Docket #1046 Date Filed: 10/19/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

2026 OCT 19 AM 10: 05
CLERK OF THE BANKRUPTCY COURT N.D. OF NY SYRACUSE

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

MOTION FOR LIMITED ADMISSION – *PRO HAC VICE*

Kenneth E. Hildebrand ("***Applicant***") of Latham & Watkins LLP, hereby files this motion (this "***Motion***") for the entry of an order pursuant to Local Bankruptcy Rule 2014-2, substantially in the form attached hereto as Exhibit A, granting admission *pro hac vice* for the purpose of appearing as co-counsel to the above captioned debtor and debtor in possession, and to participate in this chapter 11 case and any adversary proceedings, other contested matters, or other proceedings arising herein (this "***Chapter 11 Case***").

1. The Applicant is not currently under suspension or subject to other disciplinary action with respect to the practice of law in any jurisdiction, and is admitted to practice and a member of good standing of the bar of the State of New York.

2. In further support of the Motion, Applicant submits the *Declaration of Kenneth E. Hildebrand in Support of Motion for Limited Admission – Pro Hac Vice* (the "***Declaration***"), attached hereto as Exhibit B.

[1] The Debtor is Syracuse Minerals, LLC (f/k/a Vanderbilt Minerals, LLC) (EIN 13-1432885). The Debtor's mailing address for purposes of this Chapter 11 Case is 33 Winfield Street, Norwalk, Connecticut 06855.

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3. As set forth in the attached Declaration, the Applicant is a member in good standing in the aforementioned jurisdiction(s) and is not subject to any pending disciplinary proceedings in any jurisdiction.

Dated: October 19, 2026

Respectfully submitted,

/s/ Kenneth E. Hildebrand

LATHAM & WATKINS LLP
Kenneth E. Hildebrand (*pro hac vice* requested)
1271 Avenue of the Americas
New York, New York 10020
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Email: kenny.hildebrand@lw.com

Co-Counsel to the Debtor and Debtor in Possession

Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

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

ORDER GRANTING ADMISSION TO PRACTICE *PRO HAC VICE*

Upon consideration of the motion (the "***Motion***") of Kenneth E. Hildebrand seeking admission *pro hac vice* for the purpose of appearing as co-counsel to the above captioned debtor and debtor in possession, and to participate in this chapter 11 case and any adversary proceedings, other contested matters, or other proceedings arising herein (this "***Chapter 11 Case***"), and the Court having jurisdiction to consider the Motion, and the relief requested therein, and upon the Motion

[1] The Debtor is Syracuse Minerals, LLC (f/k/a Vanderbilt Minerals, LLC) (EIN 13-1432885). The Debtor's mailing address for purposes of this Chapter 11 Case is 33 Winfield Street, Norwalk, Connecticut 06855.

and all of the proceedings had before the Court, and after due deliberation and sufficient cause appearing therefor, it is hereby:

ORDERED, that Kenneth E. Hildebrand is permitted to practice *pro hac vice* in the above-captioned cases as co-counsel to the debtor and debtor in possession in the Chapter 11 Case, provided that the filing fee has been paid.

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Exhibit B

Declaration

IN THE 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]	:	

DECLARATION OF KENNETH E. HILDEBRAND IN SUPPORT OF MOTION FOR LIMITED ADMISSION – *PRO HAC VICE*

1. I am an associate at the law firm of Latham & Watkins LLP, which maintains offices for the practice of law at, among others, 1271 Avenue of the Americas, New York, New York 10020.

2. I submit this Declaration in support of the *Motion for Limited Admission – Pro Hac Vice* filed contemporaneously herewith.

3. I certify that I am eligible for admission to this Court. I have been a member in good standing of the bar of the State of New York since 2021.

4. Attached hereto as Exhibit 1 is a Certificate of Good Standing issued on April 20, 2026, by the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department.

5. I have never been held in contempt of court, censured, suspended, or disbarred by any court and am not subject to any pending disciplinary proceedings in any jurisdiction. I also certify that I have never been convicted of a crime, either a felony or misdemeanor.

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[1] The Debtor is Syracuse Minerals, LLC (f/k/a Vanderbilt Minerals, LLC) (EIN 13-1432885). The Debtor's mailing address for purposes of this Chapter 11 Case is 33 Winfield Street, Norwalk, Connecticut 06855.

6. I certify that I am familiar with the provisions of the Judicial Code (Title 28 U.S.C.), which pertain to the jurisdiction of, and practice in, the United States Bankruptcy Courts; the Bankruptcy Code (title 11 U.S.C.); the Federal Rules of Bankruptcy Procedure; the Local Rules of the Bankruptcy Court for the Northern District of New York; and the New York Rules of Professional Conduct. I affirm faithful adherence to these rules and responsibilities.

7. I acknowledge that I shall be subject to the jurisdiction of the United States Bankruptcy Court for the Northern District of New York with respect to any acts occurring during the course of my participation in this matter.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury the foregoing is true and correct.

Dated: October 19, 2026

/s/ Kenneth E. Hildebrand
Kenneth E. Hildebrand

Exhibit 1

Certificate of Good Standing

Appellate Division of the Supreme Court
of the State of New York
Third Judicial Department

I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Kenneth Erwin John Hildebrand

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on ***August 26, 2021****, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

In Witness Whereof, I have hereunto set my hand in the City of Albany on April 20, 2026.

Robert D Mayberger

Clerk of the Court

CertID-00286252

State of New York
Supreme Court, Appellate Division
Third Judicial Department
Admissions Office
P.O. Box 7350, Capitol Station
Albany, NY 12224-0350

Robert D. Mayberger
Clerk of the Court

AD3AdmissionsOffice@nycourts.gov
http://www.nycourts.gov/ad3/admissions
(518) 471-4778

Anthony A. Moore
Director of Attorney Admissions

To Whom It May Concern:

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on the website of the Unified Court System.

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the Attorney Grievance Committee of the Third Judicial Department.

Bar examination history is available from the New York State Board of Law Examiners.

Instructions, forms and links are available on this Court's website.

Robert D Mayberger

Robert D. Mayberger
Clerk of the Court

Revised January 2022