

EXHIBIT A

Proposed Order

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

In re:	)	
	)	Chapter 11
	)	
VYAIR MEDICAL, INC., <i>et al.</i> ,	)	Case No. 24-11217 (BLS)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Re: Docket No. __

ORDER GRANTING AND SUSTAINING PLAN ADMINISTRATOR'S SECOND OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO CERTAIN CLAIMS

Upon consideration of the *Plan Administrator’s Second Omnibus Objection (Non-Substantive) to Certain Claims* (the “Objection”);¹ and the Court having jurisdiction over this core proceeding under 28 U.S.C. §§ 157 and 1334; and venue of this matter in the District of Delaware being proper under 28 U.S.C. §§ 1408 and 1409; and the Court having reviewed the Objection, the Disputed Claims listed on Schedule 1 and Schedule 2 hereto, the Declaration of Joel Amico of AP Services, LLC in support of the Objection, any responses to the Objection, and any replies to those responses; and due notice of the Objection having been provided; and the relief sought by the Objection being in the best interests of the Debtors, the Debtors’ creditors and all other parties in interest; and after due deliberation thereon and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED AND DECREED THAT:

1. The Objection is GRANTED to the extent set forth herein.
2. Each Amended/Superseded Claim listed on Schedule 1 hereto is hereby disallowed and expunged in its entirety.

¹ Capitalized terms not defined herein shall have the meanings ascribed to the terms in the Objection.

3. Each Late Filed Claim listed on Schedule 2 hereto is hereby disallowed and expunged in its entirety.

4. The Plan Administrator is authorized to take any action necessary or appropriate to give effect to this Order and the relief granted therein.

5. Omni Agent Solutions, Inc., the Court-appointed claims and noticing agent in the chapter 11 cases, is hereby authorized and directed to make such revisions to the official claims register as are necessary to reflect the relief granted in this Order.

6. The Plan Administrator, the Debtors and their estates, any successors thereto and any other party in interest shall retain and shall have the right to object in the future to any of the claims listed on Schedules 1 and 2 on any additional grounds, and the Plan Administrator shall retain and shall have the right to amend, modify and/or supplement the Objection as may be necessary.

7. The Plan Administrator's objection to each Disputed Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Disputed Claim. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.

8. This Order is without prejudice rights of the Plan Administrator, the Debtors' estates, any successors thereto and any other party in interest to object to any other proof of claim filed in the chapter 11 cases.

9. The Court shall retain jurisdiction over the claimants whose claims are subject to the Objection with respect to any matter arising from or related to the Objection or this Order, including the interpretation, enforcement and implementation of this Order.

SCHEDULE 1**AMENDED/SUPERSEDED CLAIMS*****Objection Key***

(Sec)- Secured
 (Adm)- Administrative
 (503)- 503(b)(9)
 (Pri)- Priority
 (GUC)- Non-Priority General Unsecured
 (Tot)- Total Claim

Item No.	Claimant Name	Case Number	Debtor Against Whom Claim is Filed	Surviving Claim No.	Amended / Superseded Claim to be Disallowed	Surviving Claim Amount & Classification Status	Reason for Disallowance
1	Da/Pro Rubber Inc.	24-11217	Vyaire Medical Inc.	116	22	(Sec)- \$ - (Adm)- \$ - (503)- \$ 4,350.00 (Pri)- \$ - (GUC)- \$ 110,379.28 (Tot)- \$ 114,729.28	Claim No. 22 has been amended and superseded by Claim No. 116.
2	Newark Corporation	24-11217	Vyaire Medical Inc.	152	34	(Sec)- \$ - (Adm)- \$ - (503)- \$ 32,000.00 (Pri)- \$ - (GUC)- \$ 336,749.80 (Tot)- \$ 368,749.80	Claim No. 34 has been amended and superseded by Claim No. 152.

SCHEDULE 2
LATE FILED CLAIMS

Objection Key

(Sec)- Secured
 (Adm)- Administrative
 (503)- 503(b)(9)
 (Pri)- Priority
 (GUC)- Non-Priority General Unsecured
 (Tot)- Total Claim

Item No.	Claimant Name	Claim Date Filed	Case Number	Debtor Against Whom Claim is Filed	Claim No.	Claim Amount & Classification Status	Adjusted Classification Status & Amount	Reason for Disallowance
1	3MD Relocation Services, LLC	8/27/2024	24-11217	Vyaire Medical Inc.	170	(Sec)- \$ - (Adm)- \$ - (503)- \$ 2,004.50 (Pri)- \$ - (GUC)- \$ - (Tot)- \$ 2,004.50	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ - (GUC)- \$ - (Tot)- \$ -	Claim No. 170 was filed on 8/27/2024, which was after the General Bar Date, 8/2/2024.
2	John L. O'Donahue, VMD, PhD, DABT	12/17/2024	24-11217	Vyaire Medical Inc.	215	(Sec)- \$ - (Adm)- \$ - (503)- \$ 7,260.00 (Pri)- \$ - (GUC)- \$ - (Tot)- \$ 7,260.00	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ - (GUC)- \$ - (Tot)- \$ -	Claim No. 215 was filed on 12/17/2024, which was after the General Bar Date, 8/2/2024.
3	McKinley Equipment Corporation	8/28/2024	24-11217	Vyaire Medical Inc.	171	(Sec)- \$ - (Adm)- \$ - (503)- \$ 1,191.63 (Pri)- \$ - (GUC)- \$ 4,381.43 (Tot)- \$ 5,573.06	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ - (GUC)- \$ - (Tot)- \$ -	Claim No. 171 was filed on 8/28/2024, which was after the General Bar Date, 8/2/2024.
4	Qmedic W.L.L.	8/31/2024	24-11217	Vyaire Medical Inc.	174	(Sec)- \$ - (Adm)- \$ - (503)- \$ 4,989.95 (Pri)- \$ - (GUC)- \$ - (Tot)- \$ 4,989.95	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ - (GUC)- \$ - (Tot)- \$ -	Claim No. 174 was filed on 8/31/2024, which was after the General Bar Date, 8/2/2024.
5	Trademark Plastics, Inc.	11/12/2024	24-11217	Vyaire Medical Inc.	206	(Sec)- \$ - (Adm)- \$ - (503)- Blank (Pri)- \$ - (GUC)- \$ 19,204.32 (Tot)- \$ 19,204.32	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ - (GUC)- \$ - (Tot)- \$ -	Claim No. 206 was filed on 11/12/2024, which was after the General Bar Date, 8/2/2024.