IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re	:	**Chapter 11**
	:	
VALVES AND CONTROLS US, INC.,	:	**Case No. 25 – 11403 (TMH)**
	:	
Debtor.[1]	:	**Hearing Date: July 24, 2026 at 10:00 a.m. (ET)**
	:	**Obj. Deadline: July 6, 2026 at 4:00 p.m. (ET)**

MOTION OF DEBTOR FOR ENTRY OF ORDER (I) FURTHER EXTENDING DEADLINE BY WHICH DEBTOR MAY REMOVE CIVIL ACTIONS AND (II) GRANTING RELATED RELIEF

Valves and Controls US, Inc., as debtor and debtor in possession in the above-captioned chapter 11 case (the "**Debtor**"), respectfully represents as follows:

Relief Requested

1. By this motion (the "**Motion**"), pursuant to section 1452 of title 28 of the United States Code and Rules 9006(b) and 9027 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), the Debtor requests entry of an order (i) further extending the deadline by which the Debtor may file notices of removal under Bankruptcy Rule 9027(a) (the "**Removal Deadline**") by another 60 days from the current deadline, June 20, 2026, through and including August 19, 2026, and (ii) granting related relief.[2]

2. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit A** (the "**Proposed Order**").

[1] The last four digits of the Debtor's federal tax identification number are 3959. The Debtor's mailing address is 777 Main Street, Suite 2050, Fort Worth, TX 76102.

[2] Pursuant to Rule 9006-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "**Local Bankruptcy Rules**"), the filing of this Motion prior to the expiration of the Removal Deadline automatically extends such deadline until such time as the Court enters an order with respect to the relief requested herein.

Jurisdiction

3. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. §1334, which was referred to the Court under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Pursuant to Local Bankruptcy Rule 9013-1(f) the Debtor consents to the entry of a final order by the Court in connection with this Motion if it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

4. On July 25, 2025 (the "**Petition Date**"), the Debtor commenced with the Court a voluntary case under chapter 11 of the Bankruptcy Code. The Debtor is authorized to continue to operate as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this chapter 11 case. On August 14, 2025, the United States Trustee for Region 3 (the "**U.S. Trustee**") appointed an official committee of unsecured creditors (the "**UCC**") [Docket No. 56].

5. Additional information regarding the Debtor's business and the circumstances leading to the commencement of this chapter 11 case is set forth in the *Declaration of Scott M. Tandberg in Support of Debtor's Chapter 11 Petition and First Day Relief* (the "**First Day Declaration**") [Docket No. 2].[3]

[3] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in in the First Day Declaration or the Plan (as defined below), as applicable.

6. On November 3, 2025, the Court entered the *Order (I) Extending Deadline by Which Debtor May Remove Civil Actions, and (II) Granting Related Relief* [Docket No. 178], extending the Removal Deadline by 120 days, through and including February 20, 2026.

7. On March 10, 2026, the Court entered the *Order (I) Extending Deadline by Which Debtor May Remove Civil Actions, and (II) Granting Related Relief* [Docket No. 331], extending the Removal Deadline by 120 days, through and including June 20, 2026.

Relief Requested Should Be Granted

8. Bankruptcy Rule 9027 and 28 U.S.C. § 1452 govern the removal of pending civil actions. Specifically, 28 U.S.C. § 1452 provides:

> A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.

28 U.S.C. § 1452(a).

9. Bankruptcy Rule 9027(a)(2) further provides, in pertinent part:

> If the claim or cause of action in a civil action is pending when a bankruptcy case is commenced, the notice of removal must be filed within the longest of these periods: (A) 90 days after the order for relief in the bankruptcy case; (B) if the claim or cause of action has been stayed under § 362, 30 days after an order terminating the stay is entered; or (C) in a Chapter 11 case, 30 days after a trustee qualifies—but no later than 180 days after the order for relief.

Fed. R. Bankr. P. 9027(a)(2).

10. With respect to postpetition actions, Bankruptcy Rule 9027(a)(3) provides that a notice of removal may be filed:

> within the shorter of these periods: (A) 30 days after receiving (by service or otherwise) the initial pleading setting forth the claim or cause of action sought to be removed; or (B) 30 days after receiving

> the summons if the initial pleading has been filed but not served with the summons.

Fed. R. Bankr. P. 9027(a)(3).

11. Bankruptcy Rule 9006(b) provides that the court may extend unexpired time periods, such as the Removal Deadline, without notice:

> [T]he court may—at any time and for cause—extend the time to act if: (A) with or without a motion or notice, a request to extend is made before the period (or a previously extended period) expires; or (B) on motion made after the specified period expires, the failure to act within that period resulted from excusable neglect.

Fed. R. Bankr. P. 9006(b)(1).

12. It is well settled that the Court is authorized to extend, for cause, the removal period provided under 28 U.S.C. § 1452 and Bankruptcy Rule 9027. *See Pacor, Inc. v. Higgins*, 743 F.2d 984, 996 n.17 (3d Cir. 1984) (holding that the bankruptcy court's power to grant an extension of the removal period pursuant to Bankruptcy Rule 9006(b) is "clear"), *overruled on other grounds by Things Remembered, Inc. v. Petrarca*, 516 U.S. 124, 134–35 (1995); *see also Caperton v. A.T. Massey Coal Co., Inc.*, 251 B.R. 322, 325 (S.D. W. Va. 2000) (explaining that Bankruptcy Rule 9006 provides authority to enlarge time periods for removing actions under Bankruptcy Rule 9027); *Raff v. Gordon*, 58 B.R. 988, 990 (E.D. Pa. 1986) (finding that an expansion of time to file notices of removal is authorized under the Bankruptcy Rules); *In re World Fin. Servs. Ctr., Inc.*, 81 B.R. 33, 39 (Bankr. S.D. Cal. 1987) (providing that the United States Supreme Court intended to give bankruptcy judges the power to enlarge the filing periods under Bankruptcy Rule 9027(a) pursuant to Bankruptcy Rule 9006(b)).

13. Cause exists to extend the Removal Deadline in this chapter 11 case by 60 days from the current Removal Deadline, June 20, 2026, through and including August 19, 2026. Since the Debtor filed its initial request to extend the Removal Deadline, the Debtor and the UCC

filed the *Joint Chapter 11 Plan of Liquidation of Valves and Controls US, Inc., and Official Committee of Unsecured Creditors* [Docket No. 402] (the "**Plan**") along with the related *Disclosure Statement for Joint Chapter 11 Plan of Liquidation of Valves and Controls US, Inc., and Official Committee of Unsecured Creditors* [Docket No. 403] (the "**Disclosure Statement**") and solicitation procedures (the "**Solicitation Procedures**"). The Debtor and the UCC worked collaboratively to develop and negotiate the terms of the Plan, the Disclosure Statement, and the Solicitation Procedures. Confirmation of the Plan is currently scheduled for July 24 at 10:00 a.m. ET. The Debtor and the UCC also continue to negotiate the terms and provisions of the Trust Agreement and Trust Distribution Procedures, as provided for and in accordance with, the Plan.

14. The Debtor is party to over 2,000 civil actions (such civil actions, collectively with any other civil actions in other jurisdictions to which the Debtor is, or may become, a party, the "**Civil Actions**"). Given the Debtor's focus on working with the UCC on the Plan and the other aforementioned matters, the Debtor has not made a determination as to which, if any, of the Civil Actions it may seek to remove. Therefore, the Debtor believes that it is prudent to seek an extension of the time prescribed under Bankruptcy Rule 9027(a), through and including August 19, 2026, to protect its right to remove those Civil Actions if it deems it appropriate.

15. The extension sought will afford the Debtor a reasonable amount of additional time to determine whether to remove any pending Civil Action, thereby ensuring the Debtor does not forfeit valuable rights under 28 U.S.C. § 1452. Further, the rights of the Debtor's adversaries will not be prejudiced by such an extension, because any party to an action that is removed may seek to have the action remanded to the state court pursuant to 28 U.S.C. § 1452.

16. Accordingly, for the reasons stated above, the Debtor submits that cause exists to grant the relief requested herein, which relief is appropriate and in the best interests of the Debtor, its estates, and all stakeholders.

Notice

17. Notice of this Motion will be provided to (i) the Office of the United States Trustee for the District of Delaware, (ii) counsel to the UCC, and (iii) any other party entitled to notice pursuant to Bankruptcy Rule 2002. The Debtor believes that no further notice is required.

[*Remainder of Page Intentionally Left Blank*]

WHEREFORE the Debtor respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: June 19, 2026
Wilmington, Delaware

/s/ Melissa M. Hartlipp

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re	:	**Chapter 11**
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VALVES AND CONTROLS US, INC.,	:	**Case No. 25 – 11403 (TMH)**
	:	
Debtor.[1]	:	**Hearing Date: July 24, 2026 at 10:00 a.m. (ET)**
	:	**Obj. Deadline: July 6, 2026 at 4:00 p.m. (ET)**

NOTICE OF MOTION OF DEBTOR FOR ENTRY OF ORDER (I) FURTHER EXTENDING DEADLINE BY WHICH DEBTOR MAY REMOVE CIVIL ACTIONS AND (II) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that, on June 19, 2026, the above-captioned debtor and debtor in possession (the "**Debtor**") filed the *Motion of Debtor for Entry of Order (I) Further Extending Deadline by Which Debtor May Remove Civil Actions and (II) Granting Related Relief* (the "**Motion**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be filed on or before **July 6, 2026 at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline")** with the Court, 3rd Floor, 824 North Market Street, Wilmington, DE 19801. At the same time, you must serve a copy of the response or objection upon the undersigned counsel to the Debtor so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **July 24, 2026 at 10:00 a.m. (prevailing Eastern Time)** before The Honorable Thomas M. Horan, United States Bankruptcy Court for the District of Delaware, 5th Floor, Courtroom No. 5, 824 North Market Street, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that a copy of the Motion may be obtained free of charge at the website of Debtor's claims and noticing agent, Kroll Restructuring Administration LLC, https://cases.ra.kroll.com/valvesandcontrols. In addition, copies of the Motion can also be downloaded for a fee from the Court's website, www.deb.uscourts.gov. To access documents on the Court's website, you will need a PACER password and login which can be obtained at www.pacer.psc.uscourts.gov.

[1] The last four digits of the Debtor's federal tax identification number are 3959. The Debtor's mailing address is 777 Main Street, Suite 2050, Fort Worth, TX 76102.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: June 19, 2026
Wilmington, Delaware

/s/ Melissa M. Hartlipp
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and Debtor in Possession

<u>Exhibit A</u>

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re	:	**Chapter 11**
	:	
VALVES AND CONTROLS US, INC.,	:	**Case No. 25 – 11403 (TMH)**
	:	
Debtor.[1]	:	**Re: Docket No. [●]**

ORDER (I) FURTHER EXTENDING
DEADLINE BY WHICH DEBTOR MAY REMOVE
CIVIL ACTIONS AND (II) GRANTING RELATED RELIEF

Upon the motion (the "**Motion**")[2] of Valves and Controls US, Inc., as debtor and debtor in possession in the above-captioned chapter 11 case (the "**Debtor**"), pursuant to section 1452 of title 28 of the United States Code and Bankruptcy Rules 9006(b) and 9027, for entry of an order (i) further extending the Removal Deadline by another 60 days, through and including August 19, 2026, and (ii) granting related relief, all as more fully set forth in the Motion; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances; and it appearing that no other or further notice need be provided; and this Court having reviewed the

[1] The last four digits of the Debtor's federal tax identification number are 3959. The Debtor's mailing address is 777 Main Street, Suite 2050, Fort Worth, TX 76102.

[2] Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.

Motion; and upon any hearing held on the Motion; and all objections, if any, to the Motion have been withdrawn, resolved, or overruled; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtor, its estate, creditors, and all parties in interest; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT

1. The Motion is granted to the extent set forth herein.

2. The Debtor's Removal Deadline is further extended through and including August 19, 2026.

3. This Order shall be without prejudice to the Debtor's right to seek a further extension of the Debtor's Removal Deadline.

4. Notwithstanding entry of this Order, nothing herein shall create, nor is intended to create, any rights in favor of or enhance the status of any claim held by any party.

5. The Debtor is authorized to take all action necessary or appropriate to effectuate the relief granted in this Order.

6. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.