Docket #0684 Date Filed: 05/27/2026

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

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

NOTICE OF DEBTOR'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO SECTIONS 105(a), 363(b) AND 363(c) OF THE BANKRUPTCY CODE (I) AUTHORIZING THE DEBTOR TO DISPOSE OF CERTAIN VALUELESS ASSETS WITHOUT FURTHER COURT APPROVAL AND (II) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE, that on May 27, 2026, the above-captioned debtor and debtor in possession (the "Debtor"), by and through its undersigned counsel, filed with the United States Bankruptcy Court for the Northern District of New York (the "Court") the *Debtor's Motion for Entry of an Order Pursuant to Sections 105(a), 363(b) and 363(c) of the Bankruptcy Code (I) Authorizing the Debtor to Dispose of Certain Valueless Assets Without Further Court Approval and (II) Granting Related Relief* (the "Motion").

PLEASE TAKE FURTHER NOTICE, that a hearing to consider entry of the Motion will be held before the Honorable Wendy A. Kinsella, Chief United States Bankruptcy Judge for the Northern District of New York on **June 17 at 3:00 p.m. (prevailing Eastern time)** (the "Hearing"), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE, that parties may appear at the Hearing in person at the United States Bankruptcy Court for the Northern District of New York, James M. Hanley U.S. Courthouse and Federal Building, 100 South Clinton Street, Syracuse, New York 13216, or

[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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by video via Teams, for which pre-registration is required by 3:00 p.m. the day before the Hearing. Go to https://www.nynb.uscourts.gov/Remote-Hearing-Appearances to register.

PLEASE TAKE FURTHER NOTICE, that objections to the entry of the Motion, if any, must be in writing and shall be filed and served no later than **June 10, 2026**, upon (i) co-counsel for the Debtor, Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202 (Attn: Charles J. Sullivan, Esq., Grayson T. Walter, Esq., and Andrew S. Rivera, Esq.), and proposed co-counsel Latham & Watkins LLP, 1271 Avenue of the Americas, New York, NY 10020 (Attn: Ray C. Schrock, Esq. and George A. Davis, Esq.), and 10250 Constellation Blvd., Suite 1100, Los Angeles, CA 90067 (Attn: Jeffrey E. Bjork, Esq. and Kimberly A. Posin, Esq.); (ii) counsel for the Riverspan DIP Lender, Milbank, LLP, 55 Hudson Yards, New York, NY 10001-2163 (Attn: Evan Fleck, Esq.); (iii) the Office of the United States Trustee for the Northern District of New York, 100 State St., Suite 4230, Rochester, NY 14614 (Attn: Erin P. Champion, Esq.); and (iv) co-counsel to the Official Committee of Unsecured Creditors, Brown Rudnick LLP, 7 Times Square, New York, NY 10036 (Attn: David Molton, Esq., Jeffrey Jonas, Esq., and Eric Goodman, Esq.) and Caplin & Drysdale, Chartered, 1200 New Hampshire Avenue NW, 8th Floor, Washington, DC 20036 (Attn: Kevin Maclay, Esq., Kevin Davis, Esq., and Todd Phillips, Esq.).

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Dated: May 27, 2026
Syracuse, New York

Respectfully submitted,

/s/ Charles J. Sullivan

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