IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: WEST MARINE, INC., *et al.*,[1] Debtors.	Chapter 11 Case No. 26-10794 (KBO) (Jointly Administered) **Proposed Objection Deadline: July 1, 2026 at 1:00 pm (ET)** **Proposed Hearing Date: July 1, 2026 at 1:00 pm (ET)**

OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION PURSUANT TO BANKRUPTCY RULE 2004 FOR AN ORDER DIRECTING THE PRODUCTION OF DOCUMENTS AND INFORMATION

The Official Committee of Unsecured Creditors (the "Committee") of West Marine, Inc., *et al.*, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), by and through its proposed undersigned counsel, hereby files this motion (the "Motion"), pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2004-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), for entry of an order, substantially in the form attached hereto as Exhibit A (the "Proposed Order"), (i) directing the Debtors and the Special Committee (defined below) to produce on a rolling basis, but in no event later than five (5) days from entry of the Proposed Order, all documents and information within their possession, custody, or control that are responsive to the applicable categories set forth on Exhibit 1 to the Proposed Order (the "Document Requests") and that have not been previously produced; and (ii) authorizing the Committee to serve the notices of deposition attached as Exhibit 2 to the Proposed Order (the "Requested Depositions").

[1] The Debtors in these chapter 11 cases are: West Marine, Inc.; Marine One Holdco, LLC; Marine One Parent, Inc.; Rising Tide Holdings Inc.; Rising Tide Parent Inc.; Seascapes, Inc.; W Marine Management Company, Inc.; and West Marine Products, Inc.

JURISDICTION AND VENUE

1. The Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(b) and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b).

2. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief requested herein are section 1103 of the Bankruptcy Code, Bankruptcy Rule 2004, and Local Rule 2004-1.

4. The Committee consents to the entry of a final order in connection with this Motion in accordance with Local Rule 9013-1(f) if it is determined the Court, absent the consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

BACKGROUND

A. General Background

5. On May 17, 2026 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court. Since the Petition Date, the Debtors have remained in possession of their assets and have continued to operate and manage their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On May 29, 2026, the Office of the United States Trustee for Region 3 appointed a seven-member Committee consisting of: (i) Realty Income Corporation; (ii) Facility Solutions Group, Inc.; (iii) Modern Recreational Technologies, Inc.; (iv) East Penn Manufacturing Co.; (v) Virtual Supply, Inc.; (vi) Lippert Components, Inc.; and (vii) Garmin USA, Inc.[2]

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[2] Docket. No. 103.

7. On June 1, 2026, the Committee selected Kelley Drye & Warren LLP as its lead counsel and, on June 2, selected Ice Miller LLP as its Delaware co-counsel and Province, Inc. as its financial advisor.

8. The Debtors entered bankruptcy with approximately $429 million in purportedly secured debt consisting of (i) $118.9 million under a May 1, 2024 ABL facility; (ii) $59.2 million under a May 1, 2024 FILO facility; and (iii) $251 million under a September 26, 2024 term loan facility (collectively the "Prepetition Debt").[3]

9. On the Petition Date, the Debtors entered into a Restructuring Support Agreement (the "RSA") with a majority of their prepetition lenders and equity holders (the "Consenting Stakeholders"), which was incorporated into the *Amended Joint Plan of Reorganization of West Marine, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the "Plan").[4]

10. The RSA and Plan provide for the Debtors' reorganization pursuant to which: (i) the term loan debt will be exchanged for 100% of the reorganized company's equity (subject to dilution from a MIP); (ii) the ABL and FILO debt will either be paid in full or converted into exit debt; and (iii) general unsecured creditors will receive a pro rata share of $250,000—representing an approximate 0.2-0.3% recovery—provided the class votes to accept the Plan.[5] The Plan also provides for broad estate releases (the "Estate Releases") of various parties, including the Debtors' current and former officers and directors, the ABL lenders, each consenting lender

[3] *See Declaration of Paulee Day, Chief Executive Officer of West Marine, Inc. in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [Docket No. 15] (the "First Day Declaration"), ¶¶ 19-20, 26.

[4] Docket No. 278; *see also* First Day Declaration, Ex. A (RSA).

[5] Plan Art. III.

under the term loan and FILO facilities, each consenting equity holder, and any related parties thereto (collectively, the "Released Parties").[6]

11. On June 23, 2026, the Court entered an order (the "Solicitation Order")[7] conditionally approving the adequacy of the *Disclosure Statement for the Amended Joint Plan of Reorganization of West Marine, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the "Disclosure Statement").[8] Among other things, the Solicitation Order set a confirmation hearing for August 11, 2026, with objections due August 3.[9]

12. As set forth in the Disclosure Statement, on April 13, 2026, one month prior to the Petition Date, the Debtors established special committees of the board of directors of the Debtors (collectively, the "Special Committee").[10] The Debtors assert the Special Committee was tasked with, among other things, taking actions in connection with the potential release or settlement of potential claims of causes of actions against Related Parties.[11]

13. The Special Committee did not commence its investigation or retain counsel until May 2026. Thereafter, the Special Committee directed its counsel, Young Conaway, to assist them in connection with an investigation with respect to the propriety of the Estate Releases and potential claims that could be asserted by the Debtors' estates against the Released Parties. Young Conaway purportedly submitted broad diligence requests to the Debtors, unnamed third parties, and the Debtors' advisors seeking documents and information relevant to this investigation. The

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6 Plan Art. I.A, VIII.C.

7 Docket No. 284.

8 Docket No. 280.

9 Confirmation Order ¶ 5.

10 Disclosure Statement Art. VI.C.2.

11 *Id.* Art. VII.M.

scope of the investigation encompassed, among other unidentified potential claims and causes of action, and without any specificity, potential claims for (a) fraudulent transfers; (b) preferences; (c) breach of fiduciary duty; (d) fraud; (e) recharacterization; and (f) equitable subordination.[12]

14. Young Conaway's investigation has purportedly concluded and, as set forth in the Disclosure Statement, was presented to the Special Committee. The Disclosure Statement, provides, without explanation, that the Special Committee "has not identified ***any viable causes of action*** held by the Debtors' Estates against Released Parties ***that are worthy of pursuit*** during these Chapter 11 Cases."[13]

B. The Committee's Stalled Investigation

15. As set forth in the Disclosure Statement, the Committee promptly commenced its own investigation into, among other things (i) the prepetition liens and claims associated with the Prepetition Debt; (ii) the events and transactions that precipitated these chapter 11 cases; and (iii) the conduct of the Released Parties.[14]

16. To facilitate this investigation, and to minimize costs to the estates, the Committee sent informal document requests to the Debtors and the Special Committee on June 4, 2026, only three days after the Committee selected counsel (the "Initial Requests"). A copy of the Initial Requests is attached hereto as Exhibit B.

17. As highlighted in the Committee's previously filed objections,[15] much of what has transpired with respect to the Debtors over the past ten years is not publicly available.

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[12] *Id*.

[13] *Id*. (emphasis added).

[14] *Id.* Art. VII.H.

[15] Docket Nos. 168, 231, and 233.

While previously a publicly reporting entity, the company was taken private in September 2017 when private equity firm Monomoy Capital Partners ("Monomoy") acquired the company in a leveraged buyout.[16] Since that time, the Debtors have been a black box, with limited transparency into their operations and financial conditions.

18. In April 2021, Monomoy sold the company to private equity firm L Catterton Management Limited ("L Catterton").[17] Upon information and belief, the transaction substantially increased the company's secured debt.[18] Yet the Disclosure Statement does little to shed additional light on these transactions, dedicating just two sentences to the Monomoy transaction and failing to even mention the L Catterton acquisition in 2021.[19]

19. In March 2023, the company completed the first of two liability management transactions ("LMT") with L Catterton and existing lenders that restructured its debt into multiple new super-senior and junior tranches ("March LMT").[20] Only six months later, the Company completed the second LMT in which approximately $660 million of funded debt was exchanged for equity (the "September LMT" and, together with the March LMT, the "2023 LMTs").[21] The 2023 LMTs were presumably required to restructure debt originating from the Monomoy and/or L Catterton transactions.

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16 First Day Declaration,¶ 29; GlobeNewswire, *West Marine Inc. to be Acquired by Monomoy Capital Partners for $12.97 Per Share* (June 29, 2017), https://www.globenewswire.com/news-release/2017/06/29/1035237/0/en/west-marine-inc-to-be-acquired-by-monomoy-capital-partners-for-12-97-per-share.html.

17 Monomoy Capital Partners, *Monomoy Capital Partners Agrees to Sell West Marine, Inc.* (Apr. 14, 2021), https://www.mcpfunds.com/news/monomoy-capital-partners-agrees-to-sell-west-marine-inc/.

18 First Day Declaration ¶ 58.

19 *See* Disclosure Statement Art. V.A, VI.

20 *Id.* ¶ 56; BoatBlurb, *West Marine Files for Chapter 11 Bankruptcy Protection* (May 19, 2026), https://www.boatblurb.com/post/west-marine-files-for-chapter-11-bankruptcy-protection.

21 First Day Declaration ¶¶ 58–59.

20. Given the lack of publicly available information, the Initial Requests sought, among other things, information regarding these transactions. The Debtors made an initial production of approximately 235 documents to the Committee on June 6, 2026. That production addressed only a handful of the Committee's Initial Requests with respect to the Debtors' current Prepetition Debt, claims information regarding vendors and landlords, employment agreements, insurance policies, financial statements, and only a partial production regarding the September LMT.

21. The Debtors made additional smaller productions on June 7, June 9, June 18, June 23, and June 25. However, at least until the Committee advised the Debtors of its intent to file this Motion on June 25, the Debtors' production has been deficient, with the Debtors having produced as of June 24 only approximately 300 documents, some of which are completely or heavily redacted.[22]

22. As part of the Initial Requests, the Committee sought documents relating to the Monomoy acquisition, including any debt documents entered into in connection therewith. The Debtors and the Special Committee have not produced such documents.

23. The Debtors have represented that the Special Committee submitted diligence requests "to the Debtors, third parties, and the Debtors' advisors."[23] The Committee has requested production of all discovery requests the Special Committee made, all responses thereto, and all documents received by the Special Committee. However, to date, the Debtors and the

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[22] Upon informing the Debtors that the Committee intended to file this Motion, the Debtors began producing additional documents, which the Committee's professionals are in process of reviewing.

[23] Disclosure Statement Art. VII.M.

Special Committee have only produced the Special Committee's initial discovery requests to the Debtors.

24. The Committee was made aware that the Special Committee was conducting interviews of various individuals in connection with its investigation. Accordingly, the Committee requested to participate in such interviews. The Special Committee refused this request. The Committee requested any notes from these interviews, which the Special Committee has failed to produce. The Committee also requested the Special Committee's analysis of the potential claims it was investigating. To date, the Special Committee has failed to produce its analysis.

25. Counsel for the Committee and the Debtors held meet and confers on June 13 and June 19. Such meetings have failed to result in the production of all responsive documents.

26. On June 24, counsel for the Committee demanded production of all outstanding documents by June 25—three full weeks after the Committee's Initial Requests—and advised the Debtors of their intent to file this Motion. Shortly thereafter, the Debtors' rate of responses and production increased. The production, however, remains woefully incomplete.

REQUESTED RELIEF

27. The Debtors entered bankruptcy to pursue an expedited plan process that provides no real recovery for unsecured creditors but will provide Estate Releases to lenders and insiders, many of whom are overlapping. The Debtors justify such treatment in the Disclosure Statement by relying on vague statements regarding the outcome of the Special Committee's investigation without any detail or specificity.

28. The Special Committee has concluded, without any real explanation, that it has not identified *any* viable cause of action worthy of pursuit. Yet, the Special Committee has,

to date, been unwilling to share with the Committee all documents that would support such a conclusion.

29. The confirmation hearing is scheduled for August 11 and the Committee's objection is due on August 3—in a little over five weeks. The Committee moved swiftly in making its Initial Requests, sending them to the Debtors and the Special Committee within three days of selecting counsel. It has now been three weeks. The Committee has received approximately 325 documents and the Debtors and the Special Committee have refused to produce documents clearly within their possession and control.

30. The Committee's attempts to work cooperatively with the Debtors and the Special Committee have failed. The Debtors' position is clear—they do not intend to cooperate with the Committee's investigation. Instead—as stated in the Disclosure Statement—they will seek to "establish their burden of proof that the releases are reasonable and appropriate" at the confirmation hearing.[24]

31. While not the Committee's preferred path, the Committee has no option other than to proceed with formal discovery to be prepared to respond to the Debtors' "proof" at confirmation. As a first step, the Committee requests entry of the Proposed Order (a) directing the Debtors and the Special Committee to respond to all questions and produce all Requested Documents—including emails, text messages, and other communications (none of which have been produced to date)—in their possession, custody or control on a rolling basis, but in no event later than five (5) days after entry of the Proposed Order; and (b) allowing the Committee to pursue the Requested Depositions.

[24] *Id.*

32. Given the deficiencies in the Debtors' production, the Committee also intends to seek discovery from other parties.

BASIS FOR RELIEF

33. The documents and information requested are critical for the Committee to fulfill its statutory duties and obligations. Section 1103 of the Bankruptcy Code provides the Committee the right to investigate the acts and conduct of the Debtors as well as any matters relevant to these cases or to the formulation of the Plan.[25] This statutory right includes the Committee's right to test and, if appropriate, challenge the foundations of the Plan, the value proposed for unsecured creditors under the Plan, the proposed Estate Releases, and the merits of the Special Committee's conclusions. Among other tools to accomplish these goals, Bankruptcy Rule 2004 gives the Committee the right to conduct discovery, providing that "[o]n motion of any party in interest, the court may order" the production of documents or examination of any entity.[26] A Rule 2004 examination may relate, among other things, to "the acts, conduct, or property" or to the "liabilities and financial condition" of the debtor, or to "any matter that may affect the administration of the debtor's estate."[27] "'Unlike traditional discovery, which narrowly focuses on the issues germane to the dispute,' the scope of Bankruptcy Rule 2004 is broad and unfettered, and has been likened to a 'fishing expedition' and 'an inquisition.'"[28]

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[25] 11 U.S.C. § 1103(c).

[26] Fed R. Bankr. P. 2004(a), (c).

[27] Fed. R. Bankr. P. 2004(b)(1)(A)-(C).

[28] *In re Millenium Lab Holdings II, LLC*, 562 B.R. 614, 626 (Bankr. D. Del. 2016) (quoting *In re J & R Trucking, Inc.*, 431 B.R. 818, 821 (Bankr. N.D. Ind. 2010)).

34. The information sought by the Committee concerns the Debtors' "liabilities and financial condition," and is therefore squarely within the proper scope of a Bankruptcy Rule 2004 examination and should be permitted.[29] While the documents sought relate to potential estate claims, they are also documents that may "affect the administration of the debtor's estate."[30]

35. As a fiduciary for the general unsecured creditors, the Committee must take steps to obtain the information necessary to preserve any actions related to estate claims before the confirmation hearing. The Committee's receipt, review, and analysis of the Requested Documents and the ability to conduct the Requested Depositions are critical for the Committee's ability to fulfill its fiduciary obligations and to represent the interests of unsecured creditors in connection with confirmation of the Plan. Further, no party in interest will be prejudiced by the Court's granting of this Motion, especially considering that the Debtors have already committed to produce the documents requested.

36. The Committee has worked, and will continue to work, with the Debtors' counsel in connection with the wide range of matters that have arisen and will arise in the administration of these chapter 11 cases. Given the expedited confirmation timeline and the substantial factual and legal issues that the Committee may need to raise at confirmation, the Committee had no choice but to file this Motion.

CERTIFICATION PURSUANT TO LOCAL RULE 2004-1

37. The Committee met and conferred with counsel for the Debtors and the Special Committee on June 13 and June 19, 2026.

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[29] Fed. R. Bankr. P. 2004(b)(1)(B).

[30] Fed. R. Bankr. P. 2004(b)(1)(C).

38. Pursuant to Local Rule 2004-1(a), the Committee's undersigned counsel certifies that the Committee conferred with counsel for the Debtors regarding the requested production of documents and the timing of such production. Despite the Committee's good faith efforts to reach an agreement with the Debtors to obtain the Requested Documents, the parties were unable to reach an agreement.

39. Counsel for the Debtors and the Special Committee has informed the Committee that the Debtors object to both the merits of this Motion and to the request to shorten notice filed in connection herewith.

NOTICE

40. Notice of the Motion will be provided to: (a) the Debtors; (b) counsel to the Debtors; (c) counsel to the Special Committee; (d) the U.S. Trustee; and (e) any other person or entity entitled to notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Committee respectfully submits that no further notice of the Motion is necessary or required.

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CONCLUSION

WHEREFORE, the Committee respectfully requests that this Court grant the Motion and enter the Proposed Order: (i) directing the Debtors and the Special Committee to produce the Requested Documents on a rolling basis, but in no event later than five (5) days from entry of the Proposed Order; (ii) authorizing the Committee to pursue the Requested Depositions by serving the notices of deposition attached as Exhibit 2 to the Proposed Order; and (iii) granting such other and further relief as it deems necessary and appropriate.

Dated: June 26, 2026
Wilmington, Delaware

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Proposed Counsel to the Official Committee of Unsecured Creditors of West Marine, Inc., et al.

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
WEST MARINE, INC., *et al.*,[1]	Case No. 26-10794 (KBO)
Debtors.	(Jointly Administered)
	Re: Docket No. ___

[PROPOSED] ORDER GRANTING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION PURSUANT TO BANKRUPTCY RULE 2004 FOR AN ORDER DIRECTING THE PRODUCTION OF DOCUMENTS AND INFORMATION

Upon consideration of the *Official Committee of Unsecured Creditors' Motion Pursuant to Bankruptcy Rule 2004 for an Order Directing the Production of Documents and Information* (the "Motion"),[2] filed by the Official Committee of Unsecured Creditors (the "Committee"); 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 this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found

[1] The Debtors in these chapter 11 cases are: West Marine, Inc.; Marine One Holdco, LLC; Marine One Parent, Inc.; Rising Tide Holdings Inc.; Rising Tide Parent Inc.; Seascapes, Inc.; W Marine Management Company, Inc.; and West Marine Products, Inc.

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

that the Committee's notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; 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 as set forth herein.

2. Any objections to the entry of this Order, to the extent not withdrawn or settled, are overruled.

3. The Debtors and the Special Committee shall produce the Requested Documents, as set forth in Exhibit 1 to this Order, on a rolling basis, but in no event later than five (5) days from entry of this Order.

4. The Committee is authorized to pursue the Requested Depositions by serving the notices of deposition attached as Exhibit 2 to this Order.

5. All notices given in accordance with this Order shall be deemed sufficient and adequate notice and in full compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules.

6. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

7. Notice of the Motion as provided therein shall be deemed good and sufficient notice of the Motion, and such notice satisfies the requirements of the Bankruptcy Rules and the Local Rules.

8. Nothing in this Order shall be deemed to limit or restrict the Committee's right to seek further discovery or other additional examinations, including, but not limited to, under Bankruptcy Rule 2004 or in the context of contested matters.

9. The Committee is authorized, but not directed, to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

10. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order, including any discovery disputes that may arise between or among the parties.

EXHIBIT 1

Document Requests

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: WEST MARINE, INC., *et al.*,[1] Debtors.	Chapter 11 Case No. 26-10794 (KBO) (Jointly Administered)

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' REQUESTS FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, as made applicable by Rules 7034 and 9014 of the Federal Rules of Bankruptcy Procedure, the Official Committee of Unsecured Creditors (the "Committee"), by and through its proposed undersigned counsel, hereby requests that West Marine, Inc., and its affiliated debtors and debtors-in-possession (collectively, the "Debtors") and the Special Committee (as defined below) produce and make available for inspection and copying all documents and things requested below (the "Requests") via electronic mail to Randall L. Morrison Jr., Esq. (rmorrison@kelleydrye.com) and Richard D. Gage, Esq. (rgage@kelleydrye.com) on or before [•], 2026 at 12:00 p.m. (ET).

DEFINITIONS

- **"Action"** shall mean the jointly administered chapter 11 cases captioned *In re West Marine, Inc., et al.*, Case No. 26-10794 (KBO), pending in the United States Bankruptcy Court for the District of Delaware.

- **"Disclosure Statement"** shall mean the *Disclosure Statement for the Amended Joint Plan of Reorganization of West Marine, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* filed at Docket No. 280 in the Action.

- **"Financial Projections"** shall mean those certain financial projections attached as Exhibit E of the Disclosure Statement.

[1] The Debtors in these chapter 11 cases are: West Marine, Inc.; Marine One Holdco, LLC; Marine One Parent, Inc.; Rising Tide Holdings Inc.; Rising Tide Parent Inc.; Seascapes, Inc.; W Marine Management Company, Inc.; and West Marine Products, Inc.

- **"Independent Investigation"** shall mean the investigation conducted by the Special Committee and their advisors into potential claims and causes of action, as referenced in the Disclosure Statement.

- **"L Catterton"** shall mean L Catterton Management Limited and any of its direct or indirect affiliates, funds, fund vehicles, portfolio companies, general partners, limited partners, managing members, investment advisors, officers, directors, employees, partners, principals, agents, representatives, successors, and assigns, including without limitation LC9 Marine One Aggregator LP.

- **"Liquidation Analysis"** shall mean that certain Liquidation Analysis attached as Exhibit D to the Disclosure Statement.

- **"March 2023 Transaction"** shall mean the balance sheet restructuring of the Company effectuated in March 2023, as described in the Disclosure Statement.

- **"Oaktree"** shall mean Oaktree Capital Management, L.P. and any of its direct or indirect affiliates, funds, or portfolio companies.

- **"Petition Date"** shall mean May 17, 2026.

- **"Plan"** shall mean the *Amended Joint Plan of Reorganization of West Marine, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* filed at Docket No. 278 in the Action.

- **"Prepetition ABL Credit Agreement"** shall mean the ABL Credit Agreement, dated as of May 1, 2024, among Rising Tide Holdings, Inc., Marine One Parent, Inc., the revolving lenders and FILO lenders party thereto, and Eclipse Business Capital LLC, as amended.

- **"Prepetition Term Loan Credit Agreement"** shall mean the Term Loan Credit Agreement, dated as of September 25, 2024, among Rising Tide Holdings, Inc., Marine One Parent, Inc., Wilmington Savings Fund Society, FSB, the guarantors and lenders party thereto, as amended.

- **"RSA"** shall mean the Restructuring Support Agreement dated May 17, 2026, among Marine One Holdco, LLC and certain of its subsidiaries and affiliates, the Consenting FILO Lenders, the Consenting Term Loan Lenders, and the Consenting Equity Holders.

- **"September 2023 Transaction"** shall mean the comprehensive out-of-court restructuring consummated in September 2023, as described in the Disclosure Statement.

- **"Special Committee"** shall mean the special committees of the boards of directors of Marine One Parent, Inc. and each of its subsidiaries established in April 2026 and comprised of directors Matthew Kahn and Hugh Charvat.

- **"Valuation Analysis"** shall mean that certain valuation analysis attached as Exhibit F to the Disclosure Statement.

- "**You**" or "**Your**" means the Debtors and the Special Committee, both individually and collectively.

- The term "communication" shall mean the transmittal of information (in the form of facts, ideas, inquiries or otherwise) by any means, including, but not limited to, by United States or private mail service, facsimile, memorandum, e-mail, text messages, telephone voice mail, hand delivery, computer transmission, conversation among persons or telephone.

- The term "information" shall be expansively construed and shall include, but not be limited to, facts, data, opinion, images, impressions, concepts and formulas.

- The term "document(s)" is used in the broadest sense and means all writings of any nature whatsoever, whether originals or copies, including all non-identical copies (whether different from the original because of notes made on or attached to them or otherwise), whether drafts, preliminary, proposed, or final versions, whether printed, recorded, produced or reproduced by any other mechanical process, whether written or produced by hand, within your possession, custody or control, including, but not limited to, contracts, agreements, arrangements, understandings, communications, including intra-bank communications, correspondence, telegrams, records, reports, studies, memoranda, including memoranda of telephone, personal, or intra-office conversations and memoranda of meetings or conferences, notes, advertisements, notices, telex communications, text messages, telephone bills and records, cables, books, diaries, forecasts, statistical statements, accountants' workpapers, graphs, summaries, lists, tabulations, charts, maps, diagrams, blueprints, tables, indices, pictures, recordings, tapes, microfilms, charges, accounts, minutes, brochures, pamphlets, circulars, trade letters, press releases, stenographic, handwritten, or any other notes, projections, working papers, checks, check stubs, receipts, invoice vouchers, tape data sheets or data processing cards or discs, magnetic tapes, discs, drums, promotional devices, or any other documents or writings of whatever description, including, without limitation, any information contained in any computer or memory system, although not yet printed out, or any material underlying, supporting, or used in the preparation of any such documents.

- "Correspondence" shall mean any and all written or electronic communications of any kind, including without limitation, documents, letters, forms, memoranda, reports, notes, worksheets, drafts, working papers, contracts, agreements or other papers whether handwritten, typed, printed or reproduced photostatically or photographically, including all film, microfilm, photographs, audiotapes, videotapes, e-mails, text messages, drawings or other visual representations and any computer, magnetic, mechanical or electronic recordings. The term "correspondence" extends to and specifically encompasses all non-identical copies of any responsive documents, and all such non-identical copies should be produced.

- The terms "relating to" or "regarding" shall be construed to include pertaining to, responding to, constituting, comprising, concerning, setting forth, summarizing, reflecting, stating, describing, recording, noting, embodying, mentioning, studying, analyzing, discussing, identifying or evaluating, directly or indirectly, or in any way having any logical or factual connection whatsoever with this Action.

- All terms in these Requests have the broadest meaning accorded to them pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, and all information and documents should be accorded with those rules. In particular: (i) the terms "all" and "each" shall be construed as all and each; (ii) the connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of the scope; and (iii) the use of the singular form of any word shall include the plural and vice versa.

INSTRUCTIONS

1. In the event that any document, or any portion of any document, within the scope of this request is withheld from production upon a claim of privilege, work product, or for any other reason, including, without limitation, that such document was lost, destroyed or otherwise disposed of since its preparation or receipt, You are requested to provide a list identifying each document so withheld, together with the following:

   a. a statement constituting the basis for any claim of privilege, work product, or other ground of non-disclosure or non-production;

   b. if, applicable, the full particulars or circumstances whereby the document was lost, destroyed or otherwise disposed of; and,

   c. a brief description of the document including:

      i. the type of document;

      ii. the date of the document;

      iii. the number of pages, attachments, and appendices;

      iv. the name(s) of its author(s) or preparer(s) and an identification by employment and title of each such person;

v. the name(s) of each person to whom the document, or a copy thereof, was sent, shown or made accessible, or to whom it was explained, together with an identification of each such person;

vi. the subject matter of the document; and

vii. last custodian of the document or copies thereof.

2. In construing these Requests, the singular includes the plural number and vice versa; the masculine includes the feminine and neutral genders; the past tense includes the present tense where the clear meaning is not destroyed by the change in tense.

3. A complete and legible copy may be produced in lieu of producing the document itself.

4. With respect to the documents produced, You shall:

a. produce them as they are kept in the usual course of business or shall organize and label them to correspond with each numbered paragraph and each lettered subparagraph of this Request in response to which such documents are produced;

b. identify the source of each document by department, division, and/or person.

5. The responses to this Request must include all documents in the possession, custody, and control of Your agents and employees, including attorneys and all persons acting on Your behalf or under Your control, or any of Your affiliates or subsidiaries.

6. Electronically stored information ("ESI"), including but not limited to emails, Word documents, and Power Points, must be produced and continue to be preserved in its original native format including its accompanying metadata.

7. All documents that respond in whole or in part, to any part of any paragraph of the following Requests shall be produced in their entirety, including all attachments and enclosures.

8. In accordance with Federal Rule of Civil Procedure 26, these Requests are continuing in nature and require You to make supplemental production(s) in a timely manner in the event that You obtain or discover additional information or documents after the documents requested herein are produced.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Request No. 1

Documents sufficient to identify all persons who negotiated the Prepetition ABL Credit Agreement and the Prepetition Term Loan Credit Agreement, and any amendments thereof, on behalf of the Debtors.

Request No. 2

Any analysis of the creditworthiness, going-concern ability, or insolvency of any of the Debtors since January 1, 2020 (individually or collectively).

Request No. 3

To the extent not previously produced, all documents concerning or related to any secured or unsecured credit facilities entered into by the Debtors since June 1, 2017, including the Loan and Security Agreement with Barclays Bank PLC entered into on or about June 1, 2021 and the First Lien Credit Agreement with L Catterton entered into on or about October 19, 2022.

Request No. 4

All documents, including any closing binders, related to L Catterton's acquisition of a controlling interest in West Marine, Inc. in or about 2021, and all debt documents entered into in connection therewith.

Request No. 5

To the extent not previously produced, all documents related to the March 2023 Transaction, including but not limited to, closing binders, term sheets, drafts of the credit agreements, and all correspondence regarding the negotiation of the March 2023 Transaction, including correspondence with L Catterton, Oaktree, or any lenders involved in the March 2023 Transaction.

Request No. 6

To the extent not previously produced, all documents related to the September 2023 Transaction, including but not limited to, closing binders, term sheets, drafts of the credit agreements, and all correspondence regarding the negotiation of the September 2023 Transaction, including correspondence with L Catterton, Oaktree, or any lenders involved in the September 2023 Transaction.

Request No. 7

All formal or informal requests for production of documents, interrogatories, requests for admission, or notices of deposition(s) or interview(s) (collectively, "Discovery Requests") served by the Special Committee on the Debtors or any other person or entity in connection with the Independent Investigation.

Request No. 8

All formal or informal responses or objections received by the Special Committee to any Discovery Requests.

Request No. 9

All non-privileged documents provided or produced to, or prepared by, the Special Committee in connection with the Independent Investigation.

Request No. 10

All documents concerning any past or present relationships or connections between the Debtors and any related affiliates, equity sponsors, or lenders, on the one hand, and Matthew Kahn and Hugh Charvat, on the other hand.

Request No. 11

All non-privileged documents concerning or relating to the Independent Investigation, and any findings or determinations made by the Special Committee.

Request No. 12

Identify all transactions the Special Committee analyzed in connection with the Independent Investigation.

Request No. 13

All presentations, agenda, or materials considered by the Special Committee as part of the Independent Investigation.

Request No. 14

All communications between members of the Special Committee regarding the Independent Investigation.

<u>Request No. 15</u>

All communications between the members of the Special Committee and any of the Debtors' lenders or equity holders regarding the Independent Investigation.

<u>Request No. 16</u>

A copy of any transcripts or notes from any interviews conducted by the Special Committee in connection with their investigation.

<u>Request No. 17</u>

Documents sufficient to show the composition of each board of directors, or similar body, of each Debtor since June 1, 2021, including the identity of all board members.

<u>Request No. 18</u>

To the extent not previously produced, all unredacted board minutes, agendas, resolutions, presentations, and monthly performance decks for any meeting of the boards of directors of the Debtors since June 1, 2021.

<u>Request No. 19</u>

To the extent not previously produced, all board minutes, agendas, resolutions, presentations, and monthly performance decks for any meeting of the Special Committee.

<u>Request No. 20</u>

Documents sufficient to show the identity of all corporate officers of the Debtors since June 1, 2021.

<u>Request No. 21</u>

All documents and Correspondence concerning or relating to the negotiation and execution of the RSA and the Plan, including the negotiation of the amount of the GUC Cash (as defined in the Plan).

<u>Request No. 22</u>

Documents sufficient to show the holders of the Debtors' equity interests since 2021, including but not limited to, summary capitalization table(s) showing stock ownership of the company, and organizational chart(s) illustrating upstream ownership of the Debtors.

<u>Request No. 23</u>

All documents concerning or relating to the prepetition retention bonuses paid to executives within the last two years, including any report or analysis prepared for the Debtors or relied upon by the Debtors in authorizing the bonuses.

<u>Request No. 24</u>

All documents relied on by the Debtors in connection with the prepared Valuation Analysis of the Debtors' assets and Financial Projections.

Request No. 25

All documents the Debtors intend to rely on at the confirmation hearing to demonstrate the feasibility of the Plan.

Request No. 26

All documents concerning the valuation of any of the Debtors or their assets since January 1, 2020.

Request No. 27

All documents related to the Exit Facilities (as defined in the Plan).

Request No. 28

Any engagement letter or agreement by and between the Debtors or the Special Committee and Young Conaway.

Request No. 29

Documents sufficient to show Kirkland & Ellis's or Young Conaway's representation of any other special committee or special committee member where Matthew Kahn or Hugh Charvat served as a board member.

Request No. 30

All documents, drafts, inputs, assumptions, working papers, native files, valuation and forecasting models, analysis, including comparable company analyses and precedent transaction analyses, and communications relied on to generate the Liquidation Analysis, Financial Projections, and Valuation Analysis.

Request No. 31

Documents sufficient to identify all states and foreign countries in which the Debtors are authorized to conduct business.

Request No. 32

All presentations prepared by the Debtors, or on their behalf, that were provided to creditors and/or rating agencies in connection with any financing or proposed financing.

Request No. 33

All documents and Correspondence concerning or relating to any efforts by the Debtors to market or sell their assets since June 1, 2021.

Request No. 34

All documents concerning, relating to, or otherwise constituting, schedules of the Debtors' federal and state net operating losses for each tax year since June 1, 2021, including but not limited to, documents sufficient to show the beginning and ending balance of the net operating losses and the application of same.

<u>Request No. 35</u>

To the extent not previously produced, all documents concerning or relating to management projections for the Debtors' financial performance for each year since June 1, 2021 and any variances thereto.

<u>Request No. 36</u>

All documents concerning, relating to, or otherwise constituting, any asset impairment analyses prepared by the Debtors, or on their behalf, including but not limited to, studies pertaining to the write-off of goodwill.

<u>Request No. 37</u>

All documents concerning, relating to, or otherwise constituting, any studies and/or analyses prepared by the Debtors, or on their behalf, related to the allocation of prices paid in mergers and acquisitions.

Dated: June [•], 2026

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Proposed Counsel to the Official Committee of Unsecured Creditors of West Marine, Inc.

EXHIBIT 2

Deposition Notices

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: WEST MARINE, INC., *et al.*,[1] Debtors.	Chapter 11 Case No. 26-10794 (KBO) (Jointly Administered)

NOTICE OF RULE 2004 EXAMINATION OF THE DEBTORS

PLEASE TAKE NOTICE THAT pursuant to Rules 2004 and 9016 of the Federal Rules of Bankruptcy Procedure, Rule 30 of the Federal Rules of Civil Procedure, and Rule 2004-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, the Official Committee of Unsecured Creditors of West Marine, Inc. *et al.* and its affiliated debtors (the "Debtors"), by and through its proposed undersigned counsel, will take the deposition upon oral examination of a designee or designees of the Debtors in the above-caption chapter 11 cases. The deposition will take place on [•], starting at 10:00 a.m. (Eastern), at the office of Kelley Drye & Warren LLP (3 World Trade Center, 175 Greenwich Street, New York, NY 10007). The deposition(s) will take place before a court reporter, will be recorded by stenographic means and videotapes, and shall continue from day to day until it has been completed.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Federal Rule of Civil Procedure 30(b)(6), the Debtors must designate one or more persons to testify on their behalf with regard to all matters known or reasonably available to them on the matters set forth on Schedule A attached hereto.

[1] The Debtors in these chapter 11 cases are: West Marine, Inc.; Marine One Holdco, LLC; Marine One Parent, Inc.; Rising Tide Holdings Inc.; Rising Tide Parent Inc.; Seascapes, Inc.; W Marine Management Company, Inc.; and West Marine Products, Inc.

Dated: June [•], 2026

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Proposed Counsel to the Official Committee of Unsecured Creditors of West Marine, Inc.

SCHEDULE A

DEFINITIONS

1. "ABL and FILO Facilities" refers to the credit agreements described in the Disclosure Statement.

2. "Action" shall mean the jointly administered chapter 11 cases captioned *In re West Marine, Inc., et al.*, Case No. 26-10794 (KBO), pending in the United States Bankruptcy Court for the District of Delaware.

3. "Board" means any boards of directors, boards of managers, managing members, or other governing bodies, of the Debtors.

4. "Chapter 11 Cases" means the cases captioned *In re West Marine, Inc., et al.*, Case No. 26-10794, filed in the United States Bankruptcy Court for the District of Delaware.

5. "Debtors" means West Marine, Inc., and its affiliated debtors in these Chapter 11 Cases, and any former or current directors, officers, members, agents, employees, representatives, managing agents, accountants, attorneys, investigators or affiliates, and any agents, employees, or representatives thereof.

6. **"**Disclosure Statement**"** shall mean the *Disclosure Statement for the Amended Joint Plan of Reorganization of West Marine, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* filed at Docket No. 280 in the Action.

7. "L Catterton" refers to L Catterton Management Limited, acting on behalf of one or more affiliated or managed funds, investment vehicles, or accounts and all officers, members, agents, employees, advisors, representatives, affiliates, or any Person acting on their behalf.

8. "L Catterton Acquisition" refers to the April 2021 acquisition of the Debtors by L Catterton.

9. "March 2023 Transaction" refers to the transaction described in the Disclosure Statement.

10. "Person" refers to any individual, corporation, partnership, joint venture, association, governmental agency, or other entity.

11. "Plan" shall mean the *Amended Joint Plan of Reorganization of West Marine, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* filed at Docket No. 278 in the Action.

12. "Prepetition Marketing Process" refers to the marketing process described in the Disclosure Statement.

13. "RSA" means the Restructuring Support Agreement dated as of May 17, 2026.

14. "September 2023 Transaction" refers to the transaction described in the Disclosure Statement.

15. "Term Loan Facility" refers to the credit agreement described in the Disclosure Statement.

DEPOSITION TOPICS

1. The L Catterton Acquisition.

2. The March 2023 Transaction.

3. The September 2023 Transaction.

4. The Debtors' organizational structure and equity ownership.

5. The ABL and FILO Facilities, including, but not limited to, the ABL Credit Agreement dated May 1, 2024, as amended.

6. The Term Loan Facility, including, but not limited to, the Super-Priority Credit Agreement dated September 25, 2024, as amended.

7. The composition of the Board since June 1, 2021.

8. The Debtors' financial condition, liquidity, solvency, and operational performance from January 2020 through the Petition Date.

9. The receipt, deployment, allocation, use, transfer, investment, expenditure, or other disposition of any proceeds or capital raised, provided, or made available in connection with the L Catterton Acquisition, the March 2023 Transaction, the September 2023 Transaction, or any related financing, including any use for debt service, working capital, inventory, capital expenditures, lease obligations, professional fees, management fees, dividends, distributions, payments to insiders or affiliates, or other transfers of value, and any reporting, budgets, cash-flow forecasts, or variance analyses concerning the foregoing.

10. The formation, authority, scope, activities, and independence of the Special Committee established on April 13, 2026.

11. The Debtors' filing of the Chapter 11 Cases, including the timing of, and preparation for, any such filing, and the decision-making in connection therewith.

12. The RSA, including, but not limited to, its negotiation and execution.

13. The Plan and Disclosure Statement, including in connection with valuation of the Debtors' assets and the feasibility of the Plan.

14. The sale process that the Debtors and their advisors are undertaking in this Action.

15. All negotiations related to cash collateral in this Action.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: WEST MARINE, INC., *et al.*,[1] Debtors.	Chapter 11 Case No. 26-10794 (KBO) (Jointly Administered)

NOTICE OF RULE 2004 EXAMINATION OF HUGH CHARVAT

PLEASE TAKE NOTICE THAT pursuant to Rules 2004 and 9016 of the Federal Rules of Bankruptcy Procedure, Rule 30 of the Federal Rules of Civil Procedure, and Rule 2004-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, the Official Committee of Unsecured Creditors of West Marine, Inc. *et al.* and its affiliated debtors (the "Debtors"), by and through its proposed undersigned counsel, will take the deposition upon oral examination of Hugh Charvat on [•], at 10:00 a.m. (Eastern). The deposition shall take place remotely via Zoom or other video conference platform. The deposition will be videotaped and taken before a court reporter duly authorized to administer oaths and will continue from day to day until the examination is completed.

[1] The Debtors in these chapter 11 cases are: West Marine, Inc.; Marine One Holdco, LLC; Marine One Parent, Inc.; Rising Tide Holdings Inc.; Rising Tide Parent Inc.; Seascapes, Inc.; W Marine Management Company, Inc.; and West Marine Products, Inc.

Dated: June [•], 2026

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Proposed Counsel to the Official Committee of Unsecured Creditors of West Marine, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: WEST MARINE, INC., *et al.*,[1] Debtors.	Chapter 11 Case No. 26-10794 (KBO) (Jointly Administered)

NOTICE OF RULE 2004 EXAMINATION OF MATTHEW KAHN

PLEASE TAKE NOTICE THAT pursuant to Rules 2004 and 9016 of the Federal Rules of Bankruptcy Procedure, Rule 30 of the Federal Rules of Civil Procedure, and Rule 2004-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, the Official Committee of Unsecured Creditors of West Marine, Inc. *et al.* and its affiliated debtors (the "Debtors"), by and through its proposed undersigned counsel, will take the deposition upon oral examination of Matthew Kahn on [•], at 10:00 a.m. (Eastern). The deposition shall take place remotely via Zoom or other video conference platform. The deposition will be videotaped and taken before a court reporter duly authorized to administer oaths and will continue from day to day until the examination is completed.

[1] The Debtors in these chapter 11 cases are: West Marine, Inc.; Marine One Holdco, LLC; Marine One Parent, Inc.; Rising Tide Holdings Inc.; Rising Tide Parent Inc.; Seascapes, Inc.; W Marine Management Company, Inc.; and West Marine Products, Inc.

Dated: June [•], 2026

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EXHIBIT B

Initial Requests

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June 4, 2026

Via Email

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Re: *In re West Marine, Inc. et al.* (the "Debtors")
Case No. 26-10794 (KBO) (Bankr. D. Del.)

Dear Counsel:

As you are aware, Kelley Drye & Warren LLP is proposed counsel to the Official Committee of Unsecured Creditors (the "Committee") in the above-referenced chapter 11 cases.

On May 19, 2026, the United States Bankruptcy Court for the District of Delaware (the "Court") entered an interim order authorizing the Debtors to use Cash Collateral (the "Interim Cash Collateral Order").[1] Pursuant to paragraph 16 of the Interim Cash Collateral Order, the Committee has until the earlier of (i) the date of entry of an order confirming a chapter 11 plan and (ii) seventy-five (75) calendar days after entry of the Interim Cash Collateral Order to commence any Challenges (as defined in the Interim Cash Collateral Order) (the "Challenge Period").

In connection with its investigation of the Debtors and potential estate claims, and without waiving its right to oppose the Challenge Period provisions set forth in the Interim Cash Collateral Order, the Committee hereby requests the below information from the Debtors and the Special

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[1] Dkt. No. 71. Capitalized terms used but not defined in this letter have the meaning ascribed to them in the Interim Cash Collateral Order or the *Declaration of Paulee Day, Chief Executive Officer of West Marine, Inc., in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [Dkt. No. 15] (the "First Day Declaration").

Committees.[2] To the extent the Debtors or the Special Committees believe they have already completed production with respect to any request set forth in this letter, please specify the date(s) and method(s) of production.

Loan Documents

1. All documents, including any and all closing sets, loan and credit files, fee letters, flow of funds memoranda, and borrowing base certificates related to (i) the ABL Credit Agreement, dated as of May 1, 2024, among Rising Tide Holdings, Inc., as borrower, Marine One Parent, Inc., the revolving lenders party thereto from time to time, the FILO lenders party thereto from time to time, and Eclipse Business Capital LLC, as administrative agent, collateral agent, and FILO agent (the "Prepetition ABL Credit Agreement"); and (ii) the Term Loan Credit Agreement, dated as of September 25, 2024, among Rising Tide Holdings, Inc., as borrower, Marine One Parent, Inc., Wilmington Savings Fund Society, FSB, as administrative agent and collateral agent, the guarantors that are parties thereto from time to time, and the lenders that are parties thereto from time to time (the "Prepetition Term Loan Credit Agreement"); together with any and all amendments, modifications, supplements, or payoffs to the foregoing documents, as well as any related subordination and intercreditor agreements (collectively, the "Prepetition Loan Documents").

2. All loan ledgers related to the Prepetition Loan Documents.

3. All documents regarding, concerning, or evidencing the creation, attachment, and perfection of security interests with respect to the Prepetition Loan Documents and any obligations under the Prepetition Loan Documents.

4. All documents regarding, concerning, or evidencing the disbursement(s) and the Debtors' use of funds under the Prepetition Loan Documents, including the purpose for each such disbursement(s).

5. The identity of all persons who negotiated the Prepetition Loan Documents on behalf of the Debtors and their counterparties.

6. Any statement of fees or expenses paid by or on behalf of the Debtors to, or on account of, any lender or agent under the Prepetition Loan Documents, including the date, payor, recipient, amount, and description of each such payment.

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[2] The Committee reserves all rights to supplement the requests made in this letter and/or to seek information pursuant to Federal Rule of Bankruptcy Procedure Rules 2004 or 7026–7037, if necessary.

7. All documents regarding, concerning, or evidencing any repayment of indebtedness of the Debtors under the Prepetition Loan Documents, including any principal, interest, fees, or other obligations.

8. Any default notices, waivers, or forbearance agreements received by Debtors in connection with the Prepetition Loan Documents.

9. All financial statements and reports, compliance certificates, and similar documents delivered in connection with the Prepetition Loan Documents.

10. Any analysis of the credit worthiness, going concern ability, or insolvency of any of the Debtors (individually or collectively).

11. All documents related to any other secured or unsecured credit facilities entered into by the Debtors since June 1, 2017, including the Loan and Security Agreement with Barclays Bank PLC entered into on or about June 1, 2021 and the 2022 First Lien Credit Agreement with L Catterton entered into on or about October 19, 2022.

Cash Collateral and Budget

12. All communications between the Debtors and the Prepetition Secured Parties regarding negotiation of the Debtors' use of Cash Collateral during the Debtors' chapter 11 cases, including negotiation of the Approved Budget and the proposed investigation budget for the Committee.

13. Any analysis of the Prepetition ABL Priority Collateral or Term Loan Priority Collateral, including any valuations of such collateral.

Restructuring Support Agreement and Plan

14. All documents related to the negotiation of the Restructuring Support Agreement (the "RSA"), dated May 17, 2026, among Marine One Holdco, LLC and certain of its subsidiaries and affiliates, the Consenting FILO Lenders, the Consenting Term Loan Lenders, and the Consenting Equity Holders.

15. All documents related to the Recapitalization Transaction contemplated under the RSA, including all documents related to the Exit Term Loan Facility, the Exit ABL Facility, all go-forward business plans, the feasibility of the proposed Plan, any valuation of the Debtors' assets, the ability of the Debtors to service their debt, and any projections regarding go-forward liquidity.

16. All documents concerning the negotiation of the terms of the RSA milestones, including all communications between the Debtors and any third parties regarding the Bid

Deadline of June 26, 2026, the target Confirmation Order date of August 5, 2026, and the Plan Effective Date of August 20, 2026.

2023 Restructuring Transactions

17. All documents related to the March 2023 Transaction, including all transaction documents, the exchange offers to the Company's then-existing first and second lien lenders, and the negotiation of the 1A Term Loan, 1B Term Loan, and 2A Term Loan.

18. All documents related to the September 2023 Transaction, including all transaction documents, the equitization of approximately $660 million of funded debt, the exchange of 1A Term Loan claims for 10% of newly issued common stock, the exchange of 1B Term Loan claims and 2A Term Loan claims for newly issued warrants, and the provision of $125 million of new capital by the equity sponsor and then-existing lenders.

19. All term sheets and communications regarding the negotiations of the March 2023 Transaction and the September 2023 Transaction.

Special Committees Investigation

20. All documents related to the creation and formation of the Special Committees of the boards of directors of Marine One Parent, Inc. and each of its subsidiaries in April 2026.

21. All documents provided to or prepared by the disinterested directors Matthew Kahn and Hugh Charvat or their advisors.

22. All documents concerning the selection of Matthew Kahn and Hugh Charvat as disinterested directors.

23. All documents concerning any past or present relationships or connections between the Debtors and any related affiliates, equity sponsors, or lenders, on the one hand, and Matthew Kahn and Hugh Charvat, on the other hand.

24. All documents concerning the Independent Investigation and any findings related to the existence of potential claims or causes of action the Debtors may hold against any lenders, insiders, other affiliated entities, including L Catterton, Oaktree, and their respective affiliates, or the Debtors' directors or officers (collectively, the "Potential Claims").

25. All documents concerning Conflict Matters delegated to the Special Committees, including any investigation, release, or settlement of the Potential Claims.

26. All formal or informal requests for production of documents, interrogatories, requests for admission, or notices of deposition(s) or interview(s) (collectively, "Discovery Requests") made on the Debtors by the Special Committees or its counsel.

27. All formal or informal responses or objections to any Discovery Requests.

28. All documents received by the Special Committees as part of their Independent Investigation.

29. All documents produced by the Debtors to the Special Committees as part of the Independent Investigation.

30. A copy of any transcripts or notes from any interviews or depositions that have been conducted by the Special Committees.

31. All memoranda, correspondence, emails, or similar documents regarding the selection of independent board directors, including Matthew Kahn and Hugh Charvat.

32. All board minutes, agendas, resolutions, presentations, and documents concerning or relating to all meetings of any board or independent or special committees thereof, including the Special Committees, since June 1, 2021.

33. Any analysis conducted by the Debtors, including by any independent board or independent director(s) or member(s), or their representatives regarding the Potential Claims.

Equity Sponsor and Related Parties

34. All documents related to L Catterton's acquisition of a controlling interest in West Marine, Inc. in or about 2021, including any debt financing provided by Barclays Bank PLC, Golub Capital LLC, Nomura, or any other entity.

35. All documents related to Monomoy Capital Partners' acquisition of West Marine, Inc. and certain affiliates in 2017, including any debt financing provided by Bank of America, Pathlight Capital, or any other entity.

36. Documents sufficient to show the equity interests held by L Catterton and any of its affiliates, and Oaktree and any of its affiliates, including the type and amount of each such interest held.

37. All documents related to any transactions between the Debtors and any of their direct or indirect equity holders, sponsors, or affiliates, including L Catterton, Oaktree, and any entities managed or advised by such parties, since June 1, 2021.

38. All documents concerning any equity distributions or other payments, including management fees, transaction fees, monitoring fees, dividends, or consulting fees, made by the Debtors to any equity holder (including L Catterton or Oaktree) or their respective affiliates since June 1, 2021.

39. All documents related to the commitment by L Catterton to fund $5.0 million and Oaktree to fund $2.5 million (with an additional $2.5 million offered to other Tranche A Term Loan Lenders) of Exit Term Loan new money.

40. A list, in Excel format, of all transfers made to any Insider, as that term is defined in section 101(31) of the Bankruptcy Code, within one year of the Petition Date.

Corporate Documents

41. All corporate formation and governance documents of each of the Debtors.

42. All audited, and if not available, unaudited, financial statements of the Debtors for all years since 2017.

43. The identity of all board members of the Debtors since June 1, 2021, including details surrounding the appointment of each board member, their respective date of appointment, resignation or removal, the reason for removal, all compensation paid to such board members by the Debtors, and any known affiliations with any equity holders or secured lenders of the Debtors.

44. The identity of all corporate officers of the Debtors since June 1, 2021, including details surrounding the appointment of each officer, their respective date of appointment, resignation or removal, the reason for removal, all compensation paid to such officers by the Debtors, and any known affiliations with any equity holders or secured lenders of the Debtors.

45. The identity and description of all independent or special committees, including the Special Committees and any restructuring committees, of the Debtors since June 1, 2021, including the purpose of each such committee, the identity of each committee member, each committee's dates of formation and disbandment, the reason for disbandment, all compensation paid to such independent committees and their members by the Debtors, and any information regarding any independent or special committees created in connection with the March 2023 Transaction and the September 2023 Transaction.

46. Any compensation or employment agreements for any current or former directors and officers of the Debtors in effect since June 1, 2021.

47. Any analysis conducted by the Debtors, including the independent board or independent director(s) or member(s), or their representatives regarding the value of potential claims and causes of action against the Debtors' directors or officers.

48. A complete list of all holders of any equity interest in each Debtor since June 1, 2021, including the type and amount of each such interest held.

49. Documents sufficient to show the salary and bonuses paid to the officers and management of the Debtors since June 1, 2021.

50. Documents sufficient to show the net operating losses of approximately $194.6 million and the Internal Revenue Code § 163(j) interest expense carryforwards of approximately $189.6 million, as referenced in the NOL Motion.[3]

Financials, Valuation, and Projections

51. All valuations of any one or more of the Debtors or any of their assets conducted by the Debtors since June 1, 2021.

52. All documents concerning the Debtors' go-forward business plan and financial projections.

53. All cash flow budgets for the Debtors since June 1, 2021.

54. All documents used by the Debtors in formulating financial projections since June 1, 2021.

55. Any liquidation analysis conducted by the Debtors or their advisors since June 1, 2021.

56. All tax returns of the Debtors for the years since 2023.

Critical Vendor and Trade Claims

57. All documents related to the Critical Vendors Motion,[4] including any analysis supporting the designation of critical vendors and the criteria used to determine which trade creditors qualified for critical vendor treatment.

58. A list, in Excel format, of all payments made to vendors in the ninety (90) days prior to the Petition Date, including, for each payment, the identity of the recipient, the date of payment, the amount of payment, and a description of the goods or services received by the Debtors.

59. Any calculation or analysis of stub rent under 11 U.S.C. § 365(d)(3).

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[3] Dkt. No. 8.

[4] Dkt. No. 11.

60. Any calculation or analysis of administrative expense claims under 11 U.S.C. § 503(b)(9).

Insurance Policies

61. Copies of all insurance policies in effect as of the Petition Date, including copies of all directors and officers' insurance policies since June 1, 2021.

Please provide the requested documents and information to us by no later than June 12, 2026. If you are unable or unwilling to produce any of the documents or information by that time, please advise us in writing so we can set up a meet and confer and/or seek such information pursuant to Federal Rule of Bankruptcy Procedure 2004 or 7026–7037.

Thank you in advance for your attention to this matter.

Very truly yours,

/s/ *Richard D. Gage*

Richard D. Gage

CC: Matthew C. Fagen
Brian J. Nakhaimousa

CERTIFICATE OF SERVICE

I, Sarah R. Gladieux, do hereby certify that on June 26, 2026, a copy of the foregoing **Official Committee of Unsecured Creditors' Motion Pursuant to Bankruptcy Rule 2004 for an Order Directing the Production of Documents and Information** was served on the parties listed on the attached service list via email.

/s/ Sarah R. Gladieux
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