

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

In re:

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

Debtors.¹

Chapter 11

Case No. 24-11217 (BLS)

(Jointly Administered)

Hearing Date: To Be Determined

Objection Deadline: January 27, 2025 at 4:00 p.m.²

**NOTICE OF MOTION OF CLAYTON CONTROLS
REQUESTING ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. § 503(B)(1)(A)**

Clayton Controls (“Movant”), has filed concurrently herewith its *Motion of Clayton Controls Requesting Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. §§ 503(b)(1)(A)* (the “Motion”) which seeks the following relief: allowance and payment of Movant’s administrative expense claim associated with some of the product that Debtor specifically requested post-petition (Debtor paid for some but not all of this product).

A HEARING ON THE MOTION WILL BE HELD ON A DATE TO BE DETERMINED, BEFORE THE HONORABLE BRENDEN L. SHANNON, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 6TH FLOOR, COURTROOM # 1, 824 MARKET STREET, WILMINGTON, DE 19801.

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.

² Pursuant to the Debtors’ confirmed plan (at Art. I.A. ¶6), the deadline to object to administrative expense claims is the later of 30 days after the filing of the motion or 60 days after the effective date. Moreover, as there are no omnibus hearing dates available after January 29, 2025, the hearing date has yet to be determined.

You are required to file a response to the Motion on or before January 27, 2025 at 4:00 P.M. EST. At the same time, you must also serve a copy of the response upon Movant's attorneys at the addresses listed below.

FAILURE TO TIMELY FILE AND SERVE A RESPONSE MAY RESULT IN AN ORDER GRANTING THE RELIEF REQUESTED IN THE MOTION.

Dated: December 27, 2024

Wilmington, Delaware

Respectfully submitted,

By: /s/ Christopher D. Loizides
Christopher D. Loizides, Esq. (No. 3968)
LOIZIDES, P.A.
Legal Arts Building
1225 King Street, Suite 800
Wilmington, Delaware 19801
Telephone: (302) 654-0248
Facsimile: (302) 654-0728
Email: loizides@loizides.com

and

Marc C. Forsythe (*pro hac vice forthcoming*)
California State Bar No. 153854
GOE FORSYTHE & HODGES, LLP
17701 Cowan Avenue, Building D, Suite 210
Irvine, CA 92614
P: 949-798-2460
F: 949-955-9437
Email: mforsythe@goeforlaw.com

Counsel to Movant Clayton Controls