IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
VYAIRE MEDICAL, INC., *et al.*,[1]	)	Case No. 24-11217 (BLS)
Debtors.	)	(Jointly Administered)
	)	**Re: Docket No. 239**

SUPPLEMENTAL DECLARATION OF PATRICK J. REILLEY IN SUPPORT OF DEBTORS' APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF COLE SCHOTZ P.C. AS DELAWARE CO-COUNSEL FOR THE DEBTORS EFFECTIVE AS OF THE PETITION DATE

Patrick J. Reilley, hereby declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the law firm of Cole Schotz P.C. ("Cole Schotz"), which maintains offices for the practice of law at 500 Delaware Avenue, Suite 1410, Wilmington, Delaware 19801. Cole Schotz also maintains offices in Baltimore, Maryland; Boca Raton, Florida; Dallas, Texas; Fort Worth, Texas; Hackensack, New Jersey; and New York, New York.

2. I am duly authorized to make this supplemental declaration (the "Supplemental Declaration") on behalf of Cole Schotz in support of the *Application for Entry of an Order Authorizing the Retention and Employment of Cole Schotz P.C. as Delaware Co-Counsel for the Debtors Effective as of the Petition Date* [Docket No. 239] (the "Application").[2]

3. On July 9, 2024, the Debtors filed the Application, together with, among other things, the *Declaration of Patrick J. Reilley in Support of Debtors' Application for Entry of an*

[1] The last four digits of Debtor Vyaire 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' 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.

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Application.

Order Authorizing the Retention and Employment of Cole Schotz P.C. as Delaware Co-Counsel for the Debtors Effective as of the Petition Date, which is attached to the Application as Exhibit B (the "Reilley Declaration").

4. I submit this Supplemental Declaration in accordance with sections 327, 328 and 330 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, Local Rules 2014-1 and 2016-1 and the Reilley Declaration.[3] Except as otherwise noted, I have personal knowledge of the matters set forth herein.

5. Additional parties have been identified as Potential Parties in Interest in these chapter 11 cases.

6. A conflicts search of the additional Parties in Interest indicates that (i) Mitsubishi HC Capital American Inc, f/k/a Hitachi Capital, a material contract counterparty, is a former client of Cole Schotz and (ii) Berkeley Research Group, a committee professional, is a current client of Cole Schotz. These representations are unrelated to the Debtors and the chapter 11 cases.

7. To the best of my knowledge, information and belief, I continue to believe that Cole Schotz neither holds nor represents any interest adverse the Debtors, their creditors or other parties in interest in connection with these Chapter 11 Cases. Based upon information available to me, I believe that Cole Schotz is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code.

[3] *See* Reilley Declaration ¶ 16 ("To the extent Cole Schotz discovers any facts or additional information during the period of Cole Schotz's retention that requires disclosure, Cole Schotz will file with the Court a supplement to this Declaration to disclose such information.").

I declare under penalty of perjury that the foregoing is true and correct on this 8th day of August, 2024.

/s/ Patrick J. Reilley
Patrick J. Reilley