

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

In re:

VYAIRE MEDICAL, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11217 (BLS)

(Joint Administration Requested)

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002**

PLEASE TAKE NOTICE that a certain ad hoc group of holders of the First Lien Term Loans and providers of debtor in possession financing (the “1L Ad Hoc Group”) hereby appears by their counsel, Gibson, Dunn & Crutcher LLP (“Gibson Dunn”) and Pachulski Stang Ziehl & Jones LLP (“PSZJ”). Gibson Dunn and PSZJ hereby enter their appearances pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and request that the undersigned be added to the official mailing matrix and service lists in these cases. Gibson Dunn and PSZJ request, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in these chapter 11 cases and copies of all papers served or required to be served in these chapter 11 cases, including but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, chapter 11 plans, disclosure statements and all other matters arising herein or in any

¹ 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/Vyaire>. The location of Debtor Vyaire 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.

related adversary proceeding, be given and served upon the 1L Ad Hoc Group through service upon Gibson Dunn and PSZJ at the addresses, telephone, and facsimile numbers set forth below:

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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in these cases, whether formal or informal, written or oral, and whether served, transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that this *Notice of Appearance and Request for Service Pursuant to Fed. R. Bankr. P. 2002* shall not be deemed or construed to be a waiver of any of the rights of the 1L Ad Hoc Group, including, without limitation, to (i) have final orders in non-core matters entered only after *de novo* review by a higher court, (ii) trial by jury in any proceeding so triable in this case, or any case, controversy, or adversary proceeding related to this case, (iii) have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or

recoupments to which the 1L Ad Hoc Group may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: June 10, 2024

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

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