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

IN RE: CROWN BOILER CO., LLC, Debtor.	Chapter 11 Case No. 26-20515-JCM
CROWN BOILER CO., LLC, OFFICIAL COMMITTEE OF UNSECURED CREDITORS, AND BURNHAM HOLDINGS, INC. v. No Respondent.	Related Doc. Nos.: 38, 58, 73, 283, 294, 297, and 320.

JOINT MOTION OF THE DEBTOR, THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, AND BURNHAM HOLDINGS, INC. FOR ADJOURNMENT OF CERTAIN HEARING DATES AND DEADLINES

Crown Boiler Co., LLC (the "Debtor"), as debtor and debtor-in-possession in the above-captioned chapter 11 case (this "Case"), the Official Committee of Unsecured Creditors (the "Committee"), and Burnham Holdings, Inc. ("BHI" and, collectively with the Debtor and the Committee, the "Parties") hereby submit this joint motion (this "Motion") for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), adjourning certain hearing dates and related deadlines in this Case pending further order of the Court and scheduling a status conference on or after August 5, 2026, prior to which the Parties will file a joint status report and scheduling proposal. The Parties have conferred with the Office of the United States Trustee (the "U.S. Trustee") and confirm that the U.S. Trustee has no objection to the relief requested in this Motion. In support of this Motion, the Parties respectfully represent as follows:

PRELIMINARY STATEMENT

1. BHI retained counsel in this Case last week. Since its retention, BHI's counsel has conferred with counsel to each of the Debtor, the Committee, and the U.S. Trustee regarding the status of this Case and the presently disputed issues, many of which involve BHI in its capacity as the Debtor's proposed lender or as a subject of the Committee's discovery requests. There is at least one matter on which all Parties agree: this Case presently is on an expensive, adversarial course that the Debtor's estate can ill-afford. Understanding that BHI, as the Debtor's proposed lender, will be asked to fund the professional fees arising from these disputes, BHI also discussed with each of the Debtor, the Committee, and the U.S. Trustee means by which the present adversarial course might be changed to a more consensual posture. The Parties generally are receptive to the ideas exchanged and are willing to continue those conversations, but these ideas will take time to negotiate and implement. And, it would be helpful to have time and space to have those conversations outside of the urgency of pending adversarial deadlines, which tend to cause parties to entrench further, rather than evaluate consensual solutions. For that reason and other reasons set forth more fully in this Motion, the Parties seek an adjournment of certain hearing dates and deadlines in this Case pending a status conference to be scheduled in early August and further Court order. While the Parties acknowledge the unusual nature of the relief requested in this Motion, the Parties agree that a pause is needed to steer this Case in a more consensual and less costly direction.

PROCEDURAL BACKGROUND

2. On February 25, 2026, the Debtor filed a voluntary petition for relief under chapter 11 of the United States Bankruptcy Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Western District of Pennsylvania (the "Court").

3. On March 11, 2026, the Debtor filed 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. No. 38] (the "DIP Motion"). The final hearing on the DIP Motion has been adjourned twice since the initial hearing date and currently is set to be heard on June 25, 2026.

4. On March 17, 2026, the Debtor filed the *Debtor's Expedited Motion for Order Appointing Edward T. Gavin, CTP, NCPM as Legal Representative for Future Asbestos Claimants* [Doc. No. 58] (the "FCR Motion"). The final hearing on the FCR Motion has been adjourned twice since the initial hearing date and currently is set to be heard on June 25, 2026.

5. On March 24, 2026, the Debtor filed the *Debtor's Expedited Motion for Authority to Use Cash Collateral and to Approve Execution of Waiver and Third Amendment to Credit Agreement* [Doc. No. 73] (the "Cash Collateral Motion"). The Debtor filed a proposed interim order regarding the Cash Collateral Motion on March 24, 2026 [Doc. No. 78]. The final hearing on the Cash Collateral Motion has been adjourned twice since the initial hearing date and currently is set to be heard on June 25, 2026.

6. On March 30, 2026, the U.S. Trustee filed an omnibus objection that included objections to the Debtor's DIP Motion [Doc. No. 87].

7. On April 1, 2026, the U.S. Trustee filed its *Appointment of Official Committee of Unsecured Creditors* [Doc. No. 90].

8. The U.S. Trustee filed an objection to the Cash Collateral Motion on April 7, 2026 [Doc. No. 107].

9. On April 7, 2026, the Committee filed a reservation of rights and joinder with respect the U.S. Trustee's omnibus objection filed at Doc. No. 87 [Doc. No. 113].

10. On April 8, 2026, Fulton Bank, N.A. filed an objection to the Cash Collateral Motion [Doc. No. 119].

11. On April 30, 2026, the Committee filed an *Expedited Motion of the Official Committee of Unsecured Creditors to (I) Compel the Production of Discoverable Information and Documents; and (II) Adjourn the May 13th Hearing* [Doc. No. 181]. The Debtor filed its response in opposition on May 4, 2026 [Doc. No. 194]. On May 4, 2026, the Court entered an Order granting the Committee's motion to compel in part [Doc. No. 205].

12. On May 22, 2026, the Committee filed the *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 the *Certification of David W. Ross in Support 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. No. 257]. The Debtor filed a response on May 27, 2026 [Doc. No. 276].

13. On May 27, 2026, the Debtor filed the *Debtor's Motion to Remove [Redacted Member] from the Unsecured Creditors' Committee* [Doc. No. 283].

14. At a hearing on May 27, 2026, the Court continued the hearing on the DIP Motion and Cash Collateral Motion to June 25, 2026 [Doc. Nos. 286, 289]. On May 27, 2026, the Court entered an Order continuing the hearing on the FCR Motion to June 25, 2026 and providing that the U.S. Trustee and the Committee each may submit Motions to Employ its choice of legal representative for future asbestos claimants [Doc. No. 294] (the "FCR Adjournment Order").

15. On May 28, 2026, the Court entered an Order granting the *Expedited Motion of the Official Committee of Unsecured Creditors to Compel Debtor's Compliance with the Court's May 4, 2026, Order* [Doc. No. 297].

16. On June 5, 2026, the Debtor filed the *Notice of Production of Documents for In Camera Review* [Doc. No. 314]. On June 9, 2026, the Court entered an Order, after conducting *in camera* review of documents, requiring the Debtor to provide the Committee with copies of all documents on or before June 17, 2026, unless BHI files a motion setting forth the basis for exclusion on or before June 12, 2026 [Doc. No. 320].

17. The Parties understand that the Committee intends to file a Motion to Employ alternative FCR candidates by June 11, 2026 in compliance with the FCR Adjournment Order (such motion filed by the Committee, a "<u>Committee FCR Motion</u>").

RELIEF REQUESTED

18. Through this Motion, the Parties collectively respectfully request that the Court enter an order substantially in the form of the Proposed Order:

a. pending further order of the Court, adjourning all hearing dates and deadlines related to the following motions: (i) the DIP Motion; (ii) the Cash Collateral Motion; (iii) the FCR Motion and any Committee FCR Motion; and (iv) the Motion to Remove Committee Member;

b. pending further order of the Court, adjourning the June 10, 2026, production deadlines for the Debtor and Committee as established in the Court's Order dated May 28, 2026 [Doc. No. 297];

c. pending further order of the Court, adjourning the deadlines set forth in the Court's Order dated June 8, 2026, and entered June 9, 2026 [Doc. No. 320] pertaining to the Debtor's production of certain documents to the Committee (deadline of June 17, 2026) and to BHI's filing of a motion setting forth the basis for exclusion of the production of those documents (deadline of June 12, 2026);

d. cancelling any deadline for the Debtor to file a chapter 11 plan;

e. scheduling a case status conference for the omnibus hearing date scheduled on August 5, 2026; and

f. requiring the Parties to submit a joint status report by 12:00 pm ET one day prior to the scheduled status conference, which report must include a scheduling proposal with respect to each of the foregoing motions (to the extent not withdrawn) and case discovery.

BASIS FOR RELIEF REQUESTED

19. Cause exists to grant the Parties' request for an adjournment of the aforementioned hearing dates and deadlines for a number of reasons.

20. *First*, BHI—the proposed lender to the Debtor and a subject of the Committee's discovery requests—recently retained the law firm Reed Smith LLP to represent it in connection with this Case. The Parties agree that the bests interests of the Case are served by giving Reed Smith LLP time to (i) assess the status of this Case and the issues presented herein, including the various presently contested matters involving BHI, and (ii) negotiate with the Debtor and the Committee regarding potential consensual resolutions to issues involving BHI.

21. *Second*, the Committee and the U.S. Trustee have expressed concerns to the Debtor and BHI regarding their lack of visibility into and understanding regarding the general direction of this Case and the Debtor's desired outcome. The proposed adjournment will provide the Parties an opportunity to meet and confer on these general guiding principles without the pressure of pending discovery and litigation deadlines. One path forward is for the Debtor to seek relief under section 524(g) of the Bankruptcy Code. There are alternative paths, however, that may not involve relief under that section. If the Debtor ultimately decides to pursue a path without relief under section 524(g) of the Bankruptcy Code, the appointment of a future claimants' representative is not required. The Parties agree that arriving at a mutual understanding and consensus concerning the general direction of this Case and what each Party hopes to accomplish through this Case will lead to more productive discussions on presently contested issues and, ultimately, negotiations on a chapter 11 plan. Such a mutual understanding also will inform the Parties as to whether the appointment of a future claimants' representative (and the costs associated with continued litigation on the FCR Motion) and whether a bar date for asbestos personal injury claims are

necessary or appropriate in this Case. The Parties understand that the Committee will be filing a motion to exempt holders of asbestos-related claims from the July 20, 2026 general bar date, and will consider whether to support the relief sought or relief similar to what is sought in that motion.

22. *Third*, the Committee and the U.S. Trustee have objected (whether formally or informally) to the DIP Motion on the basis that there is no 13-week cash flow forecast accounting for all anticipated expenses in this Case, a written credit agreement, or a proposed order granting the DIP Motion. After conferring with its recently retained counsel, BHI also prefers to move forward with a written credit agreement, revised cash flow forecast, and a proposed order. In an effort to resolve objections and provide clarity to parties in interest concerning the terms and conditions of the proposed debtor-in-possession loan, the Debtor and BHI desire additional time to negotiate and prepare a written credit agreement, a revised 13-week cash flow forecast, and a proposed order approving the DIP facility, and to discuss each of those documents with the Committee and the U.S. Trustee with the goal of presenting a consensual financing solution to the Court. An adjournment of the DIP Motion will not prejudice the Debtor because it is not operating and has no immediate need for cash.

23. *Fourth*, BHI and the Debtor presently are analyzing available strategies and opportunities to avoid needing to use Cash Collateral as part of this Case. In a scenario where Cash Collateral is not utilized, the Cash Collateral Motion could be withdrawn, in turn resolving any contested issues relating thereto, including the scope or interpretation of any release sought in associated waiver and amendment agreements. Before spending additional time and resources litigating or attempting to resolve disputes associated with the Cash Collateral Motion, the Parties agree that it is worthwhile to pause that process for at least thirty (30) days pending the outcome of that analysis.

24. *Fifth*, while the Debtor understands that its exclusive period to file a chapter 11 plan expires on June 25, 2026 (and it will likely file a motion to extend its exclusive periods under section 1121(d) of the Bankruptcy Code), nothing in the Bankruptcy Code or the applicable procedural rules requires the Debtor to file a chapter 11 plan by that time. Notwithstanding that, the Debtor understands that it presently is required to file a chapter 11 plan by June 25, 2026, based upon the docket entry for the Debtor's Chapter 11 Voluntary Petition. The Parties believe it would be premature and counterproductive for the Debtor to file a chapter 11 plan on or before that date—before the Parties have any meaningful opportunity to negotiate on the terms of a chapter 11 plan. Instead, the Parties desire additional breathing room for (i) the Debtor and BHI to produce relevant documents to the Committee, (ii) the Debtor and the Committee to investigate whether the estate has any colorable claims and causes of action against third parties, and (iii) the Parties to negotiate the terms of any chapter 11 plan.

25. *Sixth*, with respect to the Parties' numerous discovery disputes, BHI has requested, and the other Parties have agreed subject to the Court's approval, to adjourn discovery-related deadlines to permit BHI's recently retained counsel to understand the issues and attempt to find consensual resolutions. Indeed, many of the discovery disputes relate specifically to BHI's documents. While the Committee consents to the adjournment, given that BHI has been in possession of its discovery requests for several weeks, it expects that responses and productions will be made in due course. The Parties also will use the adjournment to discuss whether the Motion to Remove Committee Member can be withdrawn or otherwise resolved consensually as part of a broader resolution of discovery-related disputes.

CONCLUSION

WHEREFORE, the Parties respectfully request entry of the Proposed Order granting the relief requested in this Motion.

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Dated: June 10, 2026

Respectfully submitted,

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EXHIBIT A

Proposed Form of Order

(Attached)

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

IN RE: CROWN BOILER CO., LLC, Debtor.	Chapter 11 Case No. 26-20515-JCM
CROWN BOILER CO., LLC, OFFICIAL COMMITTEE OF UNSECURED CREDITORS, AND BURNHAM HOLDINGS, INC. v. No Respondent.	Related Doc. Nos.: 38, 58, 73, 283, 294, 297, and 320.

ORDER ADJOURNING CERTAIN HEARING DATES AND DEADLINES

Upon the joint motion (the "Motion")[1] of the above-captioned debtor and debtor-in-possession (the "Debtor"), the Official Committee of Unsecured Creditors (the "Committee"), and Burnham Holdings, Inc. ("BHI") for entry of an order (this "Order") adjourning certain hearing dates and deadlines, all as more fully set forth in the Motion;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

1. The Motion is GRANTED as set forth herein.

2. All hearing dates and deadlines related to the following motions are adjourned pending further order of the Court: (i) the DIP Motion; (ii) the Cash Collateral Motion; (iii) the FCR Motion; and (iv) the Motion to Remove Committee Member. All objections and reservations to the DIP Motion, the Cash Collateral Motion, the FCR Motion, and the Motion to Remove Committee Member are preserved.

[1] Capitalized terms used but not otherwise defined in this Order have the meanings ascribed to them in the Motion.

3. The June 10, 2026, production deadlines for the Debtor and Committee set forth in the Court's Order dated May 28, 2026 [Doc. No. 297] are adjourned pending further order of the Court.

4. The deadlines set forth in the Court's Order dated June 8, 2026, and entered June 9, 2026 [Doc. No. 320] pertaining to the Debtor's production of certain documents to the Committee (deadline of June 17, 2026) and to BHI's filing of a motion setting forth the basis for exclusion of the production of those documents (deadline of June 12, 2026) are adjourned pending further order of the Court.

5. Notwithstanding any prior docket entry, the Debtor is not required to file a chapter 11 plan by any date certain.

6. A case status conference is scheduled for August ____, 2026, at __:____.

7. The Parties shall submit a joint status report by 12:00 pm ET one day prior to the scheduled status conference, which report must include a scheduling proposal with respect to each of the foregoing motions (to the extent not withdrawn) and case discovery.

Signed: ____________________, 2026

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John C. Melaragno, Judge
United States Bankruptcy Court