

**IN THE 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)

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

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 102(1) of title 11 of the United States Code (the “Bankruptcy Code”), Bayard, P.A. (“Bayard”) hereby enters its appearance in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Cases”) as counsel to Kilmainham Holdings, LLC (“Kilmainham”), and hereby requests, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in the Chapter 11 Cases and copies of all papers served or required to be served in the 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 related adversary proceeding, be given and served upon Kilmainham through service upon Bayard at the addresses or e-mail addresses set forth below:

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Steven D. Adler
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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, or otherwise filed or made with regard to the Chapter 11 Cases and any proceedings therein.

PLEASE TAKE FURTHER NOTICE that, neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Kilmainham's (i) right to have a final order in non-core matters entered only after *de novo* review by a United States District Court Judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which Kilmainham is or may be entitled to under agreements, in law, or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

Dated: July 3, 2024
Wilmington, Delaware

BAYARD, P.A.

/s/ Steven D. Adler

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