

**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)
	)	
Liquidating Debtor.	)	
	)	Re: Docket No. 976

**CERTIFICATE OF NO OBJECTION REGARDING THE PLAN ADMINISTRATOR'S
FIRST OMNIBUS OBJECTION (SUBSTANTIVE) TO CERTAIN SECTION 503(B)(9)
CLAIMS (ASSUMED CLAIMS, NON-STATUTORY PERIOD CLAIMS,
NON-GOODS CLAIMS, BOOKS AND RECORD CLAIMS)**

The undersigned counsel to David M. Barse, the plan administrator (the “Plan Administrator”) in the above-captioned chapter 11 case, hereby certifies that, as of the date hereof, no answer, objection, or other responsive pleading has been filed or received to the *Plan Administrator’s First Omnibus Objection (Substantive) to Certain Section 503(B)(9) Claims (Assumed Claims, Non-Statutory Period Claims, Non-Goods Claims, Books and Record Claims)* [Docket No. 976] (the “Objection”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) on January 27, 2025. Responses to the Objection were to be filed and served no later than February 26, 2025 at 4:00 p.m. (ET) (the “Response Deadline”).

The Response Deadline has passed, and no responses or other responsive pleading to the Objection appear on the docket or were served upon the undersigned counsel. It is therefore

¹ This chapter 11 case is now being administered by the Plan Administrator pursuant to the terms of the *Findings of Fact, Conclusions of Law, and Order Approving the Debtors' Disclosure Statement for, and Confirming the Second Amended Joint Chapter 11 Plan of Vyaire Medical, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 745]. The Plan Administrator's mailing address is Vyaire Medical, Inc., Attn: David M. Barse, Plan Administrator, c/o Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801.

respectfully requested that the Court enter the proposed order attached to the Objection at the earliest convenience of the Court.

Dated: February 27, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

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