

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

In re:

VYAIRE MEDICAL, INC.¹

Liquidating Debtor.

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Chapter 11

Case No. 24-11217 (BLS)

**CERTIFICATION OF COUNSEL REGARDING
PROPOSED ORDER SCHEDULING OMNIBUS HEARING DATE**

The undersigned, counsel to David M. Barse, solely in his capacity as the Plan Administrator of Vyair Medical, Inc., *et al.* (the “Plan Administrator”), hereby certifies the following:

1. Counsel for the Plan Administrator, through communication with the Chambers of The Honorable Brendan L. Shannon, received an omnibus hearing date.
2. Attached hereto, as Exhibit A, is a proposed Order Scheduling Omnibus Hearing Date (the “Proposed Order”) that states with specificity the date and time of the omnibus hearing scheduled, subject to Court approval.
3. The Plan Administrator respectfully request that the Proposed Order be entered at the earliest convenience of the Court.

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 Vyair Medical, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 745]. The Plan Administrator’s mailing address is Vyair Medical, Inc., Attn: David M. Barse, Plan Administrator, c/o Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801.

Dated: March 25, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Patrick J. Reilley
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- and -

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