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September 9, 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 Chief Judge Kinsella:

As the Court is aware, my firm is co-counsel to Vanderbilt Minerals, LLC (the "Debtor"). The Debtor writes to advise the Court that the Debtor and the Official Committee of Unsecured Creditors (the "Committee") have been engaged in productive discussions regarding certain modifications to the *Chapter 11 Plan of Liquidation of Vanderbilt Minerals, LLC* [Docket No. 857] (the "Plan") and the *Disclosure Statement for Chapter 11 Plan of Liquidation of Vanderbilt Minerals, LLC* [Docket No. 858] (the "Disclosure Statement") to address various concerns raised by the Committee. The Debtor intends to file an amended plan and disclosure statement reflecting these modifications in the very near future.

As a result of these forthcoming modifications, the Debtor has determined not to seek entry of an order approving the Disclosure Statement at the upcoming hearing scheduled for September 14, 2026 at 11:00 a.m. (prevailing Eastern time). Instead, should it please the Court, the Debtor proposes to use the September 14 hearing as a status conference to advise the Court and other parties in interest regarding the progress of Plan negotiations between the Debtor and the Committee, and to address confirmation scheduling issues raised by certain insurers in recently-filed objections to the *Motion of Debtor for Entry of an Order (I) Approving Proposed Disclosure Statement and the Form and Manner of Notice of Hearing Thereof, (II) Establishing Solicitation and Voting Procedures with Respect to Debtor's Proposed Chapter 11 Plan, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Debtor's Proposed Chapter 11 Plan, and (V) Granting Related Relief* [Docket No. 859] (the "Solicitation Procedures Motion").[1] The Debtor further intends to request an adjournment of the hearing on the Solicitation Procedures Motion to September 29, 2026, or such other date as the Court may be available.

[1] To conserve estate resources, counsel for the Debtor intends to appear remotely via the Court's Teams platform.

Respectfully yours,

BOND, SCHOENECK & KING, PLLC



Charles J. Sullivan

CJS/ta

cc: All Parties via ECF