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September 14, 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"). In response to the Court's request at this morning's status conference, the Debtor proposes the following schedule in advance of the Court's consideration of the adequacy of the *Disclosure Statement for Chapter 11 Plan of Liquidation of Vanderbilt Minerals, LLC* [Docket No. 858] (the "Disclosure Statement") and related relief requested in 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"):

Date	Event
September 15, 2026	Debtor to file amended Plan and Disclosure Statement
September 18, 2026	Debtor to file revised Disclosure Statement Order (with revised confirmation schedule)
September 21, 2026	Deadline to file (i) objections for the Office of the United States Trustee and the Debtor's non-debtor affiliates and (ii) supplemental objections limited to amendments for all others
September 24, 2026	Deadline for Debtor to file reply
September 25, 2026	Debtor to file Trust Distribution Procedures
September 29, 2026	Disclosure Statement Hearing

In further response to the Court's request, and by way of example and not limitation, the Debtor submits the following examples of mass tort cases where bankruptcy courts have approved a disclosure statement prior to the filing of trust distribution procedures:

(i) *In re Yarway Corp.*, Case No. 13-11025 (BLS) (Bankr. D. Del. March 18, 2015) [Docket No. 827-1] (TDP filed after the disclosure statement was approved and 2 days before the voting deadline)

(ii) *In re Specialty Prods. Holding Corp.*, Case No. 10-11780 (PJW) (Bankr. D. Del. Oct. 23, 2014) [Docket No. 5117-3] (TDP filed after the disclosure statement was approved and 40 days before the voting deadline)

(iii) *In re TK Holdings Inc.*, Case No. 17-11375 (BLS) (Bankr. D. Del. Jan. 23, 2018) [Docket No. 1789-14] (TDP filed after the disclosure statement was approved and 14 days before the voting deadline)

(iv) *In re United Gilsonite Labs*, Case No. 5:11-bk-02032 (RNO) (Bankr. M.D. Pa. Nov. 14, 2014) [Docket No. 2098-6] (TDP filed after the disclosure statement was approved and 7 days before the voting deadline)

Respectfully yours,

BOND, SCHOENECK & KING, PLLC



Charles J. Sullivan

CJS/ta

cc: All Parties via ECF