

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

VWS Holdco, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10979-JKS

Jointly Administered

Re: D.I. 198

**JOINDER OF EVERGREEN NATIONAL INDEMNITY COMPANY
IN JOINT MOTION OF CHESTERFIELD COUNTY, VIRGINIA AND THE
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY TO TRANSFER
VENUE TO THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Evergreen National Indemnity Company (“Evergreen”), a secured creditor, through counsel, joins in the *Joint Motion of Chesterfield County, Virginia and the Virginia Department of Environmental Quality to Transfer Venue to the United States Bankruptcy Court for the Eastern District of Virginia* [Doc. No. 198] (“Motion”). In addition to the interests of justice, the convenience of the parties, and the conservation of time and resources, along with the substantial impact of this matter on the health and safety of the residents of Chesterfield County, Evergreen supports this Motion.

Wherefore, Evergreen respectfully requests that this Court grant the Motion and transfer venue of this case to the United States Bankruptcy Court for the Eastern District of Virginia.

Respectfully submitted,

Dated: July 29, 2025

/s/ Frederick B. Rosner

Frederick B. Rosner (DE #3995)

The Rosner Law Group LLC

824 N. Market Street, Suite 810

Wilmington, DE 19801

¹The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification numbers are as follows: VWS Holdco, Inc. (5412) and Shoosmith Bros., Inc. (6914). The Debtors’ mailing address is P.O. Box 2770, Chesterfield, VA 23832.

Telephone: (302) 777-1111

Email: rosner@teamrosner.com

Counsel for Evergreen National Indemnity Co.

-and-

Chrisandrea L. Turner

William T. Gorton III

W. Blaine Early, III

STITES & HARBISON PLLC

250 W. Main St., Ste. 2300

Lexington, Kentucky 40507

Telephone: (859) 226-2300

Email: clturner@stites.com

wgorton@stites.com

beary@stites.com

Co-Counsel for Evergreen National Indemnity Co.