

Exhibit A

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

	)	
In re:	)	Chapter 11
	)	
VYAIRE MEDICAL, INC., <i>et al.</i> , ¹	)	Case No. 24-11217 (BLS)
	)	
Debtors.	)	

**DECLARATION OF DAVID M. KLAUDER, ESQ. IN SUPPORT OF APPLICATION TO
EMPLOY AND RETAIN BIELLI & KLAUDER, LLC AS COUNSEL FOR THE FEE
EXAMINER, DAVID M. KLAUDER, *NUNC PRO TUNC* TO OCTOBER 30, 2024**

In accordance with Bankruptcy Rule 2014 and the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases, I, David M. Klauder, Esquire (“Fee Examiner”), hereby state as follows:

1. I am an attorney and counselor at law, admitted to practice in the State of Delaware and in this Court.
2. I am a partner at the law firm of Bielli & Klauder, LLC, 1204 N. King Street, Wilmington, Delaware 19801.
3. On June 9, 2024, the Debtors each filed a voluntary petition of relief under chapter 11 the Bankruptcy Code in this Court.
4. On October 30, 2024, I was appointed as the Fee Examiner for this case.
5. As a member of this profession and former counsel to the United States Trustee, I relied upon my knowledge and experience to ensure that BK’s billing rates and material terms for the engagement are comparable to its billing rates and terms for other non-bankruptcy engagements

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.

and to the billing rates and terms of other comparably skilled professionals. Additionally, BK has prepared the following chart comparing its proposed billing rates to those billed for the period from January 1, 2024 through the current date.

Timekeeper Category	Blended Hourly Rate	
	Worked and Billed in 2024 (excluding Restructuring lawyers)	Proposed in the Retention Application
Members	\$460.00	\$490.00
Associates and of Counsel	\$225.00-\$425.00	\$225.00-\$425.00
Paraprofessionals and law clerks	\$195.00 - \$275.00	\$195.00-\$275.00
Total Blended Rate	\$316.00	\$322.00

6. I only interviewed BK prior to filing the Retention Application.

7. To supervise BK's fees and expenses and to manage costs, I have set aside time each month to review the invoices provided to me so that any entries for which BK is not entitled to be compensated can be addressed before any application for compensation is filed by BK in this matter.

8. Additionally, to manage the costs in this matter, I have requested that BK delegate matters to less expensive counsel, as appropriate.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: November 19, 2024

/s/ David M. Klauder
David M. Klauder (No. 5769)