Docket #0794 Date Filed: 07/08/2026

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 SECOND MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING THE PERIOD WITHIN WHICH THE DEBTOR MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND RULE 9027 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

PLEASE TAKE NOTICE, that the above-captioned debtor and debtor in possession (the "Debtor"), by and through its undersigned counsel, has filed with the United States Bankruptcy Court for the Northern District of New York (the "Court") the *Debtor's Second Motion for Entry of an Order Further Extending the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure* (the "Motion").

PLEASE TAKE FURTHER NOTICE, that a hearing to consider entry of an order granting the relief requested in the Motion will be held before the Honorable Wendy A. Kinsella, Chief United States Bankruptcy Judge for the Northern District of New York on **July 29, 2026 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 relief requested in the Motion, if any, must be in writing and shall be filed and served no later than **July 22, 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 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) 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 (iii) 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: July 8, 2026
Syracuse, New York

Respectfully submitted,

/s/ Charles J. Sullivan

BOND, SCHOENECK & KING, PLLC
Charles J. Sullivan, Esq., Bar Roll No. 507717
Grayson T. Walter, Esq., Bar Roll No. 518237
Andrew S. Rivera, Esq., Bar Roll No. 700712
One Lincoln Center
Syracuse, NY 13202-1355
Telephone: (315) 218-8000
Facsimile: (315) 218-8100
Emails: csullivan@bsk.com
gwalter@bsk.com
arivera@bsk.com

-and-

LATHAM & WATKINS LLP
Ray C. Schrock (admitted *pro hac vice*)
George A. Davis (admitted *pro hac vice*)
Jamie L. Wine (admitted *pro hac vice*)
Anupama Yerramalli (admitted *pro hac vice*)
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
Emails: ray.schrock@lw.com
george.davis@lw.com
jamie.wine@lw.com
anu.yerramalli@lw.com

-and-

Jeffrey E. Bjork (admitted *pro hac vice*)
Kimberly A. Posin (admitted *pro hac vice*)
10250 Constellation Blvd., Suite 1100
Los Angeles, CA 90067
Telephone: (424) 653-5500
Facsimile: (424) 653-5501
Emails: jeff.bjork@lw.com
kim.posin@lw.com

Counsel for the Debtor and Debtor in Possession