Docket #1113 Date Filed: 11/12/2026

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

In re:	Chapter 11
Syracuse Minerals, LLC,[1]	Case No. 26-60110 (WAK)
Debtor.	Related Dkt. No. 1006

CERTIFICATE OF NO OBJECTION TO APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF MOLOLAMKEN LLP AS AMICUS COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF VANDERBILT MINERALS, LLC, *NUNC PRO TUNC* TO SEPTEMBER 11, 2026

1. On October 2, 2026, the Official Committee of Unsecured Creditors (the "**Committee**") filed its *Application for Order Authorizing the Employment and Retention of MoloLamken LLP as Amicus Counsel for the Official Committee of Unsecured Creditors of Vanderbilt Minerals, LLC, Nunc Pro Tunc to September 11, 2026* [Dkt. No. 1006] (the "**Application**").

2. Objections, if any, to the Application were required to have been filed with the Court on or before October 26, 2026 (the "**Objection Deadline**"). *See* Dkt. No. 1009.

3. The Objection Deadline has passed and no objection or responsive pleading to the Application has appeared on the Court's docket in the above-captioned Chapter 11 case or was served upon the undersigned counsel. Accordingly, the undersigned respectfully requests that the proposed form of order granting the Application, attached hereto as **Exhibit A**, be entered at the Court's earliest convenience.

[1] The Debtor is Syracuse Minerals, LLC (f/k/a 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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Dated: November 12, 2026

Respectfully submitted,

BROWN RUDNICK LLP

/s/ *David J. Molton*

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COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS

EXHIBIT A

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

In re:	)	
	)	Chapter 11
Syracuse Minerals, LLC,[2]	)	
	)	Case No. 26-60110 (WAK)
Debtor.	)	

ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF MOLOLAMKEN LLP AS AMICUS COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF VANDERBILT MINERALS, LLC, *NUNC PRO TUNC* TO SEPTEMBER 11, 2026

Upon consideration of the *Application for Order Authorizing the Employment and Retention of MoloLamken LLP as Amicus Counsel for the Official Committee of Unsecured Creditors of Vanderbilt Minerals, LLC, Nunc Pro Tunc to September 11, 2026* (the

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

"Application"),[3] pursuant to sections 328 and 1103 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of New York (the "Local Rules"), authorizing and approving the employment of MoloLamken LLP ("MoloLamken") as Amicus Counsel ("Amicus Counsel") to the Official Committee of Unsecured Creditors (the "Committee") appointed in the above-captioned bankruptcy case (the "Case") effective as of September 11, 2026; and the declarations Jeffrey A. Lamken, Esq. and Linda Weaver in support of the Application annexed thereto; and the Court having jurisdiction to consider the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that the relief requested in the Application is in the best interests of the Debtor's estate, its creditors and other parties-in-interest; and the Committee having provided adequate and appropriate notice of the Application under the circumstances; and after due deliberation and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED as set forth herein.

2. The Committee is authorized pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code to retain and employ MoloLamken as Amicus Counsel to the Committee effective as of September 11, 2026.

3. MoloLamken shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Case as set forth in the Application

[3] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

and in compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures or orders of this Court.

4. MoloLamken shall provide at least 10 calendar days' notice to the Committee, the Debtor, and the U.S. Trustee prior to any increases in the rates set forth in the Lamken Declaration and shall file such notice with this Court.

5. The Committee and MoloLamken are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

6. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

7. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.

8. Further terms of this Order shall be as follows:

a. MoloLamken will only bill 50% for non-working travel and shall not seek the reimbursement of any fees or costs, including attorney fees and costs, arising from the defense of any of MoloLamken's fee applications in this Case;

b. MoloLamken will agree to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the "U.S. Trustee Guidelines");

c. MoloLamken will use the billing and expense categories set forth in the U.S. Trustee Guidelines (Exhibit D-1, "Summary of Compensation Requested by Project Category"), and may use additional categories that provide additional detail on work performed;

d. MoloLamken will provide any and all monthly fee statements, interim fee applications, and final fee applications in "LEDES" format to the U.S. Trustee; and

e. any and all compensation to be paid to MoloLamken for services rendered on the Committee's behalf shall be fixed by application to this

Court in accordance with sections 330 and 331 of the Bankruptcy Code, such Federal Rules and Local Rules as may then be applicable, and any orders entered in this Case governing the compensation and reimbursement of professionals for services rendered and charges and disbursements incurred.

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