Docket #0013 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 DEBTOR AND DEBTOR IN POSSESSION FOR ENTRY OF AN ORDER (I) AUTHORIZING IT TO FILE A LIST OF THE TOP LAW FIRMS WITH TALC CLAIMS AGAINST THE DEBTOR IN LIEU OF THE LIST OF THE 20 LARGEST UNSECURED CREDITORS; (II) APPROVING CERTAIN NOTICE PROCEDURES FOR REPRESENTED TALC CLAIMANTS; (III) APPROVING THE FORM AND MANNER OF NOTICE OF COMMENCEMENT OF THIS CASE; AND (IV) AUTHORIZING THE DEBTOR TO REDACT PERSONALLY IDENTIFIABLE INFORMATION

The above-captioned debtor and debtor in possession (the "Debtor"), pursuant to sections 105(a) and 107(c) of the Bankruptcy Code, Rules 1007(d), 2002(m), 7004 and 9014(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2002-1 of the Local Rules of Bankruptcy Procedure for the Bankruptcy Court for the Northern District of New York (the "Local Rules"), hereby moves (the "Motion") for the entry of an order (i) authorizing the Debtor to file a list of the 15 law firms with the most significant representations of parties with talc claims against the Debtor based on the volume of claims or other related factors (a "Top Talc Counsel List"), in lieu of a list of creditors that hold the 20 largest unsecured claims against the Debtor; (ii) approving certain notice procedures for creditors (collectively, the "Talc Claimants") who are claimants in talc-related personal injury lawsuits or other proceedings involving the Debtor or who have similar claims asserted through counsel; (iii) approving

[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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the form and manner of notice of the commencement of this Chapter 11 Case; and (iv) authorizing the Debtors to redact certain personally identifiable information for the Debtors' individual creditors and interest holders. In support of this Motion, the Debtor respectfully represents as follows:

Jurisdiction and Venue

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for this matter is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

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.

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

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.

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 (the "First Day Declaration"), which was filed contemporaneously herewith and is incorporated by reference.

Argument

List of the Top Talc Plaintiff Firms

8. Pursuant to Bankruptcy Rule 1007(d), a chapter 11 debtor must file with its voluntary petition a list setting forth the names, addresses and claim amounts of the creditors, excluding insiders, that hold the 20 largest unsecured claims in the debtor's case (a "Top 20 List"). This Top 20 List primarily is used by the Office of the United States Trustee for the Northern District of New York (the "U.S. Trustee") to understand the types and amounts of unsecured claims against the debtor and thus evaluate prospective candidates to serve on the

official committee of unsecured creditors appointed in the debtor's case under section 1102 of the Bankruptcy Code.[3]

9. As discussed in the First Day Declaration, the Debtor's largest creditors are talc personal injury claimants. As a result, the Debtor anticipates that an official committee of unsecured creditors (a "Creditors' Committee") will be appointed that will include individuals that are (a) representative of the Debtor's overall pool of talc personal injury claimants and (b) represented by law firms with the most talc-related claims against the Debtor.

10. In light of the foregoing, the Debtor does not believe that listing the individual Talc Claimants with the largest unsecured claims against the Debtor would facilitate the U.S. Trustee's evaluation of potential members of a Creditors' Committee. Instead, because committees in mass tort chapter 11 cases typically consist of individual plaintiffs represented by law firms, the Debtor believes that providing the U.S. Trustee with a Top Talc Counsel List would better assist the U.S. Trustee in evaluating such a committee.

11. Accordingly, the Debtor seeks authority to file a Top Talc Counsel List in lieu of listing the Talc Claimants with the largest unsecured claims against the Debtor on a Top 20 List. The Top Talc Counsel List is comprised of the 15 law firms with the most significant representations of parties with claims against the Debtor based on the volume of claims or related factors, representing plaintiffs covering more than 90% of all active talc-related litigation pending against the Debtor.

12. Courts have granted similar relief in cases dealing with mass-tort litigation. See, e.g., In re Presperse Corp., No. 24-18921 (MBK) (Bankr. D.N.J. Oct. 2, 2024)

[3] "The purpose of the separate list of 20 largest creditors required by this provision in the rules is to enable the clerk to identify members and the court to appoint immediately an unsecured creditors' committee in compliance with 11 U.S.C. § 1102(a)(1)." In re Dandy Doughboy Donuts, Inc., 66 B.R. 457, 458 (Bankr. S.D. Fla. 1986).

(the "Presperse Order") (authorizing debtors to file consolidated list of law firms representing large number of claimants in talc lawsuits in which debtors were defendants in lieu of a Top 20 List); In re LTL Management LLC, No. 21-30589 (JCW) (Bankr. W.D.N.C. Nov. 4, 2021) (the "LTL Order") (same); In re Aldrich Pump LLC, No. 20-30608 (JCW) (Bankr. W.D.N.C. June 25, 2020) (authorizing debtors to file consolidated list of law firms representing large number of claimants in asbestos lawsuits in which debtors were defendants in lieu of a Top 20 List) (the "Aldrich Order"); In re Boy Scouts of America, No. 20-10343 (LSS) (Bankr. D. Del. Mar. 23, 2020) (authorizing debtors to file, in lieu of a Top 20 List, a consolidated list of law firms representing large numbers of abuse victims asserting claims against debtors); In re DBMP LLC, No. 20-30080 (JCW) (Bankr. W.D.N.C. Jan. 28, 2020) (authorizing debtor to file list of law firms with most significant representations of parties with asbestos claims against debtor in lieu of a Top 20 List based on volume of filings, scope of payments or other related factors, across the major types of claims faced by the debtor) (the "DBMP Order"); In re Duro Dyne Nat'l Corp., No. 18-27963 (MBK) (Bankr. D.N.J. Sept. 11, 2018) (authorizing debtors to send notices, mailings and other communications to counsel of record for individual asbestos claimants in lieu of notifying such claimants personally); In re Bestwall LLC, No. 17-31795 (LTB) (Bankr. W.D.N.C. Nov. 8, 2017) (same) (the "Bestwall Order"); In re Kaiser Gypsum Co., Inc., No. 16-31602 (JCW) (Bankr. W.D.N.C. Oct. 7, 2016) (authorizing debtors to file consolidated list of asbestos plaintiff firms with largest number or scope of asbestos cases in lieu of a Top 20 List) (the "Kaiser Gypsum Order").

Notice Procedures for Represented Talc Claimants

13. Pursuant to section 105(a) of the Bankruptcy Code, the Court may "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of the [Bankruptcy Code]." 11 U.S.C. § 105(a). In addition, the Court may "enter orders

designating the matters in respect to which, the entity to whom, and the form and manner in which notices shall be sent except as otherwise provided by [the Bankruptcy Rules]." Fed. R. Bankr. P. 2002(m). For notice to be proper, it must be "reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." Mullane v. Cent. Hanover Bank & Tr. Co., 339 U.S. 306, 314 (1950) (describing notice required to satisfy due process).[4]

14. In many cases, courts have found that providing notice of bankruptcy case proceedings to the attorney representing a creditor in prepetition litigation (or threatened litigation) provides adequate and appropriate notice to that creditor. See, e.g., In re Garlock Sealing Techs., LLC, 2017 WL 2539412, at *15 (W.D.N.C. June 12, 2017) (finding that all asbestos claimants had been afforded due process when debtors provided notice of their proposed plan of reorganization and the confirmation hearing to asbestos claimants' attorneys, rather than to asbestos claimants); Chanute Proc. Credit Assoc. v. Schicke (In re Schicke), 290 B.R. 792, 805-06 (B.A.P. 10th Cir. 2003) (holding that notice of chapter 7 proceedings to the attorney representing a judgment creditor in non-bankruptcy litigation was the best notice possible where the debtor did not know the creditor's contact information), aff'd, 97 F. App'x 249 (10th Cir. 2004); Cablevision Sys. Corp. v. Malandra (In re Malandra), 206 B.R. 667, 676

[4] Pursuant to Bankruptcy Rule 9014(b), service of pleadings in a contested matter is to be accomplished in the manner provided for by Bankruptcy Rule 7004. Pursuant to Bankruptcy Rule 7004(b)(8), "in addition to the methods authorized by Rule 4(e) . . . service may be made within the United States by first class mail postage prepaid" upon "any defendant . . . [by mailing] a copy of the summons and complaint . . . to an agent of such defendant authorized by appointment or by law to receive service of process . . . ." Fed. R. Bankr. P. 7004(b)(8). Rule 4(e)(2)(C) of the Federal Rules of Civil Procedure (the "Civil Rules") states that "an individual . . . may be served in a judicial district of the United States by . . . delivering a copy of [a summons and complaint] to an agent authorized by appointment or by law to receive service of process." Fed. R. Civ. P. 4(e)(2)(C). The Debtor respectfully submits that the procedures described herein are consistent with such rules and reasonably calculated to apprise Represented Talc Claimants (as defined below) of any notices, mailings, pleadings and communications, in a contested matter.

(Bankr. E.D.N.Y. 1997) (holding that notice to the attorney representing a creditor in prepetition litigation relating to the creditor's claim constituted adequate notice to the creditor).

15. In fact, providing notice to a claimant's attorney of record in matters relating to bankruptcy claims, even where the attorney does not represent the claimant in connection with the bankruptcy case, has been held to be the equivalent of giving notice to creditors directly. See, e.g., Seifert v. Rice (In re Rice), 2010 Bankr. LEXIS 639, at *7 (Bankr. E.D.N.C. Mar. 1, 2010) (following "the majority of courts addressing the issue" in holding that (a) an attorney that represented creditors with respect to a prepetition judgment against the debtor continued to serve as the creditors' agent in bankruptcy proceedings concerning that same judgment and (b) notice to that attorney regarding bankruptcy proceedings therefore constituted sufficient notice to the creditors); see also Lompa v. Price (In re Price), 871 F.2d 97, 99 (9th Cir. 1989) (holding that notice to the attorney who represented a creditor in an action affected by a bankruptcy proceeding constituted notice to the creditor); Schicke, 290 B.R. at 803 ("It is generally held that an attorney who represents the creditor in matters against a debtor prepetition . . . will be an agent of the creditor in the context of a debtor's bankruptcy case."); Linder v. Trump's Castle Assocs., 155 B.R. 102, 105 (D.N.J. 1993) (notice to a claimant's attorney is imputed to the claimant if the attorney's representation relates to a bankruptcy claim).

16. In certain cases, moreover, providing notice of bankruptcy proceedings and deadlines directly to personal injury claimants, rather than to their known attorneys, may *not* constitute adequate notice, including, for instance, where it is unlikely that such claimants would appreciate the legal significance of the notices. See In re Grand Union Co., 204 B.R. 864, 874-75 (Bankr. D. Del. 1997) (holding that providing notice of bar dates in a chapter 11 case directly to personal injury claimants where the debtor was aware the claimants were represented

by counsel was not adequate to satisfy due process, and notice should have been provided to the claimants' attorneys); accord United States v. Thomas, 342 B.R. 758, 761 (S.D. Tex. 2005) ("Being in bankruptcy does not alter the responsibilities that generally apply to work through counsel.").[5]

17. In this case, the Debtor is subject to thousands of pending claims asserted by the Talc Claimants. The Debtor has communicated solely with the plaintiff law firms (collectively, the "Talc Firms") that represent certain of the Talc Claimants (such Talc Claimants that are represented by counsel, the "Represented Talc Claimants") regarding these claims. In many cases, the Debtor cannot be sure that it has the current addresses for the Represented Talc Claimants. Under these circumstances, the Debtor seeks authority to provide notice to the Represented Talc Claimants through the Talc Firms and, thereby, avoid any confusion that undoubtedly would arise from sending notices directly to the Represented Talc Claimants.[6]

18. Accordingly, the Debtor seeks Court approval to: (a) serve all notices, mailings, filed documents and other communications relating to the Chapter 11 Case, including, without limitation, pleadings, in any contested matter or otherwise, seeking relief that could directly impact Represented Talc Claimants' rights and obligations in this Chapter 11 Case, on the Represented Talc Claimants in care of their counsel at such counsel's address, including, for

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5 Additionally, pursuant to Civil Rule 5(b), as incorporated by Bankruptcy Rule 7005, in an adversary proceeding, "[i]f a party is represented by an attorney, service [of pleadings and other papers] must be made on the attorney, unless the court orders otherwise." Thus, service on the Talc Firms (defined below) as the authorized agents of the Represented Talc Claimants each represents is not only proper, but required, under both the Civil Rules and the Bankruptcy Rules.

6 For the avoidance of doubt, Talc Claimants that are not represented by counsel (the "Unrepresented Talc Claimants") will be personally served with all notices, mailings, pleadings, and other communications relating to this Chapter 11 Case, as the Debtor deems appropriate, including, without limitation, all notices, mailings, pleadings, and other communications required to be served on all creditors relating to the Debtor's proposed sale process, and all other notices, mailings, pleadings and other communications in any contested matters or otherwise, seeking relief that could directly impact the Unrepresented Talc Claimants' rights or obligations in this Chapter 11 Case.

the avoidance of doubt, an e-mail address; and (b) list the names, addresses and other contact information, as applicable, of the Talc Firms in any creditor or service lists, including the creditor matrix provided to the Court or filed in this case, in lieu of listing the contact information of individual Represented Talc Claimants (collectively, the "Notice Procedures"). For a Talc Firm representing multiple Represented Talc Claimants, the Debtor may serve each document only a single time on such Talc Firm (at each relevant address) on behalf of all of such counsel's clients; provided that any notice or other document relating specifically to one or more particular Represented Talc Claimants (rather than all Represented Talc Claimants represented by a Talc Firm) shall clearly identify the parties to whom it relates.[7]

19. The Debtor believes that the Notice Procedures provide for an effective and appropriate noticing process for the Represented Talc Claimants. Implementing the Notice Procedures would alleviate the administrative burden and expense of gathering current contact information for each of the Represented Talc Claimants, which, in many cases, is not readily available or is difficult to verify. It would be extremely burdensome, costly and time-consuming for the Debtor to attempt to obtain this information. In addition, any contact information for the individual Represented Talc Claimants the Debtor has or is able to obtain may be outdated and unreliable. Moreover, implementing the Notice Procedures better enables counsel to the Represented Talc Claimants to advise their clients in matters related to the Chapter 11 Case.

20. Accordingly, the Debtor respectfully submits that the Notice Procedures are warranted under the facts and circumstances of the Chapter 11 Case, and they represent a fair and appropriate process to serve the Represented Talc Claimants with notices, pleadings and

[7] In connection with providing notices under the Notice Procedures, the Debtor also may provide for each Talc Firm a list of each of the Represented Talc Claimants that, according to the Debtor's records, are represented by such Talc Firm. Any such list shall not be deemed to be an exclusive list or to limit the effectiveness of any notice with respect to other clients of the Talc Firm not listed therein.

communications in the Chapter 11 Case. The Notice Procedures are reasonably calculated, under all the circumstances, to apprise the Represented Talc Claimants of the matters before the Court and present to them an opportunity to be heard thereon. For the foregoing reasons, the Debtor requests that the Court approve the Notice Procedures, as described herein.

21. Courts have frequently granted similar relief. See, e.g., In re The Roman Catholic Diocese of Syracuse, N.Y., No. 20-30663 (MCR) (Bankr. N.D.N.Y. Aug. 10, 2020) (approving notice to claimants' counsel of record in lieu of notice to individual claimants directly, and identification of claimants' counsel, rather than claimants, on creditor lists); Presperse Order (same); LTL Order (same); Aldrich Order (same); DBMP Order (same); Bestwall Order (same); Kaiser Gypsum Order (same).

Form and Manner of the Case Commencement Notice

22. Contemporaneously herewith, the Debtor has filed a motion seeking authority to employ Kurtzman Carson Consultants, LLC dba Verita Global (the "Agent") as, among other things, claims and noticing agent in this case. One of the Agent's responsibilities as claims and noticing agent, if its appointment is approved, will be to serve a notice of the commencement of the Chapter 11 Case (the "Case Commencement Notice") and the initial meeting of creditors pursuant to section 341(a) of the Bankruptcy Code (the "Section 341 Meeting") in lieu of the standard notice automatically entered in chapter 11 cases filed in this jurisdiction. The Debtor seeks authority not to serve the form of Case Commencement Notice prepared by the Clerk of Court and, instead, serve a Case Commencement Notice substantially in the form attached hereto as Exhibit A, subject to any revisions agreed upon by the Debtor and U.S. Trustee.[8]

[8] The form of Case Commencement Notice attached as Exhibit A is based on Official Bankruptcy Form 309F and is customized to the circumstances of the Chapter 11 Case. No bar date for the filing of

23. The Debtor proposes that the Agent serve the Case Commencement Notice by regular mail, postage prepaid, on those entities entitled to receive such notice pursuant to Bankruptcy Rule 2002 and the Notice Procedures not later than five business days after the Debtor (a) receives written notice of the time and place of the Section 341 Meeting and (b) agrees on the final form and substance of the Case Commencement Notice with the U.S. Trustee. The Debtor also will post a copy of the Case Commencement Notice on the restructuring website maintained by the Agent. The Debtor hereby requests that the Court approve the foregoing procedures as providing sufficient notice of the commencement of the Chapter 11 Case and the Section 341 Meeting.

24. Courts have granted similar relief. See, e.g., LTL Order (approving a similar form and manner of service of a case commencement notice); Aldrich Order (same); DBMP Order (same); Bestwall Order (same); Kaiser Gypsum Order (same).

Redaction of Personally Identifiable Information

25. Section 107(c) of the Bankruptcy Code provides:

> The bankruptcy court, for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual's property: … [a]ny means of identification … contained in a paper filed, or to be filed, in a case under [the Bankruptcy Code].

11 U.S.C. § 107(c)(1)(A).

26. The Debtor respectfully submits that it is appropriate to authorize the Debtor to redact from any paper filed or to be filed with the Court in this Chapter 11 Case the home addresses and email addresses of the Debtor's individual creditors because such

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proofs of claim in the Chapter 11 Case has been established. Accordingly, the Commencement Notice will not include a notice of the bar date.

information could be used, among other things, to perpetrate identity theft or locate survivors of domestic violence or stalking who have otherwise taken steps to conceal their whereabouts. Due to the large number of individual creditors (and, in particular, employees and Talc Claimants) of the Debtor, it is not feasible for the Debtor to determine if such risks exist on a creditor-by-creditor basis. Instead, the Debtor seeks to redact all such information for individual creditors and make such information available to (i) the Court, the U.S. Trustee, any subsequently appointed trustee and counsel to any official appointed in this Chapter 11 Case upon request and (ii) any other party in interest upon reasonable request.

27. Courts in the Second Circuit have granted the relief requested herein in comparable chapter 11 cases. See, e.g., In re The Roman Catholic Diocese of Ogdensburg, N.Y., No. 23-60507 (PGR) (Bankr N.D.N.Y. Aug. 29, 2023) (authorizing the debtors to redact certain personal identification information on the creditor matrix); In re The Roman Catholic Diocese of Syracuse, N.Y., No. 20-30663 (WAK) (Bankr. N.D.N.Y. Aug. 10, 2020 (same); In re Azul S.A., No. 25-11176 (SHL) (Bankr. S.D.N.Y. May 30, 2015) (same); In re Spirit Airlines, Inc., No. 24-11988 (SHL) (Bankr. S.D.N.Y. Dec. 4, 2024) (same); In re 2U, Inc., No. 24-11279 (MEW) (Bankr. S.D.N.Y. July 30, 2024) (same); In re Acorda Therapeutics, Inc., No. 24-22284 (DSJ) (Bankr. S.D.N.Y. Apr. 24, 2024) (same); In re Celsius Network LLC, No. 22-10964 (MG) (Bankr. S.D.N.Y. July 19, 2022) (same).

28. Accordingly, the Debtor respectfully submits that cause exists to authorize the Debtor to redact, pursuant to 11 U.S.C. § 107(c)(1), personally identifiable information – including home and email addresses – of the Debtors' individual creditors who are listed on the creditor matrix or any other document filed with the Court. Absent such relief, the Debtor would unnecessarily expose individual creditors to the risk of becoming victims of identity theft and

could jeopardize the safety of individuals who, unbeknownst to the Debtor, are survivors of domestic violence or stalking by publishing their home addresses without any advance notice or opportunity to opt out or take protective measures.

Notice

29. Notice of this Motion has been provided to: (a) the United States Trustee for the Northern District of New York; (b) the parties on the Top Talc Counsel List; and (c) counsel to the proposed DIP Lenders. In light of the nature of the relief requested herein, the Debtor respectfully submits that no other or further notice need be provided.

No Prior Request

30. No prior request for the relief sought in this Motion has been made to this or any other Court in connection with this Chapter 11 Case.

WHEREFORE, the Debtor respectfully requests that the Court: (i) enter an order substantially in the form submitted herewith, granting the relief requested herein; and (ii) grant such other and further relief to the Debtor as the Court may deem just and proper.

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

Case Commencement Notice

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

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

NOTICE OF COMMENCEMENT OF
CHAPTER 11 CASE AND MEETING OF CREDITORS

Commencement of Chapter 11 Case. On February 16, 2026 (the "Petition Date"), Vanderbilt Minerals, LLC, a Delaware limited liability company (the "Debtor"), filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern District of New York (the "Court"). The last four digits of the Debtor's federal tax identification number are 2885. The Debtor's address is 33 Winfield Street, Norwalk, Connecticut 06855.

Chapter 11 of the Bankruptcy Code allows a debtor to reorganize or liquidate pursuant to a plan. A plan is not effective unless confirmed (i.e., approved) by the Court. Eventually, when such a plan is proposed, you may be sent a copy of the plan and a related disclosure statement telling you about the plan, and you might have the opportunity to vote on the plan. You will be sent notice of the date of the confirmation hearing to consider approval of the plan, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the Debtor will remain in possession of its property and may continue to operate any business and manage any properties.

Attorneys for the Debtor. The attorneys representing the Debtor are: (a) Heather Lennox and T. Daniel Reynolds, Jones Day, 901 Lakeside Avenue, Cleveland, Ohio 44114, Telephone: (216) 586-3939, Facsimile: (216) 579-0212; and (b) Stephen A. Donato, Charles J. Sullivan and Grayson T. Walter, Bond, Schoeneck & King PLLC, One Lincoln Center, 110 West Fayette Street, Syracuse, New York 13202, Telephone: (315) 218-8000, Facsimile: (315) 218-8100.

Meeting of Creditors. Pursuant to section 341 of the Bankruptcy Code, the United States Trustee for the Northern District of New York (the "U.S. Trustee") has scheduled a meeting of creditors to be held on **___, 2026, at ___ _.m., prevailing Eastern Time**. The meeting of creditors shall be conducted by telephone. Please consult Kurtzman Carson Consultants, LLC dba Verita Global (the "Agent") or the U.S. Trustee in this chapter 11 case for the necessary telephonic information. The Agent shall post a banner on the Agent's website at www.veritaglobal.net/Vanderbilt that

[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.

provides the telephonic information concerning the meeting of creditors. The Debtor's representatives must be present at the meeting to be examined under oath by the U.S. Trustee and by creditors. Creditors are welcome to attend the meeting but are not required to do so. The meeting may be continued and concluded at a later date specified in a notice filed with the Court.

Creditors Generally May Not Take Certain Actions. In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the Debtor and the Debtor's property. This means that creditors generally may not take action to collect debts from the Debtor or the Debtor's property. Actions against other parties may be subject to the automatic stay to the extent such actions effectively are actions against the Debtor or its property or seek to pursue causes of action owned by the bankruptcy estate. Under certain circumstances, the Debtor may request that the Court extend or impose a stay with respect to additional entities. Prohibited actions are listed in section 362(a) of the Bankruptcy Code and common examples include: (a) contacting the Debtor by telephone, mail or otherwise to demand payment of a pre-bankruptcy obligation; (b) taking actions to collect money or obtain property from the Debtor; (c) starting or continuing lawsuits against the Debtor; and (d) repossessing or foreclosing upon the Debtor's property. See 11 U.S.C. § 362(a). If unauthorized actions are taken by a creditor against the Debtor or its property or against any party covered by the automatic stay, the Court may penalize that creditor. A creditor who is considering taking action against the Debtor or its property should review, among other things, section 362(a) of the Bankruptcy Code and any applicable orders of the Court and seek legal advice.

Claims. A Proof of Claim is a signed statement describing a creditor's claim. A Proof of Claim form is not included with this Notice, but you can obtain one at any United States Bankruptcy Court Clerk of Court's office or online at www.nynb.uscourts.gov. You may look at the Debtor's schedules of assets and liabilities that have been, or will be, filed (a) at the Clerk of Court's office, (b) by accessing the website maintained by the Debtor's claims and noticing agent at www.veritaglobal.net/Vanderbilt free of charge or (c) by accessing PACER on the Court's website at https://www.nynb.uscourts.gov for a nominal fee. If your claim is scheduled and is not listed as disputed, contingent or unliquidated, it will be allowed in the amount scheduled unless you have filed a Proof of Claim or you are sent further notice about the claim. Whether or not your claim is scheduled, you are permitted to file a Proof of Claim. If your claim is not listed at all or if your claim is listed as disputed, contingent or unliquidated, then you must file a Proof of Claim if a bar date is set or you might not be paid any money on your claim and may be unable to vote on a plan. A secured creditor retains rights in its collateral regardless of whether that creditor files a Proof of Claim. Filing a Proof of Claim may submit the creditor to the jurisdiction of the Court, with consequences a lawyer can explain. For example, a secured creditor who files a Proof of Claim may surrender important nonmonetary rights, including the right to a jury trial. **Do not include this notice with any filing you make with the Court.**

Notice of Bar Dates for Proofs of Claim. No bar date has yet been established for the filing of Proofs of Claim. If and when a bar date is established, a separate notice of the bar date (the "Bar Date Notice") will be provided. Any such Bar Date Notice will contain information regarding the bar dates, a Proof of Claim form and instructions for completing and filing a Proof of Claim form.

Filing Deadline for a Creditor with a Foreign Address. A deadline for filing claims may be set in a later Court order as set forth above, and, if so, will apply to all creditors unless the order provides otherwise. If notice of the order setting the deadline is sent to a creditor at a foreign address, the creditor may file a motion requesting the Court to extend the deadline. There is no assurance that such a motion would be granted. Consult a lawyer familiar with United States bankruptcy law if you have any questions regarding your rights in this case.

Case Management and Administrative Procedures. Any party in interest that desires to receive notice in this chapter 11 case must file with the Court a notice of appearance and request for service and shall serve such request on: (a) Heather Lennox and T. Daniel Reynolds, Jones Day, 901 Lakeside Avenue, Cleveland, Ohio 44114, Telephone: (216) 586-3939, Facsimile: (216) 579-0212; and (b) Stephen A. Donato, Charles J. Sullivan and Grayson T. Walter, Bond, Schoeneck & King PLLC, One Lincoln Center, 110 West Fayette Street, Syracuse, New York 13202, Telephone: (315) 218-8000, Facsimile: (315) 218-8100. All creditors will receive notice of certain proceedings, including, but not limited to: (a) any bar dates (unless applicable to a limited population of creditors); (b) the time fixed for filing objections to, and any hearing to consider, a disclosure statement and/or confirmation of a chapter 11 plan; and (c) dismissal or conversion of the chapter 11 case to another chapter of the Bankruptcy Code.

Deadline to File a Complaint to Determine Dischargeability of Certain Debts. Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that you may never try to collect the debt from the Debtor, except as provided in the plan. If you believe that a debt owed to you is not dischargeable under section 1141(d)(6)(A) of the Bankruptcy Code, you must start a lawsuit by filing a complaint in the Court by _____, 2026 (i.e., 60 days after the meeting of creditors described above). The Clerk of Court's Office must receive the complaint and any required filing fee by such deadline.

How to Obtain Documents. Electronic copies of all pleadings or other documents filed in this case may be obtained for $0.10 per page or up to $3.00 per document for most documents via PACER on the Court's web site at http://ecf.nynb.uscourts.gov. Paper copies of all pleadings or other documents filed in this case may be obtained by sending a written request to the Agent, at www.veritaglobal.net/Vanderbilt/inquiry, by mail at Vanderbilt Processing Center c/o KCC dba Verita, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, or by contacting the Agent by telephone at 888-733-1416 (U.S./Canada) and 310-751-2630 (International). Additionally, free electronic copies of certain pleadings or other documents filed in this case will be posted on the Agent's website at www.veritaglobal.net/Vanderbilt as soon as possible after filing.

Court Filings. This case has been assigned to the electronic case filing system. Any paper that you file in this bankruptcy case should be filed through the Court's electronic case filing (ECF) system, which may be accessed at https://www.nynb.uscourts.gov or http://ecf.nynb.uscourts.gov. Alternatively, papers may be filed at the Clerk of Court's office at the U.S. Bankruptcy Court, Northern District of New York, Office of the Clerk of Court, Alexander Pirnie U.S. Courthouse and Federal Building, 10 Broad Street, Utica, New York 13501. Filings in this case may be accessed via the Court's web site at https://www.nynb.uscourts.gov or http://ecf.nynb.uscourts.gov.

Legal Advice. **Neither the Debtor's counsel, the Agent nor the staff of the Clerk of Court's Office can give you legal advice. You may wish to consult an attorney to protect your rights.**

Dated: _____

Clerk of 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

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]	

ORDER (I) AUTHORIZING THE DEBTOR TO FILE A LIST OF THE TOP LAW FIRMS WITH TALC CLAIMS AGAINST THE DEBTOR IN LIEU OF THE LIST OF 20 LARGEST UNSECURED CREDITORS; (II) APPROVING CERTAIN NOTICE PROCEDURES FOR REPRESENTED TALC CLAIMANTS; (III) APPROVING THE FORM AND MANNER OF NOTICE OF COMMENCEMENT OF THIS CASE; AND (IV) AUTHORIZING THE DEBTOR TO REDACT PERSONALLY IDENTIFIABLE INFORMATION

This matter coming before the Court on the *Motion of Debtor and Debtor in Possession for Entry of an Order (I) Authorizing It to File a List of the Top Law Firms With Talc Claims Against the Debtor in Lieu of the List of 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Represented Talc Claimants; (III) Approving the Form and*

[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.

Manner of Notice of Commencement of This Case; and (IV) Authorizing the Debtor to Redact Personally Identifiable Information (the "Motion"),[1] filed by the debtor in the above-captioned case (the "Debtor") pursuant to sections 105(a) and 107(c) of the Bankruptcy Code, Bankruptcy Rules 1007(d), 2002(m), 7004 and 9014(b) and Local Bankruptcy Rule 2002-1; the 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"); the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409, (c) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (d) notice of the Motion and the Hearing was sufficient under the circumstances, (e) the relief requested in the Motion is in the best interests of the Debtor's estate and parties in interest, and (f) the Notice Procedures (i) provide for adequate notice to Represented Talc Claimants, (ii) are reasonable and appropriate under the circumstances and (iii) are reasonably calculated, under all the circumstances, to apprise the Represented Talc Claimants of the noticed matters and afford them an opportunity to be heard thereon; and the 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.

2. The Debtor is authorized to file a Top Talc Counsel List in lieu of listing the 20 individual creditors, excluding insiders, with the largest unsecured claims against the Debtor on the Top 20 List. By filing the Top Talc Counsel List, the Debtor shall be deemed to comply fully with Bankruptcy Rule 1007(d).

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

3. The Debtor is authorized to serve all notices, mailings, filed documents and other communications relating to the Chapter 11 Case, including, without limitation, pleadings, in any contested matters or otherwise, seeking relief that could directly impact Represented Talc Claimants' rights and obligations in this Chapter 11 Case, on the Represented Talc Claimants in care of their counsel (including counsel of record in talc-related proceedings) (each, a "Talc Firm") at such counsel's address, including e-mail address. For a Talc Firm representing multiple Represented Talc Claimants, the Debtor may serve each document only a single time on such Talc Firm (at each relevant address) on behalf of all of such counsel's clients; provided that any notice or other document relating specifically to one or more particular Represented Talc Claimants (rather than all Represented Talc Claimants represented by a Talc Firm) shall clearly identify the parties to whom it relates.

4. Unrepresented Talc Claimants shall be personally served with all notices, mailings, pleadings, and other communications relating to this Chapter 11 Case, as appropriate, including, without limitation, all notices, mailings, pleadings, and other communications required to be served on all creditors relating to the Debtor's proposed sale process, and all other notices, mailings, pleadings, and other communications in any contested matters or otherwise, seeking relief that could directly impact the Unrepresented Talc Claimants' rights or obligations in this Chapter 11 Case.

5. The Debtor is authorized to list the names, addresses and other contact information, as applicable, of the Talc Firms in any creditor or service list, including the creditor matrix provided to the Court or filed on the docket, in lieu of listing the contact information of individual Represented Talc Claimants. Notwithstanding the foregoing, any attorney representing a Represented Talc Claimant may (and upon any termination of their representation

of such Represented Talc Claimant, shall) file a motion with the Court seeking to be relieved as the designated agent for service of process and simultaneously with the filing of such motion shall (x) provide to the Debtor such identifying information with respect to their respective client(s) as may be necessary for the Debtor to effect service directly upon such Represented Talc Claimant or (y) designate alternate counsel who has agreed to accept service on behalf of such Represented Talc Claimant.

6. The Case Commencement Notice, substantially in the form attached to the Motion as Exhibit A along with such changes as are agreed upon by the Debtor and the U.S. Trustee, is hereby approved.

7. The Agent is authorized and directed not to serve the form of Case Commencement Notice prepared by the Clerk of Court and, instead, is authorized and directed to serve a Case Commencement Notice substantially in the form attached to the Motion as Exhibit A, subject to any revisions agreed upon by the Debtor and the U.S. Trustee, not later than five business days after the Debtor (a) receives written notice from the U.S. Trustee of the time and place of the Section 341 Meeting and (b) agrees on the form and substance of the Case Commencement Notice with the U.S. Trustee.

8. The Agent shall serve the Case Commencement Notice by regular mail, postage prepaid, on those entities entitled to receive the Case Commencement Notice pursuant to Bankruptcy Rule 2002(a) and the Notice Procedures approved herein. The Debtor also will post a copy of the Case Commencement Notice on the restructuring website maintained by the Agent at www.veritaglobal.net/Vanderbilt.

9. Service of the Case Commencement Notice in accordance with this Order is approved in all respects and is deemed sufficient notice to all parties in interest of

the commencement of the Chapter 11 Case and the Section 341 Meeting under the Bankruptcy Code, the Bankruptcy Rules and the Local Rules of the United States Bankruptcy Court for the Northern District of New York.

10. The Debtor is authorized to redact home and email address information of the Debtor's creditors who are individuals listed on the creditor matrix or any other document filed with the Court. The Debtor shall provide an unredacted version of the creditor matrix and any other applicable filed document to (i) the Court, the U.S. Trustee, any subsequently appointed trustee and counsel to any official committee appointed in this Chapter 11 Case upon request and (ii) any other party in interest upon reasonable request. Any party in interest that is not provided with an unredacted version of the applicable document upon request may file a motion with the Court to obtain such document. Each party receiving an unredacted copy of the creditor matrix or any other applicable document shall keep such personally identifiable information confidential unless otherwise required to be disclosed by law or court order.

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

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

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