

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

In re:

VYAIR MEDICAL, INC, *et al.*,

Debtors.

)

) Chapter 11

)

) Case No. 24-11217 (BLS)

)

) (Jointly Administered)

)

) **Re: Docket Nos. 133, 315, 498**

NOTICE OF WITHDRAWAL

Kuehne + Nagel Inc. (“K+N”), by and through its undersigned counsel, hereby withdraws the following objections in the above-captioned case:

1. *Limited Objection and Reservation of Rights of Kuehne + Nagel Inc. to Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures in Connection with the Sale of Substantially all of the Debtors’ Assets, (II) Authorizing the Debtors to Enter Into a Stalking Horse Agreement and Provide Bid Protections, (III) Approving the Form and Manner of Notice Thereof, (IV) Scheduling an Auction and Sale Hearing, (V) Approving Procedures for the Assumption and Assignment of Contracts, (VI) Approving the Sale of the Debtors’ Assets Free and Clear, and (VII) Granting Related Relief* [Docket No. 133], filed on July 2, 2024;

2. *Objection to Debtors’ First Notice to Contract Parties of Potentially Assumed and Assigned Executory Contracts and Unexpired Leases* [Docket No. 315] filed on July 25, 2024; and

3. *Supplemental Objection to First Supplemental Notice to Contract Parties of Potentially Assumed and Assigned Executory Contracts and Unexpired Leases First Notice to Contract Parties of Potentially Assumed and Assigned Executory Contracts and Unexpired Leases* [Docket No. 498], filed on September 5, 2024.

Date: October 23, 2024
Wilmington, Delaware

BIELLI & KLAUDER, LLC

/s/ David M. Klauder

David M. Klauder, Esquire (No. 5769)
1204 N. King Street
Wilmington, DE 19801
Phone: (302) 803-4600
dklauder@bk-legal.com

-and-

HALPERIN BATTAGLIA BENZIJA, LLP

Walter Benzija, Esquire (*pro hac vice*)
40 Wall Street, 37th Floor
New York, NY 10005
Telephone (212) 765-9100
wbenzija@halperinlaw.net

Co-counsel for Kuehne + Nagel Inc.