Docket #0005 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 TO EXTEND THE DEADLINE BY WHICH THE DEBTOR MUST FILE ITS (I) SCHEDULES OF ASSETS AND LIABILITIES AND (II) STATEMENTS OF FINANCIAL AFFAIRS

The above-captioned debtor and debtor in possession (the "Debtor"), pursuant to sections 105 and 521 of title 11 of the United States Code (the "Bankruptcy Code") and Rules 1007 and 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), hereby moves (this "Motion") for entry of an order in substantially the form attached hereto as Exhibit A (the "Proposed Order"), extending the deadline by which the Debtor must file its (i) schedules of assets and liabilities and (ii) statements of financial affairs (collectively, the "Schedules and Statements") by 24 days, through and including March 26, 2026, without prejudice to the Debtor's right to request additional extensions.

Jurisdiction and Venue

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding under 28 U.S.C. § 157(b). Venue for this matter is proper in this District 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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Background

2. 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.

3. 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.

4. 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.

5. 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.

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

6. 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.

7. 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

8. Pursuant to sections 105 and 521 of the Bankruptcy Code and Bankruptcy Rules 1007 and 9006, the Debtor hereby seeks the entry of the Proposed Order, extending the deadline by which the Debtor must file its Schedules and Statements by 24 days, through and including March 26, 2026, without prejudice to the Debtor's right to request additional extensions.

Legal Basis for Relief Requested

9. Although section 521 of the Bankruptcy Code and Bankruptcy Rules 1007(b) and 1007(c) require a chapter 11 debtor to file its schedules of assets and liabilities and statements of financial affairs within 14 days of its voluntary petition, Bankruptcy Rule 1007(c) provides a bankruptcy court with the ability to extend a debtor's time to file its schedules and statements for "cause." The Court has broad discretion to issue orders necessary to "carry out the provisions of" the Bankruptcy Code. 11 U.S.C. § 105(a).

10. Courts in the Second Circuit construe "cause" broadly, creating a "non-rigorous standard." Manigault v. ABC Inc., 796 F. App'x 13, 15 (2d Cir. 2019) (internal quotations omitted). Courts in the Second Circuit, including this District, have thus granted

extensions of time in complex chapter 11 cases similar to this Chapter 11 Case. See, e.g., In re Downtown Utica Development, LLC, Case No. 25-60539-6, Docket No. 23 (Bankr. N.D.N.Y. July 15, 2025) (granting a 31-day extension of the deadline to file schedules and statements); In re Crucible Industries LLC, Case No. 24-31059, Docket No. 23 (Bankr. N.D.N.Y. Dec. 13, 2024) (granting a 31-day extension); In re The College of Saint Rose, Case No. 24-11131, Docket No. 56 (Bankr. N.D.N.Y. Oct. 16, 2024) (granting a 30-day extension).

11. Ample cause exists to grant an extension of the time to file the Schedules and Statements. The Debtor operates a complex enterprise, employing more than 125 individuals in six states. As discussed in further detail in the First Day Declaration, the Debtor is also party to more than 1,450 pending lawsuits related to its historical production of talc. Completing the Schedules and Statements therefore requires the collection, review and assembly of a substantial amount of information.

12. Moreover, as further explained in the First Day Declaration, the Debtor has been dedicating all its resources to diligently orchestrating a sale process and intercompany settlement agreement, important value-maximizing tasks. Given the volume of information in the Schedules and Statements and the fact that the information is required to be accurate as of the Petition Date, additional time will help ensure that the Debtor's information systems fully process the relevant information and incorporate it into the relevant Schedules and Statements.

13. The Debtor therefore respectfully requests that the Court extend the deadline for filing the Schedules and Statements through and including March 26, 2026, without prejudice to the Debtor's right to seek further extensions of such period.

Notice

14. 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

15. 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 Proposed 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
Utica, 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. __**

ORDER GRANTING MOTION TO EXTEND THE DEADLINE BY WHICH THE DEBTOR MUST FILE ITS (I) SCHEDULES OF ASSETS AND LIABILITIES AND (II) STATEMENTS OF FINANCIAL AFFAIRS

Upon the *Motion to Extend the Deadline by Which the Debtor Must File Its (I) Schedules of Assets and Liabilities and (II) Statements of Financial Affairs* (the "Motion"),[1] filed by the above-captioned debtor and debtor in possession (the "Debtor"); this Court having reviewed the Motion and the First Day Declaration and having considered the statements of counsel and the evidence adduced with respect to the Motion at a hearing before the Court, if any (the "Hearing"); this Court having found that (i) this Court has jurisdiction over this matter

[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.

[1] Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

pursuant to 28 U.S.C. §§ 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 the First Day Declaration and at the Hearing establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The deadline by which the Debtor must file its Schedules and Statements is extended through and including March 26, 2026, without prejudice to the Debtor's right to seek further extensions of such period.

3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

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

5. 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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