

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

In re:

VYAIRE MEDICAL, INC., *et al.*,¹

Debtors.

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Chapter 11

Case No. 24-11217 (BLS)

(Joint Administration Requested)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
FIRST DAY HEARING ON JUNE 11, 2024, AT 10:30 A.M. (PREVAILING
EASTERN TIME) BEFORE THE HONORABLE BRENDAN L. SHANNON**

This hybrid hearing will be conducted in person and utilizing Zoom. All remote participants are required to register in advance using the *eCourt Appearances* tool available on the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>). Delaware counsel must appear in person at the hearing and all other parties are permitted to appear in person or via Zoom.

RELATED MATTERS

A. Voluntary Petitions

1. Vyair Medical Inc., Case No. 24-11217 (BLS) (Filed June 9, 2024) [Docket No. 1]
2. Bird Products Corporation, Case No. 24-11218 (BLS) (Filed June 9, 2024) [Docket No. 1]
3. Breathe US Holdco, Inc., Case No. 24-11219 (BLS) (Filed June 9, 2024) [Docket No. 1]
4. Breathe US Holdings LP, Case No. 24-11220 (BLS) (Filed June 9, 2024) [Docket No. 1]
5. EME Medical, Inc., Case No. 24-11221 (BLS) (Filed June 9, 2024) [Docket No. 1]
6. Revolutionary Medical Devices, Inc., Case No. 24-11222 (BLS) (Filed June 9, 2024) [Docket No. 1]

¹ The last four digits of Debtor Vyair medical, Inc.'s federal tax identification number are 6495. A complete list of each of the Debtors in these chapter 11 cases and each such Debtor's federal tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://omniagentsolutions.com/Vyair>. The location of Debtor Vyair Medical, Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is 26125 North Riverwoods Boulevard, Mettawa, Illinois, USA 60045.

7. SensorMedics Corporation, Case No. 24-11223 (BLS) (Filed June 9, 2024) [Docket No. 1]
8. VIASYS Holdings Inc., Case No. 24-11224 (BLS) (Filed June 9, 2024) [Docket No. 1]
9. VM Finance Sub, LLC, Case No. 24-11225 (BLS) (Filed June 9, 2024) [Docket No. 1]
10. Vyair Company, Case No. 24-11226 (BLS) (Filed June 9, 2024) [Docket No. 1]
11. Vyair Finance B.V., Case No. 24-11227 (BLS) (Filed June 9, 2024) [Docket No. 1]
12. Vyair Financial Holdings LLC, Case No. 24-11228 (BLS) (Filed June 9, 2024) [Docket No. 1]
13. Vyair Holding Company, Case No. 24-11229 (BLS) (Filed June 9, 2024) [Docket No. 1]
14. Vyair Medical 202, Inc., Case No. 24-11230 (BLS) (Filed June 9, 2024) [Docket No. 1]
15. Vyair Medical 203, Inc., Case No. 24-11231 (BLS) (Filed June 9, 2024) [Docket No. 1]
16. Vyair Medical 205, Inc., Case No. 24-11232 (BLS) (Filed June 9, 2024) [Docket No. 1]
17. Vyair Medical 206, Inc., Case No. 24-11233 (BLS) (Filed June 9, 2024) [Docket No. 1]
18. Vyair Medical 211, Inc., Case No. 24-11234 (BLS) (Filed June 9, 2024) [Docket No. 1]
19. Vyair Medical BR LLC, Case No. 24-11235 (BLS) (Filed June 9, 2024) [Docket No. 1]
20. Vyair Medical Capital LLC, Case No. 24-11236 (BLS) (Filed June 9, 2024) [Docket No. 1]
21. Vyair Medical Consumables LLC, Case No. 24-11237 (BLS) (Filed June 9, 2024) [Docket No. 1]
22. Vyair Medical International LLC, Case No. 24-11238 (BLS) (Filed June 9, 2024) [Docket No. 1]

23. Vyair Medical LLC, Case No. 24-11239 (BLS) (Filed June 10, 2024) [Docket No. 1]
 24. Vyair Medical Payroll LLC, Case No. 24-11240 (BLS) (Filed June 10, 2024) [Docket No. 1]
 25. Vyair Receivables LLC, Case No. 24-11241 (BLS) (Filed June 10, 2024) [Docket No. 1]
 26. Vyair Respiratory Diagnostics LLC, Case No. 24-11242 (BLS) (Filed June 10, 2024) [Docket No. 1]
 27. Vyair TSR MidCo, LLC, Case No. 24-11243 (BLS) (Filed June 10, 2024) [Docket No. 1]
 28. Vyair TSR Sub, LLC, Case No. 24-11244 (BLS) (Filed June 10, 2024) [Docket No. 1]
- B. Declaration of John Bibb, Group Chief Executive Officer of Vyair Medical, Inc., in Support of Debtors' Chapter 11 Petitions and First Day Motions (Filed June 10, 2024) [Docket No. 15]

MATTERS GOING FORWARD

A. First Day Motions

1. Motion of Debtors for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief (Filed June 10, 2024) [Docket No. 2]

Status: This matter will be going forward.

2. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief (Filed June 10, 2024) [Docket No. 12]

Related Document(s):

- (a) Notice of Filing of DIP Credit Agreement (Filed June 10, 2024) [Docket No. 33]

- (b) Declaration of Charles N. Braley in Support of the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief (Filed June 10, 2024) [Docket No. 34]
- (c) Notice of Filing of Fee Letters (Filed June 10, 2024) [(SEALED) Docket No. 35]
- (d) Declaration of Michael Schlappig in Support of the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief [TBD]

Status: This matter will be going forward.

- 3. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate the Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief (Filed June 10, 2024) [Docket No. 5]

Status: This matter will be going forward.

- 4. Motion of Debtors Seeking Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Prepetition Claims of Certain Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, and Lien Claimants (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief (Filed June 10, 2024) [Docket No. 7]

Status: This matter will be going forward.

- 5. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief (Filed June 10, 2024) [Docket No. 6]

Status: This matter will be going forward.

6. Application of Debtors for Entry of an Order (I) Authorizing and Approving the Appointment of Omni Agent Solutions, Inc. as Claims and Noticing Agent and (II) Granting Related Relief (Filed June 10, 2024) [(SEALED) Docket No. 3]

Related Document(s):

- (a) Application of Debtors for Entry of an Order (I) Authorizing and Approving the Appointment of Omni Agent Solutions, Inc. as Claims and Noticing Agent and (II) Granting Related Relief (Filed June 10, 2024) [(REDACTED) Docket No. 4]

Status: This matter will be going forward.

7. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Administer their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief (Filed June 10, 2024) [Docket No. 8]

Status: This matter will be going forward.

8. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance and Surety Coverage Entered into Prepetition and Pay Related Prepetition Obligations, and (B) Renew, Supplement, Modify, or Purchase Insurance and Surety Coverage, and (II) Granting Related Relief (Filed June 10, 2024) [Docket No. 9]

Status: This matter will be going forward.

9. Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Services, and (IV) Granting Related Relief (Filed June 10, 2024) [Docket No. 10]

Status: This matter will be going forward.

10. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individuals, (II) Approving the Form and Manner of Service of the Notice of Commencement; and (III) Granting Related Relief (Filed June 10, 2024) [Docket No. 11]

Status: This matter will be going forward.

11. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and Fees, and (II) Granting Related Relief (Filed June 10, 2024) [Docket No. 13]

Status: This matter will be going forward.

12. Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief (Filed June 10, 2024) [Docket No. 14]

Status: This matter will be going forward.

Dated: June 10, 2024
Wilmington, Delaware

/s/ Patrick J. Reilley

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