Docket #1110 Date Filed: 11/10/2026

UNITED STATES BANKRUPTY COURT
NORTHERN DISTRICT OF NEW YORK

IN RE:

SYRACUSE MINERALS, LLC,[1]

Case No. 26-60110

Chapter 11

Debtor.

UNITED STATES TRUSTEE'S OMNIBUS STATEMENT OF NO OBJECTION TO THE FIRST INTERIM APPLICATIONS FOR ALLOWANCE OF PROFESSIONAL COMPENSATION AND REIMBURSEMENT OF EXPENSES SUBJECT TO VOLUNTARY REDUCTIONS

TO: THE HONORABLE WENDY A. KINSELLA, UNITED STATES CHIEF BANKRUPTCY JUDGE:

William K. Harrington, the United States Trustee for Region 2 (the "United States Trustee"), through counsel, respectfully files this omnibus statement of no objection, subject to voluntary reductions (the "Statement"), with respect to the interim fee applications (the "Applications") of the retained professionals (collectively, the "Retained Professionals") of Syracuse Minerals f/k/a Vanderbilt Minerals, LLC (the "Debtor"), seeking interim compensation and reimbursement of out-of-pocket expenses for the time periods set forth below and defined as to each of the Retained Professionals, as follows:

ECF Docket No.	Applicant	Fees Requested	Expenses Requested	Total	Application Period	Reduction In Fees
925	Brown Rudnick LLP, *Co-Counsel to Official Committee of Unsecured Creditors*	$5,225,859.50	$164,868.97	$5,390,728.47	03/05/26-06/30/26	$209,034.36 & $17,566.11 in expenses (in addition to $154,000 previously written-off)

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

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ECF Docket No.	Applicant	Fees Requested	Expenses Requested	Total	Application Period	Reduction In Fees
926	Province, LLC *Financial Advisor, Claims Estimation Advisor, and Sales Process Advisor to the Official Committee of Unsecured Creditors*	$2,700,095.00	$4,552.61	$2,704,647.61	03/07/26-06/30/26	$135,004.75
927	Katten Muchin Rosenman LLP Independent *Manager and Sole Member of the Independent Special Committee*	$2,997,713.00	$42,946.76	3,040,659.76	02/16/26-06/30/26	$119,908.52
928	Bond Schoeneck & King *Debtor's Attorney*	$995,199.50	$20,238.54	$1,015,438.04	02/16/26-06/30/26	No objection
929	Latham & Watkins LLP *Debtor's Attorney*	$8,655,301.00	$40,232.38	$8,695,533.38	04/19/26-06/30/26	$248,859.30, (in addition to $193,585 fees & $4,009.62 in expenses previously written-off)
930	Greenhill & Co., LLC *Investment Banker to the Debtor*	$3,554,166.67	$22,655.21	$3,576821.88	02/16/26-06/30/26	No objection
937	Caplin & Drysdale *Chartered, Creditor Committee*	$2,062,628.00	$68,420.64	$2,131,048.64	03/05/26-06/30/26	$72,191.98
942	Cohen Ziffer Frenchman & Mckenna LLP, *Co-Counsel for the Official Committee of Unsecured Creditors*	$225,066.50	$0.00	$225,066.50	03/09/26-06/30/26	No objection

ECF Docket No.	Applicant	Fees Requested	Expenses Requested	Total	Application Period	Reduction In Fees
1014	Kurtzman Carson Consultants, LLC d/b/a Verita Global *Administrative Avisor to the Debtor*	$16,923.00	0.00	$16,923.00	02/16/26-06/30/26	No objection

1. A hearing on the Applications listed above is scheduled for November 18, 2026, at 3:00 p.m. [ECF 1072].

2. By Order entered April 17, 2026, the Court approved procedures for monthly compensation and reimbursement of out-of-pocket expenses (the "Monthly Compensation Order"). [ECF 419]. Under the Monthly Compensation Order, the Retained Professionals may be paid 80% of fees incurred and 100% of expenses monthly. *Id.*

3. The United States Trustee reviewed the Retained Professionals' Applications for accuracy, transparency, and general billing judgment and practices, as well as for compliance with applicable guidelines, standing orders, and local court rules.

4. The United States Trustee was cognizant of the Court's concerns at the outset of the case wherein the Court emphasized that "since this is apparently a liquidating case and every dollar going to professionals is not available for distribution to creditors, the Court finds it appropriate to caution professionals. The professional should take great care to avoid overstaffing and duplication of services among their internal teams and other professionals in what may be determined to be unnecessary or unreasonable expenses in prosecuting their respective positions." [ECF 470 at page 142].

5. The United States Trustee conducted a detailed and time-intensive review of the fee applications, and, with the Court's concerns in mind, conducted numerous meetings with the various professionals to confer and discuss concerns with respect to the fee applications.

6. While the United States Trustee reviewed all applications and all fee entries, the magnitude of the legal fees and expenses in this case rendered discussion of line-by-line entries impractical.

7. Thus, the United States Trustee identified examples of objectionable fee entries and expenses and asked the professionals to review their applications with both the Court's caution and the United States Trustee's concerns in mind.

8. After numerous discussions and in an effort to limit further expense to the estate, rather than objecting to the various applications, the United States Trustee submits its recommendation of the parties' agreed upon reduction in fees and expenses as set forth in the chart above for the Court's consideration and as listed below:

a. Brown Rudnick, LLP agreed to a voluntary reduction of $209,034.36 in fees and $17,566.11 in expenses;
b. Province, LLC agreed to a voluntary fee reduction of $135,004.75;
c. Katten Muchin Rosenman LLP agreed to a voluntary fee reduction of $119,908.52;
d. Latham Watkins LLP agreed to a voluntary fee reduction of $248,859.30; &
e. Caplin & Drysdale Chartered agreed to a voluntary fee reduction of $72,191.98.

9. The United States Trustee has no objection to the remaining Applications.

WHEREFORE, the United States Trustee the United States Trustee does not object to the entry of an Order of this Court approving Retained Professionals fees reduced by the amounts denoted above.

Dated: November 10, 2026
Albany, New York

Respectfully submitted,
WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE FOR REGION 2

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