Docket #0449 Date Filed: 04/22/2026

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

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|---|---|
| In re: | Chapter 11 |
| VANDERBILT MINERALS, LLC, | Case No. 26-60110 (WAK) |
| Debtor.[1] | (Jointly Administered) |

**APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT OF PROVINCE, LLC AS FINANCIAL ADVISOR, CLAIMS ESTIMATION ADVISOR, AND SALES PROCESS ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF MARCH 7, 2026**

The Official Committee of Unsecured Creditors (the "Committee") of the above-captioned debtor and debtor-in-possession (the "Debtor") hereby files this application (the "Application") for entry of an order, substantially in the form attached hereto as **Exhibit A**, pursuant to sections 328(a) 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 Rule 2014-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Northern District of New York (the "Local Rules") authorizing and approving the employment of Province, LLC ("Province") as financial advisor, claims estimation advisor, and sales process advisor to the Committee in connection with the Debtor's chapter 11 case, effective as of March 8, 2026. In support of the Application, the Committee also files the *Declaration of Michael Atkinson* (the "Atkinson Declaration"), attached hereto as **Exhibit B** and incorporated herein by reference. In support of the Application, the Committee respectfully represents as follows:

[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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## JURISDICTION AND VENUE

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

2. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are sections 327(a), 328(a), and 1103(a) of the Bankruptcy Code, rule 2014 of the Bankruptcy Rules, and rule 2014-1 of the Local Rules.

## BACKGROUND

4. On February 16, 2026 (the "Petition Date"), the Debtor filed their voluntary petition with this Court under chapter 11 of the Bankruptcy Code. The Debtor is operating their businesses and managing their properties as debtor-in-possession pursuant to sections 1107(a) and 1108(a) of the Bankruptcy Code. No trustee or examiner has been appointed in this chapter 11 case.

5. On March 3, 2026, the Office of the United States Trustee (the "U.S. Trustee") for Region 2 appointed the Committee, consisting of the following seven (7) members: (i) Kathleen Dole; (ii) Charles Kamprad; (iii) Frank Richard Kurzynske; (iv) Heather Colding, Estate of Rebecca Sherman; (v) Donna Franklin, Special Administrator for the Estate of Phillip Franklin; (vi) Lisa Miller, Administrator of the Estate of Joseph E. Okolish; and (vii) Linda Weaver, Executor of the Estate of Anna Bishop [ECF No. 111].

6. On March 7, 2026, the Committee selected Province as its proposed financial advisor, claims estimation advisor, and sales process advisor.

## RELIEF REQUESTED

7. By this Application, the Committee respectfully requests that the Court enter an order, substantially in the form annexed hereto as **Exhibit A**, pursuant to sections 328(a) and

1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, authorizing the Committee to employ and retain Province as its financial advisor, claims estimation advisor, and sales process advisor in this chapter 11 case. The Committee selected Province in furtherance of the efficient administration of the estate on behalf of the Committee. The Committee seeks to retain Province effective as of March 7, 2026, the date that Province began providing services to the Committee. The Committee believes that such retention is appropriate in this chapter 11 case because the Committee required Province's assistance prior to such time as a retention application could be submitted to the Court due to the exigencies of this case.

8. In support of this Application, the Committee submits the Declaration of Michael Atkinson (the "Atkinson Declaration"), attached hereto as **Exhibit B**.

## PROVINCE QUALIFICATIONS

9. Province has extensive experience representing official creditors' committees, debtors, creditors, trustees, and others in a wide variety of bankruptcy cases, including, as (i) financial advisor to the official committees of unsecured creditors of A.B.C. Carpet, AgileThought, Alex and Ani, American Signature, American Tire, Armstrong Flooring, Aruze Gaming, Ascena Group, Avadim Health, Avon Products, Barretts Minerals, Benitago, BL Restaurants Holding, Boundless Broadband, Carbonlite Holdings, Carbon Health, CarePoint Health, Cherry Man Industries, Claire's Holdings, Conn's, Inc., Cyprus Mines, David's Bridal, DCL Holdings (USA), Del Monte, Desktop Metal, Destination Maternity, DirectBuy Home Improvement, Eastern Outfitters, EHT US1 (Eagle Hospitality), Endo International, Exactech, Express, Forever 21, Francesca's Holding Corporation, Groff Tractor, Harvest Sherwood, Honx, Hooters of America, Insys Therapeutics, Independent Pet Partners, Invacare, J Crew, Kal Freight, LifeScan Global, Lucky's Market, L'Occitane, LifeScan Global, Lumio Holdings, Mallinckrodt, Meyer Burger, Mosaic Companies, Mountain Express Oil Company, Nielsen & Bainbridge (NBD Home),

Neopharma, Noble House, Norcold, One Web, Papyrus, Path Medical, Pier 1, PBS Brand Co. (Punch Bowl), Pine Gate Renewables, PosiGen, Purdue Pharma, Prime Core Technologies, Prospect Medical, Restoration Forest Products Group, LLC, Reverse Mortgage, Revlon, Salt Life, Sientra, SiO2 Medical Products, South Hills Operations, Spicey Partners Real Estate Holdings, LLC, STG Logistics, Stimwave Technologies, Surgalign, TECT Aerospace Group, The Rockport Company, True Religion Apparel, True Value, Tuesday Morning, US Magnesium, Virgin Orbit, Water Gremlin, Wesco Aircraft, White Stallion Energy, Whittaker, Clark & Daniels, and Winsor Terrace; (ii) financial advisor to the debtors 4E Brands, Basic Energy Services, Cherry Man Industries, Cinemex Holdings USA, Codiak BioSciences, Coin Cloud, Frontsight Management, Penthouse Global Media, Rhodium Encore, Superior Linen, True Religion Apparel, WeWork, Woodbridge Group of Companies, and Zynex; and (iii) trustee or trustee advisor in Aegean Marine Petroleum, Advance Watch, American Apparel, Aruze Gaming, Borden Dairy, CS Mining, Cycle Force, DCL, EBH Topco, Eclipse Berry Farms, Energy & Exploration (ENXP), Fieldwood, Gump's, Invacare, La Paloma Generating Company, Limetree Bay Services, Invacare, LifeScan Global, Mallinckrodt, Maxus Energy, Norcold, Neogenix, PBS Brand Co. (Punch Bowl), Promise Healthcare Group, Proterra, RadioShack Corporation, RMIT (Reverse Mortgage), Samson Resources, SiO2, Stimwave Technologies, and Vesta Holdings, among others.

**SCOPE OF EMPLOYMENT**

10. Subject to further order of this Court, the services Province has rendered and may be required to render for the Committee, include without limitation, the following:

a. becoming familiar with and analyzing the Debtor's DIP/Cash Collateral budget, assets and liabilities, and overall financial condition;
b. reviewing financial and operational information furnished by the Debtor;
c. monitoring the sale process, interfacing with the Debtor's professionals, and advising the Committee regarding the sale process;

d. identifying and evaluating potential debtor-in-possession financing sources, conducting preliminary vetting and assessment of such parties, and, where appropriate, facilitate introductions between the suitable parties and the Debtors;

e. identifying and evaluating potential purchasers in connection with any sale, conducting preliminary vetting and assessment of such parties, and, where appropriate, facilitate introductions between the suitable parties and the Debtors;

f. scrutinizing the economic terms of various agreements, including, but not limited to, various professional retentions;

g. analyzing the Debtor's proposed business plans and developing alternative scenarios, if necessary;

h. assessing the Debtor's various pleadings and proposed treatment of unsecured creditor claims therefrom;

i. preparing, or reviewing as applicable, avoidance action and claim analyses;

j. assisting the Committee in reviewing the Debtor's financial reports, including, but not limited to, statements of financial affairs, schedules of assets and liabilities, DIP/Cash Collateral budgets, and monthly operating reports;

k. advising the Committee on the current state of this chapter 11 case;

l. advising the Committee in negotiations with the Debtor and third parties as necessary;

m. estimating the quantity and value of present and future personal injury claims related to the Debtors' talc-, asbestos-, and other chemical compound related liabilities;

n. developing claims procedures and financial models of payments and assets to be used in the development of a claims resolution trust;

o. analyzing and responding to issues relating to draft trust distribution procedures;

p. assisting the Committee's investigation of the acts, conduct, assets, liabilities and financial condition of the Debtors and their affiliates, including certain transactions preceding the bankruptcy filing and the formation of the Debtors;

q. analyzing and valuing claims against the Debtors and non-Debtor affiliates;

r. assisting and advising the Committee and counsel regarding the identification and prosecution of estate claims, including in connection with any issues regarding the filing of the Case and the propriety of the filing;

s. assisting and advising the Committee in its review and analysis of, and negotiations with the Debtors and non-Debtor affiliates related to, intercompany transactions and claims;

t. preparing, or reviewing as applicable, avoidance action and claim analyses;

u. evaluating and analyzing any proposed proofs of claims, bar dates, notice procedures, discovery and other information and sources of information

obtained in the bankruptcy case, and analyzing data from proofs of claim and other information and forms concerning claims against the Debtors;

v. analyzing insurance coverage and related issues;

w. if necessary, participating as a witness in hearings before the Court with respect to matters upon which Province has provided advice; and

x. other activities as are approved by the Committee, the Committee's counsel, and as agreed to by Province.

**NO ADVERSE INTEREST OF PROFESSIONALS**

11. To the best of the Committee's knowledge and based upon the Atkinson Declaration attached hereto, neither Province nor any of its employees have any connection with any party in interest, their attorneys or accountants, other than as set forth in the Atkinson Declaration.

12. To the best of the Committee's knowledge, except as provided in the Atkinson Declaration, neither Province, nor any of its employees represent any interest adverse to that of the Committee in the matters on which they are to be retained.

13. While Province has undertaken, and continues to undertake, efforts to identify connections with the Debtor and other parties-in-interest, it is possible that connections with some parties-in-interest have not yet been identified. Should Province, through its continuing efforts, learn of any new connections of the nature described above, Province will promptly file supplemental declarations, as required by Bankruptcy Rule 2014(a).

14. Province represents many debtors, trustees, and committees in other bankruptcy cases, and the debtors, the members of those committees, or those estates may be creditors of the Debtor. However, Province will not represent those debtors, committees, or estates with respect to any claims that they may collectively or individually have against the Debtor.

**PROFESSIONAL COMPENSATION**

15. The Committee desires to employ Province and to have Province compensated with reasonable fees to be determined by the Court. No compensation will be paid to Province except upon compliance with the Bankruptcy Code, Bankruptcy Rules, Local Rules, and any other applicable procedures and orders of this Court. Province has received no retainer in this case to represent the Committee. Neither the Committee nor any of its members (or their representatives) are or will be liable for any fees or costs incurred by Province in its representation of the Committee. Province's current standard hourly rates are:

| **Professional Level** | **Per Hour (USD)** |
|---|---|
| Managing Directors and Partners | $900-$1,600 |
| Vice Presidents, Directors, and Senior Directors | $700-$1,050 |
| Analysts, Associates, and Senior Associates | $370-$750 |
| Paraprofessional/Admin /Interns | $270-$380 |

16. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Province intends to provide notice to the Debtor, the Committee, and the U.S. Trustee before implementing any increases in Province's rates for professionals working on this chapter 11 case.

17. In addition, Province will bill for all out-of-pocket expenses reasonably and actually incurred by Province in connection with the matters contemplated by this Application.

## NOTICE

18. Notice of the Application will be given to the following parties or their counsel: (i) the Debtor; (ii) the Office of the U.S. Trustee for the Northern District of New York; and (iii) any party that requests service pursuant to Bankruptcy Rule 2002. The Committee submits that, in light of the nature of the relief requested and the circumstances surrounding the this chapter 11 case, no other or further notice is required or necessary.

## NO PRIOR REQUEST

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

**WHEREFORE**, the Committee requests that the Court enter the order (the "Order") annexed hereto as **Exhibit A**, (i) approving the retention and employment of Province as its financial advisor, claims estimation advisor, and sales process advisor, effective as March 7, 2026, to render services as described above with compensation to be paid as an administrative expense in such amounts as this Court may hereafter determine and allow; and (ii) granting the Committee such other and further relief as the Court deems just and proper.

Dated: April 22, 2026

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF VANDERBILT MINERALS, LLC.

By: */s/ Linda Weaver*
Linda Weaver, solely in her capacity as the Chair 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, | Case No. 26-60110 (WAK) |
| Debtor.[1] | (Jointly Administered) |

**ORDER APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT OF PROVINCE, LLC AS FINANCIAL ADVISOR, CLAIMS ESTIMATION ADVISOR, AND SALES PROCESS ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF MARCH 7, 2026**

This matter came before the Court on the *Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor, Claims Estimation Advisor, and Sales Process Advisor to the Official Committee of Unsecured Creditors Effective as of March 7, 2026* (the "Application")[2] and the *Declaration of Michael Atkinson* filed in support of the Application (the "Atkinson Declaration") both filed by the Official Committee of Unsecured Creditors (the "Committee") of the above-captioned debtor and debtor-in-possession, pursuant to sections 328(a) 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 Rule 2014-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Northern District of New York (the "Local Rules") for an order authorizing and approving the retention and employment of Province, LLC ("Province") as financial advisor, claims estimation advisor, and sales process advisor for the Committee in this chapter 11 case; and the Court having jurisdiction to consider the Application and the relief requested therein in accordance with

[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.

28 U.S.C. § 1334; and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided, and it appearing that no other or further notice need be provided; and it appearing to the Court that the said Application should be approved, it is, therefore, ORDERED that:

1. The Application is granted as set forth herein.

2. Pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, the Committee is authorized to employ and retain Province as financial advisor, claims estimation advisor, and sales process advisor to the Committee effective as of March 7, 2026.

3. Province shall apply for compensation for professional services rendered and reimbursement of expenses reasonably and actually incurred in connection with the Debtor's case as set forth in the Application and in compliance with sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, the Local Rules, and any other applicable procedures and orders of this Court.

4. Notwithstanding anything to the contrary in the Application or the Atkinson Declaration, Province shall not seek reimbursement of any fees or costs arising from the defense of any of Province's fee applications in this chapter 11 case.

5. Notwithstanding anything in the Application to the contrary, Province shall (i) to the extent that it uses the services of independent contractors or subcontractors (collectively, the "Contractors") in this case, pass through the cost of such Contractors at the same rate that Province pays the Contractors; (ii) seek reimbursement for actual costs only; (iii) ensure that the Contractors

are subject to the same conflicts checks as required for Province; and (iv) file with this Court such disclosures required by Bankruptcy Rule 2014.

6. Province shall provide ten (10) business days' notice shall be provided by Province to the Debtor, the United States Trustee and the Committee prior to any increases in the rates set forth in the Application, and such notice must be filed with the Court. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

7. The Committee and Province are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

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

**EXHIBIT B**

**Declaration of Michael Atkinson**

**IN THE 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] | (Jointly Administered) |

**DECLARATION OF MICHAEL ATKINSON IN SUPPORT OF APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT OF PROVINCE, LLC AS FINANCIAL ADVISOR, CLAIMS ESTIMATION ADVISOR, AND SALES PROCESS ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF MARCH 7, 2026**

I, Michael Atkinson, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and pursuant to Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure and Rule 2014-1 of the Local Rules as follows:

1. I am a Partner with Province, LLC, which is a financial advisory firm with its principal office located at 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074. I am authorized to submit this declaration (the "Declaration") in support of the *Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor, Claims Estimation Advisor, and Sales Process Advisor to the Official Committee of Unsecured Creditors Effective as of March 7, 2026* (the "Application").

2. Province, LLC's corporate structure, including its subsidiaries, is as follows: Province, LLC is a Delaware limited liability company, and Province, LLC's only two subsidiaries, which are wholly owned, are Province Fiduciary Services, LLC, a Nevada limited

[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.

liability company, and O'Keefe & Associates Consulting, LLC, a Michigan limited liability company (collectively "Province"). All of Province, LLC's conflicts checks and related disclosures include any connections of Province's subsidiaries.

3. Neither I, Province, nor any employee thereof, insofar as I have been able to ascertain, has any connection with the Debtor, their creditors, or any other parties in interest herein, or their respective attorneys and accountants, the U.S. Trustee, or any person employed in the office of the U.S. Trustee, except as set forth herein.

4. This Declaration is submitted pursuant to sections 328 and 1103 of Title 11 of the United States Code (the "Bankruptcy Code"), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rules 2014-1 and 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Northern District of New York (the "Local Rules") in support of the Application for the entry of an order approving the retention of Province as financial advisor, claims estimation advisor, and sales process advisor to the Committee, effective March 7, 2026.

5. In connection with its proposed retention by the Committee in this chapter 11 case and in preparing this Declaration, Province used a set of procedures developed to ensure compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules regarding the retention of professionals (the "Retention Procedures"). Pursuant to the Retention Procedures, and under my direction and supervision, Province researched its client connections database, which includes all engagements that concluded within the past twenty-four (24) months, to determine whether it has relationships with any of the entities that were identified to Province as creditors or parties-in-interest in this chapter 11 case (the "Entity List") a copy which is attached hereto as **Schedule 1**. To the extent such a search indicated that Province has a

relationship with any of the entities on the Entity List, the identities of such entities and Province's relationship with such entities is disclosed in the attached **Schedule 2**.

6. Province sent an email questionnaire to each employee inquiring as to whether each employee or any member(s) of his or her household:

i. owns any debt or equity securities of the Debtor or their non-debtor affiliates;

ii. holds a claim against or interest adverse to the Debtor or their non-debtor affiliates;

iii. is or was an officer, director, or employee of the Debtor or their non-debtor affiliates;

iv. is related to or has any connections to any Bankruptcy Judge in the United States Bankruptcy Court for the Northern District of New York;

v. is related to or has any connections to anyone working in the Office of the United States Trustee for the Northern District of New York;

vi. was an officer, director or employee of the Debtor within two years prior to the Petition Date; or

vii. has a connection with a party in interest listed on the Entity List.

7. Province received no employee responses indicating a connection to any of the parties listed on the Entity List.

8. Based on the result of the foregoing searches and employee questionnaire and except as may have been expressly disclosed herein, I have been able to ascertain after diligent inquiry that to the best of my knowledge, Province (i) does not represent any entity having an adverse interest in connection with this chapter 11 case and (ii) does not represent or hold an interest adverse to the interest of the Debtor or their estate with respect to the matters on which Province is to be employed. Moreover, Province and its subsidiaries are disinterested within the meaning of section 101(14) of the Bankruptcy Code, in that neither I, Province, any Province

subsidiary, nor any of their principals, employees (including those working on this engagement) or associates:

a. are creditors, equity security holders or insiders of the Debtor;

b. are or were within two years before the Petition Date, a director, officer or employee of the Debtor;

c. have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with or interest in the Debtor or for any other reason; or

d. hold any debt or equity securities of the Debtor.

9. As a part of Province's financial advisory practice, Province's clientele includes: debtors, creditors and other statutory committees, institutional creditors, asset purchasers, venture capitalists, secured parties, lessors, contract parties, equity holders, directors and officers, court-appointed fiduciaries, plan sponsors, indenture trustees, and bond insurers. The Debtor has numerous creditors and other parties-in-interest. Province may have in the past represented, and may presently or in the future represent or be deemed adverse to, creditors or parties-in-interest in addition to those specifically disclosed in **Schedule 2** in matters unrelated to this chapter 11 case. Province believes that its representation of such creditors or other parties in such other matters has not affected and will not affect its representation of the Committee in these proceedings.

10. Except as otherwise set forth herein and in **Schedule 2**, insofar as I have been able to ascertain, the principals, associates and staff members of Province do not have any connection with the Debtor, the Debtor's officers and directors, the Debtor's creditors, the Debtor's equity security holders and other known parties-in-interests or their respective professionals.

11. To the best of my knowledge, information and belief formed after reasonable inquiry, neither I, nor any principal, associate or staff member of Province, insofar as I have been

able to ascertain, is related to the bankruptcy judge assigned to the above-captioned chapter 11 case.

12. To the best of my knowledge, information and belief formed after reasonable inquiry, neither I, nor any principal, associate or staff member of Province, insofar as I have been able to ascertain, has a connection to the United States Trustee or any person employed in the office of the United States Trustee.

13. Despite the substantial efforts described above to identify and disclose potential conflicts and connections with parties-in-interest in this case, neither I nor Province is able to conclusively identify all potential relationships or state with absolute certainty that every client representation or other connection of Province has been disclosed. To the extent Province discovers any facts or additional information during the period of Province's retention that requires disclosure, Province will supplement this Declaration to disclose such information.

14. Province has neither received any retainer nor any payment from the Debtor nor the Committee, nor has it received any promise of payment, during the one-year period prior to the filing of the Debtor's petition. No compensation has been paid or promised to be paid from a source other than the Debtor's estate in this chapter 11 case. No promises have been received by Province nor by any advisors or attorneys thereof as to compensation in connection with this chapter 11 case other than in accordance with the provisions of the Bankruptcy Code. Province has no agreement with any other entity to share with such entity any compensation received by Province in connection with this chapter 11 case, except among employees of Province. Neither the Committee nor its members (or any of their representatives) are or will be liable for fees or costs incurred by Province in its representation of the Committee.

15. Province intends to apply for compensation for professional services rendered in connection with this chapter 11 case subject to approval of this Court as stated in the Application, and in compliance with applicable provisions of the Bankruptcy Code, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by Province.

16. Province's current standard hourly rates are:

| **Professional Level** | **Per Hour (USD)** |
|---|---|
| Managing Directors and Partners | $900-$1,600 |
| Vice Presidents, Directors, and Senior Directors | $700-$1,050 |
| Analysts, Associates, and Senior Associates | $370-$750 |
| Paraprofessional/Admin /Interns | $270-$380 |

17. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Province intends to provide notice to the Debtor, the Committee, and the U.S. Trustee before implementing any increases in Province's rates for professionals working on this chapter 11 case.

18. In addition to the fees described above, Province will bill for all out-of-pocket expenses reasonably and actually incurred by Province in connection with the matters contemplated by this Application.

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

Dated: April 22, 2026

By: */s/ Michael Atkinson*
Michael Atkinson
Partner

**Schedule 1**

**Entity List**

**Schedule 2**

**Identified Connections**

| Party | Connection Role |
|---|---|
| AMCOL International | Non-Debtor Affiliate in Unrelated Cases |
| Bailey Cowan Heckaman, PLLC | Professionals |
| Belluck Law, LLP | Current Committee Member in Unrelated Case |
| Gordon & Rees, LLP | Professionals |
| Jones Day | Professionals |
| Karst & Von Oiste, LLP | Professionals |
| Katten Muchin Rosenman LLP | Professionals |
| Kazan, McClain, Satterley & Greenwood PLC | Professionals |
| Kurtzman Carson Consultants, LLC dba Verita Global | Professionals |
| Levy Konigsberg LLP | Professionals |
| Maune Raichle Hartley French & Mudd, LLC | Professional and current Committee Member in Unrelated Cases |
| Meirowitz & Wasserberg, LLP | Professionals |
| Minerals Technologies, Inc. | Non-Debtor Affiliate in Unrelated Cases |
| National Union Fire Insurance Co. | Adverse Party in Unrelated Cases |
| Pension Benefit Guaranty Corp. | Current/Former Committee Member in Unrelated Cases |
| Simmons Hanly Conroy LLC | Professional and current Committee Member in Unrelated Cases |
| Simon Greenstone Panatier, PC | Professionals |
| Sunbelt Rentals, Inc. | Former Committee Member in Unrelated Closed Case |
| SWMW Law, LLC | Professionals |
| The Sherwin-Williams Company | Adverse Party and former Committee Member in Unrelated Closed Cases |
| United Steelworkers | Former Committee Member in Unrelated Closed Case |
| Verizon | Equity Holder in Unrelated Closed Case |
| Weitz & Luxenberg, PC | Professionals |