

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

In re:

WATER GREMLIN COMPANY, et al.,¹
Debtors.

Chapter 11

Case No. 23-11775-LSS

(Jointly Administered)

Objection Deadline: March 13, 2026 at 4:00 p.m (ET)
Hearing Date: TBD

**LIQUIDATING TRUSTEE’S MOTION FOR AN ORDER
EXTENDING THE CLAIM OBJECTION DEADLINE
UNDER THE CONFIRMED CHAPTER 11 PLAN**

Edward T. Gavin (the “Liquidating Trustee”), the post-confirmation liquidating trustee for the WG GUC Liquidating Trust (the “Liquidating Trust”), hereby files this motion (this “Motion”) and respectfully states as follows.

RELIEF REQUESTED

1. By this Motion, the Liquidating Trustee seeks entry of an order (the “Proposed Order”), substantially in the form attached hereto as **Exhibit A**, extending the deadline to file objections to claims (the “Claim Objection Deadline”) under the confirmed *First Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation of Water Gremlin Company and its Debtor Affiliates* (the “Confirmed Plan”) through and including June 1, 2026, without prejudice to the rights of the Liquidating Trustee to seek further extensions of the Claim Objection Deadline.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: WG Sub, LLC (“WG Sub”) (0781), Water Gremlin Holdings, Inc. (“Holdings”) (9250), and Water Gremlin Company (“Water Gremlin” and, together with WG Sub and Holdings, the “Debtors”) (6396).

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). The Liquidating Trustee confirms his consent, pursuant to rule 7008 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Local Rule 9013-1(f), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory and legal bases for the relief requested in this Motion are section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”) and Bankruptcy Rule 9006.

BACKGROUND

A. General Background

5. On August 1, 2025 (the “Confirmation Date”), the Court entered the *Findings of Fact, Conclusions of Law, and Order Approving Disclosure Statement on a Final Basis, Confirming the Debtors’ Joint Chapter 11 Plan of Liquidation, and Granting Related Relief* [Docket No. 814] (the “Confirmation Order”).

6. Since the Confirmation Date, the Liquidating Trustee has been diligently reviewing claims filed in these cases and has attempted to negotiate certain of those claims with creditors in an effort to resolve claims rather than incur the cost of filing objections. In an effort to minimize

administrative costs to the Liquidating Trust, the Liquidating Trustee has, and will continue to, engage in discussions with creditors without resorting to motion practice and contested matters before the Court. In order to allow more time for those discussions to continue in an effort to reach resolutions with creditors and to allow sufficient time to prepare and file claims objections if necessary, the Liquidating Trustee requests that the Claim Objection Deadline be extended through June 1, 2026.

BASIS FOR RELIEF

7. Section 105(a) of the Bankruptcy Code provides that the “court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].” 11 U.S.C. § 105(a). Bankruptcy Rule 9006(b) provides that the Court may, for cause, extend the time for a party to act. Fed. R. Bankr. P. 9006(b).

8. The Liquidating Trustee submits that the extension sought herein should be granted. Since the effective date of the Confirmed Plan, the Plan Administrator has been engaged in the process of evaluating and addressing the proofs of claim filed and scheduled in these chapter 11 cases. As noted above, the Liquidating Trustee has made progress with respect to the claims review process. Several objections to claims have been filed in these cases and certain consensual resolutions of proofs of claim have been reached. Although it had appeared that all necessary objections had been filed, the Liquidating Trustee files this motion so he may continue evaluating certain additional claims that have not yet been resolved.

9. Accordingly, the Liquidating Trustee respectfully requests that the Court enter an order extending the Claim Objection Deadline through and including June 1, 2026, without prejudice to the Liquidating Trustee’s rights to seek further extensions of such deadline.

NOTICE

10. Notice of this Motion has been provided to: (a) the U.S. Trustee; (b) counsel to the WG TCE Tort Claims Settlement Trust; and (c) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Liquidating Trustee submits that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE, the Liquidating Trustee respectfully requests entry of the proposed order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other and further relief as the Court deems just and proper.

Dated: February 27, 2026
Wilmington, Delaware

DORSEY & WHITNEY (DELAWARE) LLP

/s/ Eric Lopez Schnabel

Eric Lopez Schnabel (DE Bar No. 3672)
Alessandra Glorioso (DE Bar No. 5757)
300 Delaware Avenue, Suite 1010
Wilmington, Delaware 19801
Telephone: (302) 425-7171
Email: schnabel.eric@dorsey.com
gloriosso.alessandra@dorsey.com

-and-

DORSEY & WHITNEY LLP

Eric Lopez Schnabel
Michael Galen (admitted *pro hac vice*)
Courina Yulisa (admitted *pro hac vice*)
Laura Goforth (admitted *pro hac vice* - admitted to practice only in Minnesota)
51 West 52nd Street
New York, NY 10019
Telephone: (212) 415-9200
Email: schnabel.eric@dorsey.com
galen.michael@dorsey.com
yulisa.courina@dorsey.com
goforth.laura@dorsey.com

Counsel for the Liquidating Trustee

EXHIBIT A

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

In re:

WATER GREMLIN COMPANY, et al.,¹
Debtors.

Chapter 11

Case No. 23-11775-LSS

(Jointly Administered)

Ref. Docket No. ____

**ORDER EXTENDING LIQUIDATING TRUSTEE'S
CLAIM OBJECTION DEADLINE
UNDER THE CONFIRMED CHAPTER 11 PLAN**

Upon the motion (the “Motion”) of Edward T. Gavin (the “Liquidating Trustee”) for entry of an order (this “Order”) extending the deadline to file objections to claims (the “Claim Objection Deadline”) under the confirmed *First Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation of Water Gremlin Company and its Debtor Affiliates*, as more fully set forth in the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The relief requested in the Motion is GRANTED as set forth herein.
2. The Claim Objection Deadline is hereby extended through and including June 1, 2026, without prejudice to the Liquidating Trustee’s right to seek further extensions thereof.
3. The notice of the Motion as provided therein shall be deemed good and sufficient notice.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: WG Sub, LLC (“WG Sub”) (0781), Water Gremlin Holdings, Inc. (“Holdings”) (9250), and Water Gremlin Company (“Water Gremlin” and, together with WG Sub and Holdings, the “Debtors”) (6396).

4. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

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

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Debtors.

Chapter 11

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Objection Deadline: March 13, 2026 at 4:00 p.m (ET)

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**NOTICE OF LIQUIDATING TRUSTEE’S MOTION FOR AN ORDER
EXTENDING THE CLAIM OBJECTION DEADLINE
UNDER THE CONFIRMED CHAPTER 11 PLAN**

PLEASE TAKE NOTICE that, on February 27, 2026, undersigned counsel to the Liquidating Trustee, filed the *Liquidating Trustee’s Motion for an Order Extending the Claim Objection Deadline Under the Confirmed Chapter 11 Plan* (the “**Motion**”), with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE NOTICE that objections, if any, to the Motion must be filed with the Court on or before **March 13, 2026 at 4:00 p.m. (ET)**.

PLEASE TAKE NOTICE that at the same time, you must also serve a copy of the response or objection upon: (a) counsel to the Liquidating Trustee: Dorsey & Whitney (Delaware) LLP, 300 Delaware Avenue, Suite 1010, Wilmington, Delaware 19801, attn: Eric Lopez Schnabel (schnabel.eric@dorsey.com) and Alessandra Glorioso (glorioso.alessandra@dorsey.com); and (b) the Office of the United States Trustee: U.S. Trustee, 844 King Street, Suite 2207, Lockbox #35, Wilmington, Delaware 19801, attn: Benjamin Hackman (benjamin.a.hackman@usdoj.gov). If no objections to the Motion are timely filed and received in accordance with this notice, the Court may enter an order granting the Motion without a hearing.

PLEASE TAKE FURTHER NOTICE that if any objections to the Motion are filed and cannot be resolved, a hearing on the Motion will be held before the Honorable Laurie Selber Silverstein in the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801, **at a date and time to be determined and noticed separately**.

IF NO OBJECTION OR RESPONSE TO THE MOTION IS TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

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Dated: February 27, 2026
Wilmington, Delaware

DORSEY & WHITNEY (DELAWARE) LLP

/s/ Eric Lopez Schnabel

Eric Lopez Schnabel (DE Bar No. 3672)
Alessandra Glorioso (DE Bar No. 5757)
300 Delaware Avenue, Suite 1010
Wilmington, Delaware 19801
Telephone: (302) 425-7171
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only in Minnesota)
51 West 52nd Street
New York, NY 10019
Telephone: (212) 415-9200
Email: schnabel.eric@dorsey.com
galen.michael@dorsey.com
yulisa.courina@dorsey.com
goforth.laura@dorsey.com

Counsel for the Liquidating Trustee