexander Pirnie U.S. Courthouse and Federal Building, 10 Broad Street, Utica, New York 13501 (the "Utica Courthouse").

12. By this Motion, the Debtor seeks entry of the Case Management Order, (i) directing that, after the initial First Day Hearings, all hearings in this chapter 11 case (including any adversary proceedings or other proceedings arising in or related to this Chapter 11 Case) will be held at the Syracuse Courthouse, and (ii) establishing Omnibus Hearing Dates.

BASIS FOR RELIEF REQUESTED

A. Hearing Location

13. Section 105(a) of the Bankruptcy Code provides that "[t]he court may 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). Additionally, 28 U.S.C. § 1404(b) provides that "[u]pon motion, consent or stipulation of all parties, any action, suit or proceeding of a civil nature or any motion or hearing thereof, may be transferred, *in the discretion of the court*, from the division in which pending to any other division in the same district." (emphasis added).

14. Consistent with these authorities, bankruptcy courts are well within their authority to designate the most suitable courthouse within the district for hearings in a particular case to promote efficiency and reduce expense, particularly where, as here, the assigned judge sits in, and conducts calendars from, multiple divisions. See Black v. Triplett (In re Triplett), 645 B.R. 196, 198 (Bankr. E.D. Tex. 2022) ("When considering an intra-district transfer request, courts generally have significant discretion."); see also In re Stolicker Dairy Farms, 67 B.R. 459, 461 (Bankr. E.D. Mich. 1986) (holding that "there is no statutory prohibition against an inter-divisional, intra-district transfer of a bankruptcy case in the interest of justice or for the convenience of parties" and that due to "the closer proximity of the debtor and most of its creditors to [Northern Division], the Court must conclude that the interest of justice and the convenience of the parties requires that the venue of this case be transferred to the Northern Division.").

15. Holding hearings at the Syracuse Courthouse will reduce travel time and expense for the Debtor's professionals, prospective committee members and their professionals, secured lenders, prospective buyers, key creditor constituencies, and other parties in interest. Syracuse is the location from which Judge Kinsella conducts the majority of her calendars and is more accessible for parties traveling from out of the area because of its proximity to Syracuse Hancock

International Airport and the availability of lodging near the Syracuse Courthouse. In contrast, when proceedings are held in the Utica Courthouse, professionals and parties frequently must fly into Syracuse or Albany and then travel approximately sixty to ninety minutes by car to Utica, increasing time, expense and logistical burden. Given the expected volume of motions, applications and status conferences in this chapter 11 case, those burdens would recur frequently and would needlessly increase administrative costs to the estate.

B. Omnibus Hearing Dates

16. Through this Motion, the Debtor also seeks entry of an order establishing Omnibus Hearing Dates for all matters to be heard in this Chapter 11 Case. Establishing Omnibus Hearing Dates will provide predictability and efficiency in scheduling, reduce the number of special or expedited hearings required and allow parties to consolidate multiple matters for one single hearing. In more complex chapter 11 cases, omnibus hearing dates are a well-accepted case management tool that streamlines briefing, notice and hearing preparation, lowering administrative costs borne by the estate and creditors. See, e.g., In re Barneys New York, Inc., Case No. 19-36300 (CGM) [Docket No. 207] (Bankr. S.D.N.Y. Sept. 4, 2019).

17. For the avoidance of doubt, the designation of Omnibus Hearing Dates is not intended to prohibit parties from seeking relief on an expedited basis pursuant to Local Rule 9013-5 prior to any upcoming Omnibus Hearing Dates where circumstances warrant.

18. In sum, entry of the Case Management Order will promote the efficient and orderly administration of this chapter 11 case by, among other things, reducing delays associated with longer ground travel, and facilitating the Court's ability to schedule and manage multiple complex matters through Omnibus Hearing Dates.

19. In light of the foregoing, the Debtor respectfully requests that the Court enter the Case Management Order.

NOTICE

20. Notice of this Motion shall be provided to (a) the Office of the United States Trustee for the Northern District of New York, (b) the Top Talc Counsel List, (c) counsel to the proposed DIP Lenders, and (d) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtor respectfully submits that no further notice of the Motion is required.

NO PRIOR REQUEST

21. No prior request for the relief sought herein has been made to this Court or any other court.

WHEREFORE, the Debtor respectfully requests that the Court enter the Case Management Order in substantially the form attached here as **Exhibit A**, granting (i) the relief sought herein; and (ii) such other and further relief to the Debtor as the Court may deem proper.

[*Remainder of page intentionally left blank.*]

Dated: February 16, 2026
Syracuse, New York

Respectfully submitted,

/s/ Charles J. Sullivan

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Proposed Counsel for the Debtor and Debtor in Possession

EXHIBIT A

Proposed Order

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

In re:	Chapter 11
Vanderbilt Minerals, LLC,	Case No. 26-60110 (WAK)
Debtor.[1]	**Re: Docket No. __**

CASE MANAGEMENT ORDER (I) DESIGNATING SYRACUSE AS THE VENUE FOR ALL FUTURE HEARINGS AND (II) ESTABLISHING CERTAIN OMNIBUS HEARING DATES

Upon the *Motion for Case Management Order (i) Designating Syracuse as the Venue for all Future Hearings and (ii) Establishing Certain Omnibus Hearing Dates* (the "Motion"),[2] filed by the above-captioned debtor and debtor in possession (the "Debtor"); this Court having reviewed the Motion and having considered the statements of counsel and the evidence adduced with respect to the Motion at a hearing before the Court (the "Hearing"); this Court having found that (i) this Court has jurisdiction over this matter pursuant to 28 U.S.C.

1 The Debtor is Vanderbilt Minerals, LLC (EIN 13-1432885). The Debtor's noticing address in this Chapter 11 Case is 33 Winfield Street, Norwalk, Connecticut 06855.

2 Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

§§ 157 and 1334, (ii) venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b) and (iv) notice of the Motion and the Hearing was sufficient under the circumstances and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. All future hearings in this Chapter 11 Case, including any adversary proceedings or other proceedings arising in or related to this Chapter 11 Case, shall be held at the United States Bankruptcy Court, Northern District of New York, James M. Hanley Federal Building, 100 South Clinton Street, Syracuse, New York 13261, unless otherwise ordered by the Court.

3. The Court shall schedule periodic omnibus hearings (the "Omnibus Hearing Dates") to consider all notices, motions, applications, and other requests for relief, briefs, memoranda, affidavits, declarations, replies, and other documents filed in support of such papers seeking relief.

4. The first six Omnibus Hearing Dates are scheduled as follows:

   a. March 10, 2026 at _____ AM/PM (prevailing Eastern Time);

   b. _____, 2026 at _____ AM/PM (prevailing Eastern Time);

   c. _____, 2026 at _____ AM/PM (prevailing Eastern Time);

   d. _____, 2026 at _____ AM/PM (prevailing Eastern Time);

   e. _____, 2026 at _____ AM/PM (prevailing Eastern Time); and

   f. April 7, 2026 at _____ AM/PM (prevailing Eastern Time).

5. At or before the last scheduled Omnibus Hearing Date, and if necessary, the Debtor shall request that the Court schedule additional Omnibus Hearing Dates. The Court shall schedule such additional Omnibus Hearing Dates and, upon scheduling, the Debtor shall file a notice of such additional dates on the docket of this Chapter 11 Case and cause such dates to be published on the case management website maintained by the Debtor's claims and noticing agent.

6. The Debtor and all parties in interest are authorized and directed to notice all matters for hearing on the Omnibus Hearing Dates in compliance with the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, and any minimum notice periods directed by the Court. In the event no motions or other requests for relief are set for any Omnibus Hearing Date, no hearing shall be held.

7. Notwithstanding the foregoing, nothing herein shall preclude any party in interest from seeking relief on an expedited basis pursuant to Local Rule 9013-5 prior to any upcoming Omnibus Hearing Date where circumstances warrant.

8. The Debtor is authorized and empowered to take all actions necessary to implement the relief granted in this Order.

9. This Court shall retain jurisdiction over any and all matters arising from or related to the implementation or interpretation of this Order.

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