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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

In re:

ENVIVA, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 24-10453 (BFK)
)
) (Jointly Administered)
)

**SUPPLEMENTAL STATEMENT OF THE EPES GREEN BONDS TRUSTEE (I) IN
SUPPORT OF MOTION OF THE SUCCESSOR INDENTURE TRUSTEE FOR THE
6.500% SENIOR NOTES DUE 2026 TO RECONSTITUTE THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS, AND (II) CLARIFYING THAT THE
EPES GREEN BONDS TRUSTEE SEEKS APPOINTMENT TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS [ECF NOS. 193, 228]**

Wilmington Trust, N.A., as the indenture trustee (“Wilmington Trust” or the “Epes Green Bonds Trustee”) for the Exempt Facilities Revenue Bonds (Enviva Inc. Project), Series 2022 (Green Bonds) (the “Epes Green Bonds” and the holders thereof, the “Epes Green Bondholders”) under the Epes Green Bonds Indenture,² respectfully submits this supplemental statement (“Supplemental Statement”) (i) to its prior statement in support (the “Statement in Support”) of the motion [ECF No. 193] (the “Motion”) filed by Wilmington Savings Fund Society, FSB, as the

¹ Due to the large number of Debtors in these jointly administered chapter 11 cases, a complete list of the Debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list may be obtained on the website of the Debtors’ claims and noticing agent at www.kccllc.net/enviva. The location of the Debtors’ corporate headquarters is: 7272 Wisconsin Avenue, Suite 1800, Bethesda, MD 20814.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion or the *Declaration of Glenn Nunziata in Support of Chapter 11 Petitions* [ECF No. 27] (the “First Day Declaration”), as applicable.



successor indenture trustee (the “2026 Notes Trustee”) for the 2026 Notes, seeking entry of an order, among other relief, directing the United States Trustee (the “U.S. Trustee”) to reconstitute the Official Committee of Unsecured Creditors (the “Committee”), and (ii) in response to the Court’s order entered on April 5, 2024, with respect thereto [ECF No. 243] (the “Order”). In support of this Supplemental Statement, the Epes Green Bonds Trustee respectfully represents as follows:

SUPPLEMENTAL STATEMENT

1. On April 4, 2024, the Epes Green Bonds Trustee filed its Statement in Support stating its support of the 2026 Notes Trustee’s Motion to reconstitute the Committee.

2. On April 5, 2024, this Court issued the Order directing Wilmington Trust to clarify whether it is seeking appointment to the Committee in its capacity as the Epes Green Bonds Trustee.

3. In accordance with this Court’s Order, Wilmington Trust respectfully clarifies that, in its capacity as the Epes Green Bonds Trustee, it does seek to be appointed as a member of the Committee if the Committee is reconstituted.

4. Wilmington Trust’s qualifications to serve as a member of the Committee, and its reasons for seeking such appointment, are as set forth in the Statement in Support.

CONCLUSION

5. WHEREFORE, the Epes Green Bonds Trustee respectfully requests that this Court enter an order (i) directing the U.S. Trustee (a) to reconstitute the Committee to provide “adequate representation of creditors” within the meaning of section 1102(a)(4) of the Bankruptcy Code and (b) to appoint the Epes Green Bonds Trustee as a member of the reconstituted Committee in furtherance thereof, and (ii) providing for such other and further relief as this Court deems just and appropriate under the circumstances.

Dated: April 16, 2024

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Thomas J. Mckee, Jr.

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CERTIFICATE OF SERVICE

I certify that on this 16th day of April 2024, a true and correct copy of the foregoing was filed electronically with the Court through the ECF filing system with notice being automatically provided to all those entitled to receive the same.

/s/ Thomas J. McKee, Jr.

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