

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

VYAIRE MEDICAL, INC., *et al.*,¹

Debtors.

Chapter 11

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

(Jointly Administered)

Hearing Date: November 14, 2024, 1:30 p.m.

Objections Due By: October 18, 2024

NOTICE OF MOTION

TO: Parties listed on the Certificate of Service

Jeffrey Paul Lyons, II, as Administrator of the Estate of Connita Shontell Ransom, (“Movant”) has filed a Motion for Relief From The Automatic Stay (the “Motion”), which seeks the following relief: Relief from the automatic stay to prosecute litigation under applicable non-bankruptcy law against one or more of the above-captioned debtors for claims arising from an incident that occurred on January 1, 2021 involving an LTV 1150 ventilator and minor child J.D.B., including but not limited to pursuing available insurance proceeds.

HEARING ON THE MOTION WILL BE HELD ON NOVEMBER 14, 2024 AT 1:30 P.M. PREVAILING EASTERN TIME.

You are required to file a response, if any, on or before October 18, 2024 at 4:00 P.M. Prevailing Eastern Time. At the same time, you must also serve a copy of the response upon Movant’s attorneys:

¹ The last four digits of Debtor Vyair 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/Vyair>. The location of Debtor Vyair 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.

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The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE,
THE RELIEF REQUESTED IN THE MOTION MAY BE GRANTED BY THE
COURT WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 1, 2024
Wilmington, Delaware

Respectfully submitted,

HILLER LAW, LLC

/s/ Adam Hiller

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Attorneys for Movant, Jeffrey Paul Lyons, II