Docket #0274 Date Filed: 04/02/2026

IN THE 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.	)	

APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF BROWN RUDNICK LLP AS CO-COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF VANDERBILT MINERALS, LLC, *NUNC PRO TUNC* TO MARCH 5, 2026

The Official Committee of Unsecured Creditors (the "Committee") of Vanderbilt Minerals LLC (the "Debtor") in the above-captioned case (the "Case"), hereby submits this application (the "Application") for entry of an order, substantially in the form attached hereto as **Exhibit A**, authorizing and approving the retention and employment of Brown Rudnick LLP ("Brown Rudnick") as co-counsel to the Committee in connection with this case, effective as of March 5, 2026, pursuant to sections 328 and 1103 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of New York (the "Local Rules"). In support of the Application, the Committee submits the declaration of Cathrine M. Castaldi (the "Castaldi Declaration"), a partner of Brown Rudnick, attached hereto as **Exhibit B**, and the declaration of the Committee Chairperson, Linda Weaver

[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 "Weaver Declaration"), attached as **Exhibit C**, respectively, each incorporated herein by reference. In further support of the Application, the Committee respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein are sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1.

BACKGROUND

3. On February 16, 2026 (the "Petition Date"), 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.

4. The Debtor continues to manage and operate their businesses as debtors-in-possession under sections 1107 and 1108 of the Bankruptcy Code. No trustee or examiner has been requested or appointed in this Case.

5. On March 3, 2026, the Office of the United States Trustee (the "U.S. Trustee") filed the Appointment of Official Committee of Unsecured Creditors [Docket No. 111]. On March 5, 2026, the U.S. Trustee filed the *Amended Appointment of Official Committee of Unsecured Creditors* [Docket No. 137].

6. On March 5, 2026, the Committee selected Brown Rudnick and Caplin & Drysdale, Chartered ("Caplin & Drysdale") as co-counsel, subject to the Court's approval. On March 7, 2026 the Committee selected Cohen Ziffer Frenchman & McKenna ("Cohen") as special counsel, also subject to the Court's approval.

SERVICES TO BE RENDERED

7. Subject to the direction of the Official Committee and further order of this Court, the professional services to be provided by Brown Rudnick to the Committee include, but are not limited to, the following:

a. assisting, advising, and representing the Committee in its meetings, consultations and negotiations with the Debtor and other parties in interest regarding the administration of this Case;

b. assisting, advising, and representing the Committee in understanding its powers and its duties under the Bankruptcy Code and the Bankruptcy Rules and in performing other services as are in the interests of those represented by the Committee;

c. assisting with the Committee's review of the Debtor' Schedules of Assets and Liabilities, Statement of Financial Affairs and other financial reports prepared by or on behalf of the Debtor;

d. assisting the Committee's investigation of the acts, conduct, assets, liabilities, and financial condition of the Debtor and its affiliates, including certain transactions preceding the bankruptcy filing;

e. assisting and advising the Committee regarding the identification and prosecution of estate claims and causes of action;

f. assisting and advising the Committee in its review and analysis of, and negotiations with the Debtor and any counterparties related to any potential restructuring transactions;

g. reviewing and analyzing all applications, motions, complaints, orders, and other pleadings filed with the Court by the Debtor or third parties, advising the Committee as to their propriety and, after consultation with the Committee, taking any appropriate action;

h. preparing necessary applications, motions, answers, orders, reports, and other legal papers on behalf of the Committee, and pursuing or participating in contested matters and adversary proceedings as may be necessary or appropriate in furtherance of the Committee's duties, interest, and objectives;

i. representing the Committee at hearings held before the Court and communicating with the Committee regarding the issues raised, and the decisions of the Court;

j. assisting, advising, and representing the Committee in connection with the review of filed proofs of claim and reconciliation of or objections to such proofs of claim and any claims estimation proceedings;

k. assisting, advising, and representing the Committee in their participation in the negotiation, formulation, and drafting of a plan of reorganization/liquidation for the Debtor;

l. assisting, advising, and representing the Committee with respect to its communications with the general creditor body regarding significant matters in this Case;

m. responding to inquiries from individual creditors as to the status of, and developments in, this Case; and

n. providing such other services to the Committee as may be necessary in this Case or any related proceedings.

8. The Committee has informed Brown Rudnick, and Brown Rudnick understands, that the Committee is planning to file retention applications for other professionals in this Case. In particular, the Committee determined it was in creditors' best interest to retain Brown Rudnick and Caplin & Drysdale as co-counsel, Province, LLC as financial advisor, and Cohen as special counsel. The Committee understands that Brown Rudnick intends to work closely with the Committee's other professionals to ensure that there is no unnecessary duplication of services.

PROFESSIONAL FEES AND COMPENSATION

9. Subject to this Court's approval, and in accordance with sections 330 and 331 of the Bankruptcy Code and any orders of the Court, Brown Rudnick will charge for its legal services as co-counsel to the Committee on an hourly basis in accordance with its ordinary and customary hourly rates in effect on the date such services are rendered, and for its actual, reasonable and necessary out-of-pocket disbursements incurred in connection therewith, as set forth in the Castaldi Declaration. The current hourly rates of Brown Rudnick professionals are in the following ranges:[2]

[2] As set forth in the Castaldi Declaration, pursuant to its ordinary practice, Brown Rudnick generally revises its rates on an annual basis. In the event that Brown Rudnick increases its standard hourly rates

Professional	Rate Per Hour
Partners	$1,000 - $2,600
Counsel	$445 - $1,550
Associates	$685 - $1,030
Paralegals	$450 - $575

10. The Committee is advised that Brown Rudnick intends to apply to this Court for allowance of compensation and reimbursement of expenses in accordance with applicable provisions of the Bankruptcy Code, the applicable Bankruptcy Rules, the Local Rules, the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the "U.S. Trustee Guidelines"), and further orders of this Court, including any order providing for interim compensation of professionals. Brown Rudnick will maintain detailed records of fees and expenses incurred in connection with the rendering of the professional services described above, in accordance with applicable rules and guidelines.

11. Consistent with Brown Rudnick's policy with respect to its other clients, Brown Rudnick will charge for all other services provided and for any other charges and disbursements incurred in the rendition of services. These charges and disbursements include, but are not limited to, business meals, photocopies, courier service, computer assisted research, docket and court filing fees, mail and express mail charges, messenger charges, document processing, telecommunications, travel, court reporting charges, and any other non-ordinary overhead expense such as overtime for secretarial personnel and other staff and any other incidental costs advanced by Brown Rudnick specifically for the representation of the Committee, in a manner and at rates

in its ordinary course of business during its retention in this Case, prior to any increases to the rates set forth in this Application taking effect, Brown Rudnick shall provide ten (10) calendar days' notice to the Committee, the Debtor, and the U.S. Trustee, and shall file a notice of the increase of its standard hourly rates with the Court.

consistent with charges made generally to Brown Rudnick's other clients. Photocopies and similar copies will be billed at a reduced rate of $0.10 per page.

12. Brown Rudnick has further advised the Committee that it intends to seek compensation for all time and expenses associated with the preparation of this Application to retain Brown Rudnick and related documents, and the preparation of monthly, interim, or final fee applications for Brown Rudnick. It will not bill for the defense of any fee applications. Brown Rudnick agrees to charge non-working travel time at 50% of the non-working travel time actually incurred.

13. Brown Rudnick has agreed to accept as compensation such sums as may be allowed by the Court, including on the basis of the professional time spent, the rates charged for such services, the necessity of such services to the administration of the Debtor's estate, the reasonableness of the time within which the services were performed in relation to the results achieved, and the complexity, importance, and nature of the problems, issues or tasks addressed in this Case.

14. Brown Rudnick has no agreement with any other entity to share any compensation received, nor will any be made.

BROWN RUDNICK'S DISINTERESTEDNESS

15. The Committee understands that Brown Rudnick conducted a computerized "conflicts" database search comparing to the Debtor, the Committee members and their counsel, and certain other parties-in-interest against a list of Brown Rudnick's current and former clients, matters and adverse parties to determine whether Brown Rudnick has any "connections" to any interested parties in this case. The Committee also understands that Brown Rudnick has represented, and in the future may represent, certain of the Debtor's creditors and other interested

parties in unrelated matters adverse to such creditors or parties, as disclosed in the Castaldi Declaration.

16. The Committee has reviewed the Castaldi Declaration, including the "connections" to this Case disclosed therein, as such term is used in Bankruptcy Rule 2014(a).

17. Notwithstanding any such connections, the Committee believes that Brown Rudnick is "disinterested," as that term is defined in section 101(14) of the Bankruptcy Code and does not hold or represent an interest adverse to the Debtor's estates with respect to the matters for which Brown Rudnick is to be employed, as required by section 328(c) of the Bankruptcy Code.

18. To the extent that issues arise that would cause the Committee to be adverse to any of Brown Rudnick's clients such that it would not be appropriate for Brown Rudnick to represent the Committee with respect to such matters, the Committee will request that its co-counsel Caplin & Drysdale, or conflicts counsel if appropriate, represent it with respect to those matters.

19. Other than as described herein, insofar as Brown Rudnick has been able to ascertain, other than in connection with this Case, neither Brown Rudnick nor any partner, counsel or associate of Brown Rudnick, has any connection (connection being defined as a familial or professional relationship) with the Debtor, their creditors, or any other interested party herein, or their respective attorneys or accountants, or the United States Trustee or any person employed in the Office of the United States Trustee.

20. Brown Rudnick is conducting a continuing inquiry into matters that would affect its disinterested status. In the event additional disclosure is necessary, Brown Rudnick will promptly file a supplemental declaration with this Court setting forth any facts and circumstances relevant thereto.

RELIEF REQUESTED

21. By this Application, the Committee respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, pursuant to Bankruptcy Code sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, authorizing the Committee to retain and employ Brown Rudnick as co-counsel in this Case. The Committee seeks to retain Brown Rudnick effective as of March 5, 2026, the date on which the Committee selected Brown Rudnick as proposed counsel.

BASIS FOR RELIEF

22. The Committee selected Brown Rudnick because of its extensive experience and knowledge of complex Chapter 11 matters, and believes Brown Rudnick is well qualified to represent the Committee in this Case. For example, and as more fully described in the Castaldi Declaration, Brown Rudnick has represented official and unofficial committees and other prominent parties in many of the most complex and prominent Chapter 11 bankruptcy cases in recent years. The Committee understands that Brown Rudnick intends to work closely with the Committee's other professionals to ensure that there is no unnecessary duplication of services.

NOTICE

23. Notice of this Application has been provided to (a) the Debtor; (b) counsel to the Debtor; (c) the U.S. Trustee; and (d) all parties requesting notices pursuant to Bankruptcy Rule 2002. The Committee respectfully submits that no further notice is necessary under the circumstances.

CONCLUSION

WHEREFORE, for the reasons set forth in this Application and in the annexed Castaldi Declaration, the Committee respectfully requests that the Court enter an order, substantially in the

form attached hereto as **Exhibit A**, authorizing the employment and retention of Brown Rudnick as co-counsel to the Committee effective as of March 5, 2026, and granting the Committee such other and further relief as may be just and proper.

Dated: April 2, 2026

Respectfully Submitted,

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS

/s/ Linda Weaver
Linda Weaver, solely in her capacity as Chairperson of the Official Committee of Unsecured Creditors of Vanderbilt Minerals LLC, and not in her personal capacity

Chair of the Official Committee of Unsecured Creditors

EXHIBIT A

PROPOSED ORDER

IN THE 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.	)	

ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF BROWN RUDNICK LLP AS CO-COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF VANDERBILT MINERALS, LLC, *NUNC PRO TUNC* TO MARCH 5, 2026

Upon consideration of the *Application for Order Authorizing the Employment and Retention of Brown Rudnick LLP as Co-Counsel for the Official Committee of Unsecured Creditors of Vanderbilt Minerals, LLC, Nunc Pro Tunc to March 5, 2026* (the "Application"),[2] pursuant to sections 328 and 1103 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of New York (the "Local Rules"), authorizing and approving the employment of Brown Rudnick LLP ("Brown Rudnick") as counsel to the Official Committee of Unsecured Creditors (the "Committee") appointed in the above-captioned bankruptcy case (the "Case") effective as of March 5, 2026; and the declarations of Cathrine M. Castaldi and Linda Weaver in support of the Application annexed thereto; and the Court having jurisdiction to consider the Application and the

[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 used but not defined herein shall have the meanings ascribed to them in the Application.

relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that the relief requested in the Application is in the best interests of the Debtor's estate, its creditors and other parties-in-interest; and the Committee having provided adequate and appropriate notice of the Application under the circumstances; and after due deliberation and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED as set forth herein.

2. The Committee is authorized pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code to retain and employ Brown Rudnick as co-counsel to the Committee effective as of March 5, 2026.

3. Brown Rudnick shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Case as set forth in the Application and in compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures or orders of this Court.

4. Brown Rudnick shall provide at least 10 calendar days' notice to the Committee, the Debtor, and the U.S. Trustee prior to any increases in the rates set forth in the Castaldi Declaration and shall file such notice with this Court.

5. The Committee and Brown Rudnick are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

6. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

7. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.

8. Further terms of this Order shall be as follows:

a. Brown Rudnick will only bill 50% for non-working travel and shall not seek the reimbursement of any fees or costs, including attorney fees and costs, arising from the defense of any of Brown Rudnick's fee applications in this Case;

b. Brown Rudnick will agree to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the "U.S. Trustee Guidelines");

c. Brown Rudnick will use the billing and expense categories set forth in the U.S. Trustee Guidelines (Exhibit D-1, "Summary of Compensation Requested by Project Category"), and may use additional categories that provide additional detail on work performed;

d. Brown Rudnick will provide any and all monthly fee statements, interim fee applications, and final fee applications in "LEDES" format to the U.S. Trustee; and

e. any and all compensation to be paid to Brown Rudnick for services rendered on the Committee's behalf shall be fixed by application to this Court in accordance with sections 330 and 331 of the Bankruptcy Code, such Federal Rules and Local Rules as may then be applicable, and any orders entered in this Case governing the compensation and reimbursement of professionals for services rendered and charges and disbursements incurred.

EXHIBIT B

CASTALDI DECLARATION

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

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

DECLARATION OF CATHRINE M. CASTALDI IN SUPPORT OF APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF BROWN RUDNICK LLP AS CO-COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF VANDERBILT MINERALS, LLC, *NUNC PRO TUNC* TO MARCH 5, 2026

Pursuant to 28 U.S.C § 1746, I, Cathrine M. Castaldi, hereby declare:

1. I am an attorney admitted to practice in the courts of the State of California, the United States Court of Appeals for the Ninth Circuit, and various district and bankruptcy courts in California. I am a Partner in, and Practice Group Leader of, the Bankruptcy & Corporate Restructuring Practice Group at Brown Rudnick LLP ("Brown Rudnick"), which maintains an office at 4 Park Plaza, Suite 420, Irvine, California 92614.

2. I submit this Declaration (the "Declaration") in support of the application (the "Application")[2] of the Official Committee of Unsecured Creditors (the "Committee") appointed in the above-captioned case (the "Case") for entry of an order, pursuant to sections 328 and 1103(a) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 2014-1 of the Local Rules of the

[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 used but not defined herein shall have the meanings ascribed to them in the Application.

United States Bankruptcy Court for the District of Delaware (the "Local Rules"), authorizing and approving the retention and employment of Brown Rudnick as co-counsel to the Committee in connection with this Case effective as of March 5, 2026.

3. Except as otherwise indicated herein, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

BROWN RUDNICK'S QUALIFICATIONS AND EXPERIENCE

4. Brown Rudnick is well qualified and able to represent the Committee in a cost effective and efficient manner. Among the reasons Brown Rudnick was selected as counsel includes our deep bankruptcy bench with experience in bankruptcy sales and litigation representing committees in the largest and most complex Chapter 11 cases. Brown Rudnick's Bankruptcy and Corporate Restructuring team is focused, first and foremost, on official committee engagements in large Chapter 11 cases. We are known for passionate and zealous advocacy on behalf of official committees. In addition to its attorneys with decades of experience in restructuring, Brown Rudnick has a large and well-respected litigation group at the Committee's disposal.

5. Brown Rudnick has successfully represented official committees of creditors and equity security holders and debtors in many prominent and complex bankruptcy cases throughout the country.

DISINTERESTEDNESS OF PROFESSIONALS

6. In preparing this Declaration, an attorney working under my supervision caused the implementation of certain procedures developed by Brown Rudnick's Conflicts Department to ensure compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules (collectively, the "Statutory Authority"). Pursuant to the Statutory Authority, the attorney worked with Brown Rudnick's Conflicts Department to cause to be performed an

examination and comparison (the "Connections Check") of the Debtor and its non-debtor affiliates, creditors, and other parties-in-interest (collectively, the "Case Parties"). The list of Case Parties is attached hereto as **Schedule 1**. A summary of the results of the Connections Check is attached hereto as **Schedule 2**.

7. Based upon my review of the results of the Connections Check, to the best of my knowledge after diligent inquiry, neither Brown Rudnick, nor any member of Brown Rudnick, nor any attorney associated with or employed by Brown Rudnick, has any "connection," as such term is used in Bankruptcy Rule 2014, with the Debtor herein, its creditors, any other party-in-interest herein, their respective attorneys or accountants, the U.S. Trustee, or any person employed in the office of the U.S. Trustee, except to the extent set forth in **Schedule 2** or as follows:

a. Brown Rudnick appears in cases, proceedings, and transactions involving numerous attorneys, accountants, and financial advisors, some of which may represent the Debtor, creditors, or parties-in-interest, or themselves be creditors or parties-in-interest in this Case. Brown Rudnick has not and will not represent any of these creditors, investors, potential acquirers, parties-in-interest, attorneys, financial advisors, accountants, or any other entity in connection with this Case.

b. Brown Rudnick represents many investors, financial institutions, and other persons or entities that may become creditors or parties-in-interest in this Case. Brown Rudnick has not and will not represent any of these investors, financial institutions, or other creditors or parties-in-interest in connection with this Case.

c. Brown Rudnick's Connections Check reported hits for several individuals identified on the Case Parties list. Based upon our inquiries, which remain ongoing, and except when indicated, these connections are unrelated to the Debtor and are being reported in the abundance of caution.

8. Notwithstanding any "connection" set forth in **Schedule 2** and except as set forth herein, to the best of my knowledge, any "connection" of Brown Rudnick to the identified entities are limited to matters unrelated to the Debtor.

9. Brown Rudnick may represent in the future parties in documenting the trading of claims against, interests in, and debt of, the Debtor or its estates. Brown Rudnick has not and will not provide any valuation or strategic due diligence regarding the Debtor in connection with providing such advice. Our work, on behalf of such parties, is generally limited to: (i) the ordinary course review of any underlying loan, interest, or claim documentation in connection with the purchase or sale of such loan, interest, or claim and the review of any upstream trade transaction documentation in connection therewith; or (ii) advice based solely on publicly available information or information obtained in connection with (i) above. Brown Rudnick may also assist such parties with completing the filings or submissions necessary to complete the transfer of a debt, interest, or claim against the Debtor or its estates from a seller to a purchaser.

10. Brown Rudnick discloses that it previously represented R.T. Vanderbilt Company, Inc. in a matter wholly unrelated to this Chapter 11 Case. Such representation ended approximately thirty (30) years ago, and the partner who worked on the matter is no longer affiliated with Brown Rudnick.

11. Brown Rudnick also discloses that it represents G.E. C.I.F. Trustees Ltd, which serves as the corporate trustee for the GE UK Pension Common Investment Fund, in a matter wholly unrelated to this Chapter 11 Case. The Brown Rudnick professionals assigned to this unrelated matter are not and will not be part of the team representing the Committee.

12. Brown Rudnick also represents Schneider Electric, which is the ultimate parent company of Aveva Software, LLC, in a matter wholly unrelated to this Chapter 11 Case. In connection with such representation, Brown Rudnick has obtained an advance waiver that permits Brown Rudnick to be adverse in bankruptcy-related creditor committee matters, and the Brown

Rudnick professionals assigned to this unrelated matter are not and will not be part of the team representing the Committee.

13. None of Brown Rudnick's existing clients noted in **Schedule 2** accounted for more than one percent (1%) of Brown Rudnick's gross revenues for the past twelve (12) months.

14. It is possible that certain of the partners, counsel and associates of Brown Rudnick and such persons' relatives may have familial or personal relationships, as well as business, contractual, or economic relationships, with officers, directors, and/or shareholders or creditors of the Debtor, competitors of the Debtor, other professionals engaged in this Case and/or other parties in interest in this Case. I have not been made aware of any material relationships with any such individual.

15. I am not related to and, to the best of my knowledge, no other attorney at Brown Rudnick is related to (a) any United States Bankruptcy Judge for the Northern District of New York or (b) the U.S. Trustee, or any person employed by the U.S. Trustee's office.

16. If Brown Rudnick discovers any information that is contrary to or pertinent to the statements made herein, Brown Rudnick will promptly disclose such information to the Court by filing and serving a supplemental declaration.

17. For the reasons stated herein, based on the conflicts search conducted to date and described here, to the best of my knowledge Brown Rudnick is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and as used in section 328(c) of the Bankruptcy Code, and does not have an interest materially adverse to the interests of the Debtor's estates or any class of creditors or equity holders of the Debtor.

PROFESSIONAL COMPENSATION

18. Subject to this Court's approval, and in accordance with section 330(a) of the Bankruptcy Code and any orders of the Court, Brown Rudnick will charge for its legal services as

counsel to the Committee on an hourly basis in accordance with its ordinary and customary hourly rates in effect on the date such services are rendered, and for its actual, reasonable and necessary out-of-pocket disbursements incurred in connection therewith.

19. My current hourly rate is $2,000. Other attorneys and paraprofessionals will assist with this Case as needed. As of the date hereof, the hourly rates of Brown Rudnick professionals are in the following ranges:

Professional	Rate Per Hour
Partners	$1,000 - $2,600
Counsel	$445 - $1,550
Associates	$685 - $1,030
Paralegals	$450 - $575

20. The hourly rates set forth above are Brown Rudnick's general hourly rates for work of this nature and are consistent with the customary compensation charged by comparably skilled attorneys at Brown Rudnick in similar matters, including non-bankruptcy matters. In the normal course of its business, Brown Rudnick revises its billing rates on an annual basis.[3]

21. Brown Rudnick has advised the Committee that it intends to seek compensation for all time and expenses associated with the preparation of this Application to retain Brown Rudnick and related documents, and the preparation of monthly, interim or final fee applications for Brown Rudnick. It will not bill for the defense of any fee applications. Brown Rudnick will bill any non-working travel time at 50% of the actual time incurred.

[3] In the ordinary course, Brown Rudnick reviews the billing rates of its attorneys and paraprofessionals annually. The review and rate increases are based upon increases within each attorney's and paraprofessional's current level of seniority. The rates described herein reflect the most recent rate increase. As set forth in the attached order, Brown Rudnick will provide ten (10) calendar days' notice to the Committee, the Debtor, and the U.S. Trustee before implementing any periodic increases, and shall file any such notice with the Court.

22. In addition, Brown Rudnick will apply for reimbursement for any actual and necessary expenses incurred in representing the Committee, including, but not limited to, business meals, photocopies, courier service, computer assisted research, docket and court filing fees, mail and express mail charges, messenger charges, document processing, telecommunications, travel, court reporting charges, and any other non-ordinary overhead expense such as overtime for secretarial personnel and other staff and any other incidental costs advanced by Brown Rudnick specifically for the representation of the Committee, in a manner and at rates consistent with charges made generally to Brown Rudnick's other clients. Photocopies and similar copies will be billed at a reduced rate of $0.10 per page.

23. Brown Rudnick has not agreed to share (a) any compensation it may receive with another party or person, other than with the partners, counsel, and associates of Brown Rudnick; or (b) any compensation another person or party has received or may receive in connection with this Case.

24. Brown Rudnick has not received a retainer in connection with this Case.

AFFIRMATIVE STATEMENT OF DISINTERESTEDNESS

25. Based upon the information available to me, and except as otherwise described herein, Brown Rudnick holds no interest adverse to the Debtor, its estates, or any class of creditors or equity holders as to the matters in which it is to be employed. I know of no reason why Brown Rudnick cannot act as co-counsel to the Committee.

STATEMENT REGARDING U.S. TRUSTEE GUIDELINES

26. The following information is provided pursuant to paragraph D.1 of the U.S. Trustee Guidelines:

QUESTION:	Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?

Response:	No.
QUESTION:	Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?
Response:	No.
QUESTION:	If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If your billing rates and material financial terms have changed post-petition, explain the difference and the reasons for the difference.
Response:	N/A.
QUESTION:	Has your client approved your prospective budget and staffing plan, and, if so, for what budget period?
Response:	The Committee will approve a budget and general staffing plan in connection with Brown Rudnick's representation of the Committee.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 2, 2026

/s/ *Cathrine M. Castaldi*
Cathrine M. Castaldi

Schedule 1 to Castaldi Declaration

Interested Parties

Debtor Entity
Vanderbilt Minerals, LLC

Non-Debtor Affiliates
R.T. Vanderbilt Holding Co., Inc.
Vanderbilt Global Services, LLC
Vanderbilt Chemicals, LLC
Vanderbilt Western Resources, LLC
Advanced Milling Technologies, LLC
Vanderbilt Worldwide, Ltd.
Vanderbilt (Beijing) Trading Ltd.
Vanderbilt Japan, LLC

Current Directors and Officers
Amarilys Franky
Ben Pickering
James Knowlden
Jeffrey Brohel

Banks
JPMorgan Chase Bank, N.A.
Wells Fargo Bank, N.A.

Primary Plaintiff Counsel
Antion McGee Law Group, PLLC
Bailey Cowan Heckaman, PLLC
Baron & Budd, PC Belluck Law, LLP
Bergen & Parkinson, LLC
Brookman, Rosenberg, Brown & Sandler Cohen, Placitella & Roth, PC
Cooney & Conway Dalton & Associates, P.A.
DeBlase Brown Eyerly, LLP
Dobs Legal, LLP
Duffy Law, LLC
Early, Lucarelli, Sweeney & Meisenkothen Ferrell Law Group
Flint Cooper LLC
Frost Law Firm PC
Goldberg, Persky & White, P.C.
Hobson & Bradley
Holland Law Firm
Iola Gross & Forbes-King, LLP
Jones & Bendon, LLP
JSC Legal
Karst & Von Oiste, LLP
Kassel McVey Attorneys at Law
Kazan, McClain, Satterley & Greenwood PLC
Keahey Law Office

Kelley & Ferraro, LLP
Lanier Law Firm, PLLC
Law Offices of Michael P. Joyce
Law Offices of Peter G. Angelos, PC
Levy Konigsberg LLP
Lipsitz, Ponterio & Comerford, LLC
Locks Law Firm, LLC
Maune Raichle Hartley French & Mudd, LLC
McDermott & Hickey, LLC
Meirowitz & Wasserberg, LLP
Menges Law LLC
Motley Rice LLC
Nashawati Law Group
OnderLaw, LLC
Paul, Reich & Myers, PC
Philip C Hoffman, LLC
R.G. Taylor II, P.C. & Associates
Rebecca S. Vinocur P.A.
Satterley & Kelley, PLLC
Serling & Abramson, PC
Shein Law Center, Ltd
Shepard O'Donnell, P.C.
Shrader & Associates, LLP
Sieben Polk, P.A.
Simmons Hanly Conroy LLC
Simon Greenstone Panatier, PC
SWMW Law, LLC
The Deaton Law Firm
The Ferraro Law Firm
The Gori Law Firm PC
The Halpern Law Firm, LLC
The Nemeroff Law Firm
Thornton Law Firm
Vogelzang Law Waters & Kraus, LLP
Weinstein Caggiano PLLC
Weitz & Luxenberg, PC

Significant Customers
Caldic USA Inc.
ProForm Finishing Products, LLC
Vesuvius USA Corporation
Groupe BBL
Huttenes-Albertus International LLC
Pioma Chemicals
ASK Chemicals LLC
US Gypsum Company

Southern Wall Products, Inc.
AECI Limited
CH Erbsloeh GmbH
Owens Corning
Adchem International
Mapei, S.p.A.
Sun Gro Horticulture Canada Ltd.

Frequent Co-Defendants
Crane Co.
DAP Inc.
Flowserve Corp.
Foster Wheeler Energy
General Electric Co.
Goulds Pumps Inc.
Grinnell Corp.
Honeywell International
IMO Industries
John Crane Co.
Metropolitan Life Insurance Co.
Paramount Global
Pfizer Inc
Pneumo Abex Corp
Redco Corporation
Rockwell Manufacturing Co.
The Sherwin-Williams Company
Union Carbide

Unions
United Steelworkers International Union, Local 00478
United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, Local 420-6

Competitors
Elementis Plc
Minerals Technologies, Inc.
Imerys S.A.
J.M. Huber Corp.
AMCOL International
Wolkem India Ltd.
SCR- Sibelco N.V.

Vendors
Abbott Oil Company
Activation Laboratories, Ltd.
Apex Logistics International

Applied Industrial Technology
Applied Particle Technology,
Inc Arc3 Gases, Inc.
Arcadis U.S., Inc.
Arclin Dispersant Ltd.
Ascendum Machinery Inc
Atlas Copco USA Holdings, Inc.
Augusta Machine & Welding
Aveva Software, LLC
Baruch Charles Street, LLC
Battle Lumber Company Inc.
Berry Global, Inc.
BGRS, Inc.
Blake & Pendleton Brady Systems
Brenntag North America, Inc.
Brunner & Lay Inc.
Bulldog Trucking & Grading
Canada Border Services Agency
Carolina Drilling, Inc.
Carolina Metal Works
Carolina Tractor & Equipment
Carolina Wood Products
Carroll Engineering Co.
Carthage Fibre Drum, Inc.
Casella Waste Services
Ceco Environmental Corporation
Cintas
Cintas Corp. Loc.219
Commercial Packaging
Consolidated Electrical Dist.
Consolidated Oil LLC
Constellation Energy Services
Crow Engineering, Inc.
Cruco Mill & Ind. Supply LLC
CSRA Boiler & Burner Supply
Custom Processing Services, LLC
D. I. Bush Fuels
Derrick Corporation
Destex, Inc.
Dominion Energy
Donald B. Blaikie & Co., Inc.
Driftech Inc.
Duke Energy Progress, Inc.
Elementis Global LLC
Empire Southwest, LLC
Empire State Mines, LLC

Essence Transport Corp
Essential Minerals Association
Everything Electric, Inc
Express Shipping Room Supply
FedEx Ground
Ferrellgas, LP
Fleetcor Technologies, Inc.
FL Smidth Cement USA, Inc.
Flyover Services LLC
G.R. Brozzo, LLC
G.T. Michelli Co., LLC
Global-Pak Inc
Grainger
Gregory Poole Equipment Company
Griffin Gear, Inc.
Hammond Electric Motor Repair
Handy Chemicals
Harbin Lumber Company Inc
Haun Welding Supply, Inc.
Hood Packaging Corporation
Independent Explosives
Industrial Machine & Welding, LLC
Interconn Resources, LLC
International Treasurer
IPEC-Americas
J.E.S. Forwarding Inc
Jordan Innovative Fabrication LLC
Joy Global (Canada) Ltd.
Jungbunzlauer International AG
Jungbunzlauer, Inc.
Kemira Chemicals
Kemira Oyj
Khem-Tech, Inc.
Lawson Products, Inc.
Leith Management Group Inc
Linden Warehouse & Dist., Inc.
Lisk Trucking, Inc.
LMD Integrated
Logistics Services
Logfret Inc.
Lowe's Business Account
Lubrication Engineers, Inc
Massachusetts Mutual Life
Matthews International Corp.
McIntosh Box and Pallet Co., Inc.
McMaster-Carr Supply Co.
Mels Tire Service LLC

MGF Logistics, Inc.
Mondi Bags USA, LLC
Motion Industries, Inc.
National Grid
Naumann Hobbs Handling Corp II
Newvine's Auto Parts
North Coast Logistics
New York Society of Cosmetic Chemists
Odyssey Logistics & Technology Corp
Old Dominion Freight Line
Organic Materials Review Institute
PACE Claims Services
Pahrump Auto Parts
PalletOne of NC
Palmetto Industries Intl. Inc
Paul DeLong Heavy Haul
Perrigo Property Services Inc
Personal Care Products Council
Peterson Asbestos Claims Ent. LLC
Petroleum Traders Corp.
Philly Fuels, Inc
Piedmont Electric Machine
Polsinello Fuels
PowerPlan
Professional Boiler Services
R & L Carriers Inc.
R. M. Murdock Co., Inc.
Receiver General (GST)
Reed Exhibitions Ltd.
Republic Services #778
Richmond Supply Company
RJ Lee Group, Inc.
Rockmore International
Runwell Solutions, Inc.
Sam's Club
Schaeffer Mfg. Co.
Seaway Rental Corporation
SGS North America Inc
Skye Equipment LLC
Skyline Exhibits and Graphics, Inc
Sotera Health Holdings, LLC
Southeast Pump Specialist, Inc
Southeastern Paper Group, LLC
Southworth-Milton, Inc.
Spilman's Sales & Service Sunbelt Rentals, Inc.
Sweet's Electric Team Blevins, LLC

Tennant Sales and Service Company
The Acta Group LLC
The Shaker Group, Inc.
The Timbermen
Total Quality Logistics, LLC
Transformer Service, Inc.
Transgroup Express LLC
UL Verification Services Inc.
Uline
Uniflux LLC
United Bags, Inc.
United Rentals
United Steelworkers
US Bulksak Holdings, LLC
Verizon Wireless
W.B. Mason Company, Inc.
WSP USA, Inc.
Xylem Dewatering Solutions, Inc.

Distributors
A.E. Fleming Co.
AdChem FZE
Adikem
Agencias Generales
Archway Sales
A.S. Harrison
Bang & Bonsomer
Berli Jucker
Brandt, George C.
Camsi
Cary Company, The
C.H. Erblsoeh Polska SP
Cominter
Commerce Ind. Chemical
Crozier Nelson Chemical
Deeks & Company
Dempsey Corporation
DKSH Malaysia Sdn Bhd
Dowd & Guild
DPL Trading (S) PTE. LTD
EICO s.r.l
Erteco
Farma International
Gulf Coast Chemical Corp.
Hirshberg Brothers
Hood, Abner, Inc.

Jachts Chemical & Container Corp
Jungbunzlauer Inc.
Kaufmann, E.W. Co.
Keller, Edward (Philippines) Inc.
Keyser & McKay
Kohyei Trading Laguna Clay Company
Lake Chemicals & Min
Lavollee SA
Luzenac America
Molina Ricardo S.A.
National Pigments & Chemicals, Inc.
Parfusale AB
Pioma Chemicals
Proaindsa
Productos Quimicos Amster LTd.
P.T. Dwipar Loka Ayu
P.T. Hutchins Co, Ltd
Quantiq
Quimica Anders
Ravago Chemicals
Ritz Marketing LLC
Royal, H. M., Inc.
Seidlitz
Sevchem, Ltd
Shima Trading
Shine Team Global
Suan Farma
Union Chemical
Ziko Ltd.

Utilities
AT&T
Beatty Water & Sanitation District
Brightspeed
Casella
Constellation
Dominion Energy
Duke Energy Geoffrey Jackson
Divine Health Water 4U
Interconn Resources
Keadles Septic Tank
National Grid
Port-o-Let
Robert James Mashaw A-1 Port
Spectrum
Town of Robbins

Valley Electric
Valley Public Service Authority
Verizon
Village of Gouverneur

Government Authorities
Bureau of Alcohol, Tobacco, Firearms & Explosives
City of Kingston
Commission of Motor Vehicles
Commission of Labor
Delaware Div. of Revenue
Environmental Protection Agency
Jefferson Elementary School
Kern County Public Works Dept.
Mine Safety and Health Admin.
Minister of Revenue of Quebec
Moore County Tax Dept.
N.C. Dept. of Agriculture
N.C. Secretary of State
N.C. Dept. of Motor Vehicles
Nevada State Fire Marshall
New Mexico Taxation & Revenue Dept
New York State Sales Tax
North Carolina Dept. of Revenue
Nye County Treasurer
NYS Dept of Environmental Cons.
NYS Dept of Labor
Pension Benefit Guaranty Corp.
SC Dept. Health & Environmental Control
State Board of Equalization
Tennessee Secretary of State
The State of Nevada
Town of Dekalb
Town of Diana
Town of Edwards
Town of Fowler
Town of Gouverneur
Town of Hermon
Town of Macomb
Town of Pitcairn
Town of Robbins
U.S. Department of Conservation
U.S. Department of Interior, Bureau of Land Management
U.S. Department of Transportation
Village of Gouverneur

Insurers

ACE American
ACE Property & Casualty Insurance Company
AIG Specialty Insurance Company
AIU Insurance Company
Arrowood Indemnity Company
Ascot Specialty Insurance Company
Cavello Bay Reinsurance Limited
Century Indemnity Company
Coaction Specialty Management Company, Inc.
Columbia Casualty Company
Continental Casualty Company
Everest Reinsurance Company
Fireman's Fund Insurance Company
First State Insurance Company
Government Employees Insurance Company
Granite State Insurance Company
Hamilton Syndicate 4000 at Lloyd's
Harbor Insurance Company
Hartford Accident and Indemnity Company
HDI Global Insurance Company
Lloyd's Syndicate
Munich Reinsurance America, Inc.
Mutual Marine Office, Inc.
National Union Fire Insurance Co.
Old Republic Insurance Company
River Thames Insurance Company Limited
Starr Indemnity & Liability Company
Starr Surplus Lines
The American Insurance Company
The Central National Insurance Company of Omaha
The Continental Insurance Company,
The Manhattan Marine and Fire Insurance Co.
TIG Insurance Company
Travelers Casualty and Surety Company
Twin City Fire Insurance Company
Westport Insurance Corporation
Winterthur Swiss Insurance Company
Yasuda Fire & Marine Insurance Company (UK) Limited
Zurich Reinsurance Company, Ltd.

Surety Bonds

Fidelity and Deposit Company of Maryland
Hartford Fire Insurance Company
The Guarantee Company of North America

Restructuring Professionals
Applied Business Strategy LLC
Bond, Schoeneck & King PLLC
Greenhill & Co.
Jones Day
Kurtzman Carson Consultants, LLC dba Verita Global

Other Consultants & Advisors
Gordon & Rees, LLP
Henderson & Associates, Inc.
Norris, McLaughlin & Marcus, P.A.
O'Sullivan McCormack Jensen & Bliss
Polales Horton LLP
Steptoe & Johnson LLP
Stites & Harbison Attorneys
Thigpen and Jenkins, L.L.P.

Lessors/Lessees
Barkley Solar, LLC
Baruch Charles Street, LLC
Clearwater Solar, LLC
Earls Solar, LLC
Flagstar Financial & Leasing, LLC
Harley Solar, LLC
NJZ Mines, Inc.
Ricoh USA, Inc.
Signature Financial LLC
Southern Current Development I, LLC
Southern Current LLC
Tower Ventures, LLC

United States Bankruptcy Judges
Patrick G. Radel
Robert E. Littlefield, Jr.
Wendy A. Kinsella

United States Trustee's Office
Erin Champion
Paula M. Barbaruolo

Independent Special Committee Legal Counsel
Katten Muchin Rosenman LLP

Schedule 2 to Castaldi Declaration

(Connections Check Summary)

Vanderbilt Minerals, LLC, Official Committee of Unsecured Creditors Connections Disclosure

Individual/Entity Name	Bankruptcy Role	Current Client in Unrelated Matter	Former Client in Unrelated Matter	Adverse to or Aligned with Current or Former Clients in Unrelated Matters (Applicable to Searched Entity or Affiliate of Searched Entity) [X=Yes]	Other Connection	Lateral Connection
Vanderbilt Minerals, LLC	Debtor			X		
R.T. Vanderbilt Holding Co., Inc.	Non-Debtor Affiliate		affiliate of searched entity	X		
JPMorgan Chase Bank, N.A.	Bank		affiliates of searched entity	X		affiliate of searched entity
Wells Fargo Bank, N.A.	Bank	affiliate of searched entity	searched entity and affiliates of searched entity	X		
Baron & Budd, PC	Primary Plaintiff Counsel			X		
Belluck Law, LLP	Primary Plaintiff Counsel			X		
Bergen & Parkinson, LLC	Primary Plaintiff Counsel			X		
Brookman, Rosenberg, Brown & Sandler	Primary Plaintiff Counsel			X		
Cohen, Placitella & Roth, PC	Primary Plaintiff Counsel			X		
Cooney & Conway	Primary Plaintiff Counsel	representative of member of ad hoc group in unrelated Chapter 11 case		X		
Dalton & Associates, P.A.	Primary Plaintiff Counsel			X		
DeBlase Brown Eyerly, LLP	Primary Plaintiff Counsel			X		
Duffy Law, LLC	Primary Plaintiff Counsel			X		
Early, Lucarelli, Sweeney & Meisenkothen	Primary Plaintiff Counsel	representative of member of ad hoc group in unrelated Chapter 11 case		X		
Flint Cooper LLC	Primary Plaintiff Counsel			X		
Frost Law Firm PC	Primary Plaintiff Counsel			X		
Goldberg, Persky & White, P.C.	Primary Plaintiff Counsel			X		
Holland Law Firm	Primary Plaintiff Counsel		Yes	X		
Karst & Von Oiste, LLP	Primary Plaintiff Counsel			X		
Kassel McVey Attorneys at Law	Primary Plaintiff Counsel			X		
Kazan, McClain, Satterley & Greenwood PLC	Primary Plaintiff Counsel			X		
Lanier Law Firm, PLLC	Primary Plaintiff Counsel		Yes	X		
Law Offices of Michael P. Joyce	Primary Plaintiff Counsel			X		
Law Offices of Peter G. Angelos, PC	Primary Plaintiff Counsel		Yes			
Levy Konigsberg LLP	Primary Plaintiff Counsel			X		
Lipsitz, Ponterio & Comerford, LLC	Primary Plaintiff Counsel			X		
Maune Raichle Hartley French & Mudd, LLC	Primary Plaintiff Counsel			X		
McDermott & Hickey, LLC	Primary Plaintiff Counsel			X		
Meirowitz & Wasserberg, LLP	Primary Plaintiff Counsel			X		
Menges Law LLC	Primary Plaintiff Counsel			X		
Motley Rice LLC	Primary Plaintiff Counsel			X		
OnderLaw, LLC	Primary Plaintiff Counsel			X		

Individual/Entity Name	Bankruptcy Role	Current Client in Unrelated Matter	Former Client in Unrelated Matter	Adverse to or Aligned with Current or Former Clients in Unrelated Matters (Applicable to Searched Entity or Affiliate of Searched Entity) [X=Yes]	Other Connection	Lateral Connection
Paul, Reich & Myers, PC	Primary Plaintiff Counsel			X		
Philip C Hoffman, LLC	Primary Plaintiff Counsel			X		
Satterley & Kelley, PLLC	Primary Plaintiff Counsel			X		
Serling & Abramson, PC	Primary Plaintiff Counsel			X		
Shein Law Center, Ltd	Primary Plaintiff Counsel			X		
Shepard O'Donnell, P.C.	Primary Plaintiff Counsel			X		
Shrader & Associates, LLP	Primary Plaintiff Counsel			X		
Simmons Hanly Conroy LLC	Primary Plaintiff Counsel	Yes		X		
SWMW Law, LLC	Primary Plaintiff Counsel			X		
The Deaton Law Firm	Primary Plaintiff Counsel			X		
The Ferraro Law Firm	Primary Plaintiff Counsel			X		
The Gori Law Firm PC	Primary Plaintiff Counsel			X		
The Halpern Law Firm, LLC	Primary Plaintiff Counsel			X		
The Nemeroff Law Firm	Primary Plaintiff Counsel			X		
Thornton Law Firm	Primary Plaintiff Counsel			X		
Vogelzang Law	Primary Plaintiff Counsel			X		
Waters & Kraus, LLP	Primary Plaintiff Counsel			X		
Weitz & Luxenberg, PC	Primary Plaintiff Counsel	representative of member of ad hoc group in unrelated Chapter 11 case	Yes	X		
Vesuvius USA Corporation	Significant Customer		Yes			
Groupe BBL	Significant Customer			X		
ASK Chemicals LLC	Significant Customer			X		
Crane Co.	Frequent Co-Defendant			X		
DAP Inc.	Frequent Co-Defendant			X		
Flowserve Corp.	Frequent Co-Defendant			X		
Foster Wheeler Energy	Frequent Co-Defendant		affiliates of searched entity	X		
General Electric Co.	Frequent Co-Defendant	affiliate of searched entity	affiliates of searched entity	X		affiliate of searched entity
Goulds Pumps Inc.	Frequent Co-Defendant			X		
Grinnell Corp.	Frequent Co-Defendant		searched entity and affiliate of searched entity	X		
Honeywell International	Frequent Co-Defendant		affiliates of searched entity	X	affiliate of searched entity	
IMO Industries	Frequent Co-Defendant			X		
John Crane Co.	Frequent Co-Defendant			X		
Metropolitan Life Insurance Co.	Frequent Co-Defendant		affiliates of searched entity	X	affiliate of searched entity	
Paramount Global	Frequent Co-Defendant		affiliate of searched entity	X		
Pfizer Inc	Frequent Co-Defendant			X		
Pneumo Abex Corp	Frequent Co-Defendant			X		
Rockwell Manufacturing Co.	Frequent Co-Defendant			X		
The Sherwin-Williams Company	Frequent Co-Defendant			X		Yes
Union Carbide	Frequent Co-Defendant		affiliate of searched entity	X		

Individual/Entity Name	Bankruptcy Role	Current Client in Unrelated Matter	Former Client in Unrelated Matter	Adverse to or Aligned with Current or Former Clients in Unrelated Matters (Applicable to Searched Entity or Affiliate of Searched Entity) [X=Yes]	Other Connection	Lateral Connection
United Steelworkers International Union, Local 00478	Union	**affiliate of searched entity**	**affiliate of searched entity**			
United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, Local 420-6	Union	**affiliate of searched entity**	**applicable to affiliate of searched entity**			
Minerals Technologies, Inc.	Competitor			**X**		
Imerys S.A.	Competitor			**X**		
J.M. Huber Corp.	Competitor		**Yes**			
AMCOL International	Competitor			**X**		
SCR- Sibelco N.V.	Competitor			**X**		
Applied Industrial Technology	Vendor			**X**		
Arcadis U.S., Inc.	Vendor			**X**		
Atlas Copco USA Holdings, Inc.	Vendor			**X**		
Aveva Software, LLC	Vendor	**affiliate of searched entity**				**affiliate of searched entity**
Berry Global, Inc.	Vendor			**X**		
Brenntag North America, Inc.	Vendor			**X**		
Casella Waste Services	Vendor			**X**		
Cintas	Neutral		**Yes**	**X**		
Cintas Corp. Loc.219	Neutral		**affiliate of searched entity**	**X**		
Constellation Energy Services	Vendor			**X**		
Dominion Energy	Vendor			**X**		
Duke Energy Progress, Inc.	Vendor			**X**		
FedEx Ground	Vendor		**affiliate of searched entity**	**X**		**affiliate of searched entity**
Ferrellgas, LP	Vendor			**X**		
FLSmidth Cement USA, Inc.	Vendor		**affiliate of searched entity**	**X**		
Global-Pak Inc	Vendor			**X**		
Grainger	Vendor			**X**		
Gregory Poole Equipment Company	Vendor			**X**		
Hood Packaging Corporation	Vendor			**X**		
Leith Management Group Inc	Vendor			**X**		
Lowe's Business Account	Vendor			**X**		
Massachusetts Mutual Life	Vendor			**X**		
McMaster-Carr Supply Co.	Vendor			**X**		
Motion Industries, Inc.	Vendor			**X**		
National Grid	Vendor		**affiliates of searched entity**	**X**		
Newvine's Auto Parts	Vendor			**X**		
Personal Care Products Council	Vendor			**X**		
R & L Carriers Inc.	Vendor			**X**		

Individual/Entity Name	Bankruptcy Role	Current Client in Unrelated Matter	Former Client in Unrelated Matter	Adverse to or Aligned with Current or Former Clients in Unrelated Matters (Applicable to Searched Entity or Affiliate of Searched Entity) [X=Yes]	Other Connection	Lateral Connection
Republic Services #778	Vendor			X		
RJ Lee Group, Inc.	Vendor			X		
Sam's Club	Vendor	affiliate of searched entity	affiliates of searched entity	X		affiliates of searched entity
SGS North America Inc	Vendor			X		
Southeastern Paper Group, LLC	Vendor			X		
Sunbelt Rentals, Inc.	Vendor			X		
Transgroup Express LLC	Vendor		affiliate of searched entity	X		
Uline	Vendor			X		
United Rentals	Vendor			X		
United Steelworkers	Vendor	affiliate of searched entity	affiliate of searched entity			
Verizon Wireless	Vendor		searched entity and affiliate of searched entity	X		affiliate of searched entity
W.B. Mason Company, Inc.	Vendor			X		
WSP USA, Inc.	Vendor			X		
Xylem Dewatering Solutions, Inc.	Vendor			X		
Keyser & McKay	Distributor			X		
Luzenac America	Distributor			X		
P.T. Hutchins Co, Ltd	Distributor			X		
Ravago Chemicals	Distributor			X		
AT&T	Utility	Yes	Yes	X		
Casella	Utility			X		
Constellation	Utility			X		
Dominion Energy	Utility			X		
Duke Energy	Utility			X		
National Grid	Utility		affiliates of searched entity	X		
Spectrum	Utility	affiliates of searched entity		X		
Verizon	Utility		affiliates of searched entity	X		
Bureau of Alcohol, Tobacco, Firearms & Explosives	Government Authority			X		
Commission of Labor	Government Authority			X		
Delaware Div. of Revenue	Government Authority			X		
Environmental Protection Agency	Government Authority			X		
Moore County Tax Dept.	Government Authority			X		
N.C. Dept. of Agriculture	Government Authority			X		
N.C. Secretary of State	Government Authority			X		
N.C. Dept. of Motor Vehicles	Government Authority			X		
New Mexico Taxation & Revenue Dept	Government Authority			X		
New York State Sales Tax	Government Authority				firm vendor	

Vanderbilt Minerals, LLC, Official Committee of Unsecured Creditors Connections Disclosure

Individual/Entity Name	Bankruptcy Role	Current Client in Unrelated Matter	Former Client in Unrelated Matter	Adverse to or Aligned with Current or Former Clients in Unrelated Matters (Applicable to Searched Entity or Affiliate of Searched Entity) [X=Yes]	Other Connection	Lateral Connection
North Carolina Dept. of Revenue	Government Authority			X		
NYS Dept of Labor	Government Authority			X		
Pension Benefit Guaranty Corp.	Government Authority			X		
State Board of Equalization	Government Authority			X		
Tennessee Secretary of State	Government Authority			X		
The State of Nevada	Government Authority			X		
U.S. Department of Transportation	Government Authority			X		
ACE American	Insurer			X		
ACE Property & Casualty Insurance Company	Insurer			X		
AIG Specialty Insurance Company	Insurer			X		
AIU Insurance Company	Insurer			X		
Arrowood Indemnity Company	Insurer			X		
Ascot Specialty Insurance Company	Insurer			X		
Century Indemnity Company	Insurer			X		
Coaction Specialty Management Company, Inc.	Insurer			X		
Columbia Casualty Company	Insurer			X		
Continental Casualty Company	Insurer			X		
Everest Reinsurance Company	Insurer			X		
Fireman's Fund Insurance Company	Insurer		**affiliates of searched entity**	X		
First State Insurance Company	Insurer			X		
Government Employees Insurance Company	Insurer			X		
Granite State Insurance Company	Insurer			X		
Harbor Insurance Company	Insurer			X		
Hartford Accident and Indemnity Company	Insurer		**affiliate of searched entity**	X		
Lloyd's Syndicate	Insurer			X		
Munich Reinsurance America, Inc.	Insurer			X		
National Union Fire Insurance Co.	Insurer			X		
Old Republic Insurance Company	Insurer			X		
Starr Indemnity & Liability Company	Insurer			X		
Starr Surplus Lines	Insurer			X		
The American Insurance Company	Insurer			X		

Individual/Entity Name	Bankruptcy Role	Current Client in Unrelated Matter	Former Client in Unrelated Matter	Adverse to or Aligned with Current or Former Clients in Unrelated Matters (Applicable to Searched Entity or Affiliate of Searched Entity) [X=Yes]	Other Connection	Lateral Connection
The Central National Insurance Company of Omaha	Insurer			X		
The Continental Insurance Company	Insurer			X		
The Manhattan Marine and Fire Insurance Co.	Insurer			X		
TIG Insurance Company	Insurer			X		
Travelers Casualty and Surety Company	Insurer		Yes	X		
Twin City Fire Insurance Company	Insurer			X		
Westport Insurance Corporation	Insurer			X		
Winterthur Swiss Insurance Company	Insurer			X		
Yasuda Fire & Marine Insurance Company (UK) Limited	Insurer			X		
Zurich Reinsurance Company, Ltd.	Insurer		affiliates of searched entity	X		
Fidelity and Deposit Company of Maryland	Surety Bonds		searched entity and affiliates of searched entity	X		
Hartford Fire Insurance Company	Surety Bonds			X		
The Guarantee Company of North America	Surety Bonds			X		
Jones Day	Restructuring Professionals		Yes	X		
Gordon & Rees, LLP	Other Consultants & Advisors			X		
Steptoe & Johnson LLP	Other Consultants & Advisors		affiliate of searched entity	X		
Tower Ventures, LLC	Lessor/Lessee				affiliate of searched entity	
Katten Muchin Rosenman LLP	Independent Special Committee Legal Counsel		Yes	X		
Linda Weaver, Executor of the Estate of Anna Bishop Joseph Belluck, represented by Belluck Law, LLP	Committee Member			X		

Exhibit C

(Weaver Declaration)

IN THE 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.	)	

DECLARATION OF LINDA WEAVER IN SUPPORT OF APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF BROWN RUDNICK LLP AS CO-COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF VANDERBILT MINERALS, LLC, *NUNC PRO TUNC* TO MARCH 5, 2026

Pursuant to 28 U.S.C § 1746, I, Linda Weaver, hereby declare:

1. I was appointed by the U.S. Trustee as a member of the Official Committee of Unsecured Creditors of Vanderbilt Minerals, LLC (the "Committee"). I was named as a Chairperson by the Committee. In such capacity, I was part of the process and involved in selecting and engaging counsel for the Committee.

2. I have reviewed and am familiar with the contents of the *Application for Order Authorizing the Employment and Retention of Brown Rudnick LLP as Co-Counsel for the Official Committee of Unsecured Creditors of Vanderbilt Minerals, LLC, Nunc Pro Tunc to March 5, 2026* (the "Application").[2] In support of the Application, the Committee relies upon the Castaldi Declaration, which is attached to the Application as **Exhibit B**.

[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 used and not otherwise defined herein have the meanings ascribed to them in the Application.

3. A number of prospective law firms were considered by the Committee at meetings on March 5, 2026, as potential legal counsel to the Committee. The Committee considered the materials provided as well as information and/or presentations provided by several of those firms prior to selecting Brown Rudnick LLP ("Brown Rudnick") and Caplin & Drysdale, Chartered ("Caplin & Drysdale") as its attorneys.

4. The Committee selected Brown Rudnick because of Brown Rudnick's extensive general legal experience and knowledge, and its substantial experience in representing official committees of creditors and recognized expertise in the field of creditors' rights and business reorganization under chapter 11 of the Bankruptcy Code. I understand that Brown Rudnick's expertise includes representing official creditors' committees in large and complex bankruptcy cases, as set forth in the Application and Castaldi Declaration.

5. I understand that since the Committee's appointment, Brown Rudnick is familiar with the Committee, its goals, the Debtor, and many of the potential legal issues that may arise in the context of this Chapter 11 Case. For these reasons, the Committee believes that Brown Rudnick is well-qualified and uniquely able to represent the Committee in this Case in an efficient and timely manner.

6. The members of the Committee reviewed Brown Rudnick's standard rates for bankruptcy services, as set forth in the Application. Based upon representations made to the Committee by Brown Rudnick, I understand that those rates are generally consistent with Brown Rudnick's rates for comparable non-bankruptcy engagements and the billing rates and terms of other comparably skilled firms for providing similar services. Based on this, the representations of Brown Rudnick, and the experience of the Committee members' individual counsel in both the

bankruptcy field and in other fields in which the Debtor operate, the Committee believes these rates are reasonable.

7. The Committee will review all applications for compensation submitted by Brown Rudnick to ensure that Brown Rudnick's fees and costs are consistent with budget, appropriate in scope and amount, and that there has been no duplication with the Committee's other professionals.

8. The facts set forth in this Declaration are based upon my personal knowledge, my review of the relevant documents, information provided to me or verified by Committee counsel, and my personal opinion based upon my experience, knowledge, and information provided to me. I am authorized to submit this Declaration on behalf of the Committee, and if called upon to testify, I would testify competently to the facts set forth herein.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States, that the foregoing statements are true and correct.

Dated: April 2, 2026

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS

/s/ Linda Weaver

Linda Weaver, solely in her capacity as Chairperson of the Official Committee of Unsecured Creditors of Vanderbilt Minerals, LLC, and not in her personal capacity