UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: CROWN BOILER CO., LLC Debtor.	Case No. 26-20515 Chapter 11
CROWN BOILER CO., LLC, Movant v. No Respondent.	Related to Docket No: **Hearing Date: April 9, 2026, 1:30 p.m. (EST)** **Response Deadline: March 30, 2026**

DEBTOR'S MOTION FOR APPROVAL OF POSTPETITION FINANCING PURSUANT TO 11 U.S.C. § 364(B) AND (C) AND § 901, FED. R. BANKR. P. 4001(C)

Debtor, Crown Boiler Co., LLC ("Debtor"), pursuant to 11 U.S.C. § 364(b) and (c) and § 901, Rule 4001(c) of the Federal Rules of Bankruptcy Procedure and other applicable law, hereby moves for authority to obtain post-petition financing. In support, the Debtor relies on the Affidavit of Nick Ribich in Support of Complex Chapter 11 Designation and Declaration of First Day Motions ("First Day Declarations"), filed contemporaneously herewith, and states:

1. On February 25, 2026, the Debtor filed its voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "Chapter 11 Case"). The Debtor is continuing in possession of its property and, while operations in the traditional sense are not ongoing, is both operating and managing its business as a debtor-in-possession pursuant to 11 U.S.C. §§ 1107 and 1108 for purposes of this liquidating Chapter 11 Case.

2. For a detailed description of the Debtor and its operations, the Debtor respectfully refers the Court and parties in interest to the First Day Declarations. Generally, the Debtor was in the business of manufacturing and distributing residential and commercial heating equipment, including cast iron and steel boilers.

3. As a result of the financial circumstances outlined in the First Day Declaration, the Debtor is in need of post-petition borrowing in order to: (a) address short term liquidity issues, (b) to maximize the value of the Estate and (c) to maximize the ultimate return to creditors through the monetization and administration of assets necessary to pay creditors.

4. The Debtor requires immediate access to the post-petition financing in addition to the continued use of minimal pre-petition cash in order to satisfy near-term and long-term expenses critical to its Chapter 11 efforts, including the costs of administration, which, in turn, will preserve and maximize the value of the Debtor's estate.

5. The Debtor is a wholly-owned subsidiary of Burnham Holdings, Inc. ("BHI"). BHI has agreed to provide the Debtor with a $1.5 million line of credit for use for ordinary course expenses and administrative expenses of this bankruptcy case.

6. This line of credit is provided with the consent of the Debtor and BHI's principal secured creditors, Fulton Bank, N.A. and PNC Bank, National Association.

7. The Debtors request this Court approve Debtor in Possession unsecured financing on the following essential terms and conditions:

(i) All amounts borrowed by the Debtor shall be repaid at a rate of SOFR plus 3%;

(ii) The maximum borrowing available on both an interim and final basis is: $1,500,000.

(iii) BHI shall receive a super-priority administrative expense pursuant to 11 U.S.C. § 364;

(iv) The balance shall be due and payable on the effective date the Chapter 11 liquidating plan;

(v) There are no borrowing conditions or use of funds limitations, except as otherwise described herein.

(the "DIP Credit Facility").

JURISDICTION AND BASIS FOR RELIEF REQUESTED

8. This is a core proceeding under 28 U.S.C. §§ 157(b)(2)(A), (M), and (O).

9. This Court has jurisdiction over this proceeding and the parties and property affected hereby pursuant to 28 U.S.C. §157(a). The basis for relief requested is Bankruptcy Code § 364 and Rule 4001 of the Federal Rules of Bankruptcy Procedure and W.PA.LBR 4001-2 (Use of Cash Collateral and Obtaining Financing).

RELIEF REQUESTED

10. Pursuant to Rule 4001, this Court may authorize the obtaining of credit, on an emergency basis, to the extent necessary to avoid immediate and irreparable harm to the Debtor pending a final hearing.

11. The Debtor respectfully submits that ample justification exists for the approval of the proposed DIP Credit Facility pursuant to Section 364 of the Bankruptcy Code.

12. The Debtor requires immediate access to increased availability under the DIP Credit Facility in order to ensure that the uninterrupted continuity of its business and administration of this liquidating case, which will maintain the value of the Debtor's estate for the benefit of creditors and all parties in interest.

13. In evaluating proposed post-petition financing under sections 364(c) of the Bankruptcy Code, courts perform a qualitative analysis and generally consider such factors as, whether:

(a) unencumbered credit or alternative financing without superpriority status is available to the debtor;

(b) the credit transactions are necessary to preserve assets of the estates;

(c) the terms of the credit agreement are fair, reasonable, and adequate;

(d) the proposed financing agreement was negotiated in good faith and at arm's length and entry thereto is an exercise of sound and reasonable business judgment and in the best interest of the debtors' estate and their creditors; and

(e) the proposed financing agreement adequately protects prepetition secured creditors.

See, e.g., In re Aqua Assoc., 123 B.R. 192 (Bankr. E.D. Pa. 1991) (applying the first three factors in making a determination under section 364(c)); *In re Crouse Group, Inc.*, 71 B.R. 544 (Bankr. E.D. Pa. 1987) (same); *Bland v. Farmworker Creditors*, 308 B.R. 109, 113-14 (S.D. Ga. 2003) (applying all factors in making a determination under section 364(d)).

14. The Debtor believes that, with a seamless transition into and through this Chapter 11 liquidating case, which requires the approval of the DIP Credit Facility, it will be able to protect estate assets and maximize value for the benefit of creditors and all parties-in-interest.

15. For these reasons, access to credit under the DIP Credit Facility is critical to the Debtor's ongoing Chapter 11 efforts and necessary to preserve the assets of the Debtor's estates, and necessary to avoid immediate and irreparable harm to the Debtor and its creditors.

16. Additionally, the Debtor has determined that it is in the best interest of the Debtor and all of its creditors to obtain financing from BHI, who is willing to lend to the Debtor on more favorable terms than any third-party lender would be willing to offer. Simply stated, in this market, the Debtor could not obtain loan financing at the rates and on the terms offered by BHI from any other lenders.

17. Furthermore, the Debtor believes the material terms of the DIP Credit Facility are fair, reasonable and appropriate under the circumstances, and entry into the DIP Credit Facility is an exercise in the Debtor's sound business judgment.

18. Accordingly, the Debtor satisfies the standards required to access unsecured, post-petition financing on a superpriority basis under section 364(c) of the Bankruptcy Code.

19. The Debtor reserves the right to modify this Motion until this Court rules on the relief requested in this Motion.

NOTICE

20. Notice of this Motion has been provided (i) to the Debtor; (ii) the United States Trustee for the Western District of Pennsylvania; (iii) PNC Bank, N.A. and Fulton Bank, N.A.; and (iv) all creditors on the Debtor's creditor matrix, along with any counsel that have filed an entry of appearance. In light of the nature of the relief requested, the Debtor submits that no other or further notice need be provided.

WHEREFORE, the Debtor respectfully requests this Court grant this Motion, approve the post-petition financing on the terms set forth herein, and provide such other and further relief as is necessary and proper.

Respectfully submitted,

Date: March 11, 2026

SHUMAKER, LOOP & KENDRICK, LLP

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UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: CROWN BOILER CO., LLC Debtor.	Case No. 26-20515 Chapter 11
CROWN BOILER CO., LLC, Movant v. No Respondent.	**Related to Docket No: ______** **Hearing Date: April 9, 2026, 1:30 p.m. (EST)** **Response Deadline: March 30, 2026**

ORDER GRANTING DEBTOR'S MOTION FOR
APPROVAL OF POSTPETITION FINANCING
PURSUANT TO 11 U.S.C. § 364(B) AND (C) AND § 901, FED. R. BANKR. P. 4001(C)

THIS CASE came before this Court for a hearing on ________________, 2026 at _____ a.m/p.m. ("Hearing Date") on the **DEBTOR'S MOTION FOR APPROVAL OF POSTPETITION FINANCING PURSUANT TO 11 U.S.C. § 364(B) AND (C) AND § 901, FED. R. BANKR. P. 4001(C)** (Doc. ____) (the "Motion[1]"). This Court reviewed the Motion, heard argument of counsel for the Debtor and others, and is otherwise fully advised in the premises. For the reasons stated orally and recorded in open court, which shall constitute the decision of this Court, it is hereby

ORDERED:

1. The Motion is **GRANTED,** as set forth herein.

[1] All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. The Debtor is hereby authorized to obtain post-petition financing pursuant to the terms of the DIP Credit Facility, as is set forth in the Motion.

3. The Lender, Burnham Holdings, Inc., shall be granted a super-priority administrative expense claim pursuant to 11 U.S.C. §364(c)(1), along with all other terms of such financing, as is set forth in the Motion, for all funds advanced.

4. The Debtor is further permitted to use such post-petition financing consistent with the terms and provisions of the Motion.

5. The Debtor shall serve this Order on all interested parties and file a certificate of service.

____
Honorable John C. Melaragno, Judge
United States Bankruptcy Court

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: **CROWN BOILER CO., LLC,** Debtor.	Case No. 26-20515-JCM Chapter 11
CROWN BOILER CO., LLC, Movant, v. No Respondent.	Related to Docket No: **Hearing Date: April 9, 2026 at 1:30 p.m.** **Response Deadline: March 30, 2026**

CERTIFICATION OF SERVICE

I, Salene Kraemer of MAZURKRAEMER BUSINESS LAW certify under penalty of perjury that I am, and at all times hereinafter mentioned was, more than 18 years of age and that I served a copy of the within pleading as follows:

Via ECF Noticing on March 11, 2026, addressed as follows:

William M. Buchanan on behalf of U.S. Trustee Office of the United States Trustee
william.buchanan@usdoj.gov, williammbuchanan@yahoo.com;ddefoor@cohenseglias.com

Jacob C. Cohn on behalf of Interested Party Ace Insurance Company of the Midwest
jcohn@Plevinturner.com, jcohn1031@comcast.net

Jacob C. Cohn on behalf of Interested Party Ace Property & Casualty Insurance Company
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Jacob C. Cohn on behalf of Interested Party Century Indemnity Company
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Office of the United States Trustee
ustpregion03.pi.ecf@usdoj.gov

Daniel Michael Pereira on behalf of Creditor Fulton Bank, N.A.
dpereira@stradley.com

Via U.S. mail, postage prepaid, on March 11, 2026 to the parties in the attached mailing matrix and addressed as follows:

Burnham Holdings
P.O. Box 3245
1241 Harrisburg Pike
Lancaster, PA 17604
Attention: Nick Ribich

Date: March 11, 2026

By: /s/ Salene Kraemer
Salene Kraemer
Pa. Attorney No. 86422

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Label Matrix for local noticing 0315-2 Case 26-20515-JCM WESTERN DISTRICT OF PENNSYLVANIA Pittsburgh Fri Mar 6 12:04:20 EST 2026	Altek Business Systems 300 Emlen Way Telford, PA 18969-1722	Auch Printing, inc. 1351 Harris Rd Dresher, PA 19025-1103
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Charles Wilkerson 4448 N. 17th Street Philadelphia, PA 19140-1835	Cintas Corporation PO Box 630803 Cincinnati, OH 45263-0803	Crown Boiler Co., LLC Corporation Service Company 5235 North Front St. Harrisburg, PA 17110-1717
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Helmer Martinez and Elizabeth Sanchez 123 South 22nd Street Philadelphia, PA 19103-4335	Internal Revenue Service Special Procedures Division P.O. Box 628 Bankruptcy Section Pittsburgh, PA 15230	JC Whitlaw Mfg Co. PO Box 380 Wadsworth, OH 44282-0380
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

PNC Bank N.A.
300 Fifth Avenue
Pittsburgh, PA 15222

End of Label Matrix

Mailable recipients	34
Bypassed recipients	0
Total	34