Docket #0860 Date Filed: 08/06/2026

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

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

NOTICE OF 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

PLEASE TAKE NOTICE THAT on August 6, 2026, Vanderbilt Minerals, LLC (the "Debtor"), filed the *Disclosure Statement for Chapter 11 Plan of Liquidation of Vanderbilt Minerals, LLC* [Docket No. 857] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the "Proposed Disclosure Statement") and the *Chapter 11 Plan of Liquidation of Vanderbilt Minerals, LLC* [Docket No. 858] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the "Proposed Plan").

PLEASE TAKE NOTICE, that on August 6, 2026, the Debtor, by and through its undersigned counsel, moved the United States Bankruptcy Court for the Northern District of New York (the "Court") for entry of an order (i) approving the Proposed Disclosure Statement; (ii) approving the form and manner of the notice of the hearing to consider approval of the Proposed Disclosure Statement; (iii) approving the form, manner, and scope of the confirmation notices; (iv) approving the solicitation packages and related distribution and objection procedures; (v) approving the forms of ballots and establishing procedures for voting on the Proposed Plan; (vi) approving the form of non-voting status notices; (vii) approving the form of notice to counterparties to executory contracts and unexpired leases to be assumed and subsequently assigned under the Proposed Plan; and (viii) granting related relief (the "Disclosure Statement Motion").

PLEASE TAKE FURTHER NOTICE, that a hearing to consider the Disclosure Statement Motion and any objections related thereto (the "Hearing") will be held on **September 14, 2026, at 11:00 a.m. (prevailing Eastern time)**, or as soon thereafter as counsel

[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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may appear and be heard, before the Honorable Wendy A. Kinsella, Chief United States Bankruptcy Judge for the Northern District of New York, or such other judge as may be sitting in her stead in the James M. Hanley U.S. Courthouse and Federal Building, 100 South Clinton Street, Syracuse, NY 13261.

PLEASE TAKE FURTHER NOTICE, that parties may appear at the Hearing in person at the United States Bankruptcy Court for the Northern District of New York, James M. Hanley U.S. Courthouse and Federal Building, 100 South Clinton Street, Syracuse, New York 13261, or by video via Teams, for which pre-registration is required by 3:00 p.m. the day before the Hearing. Go to https://www.nynb.uscourts.gov/Remote-Hearing-Appearances to register.

PLEASE TAKE FURTHER NOTICE, that responses in opposition to the relief requested in the Disclosure Statement Motion, if any, must be electronically filed with the Court and served **so as to be actually received not later than September 4, 2026**, upon (i) co-counsel for the Debtor, Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, NY 13202 (Attn: Charles J. Sullivan, Grayson T. Walter, and Andrew S. Rivera) and co-counsel Latham & Watkins LLP, 1271 Avenue of the Americas, New York, NY 10020 (Attn: Ray C. Schrock, George A. Davis, Jamie L. Wine, and Anupama Yerramalli), and 10250 Constellation Blvd., Suite 1100, Los Angeles, CA 90067 (Attn: Jeffrey E. Bjork and Kimberly A. Posin) (ii) the Office of the United States Trustee for the Northern District of New York, 100 State Street, Suite 4230, Rochester, NY 14614 (Attn: Erin P. Champion), (iii) co-counsel to the Official Committee of Unsecured Creditors, Brown Rudnick LLP, 7 Times Square, New York, New York, 10036 (Attn: David J. Molton and Gerard T. Cicero) and co-counsel Caplin & Drysdale, Chartered, 1200 New Hampshire Avenue NW, 8th Floor, Washington, DC 20036 (Attn: Kevin C. Maclay, Todd E. Phillips, and Kevin M. Davis), and (iv) those persons who have formally appeared and requested service in this case pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE, that a copy of the Disclosure Statement Motion, the Proposed Disclosure Statement, and the Proposed Plan may be obtained from the Clerk's Office, United States Bankruptcy Court for the Northern District of New York, Syracuse Division, via the Court's electronic case management system at https://ecf.nynb.uscourts.gov, by visiting https://www.veritaglobal.net/vanderbilt, by calling (888) 733-1416 (U.S./Canada) or +1 (310) 751-2630 (International), or by written request to the Debtor's undersigned counsel.

Dated: August 6, 2026
Syracuse, New York

Respectfully submitted,

/s/ Charles J. Sullivan

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