

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

|                                                    |   |                          |
|----------------------------------------------------|---|--------------------------|
| In re:                                             | ) |                          |
|                                                    | ) | Chapter 11               |
|                                                    | ) |                          |
| VYAIRE MEDICAL, INC., <i>et al.</i> , <sup>1</sup> | ) | Case No. 24-11217 (BLS)  |
|                                                    | ) |                          |
| Debtors.                                           | ) | (Jointly Administered)   |
|                                                    | ) |                          |
|                                                    | ) | <b>Re: Docket No. 45</b> |

**NOTICE OF MOTION OF DEBTORS FOR ENTRY OF  
AN ORDER AUTHORIZING THE DEBTORS TO FILE UNDER  
SEAL THE FEE LETTERS RELATED TO THE DIP FACILITIES**

**PLEASE TAKE NOTICE THAT**, on June 10, 2024, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Motion of the Debtors for Entry of an Order Authorizing the Debtors to File Under Seal the Fee Letters Related to the DIP Facilities* [Docket No. 45] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that a copy of the Motion is being served with this Notice. A copy of the Motion is also available on (i) the Court's website: [www.deb.uscourts.gov](http://www.deb.uscourts.gov) and (ii) the website maintained by the Debtors' Claims and Noticing Agent, Omni Agent Solutions, Inc.: <https://omniagentsolutions.com/Vyair>.

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion will be held on **July 9, 2024, at 10:00 a.m. (prevailing Eastern Time)** before The Honorable Brendan L. Shannon, United States Bankruptcy Court for the District of Delaware, 6th Floor, Courtroom No. 1, 824 North Market Street, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that, objections, if any, to the Motion and the entry of an order approving the Motion must be filed on or before **July 2, 2024, at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”)** with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801 and served upon the following parties so as to be actually received by the Objection Deadline: (a) the Debtors, 26125 North Riverwoods Boulevard, Mettawa, Illinois, USA 60045, Attn.: Charles Braley (cbraley@alixpartners.com); (b) proposed co-counsel to the Debtors (i) Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn.: Joshua A. Sussberg,

<sup>1</sup> 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.

P.C. (joshua.sussberg@kirkland.com), Chris Ceresa (chris.ceresa@kirkland.com), and Tiffani Chanroo (tiffani.chanroo@kirkland.com), (ii) Kirkland & Ellis LLP, 333 West Wolf Point Plaza, Chicago, Illinois, 60654, Attn.: Spencer A. Winters (spencer.winters@kirkland.com) and Yusuf U. Salloum (yusuf.salloum@kirkland.com), (iii) Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, Delaware 19801, Attn.: Patrick J. Reilley (preilley@coleschotz.com), Stacy L. Newman (snewman@coleschotz.com), Michael E. Fitzpatrick (mfitzpatrick@coleschotz.com), and Jack M. Dougherty (jdougherty@coleschotz.com), and (iv) Cole Schotz P.C., Court Plaza North, 25 Main Street, Hackensack, New Jersey 07601, Attn.: Michael D. Sirota (msirota@coleschotz.com) and Warren A. Usatine (wusatine@coleschotz.com); (c) counsel to the 1L Ad Hoc Group, (i) Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166-0193, Attn.: Scott J. Greenberg (SGreenberg@gibsondunn.com), Jason Zachary Goldstein (JGoldstein@gibsondunn.com), Joshua Brody (JBrody@gibsondunn.com), and Kevin Liang (KLiang@gibsondunn.com) and (ii) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, DE 19801, Attn.: Laura Davis Jones (ljones@pszjlaw.com); (d) the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn.: Benjamin A. Hackman (Benjamin.A.Hackman@usdoj.gov); and (e) any statutory committee appointed in these chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE** that, if you fail to respond in accordance with this notice, the Court may grant the relief requested and enter an order without further notice or hearing.

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Dated: June 12, 2024  
Wilmington, Delaware

*/s/ Patrick J. Reilley*

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**COLE SCHOTZ P.C.**

Patrick J. Reilley, Esq. (DE Bar No. 4451)  
500 Delaware Avenue, Suite 1410  
Wilmington, Delaware 19801  
Telephone: (302) 652-3131  
Facsimile: (302) 652-3117  
Email: preilley@coleschotz.com

- and -

Michael D. Sirota, Esq. (admitted *pro hac vice*)  
Warren A. Usatine, Esq. (admitted *pro hac vice*)  
Court Plaza North, 25 Main Street  
Hackensack, New Jersey 07601  
Telephone: (201) 489-3000  
Facsimile: (201) 489-1536  
Email: msirota@coleschotz.com  
wusatine@coleschotz.com

*Proposed Co-Counsel to the Debtors  
and Debtors in Possession*

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)  
601 Lexington Ave  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: joshua.sussberg@kirkland.com

- and -

Spencer A. Winters, P.C. (admitted *pro hac vice*)  
Yusuf U. Salloum (admitted *pro hac vice*)  
333 West Wolf Point Plaza  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: spencer.winters@kirkland.com  
yusuf.salloum@kirkland.com

*Proposed Co-Counsel to the Debtors  
and Debtors in Possession*