

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

In re:

)
) Chapter 11
)

VYAIRE MEDICAL, INC., *et al.*,¹

) Case No. 24-11217 (BLS)
)

Debtors.

) (Jointly Administered)
)

) **Hearing Date: March 5, 2025, at 10:30 a.m. (ET)**

) **Objection Deadline: February 26, 2025, at 4:00 p.m. (ET)**

**NOTICE OF 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)**

PLEASE TAKE NOTICE that on January 27, 2025, David M. Barse, solely in his capacity as the Plan Administrator of Vyair Medical, Inc., et al. (the "Plan Administrator"), filed 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 "Objection") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that a copy of the Objection is being served with this notice. A copy of the Objection is also available on (i) the Court's website: www.deb.uscourts.gov and (ii) the website maintained by the Debtors' claims and noticing agent, Omni Agent Solutions, Inc.: <https://omniagentsolutions.com/Vyair>.

PLEASE TAKE FURTHER NOTICE that a hearing on the Objection, if required, will be held on **March 5, 2025, at 10:30 a.m. (prevailing Eastern Time)** before The Honorable Brendan L. Shannon, United States Bankruptcy Court for the District of Delaware, 6th Floor, Courtroom No. 1, 824 North Market Street, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Objection and the entry of an order approving the Objection must be filed on or before **February 26, 2025, at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline")** with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801 and served upon and received by the undersigned counsel.

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.

PLEASE TAKE FURTHER NOTICE THAT, IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED AND ENTER AN ORDER WITHOUT FURTHER NOTICE OR HEARING.

Dated: January 27, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

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*Counsel to David M. Barse, solely in his capacity as
the Plan Administrator of Vyaire Medical, Inc., et al.*