

EXHIBIT A

Proposed Order

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

In re:

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

Debtors.

Chapter 11

Case No. 24-11217 (BLS)

(Jointly Administered)

Re: Docket No. __

ORDER APPROVING THE PLAN ADMINISTRATOR'S FIRST MOTION TO EXTEND THE ADMINISTRATIVE CLAIMS OBJECTION DEADLINE

Upon consideration of the motion (the “Motion”) of the Plan Administrator¹, by and through his undersigned counsel, on behalf of the estates of the Debtors, for entry of an order, pursuant to sections 105(a) and 502 of the Bankruptcy Code and Bankruptcy Rules 3007 and 9006, extending the Administrative Claims Objection Bar Date through and including May 27, 2025, and the Court having reviewed the Motion; and the Court finding that: (a) the Court having jurisdiction to consider the Motion and grant the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; (b) the matter being a core proceeding under 28 U.S.C. § 157(b)(2); and (c) due and proper notice having been given; and after due deliberation thereon and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is GRANTED to the extent set forth herein.
2. The Administrative Claims Objection Bar Date is extended through and including May 27, 2025.

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

3. The Plan Administrator shall have until May 27, 2025, to file a response or objection to any Administrative Claims or motions or requests for payment of Administrative Claims, including claims arising under section 503(b)(9) of the Bankruptcy Code.

4. This Order is without prejudice to the rights of the Plan Administrator to seek further extensions of the Administrative Claims Objection Bar Date upon motion filed with the Court.

5. The terms and conditions of this Order shall be immediately enforceable and effective upon its entry.

6. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the interpretation, construction, implementation or enforcement of this Order.