Docket #1065 Date Filed: 10/21/2026

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:	Chapter 11
Vanderbilt Minerals, LLC,[1]	Case No. 26-60110 (WAK)
Debtor.	Related Dkt. No. 993

CERTIFICATE OF NO OBJECTION REGARDING THE FOURTH MONTHLY FEE STATEMENT OF KATTEN MUCHIN ROSENMAN LLP AS COUNSEL TO THE DEBTOR AT THE SOLE DIRECTION OF THE INDEPENDENT MANAGER AND SOLE MEMBER OF THE INDEPENDENT SPECIAL COMMITTEE OF THE DEBTOR, FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF JULY 1, 2026 THROUGH AND INCLUDING JULY 31, 2026

[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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1. On September 29, 2026, Katten Muchin Rosenman LLP ("Katten"), counsel for Debtor Vanderbilt Minerals, LLC ("Debtor"), at the sole direction of Ben Pickering in his capacity as Independent Manager (the "Independent Manager") and sole member of the Independent Special Committee of the Debtor in the above-captioned chapter 11 case (the "Chapter 11 Case"), filed the *Fourth Monthly Fee Statement of Katten Muchin Rosenman LLP as Counsel to the Debtor at the Sole Direction of the Independent Manager and Sole Member of the Independent Special Committee of the Debtor, for Compensation for Services Rendered and Reimbursement of Expenses for the Period From July 1, 2026 Through and Including July 31, 2026* [Dkt. No. 993] (the "Fourth Monthly Fee Statement") with the United States Bankruptcy Court for the Northern District of New York (the "Court").

2. In accordance with the procedures established by the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [Dkt. No. 419] (the "Interim Compensation Order"), any objections or responses to the Fourth Monthly Fee Statement were due by 4:00 p.m. (prevailing Eastern Time) on October 13, 2026 (the "Objection Deadline").

3. On October 5, 2026, R.T. Vanderbilt Holding Company, Inc. and its direct and indirect subsidiaries other than Vanderbilt Minerals, LLC ("R.T. Vanderbilt") filed an omnibus objection (the "Objection") to various professionals' monthly fee applications, including Katten's Fourth Monthly Fee Statement. *See* Dkt. No. 1010. The Debtor did not receive any other formal or informal objections to the Fourth Monthly Fee Statement.

4. R.T. Vanderbilt subsequently withdrew its Objection on October 19, 2026. *See* Dkt. No. 1045.

5. Accordingly, as of the date hereof, no formal or informal objections exist as to the Fourth Monthly Fee Statement.

6. Pursuant to paragraph 3(d) of the Interim Compensation Order, upon the expiration of the Objection Deadline, a retained professional may file a certificate of no objection with the Court with respect to the unopposed portion of the fees and expenses requested in the applicable monthly fee statement (each a "CNO"). After the filing of a CNO, the Debtor is authorized and directed to pay the retained professional an amount equal to eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the applicable monthly fee statement.

Dated: October 21, 2026

Respectfully Submitted,

/s/ Cindi M. Giglio

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Counsel to the Independent Manager and Sole Member of the Independent Special Committee of the Debtor

Certificate of Service

I certify that on October 21, 2026, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of New York.

/s/ Cindi M. Giglio
Cindi M. Giglio
Partner, Katten Muchin Rosenman LLP