

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

In re	Chapter 11
CROWN BOILER CO., LLC,	Case No. 26-20515 (JCM)
Debtor	(Jointly Administered)
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,	Related to Doc. Nos.: 256, 297
v.	Hearing Date: n/a
CROWN BOILER CO., LLC.	Response Deadline: n/a

NOTICE OF PRODUCTION OF DOCUMENTS FOR IN CAMERA REVIEW

Debtor, Crown Boiler Co., LLC (“Debtor”), by and through its undersigned counsel, pursuant to this Court’s direction in open Court on May 27, 2026, and in its Order Granting Expedited Motion of the Official Committee of Unsecured Creditors to Compel Debtor's Compliance with the Court's May 4, 2026 Order (Doc. No. 256) and Debtor’s Response to Expedited Motion of the Official Committee of Unsecured Creditors to Compel Debtor's Compliance with the Court's May 4, 2026 Order entered on May 28, 2026 (Doc. No. 297) (the “Order”), hereby gives notice that on Friday, June 5, 2026, the Debtor submitted, *in camera*, eight confidential documents, all of which have been marked at the bottom of each page as “Privileged and Confidential” and sequentially bates-stamped. These documents are submitted to this Court for *in camera* review only by Judge Melaragno and his Court staff, in accordance with the Order.

By submitting these documents for *in camera* review, the Debtor does not waive any rights as to confidentiality or privilege. Following this Court’s *in camera* review, the Debtor requests that the Court deny the corresponding portions of the Expedited Motion of the Official Committee of Unsecured Creditors to Compel Debtor’s Compliance with the Court’s May 4, 2026 Order (Doc. 276)

related to these documents, so that the Debtor will have no obligation to produce them to the Unsecured Creditors Committee.

The Debtor respectfully requests that, if the Court were to determine that any of the documents submitted for *in camera* review are appropriate for dissemination to counsel for the Unsecured Creditors Committee, its financial advisor, or any other interested parties, that newly appearing counsel for Burnham Holdings, Inc., Reed Smith, and counsel for Burnham Industries LLC, Quarles & Brady LLP, be given advance notice of such ruling such that they may have time to assert any appropriate objections before such documents are disclosed.

Attached hereto as Appendix A is a production and privilege log, giving the bates ranges for documents produced previously in response to the Informal Discovery Requests made by the Official Committee of Unsecured Creditors on April 8, 2026 and April 17, 2026, and the Priority Informal Discovery Requests made by the Official Committee of Unsecured Creditors on May 4, 2026, and further describing the additional eight documents being submitted *in camera* to this Court.

Respectfully submitted,

SHUMAKER, LOOP & KENDRICK, LLP

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-and-

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By: /s/ Salene Kraemer

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Local Counsel to the Debtor

Appendix A

Record of Production and Documents Submitted for *in camera* Review

Record of Production:

Previously, Debtor produced documents in response to the Informal Discovery Requests made by the Official Committee of Unsecured Creditors on April 8, 2026 and April 17, 2026, and the Priority Informal Discovery Requests made by the Official Committee of Unsecured Creditors on May 4, 2026:

1. On May 1, 2026, Debtor produced documents bates-stamped 0000000001 – 0000000058.
2. On May 4, 2026, Debtor produced documents bates-stamped 0000000059 – 0000000206.
3. On May 14, 2026, Debtor produced documents bates-stamped Crown0000000207 - Crown0000002935.
4. On May 15, 2026, Debtor produced documents bates-stamped Crown0000002936 - Crown0000004093.
5. On May 21, 2026, Debtor produced a document bates-stamped Crown0000004094.

On June 5, 2026, Debtor submitted the following confidential documents for *in camera* review only by this Court:

1. The Pledge and Security Agreement
2. The Revolving Note with Fulton Bank
3. The Revolving Note with PNC
4. The Oct. 17, 2023 Credit Agreement
5. The First Amendment to the Credit Agreement
6. The Second Amendment to the Credit Agreement
7. The Waiver and Third Amendment to the Credit Agreement

8. Insurance Policy Schedule

These 8 documents are marked “Privileged and Confidential” and bates-stamped Crown0000004095

- Crown0000004560.

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THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,	Related to Doc. Nos.: 256, 297
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 6, 2026, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic filing to all counsel of record, including counsel for the United States Trustee and counsel for the Committee of Unsecured Creditors, and sent copies via email to counsel for Burnham Holdings, Inc., and counsel for Burnham Industries LLC as follows:

Burnham Holdings, Inc.
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/s/ Salene Kraemer

Attorney for the Debtor