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April 30, 2026

VIA ELECTRONIC FILING

Honorable Wendy A. Kinsella
United States Bankruptcy Court
Northern District of New York
100 South Clinton Street
Syracuse, New York 13202

Re: *Vanderbilt Minerals, LLC; Chapter 11 Case No. 26-60110*

Dear Judge Kinsella:

As the Court is aware, my firm is co-counsel to Vanderbilt Minerals, LLC (the "Debtor"), debtor in the above-captioned chapter 11 case (the "Case"). With the consent of the Official Committee of Unsecured Creditors (the "Committee"), Commodore Materials Funding, LLC (the "DIP Lender") and the Office of the United States Trustee, the Debtor hereby requests an adjournment of the hearings set for May 4, 2026, as follows:

1. the final hearing concerning the *Motion of the Debtor and Debtor in Possession Pursuant to Sections 105, 362, 363, 503, 507 and 552 of the Bankruptcy Code, Bankruptcy Rules 2002, 4001, 6004 and 9014 and Local Rules 2002-1, 4001-2 and 9013-1 for Interim and Final Orders (i) Authorizing the Debtor to Obtain Postpetition Financing, (ii) Granting Liens and Providing Superpriority Administrative Expense Status, (iii) Modifying the Automatic Stay, (iv) Scheduling a Final Hearing and (v) Granting Related Relief)* [Docket No. 17] (the "DIP Motion") is to be adjourned to May 7, 2026 at 10:00 a.m. to be heard contemporaneously with the sale hearing in this Case. The DIP Lender has consented to modify the milestone requiring entry of the final order concerning the DIP Motion, moving it from May 5, 2026, to May 8, 2026; and

2. the *Motion of the Official Committee of Unsecured Creditors to Dismiss the Chapter 11 Case Pursuant to 11 U.S.C. § 1112(b)*(the "Motion to Dismiss") [Docket No. 147] is to be adjourned to a date selected by the Court which is approximately sixty (60) days from its current hearing date, subject to further adjournment upon consent; provided, however that the Committee reserves the right to make an application to the Court on notice to all parties for the Court set a hearing at a different date and time (an "Alternative Hearing Date"). The parties shall be provided with not less than twenty-eight (28) days' notice of any Alternative Hearing Date.

If acceptable to the Court, I respectfully request that the Court reflect the above adjournments through an appropriate order or entry on the docket in the Case. I appreciate the Court's time and consideration of the above requests.

Respectfully yours,

BOND, SCHOENECK & KING, PLLC



Charles J. Sullivan

CJS/ta

cc: All Parties via ECF