

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

VYAIRE MEDICAL, INC., *et al.*,

Debtors.

Chapter 11

Case Nos. 24-11217 (BLS), *et seq.*

(Jointly Administered)

Re: Docket No. 589

**CERTIFICATION OF COUNSEL REGARDING
PROPOSED ORDER APPROVING JOINT STIPULATION
GRANTING LIMITED RELIEF FROM AUTOMATIC STAY
WITH JEFFREY PAUL LYONS, III, AS ADMINISTRATOR
OF THE ESTATE OF CONNITA SHONTELL RANSOM**

Adam Hiller, counsel for Jeffrey Paul Lyons, III, as Administrator of the Estate of Connita Shontell Ransom, (“Movant”) hereby certifies as follows:

1. On October 1, 2024, Movant filed a Motion for Relief from the Automatic Stay (Docket No. 589) (the “Motion”) in the above-referenced cases.
2. In lieu of a response, Vyair Medical, Inc. and its affiliated debtors and debtors-in-possession (the “Debtors”) entered into negotiations with Movant and executed a Joint Stipulation Granting Limited Relief From Automatic Stay With Jeffrey Paul Lyons, III, As Administrator Of The Estate Of Connita Shontell Ransom (the “Stipulation,” attached hereto as **Exhibit A-1**) with Movant. A proposed order approving the Stipulation is attached hereto as **Exhibit A** (the “Proposed Order”).

3. The undersigned hereby certifies that he has received no formal or informal objection or response to the Motion. The undersigned further certifies that he has reviewed the docket in this case and that no objection or response to the Motion appears thereon. The notice accompanying the Motion set a deadline of October 18, 2024 for receipt of objections to the Motion. This deadline was extended for the Debtors in order to facilitate negotiations.

4. Movant requests that the Court enter the Proposed Order as an order of the Court at the Court's convenience.

Dated: October 25, 2024
Wilmington, Delaware

Respectfully submitted,

HILLER LAW, LLC

/s/ Adam Hiller

Adam Hiller (DE No. 4105)
300 Delaware Avenue, Suite 210, #227
Wilmington, Delaware 19801
(302) 442-7677 telephone
ahiller@adamhillerlaw.com

*Attorney for Movant
Jeffrey Paul Lyons, III, as Administrator of
the Estate of Connita Shontell Ransom*