

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

In re:

VYAIRE MEDICAL, INC.¹

Liquidating Debtor.

Chapter 11

Case No. 24-11217 (BLS)

Re: Docket No. 1082

**NOTICE OF SUBMISSION OF PROOFS OF CLAIM FOR THE PLAN
ADMINISTRATOR’S FOURTH OMNIBUS OBJECTION
(SUBSTANTIVE) TO CERTAIN CLAIMS
(No Liability Claims, Reclassified Claims, and Overstated Claims)**

PLEASE TAKE NOTICE that on May 8, 2025, David M. Barse, in his capacity as the Plan Administrator for the above-captioned debtor (the “Plan Administrator”), filed the *Plan Administrator’s Fourth Omnibus Objection (Substantive) to Certain Claims (No Liability Claims, Reclassified Claims, and Overstated Claims)* [Docket No. 1082] (the “Fourth Omnibus Objection”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801. A hearing on the Fourth Omnibus Objection is scheduled for June 11, 2025 at 10:30 a.m.

PLEASE TAKE FURTHER NOTICE that the Claims Binder was hand delivered on May 28, 2025 to the Judge’s Courtroom Deputy and Judicial Assistant, with copies of the proofs of claim (the “Proofs of Claim”) that are the subject of the Fourth Omnibus Objection, along with all supporting documentation, and a copy of the Fourth Omnibus Objection, in accordance with Rule 3007-1(d)(vi) of the Local Rules of the United States Bankruptcy Court for the District

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 600, Wilmington, DE 19801.

of Delaware. Copies of the Proofs of Claim can be requested from counsel for the Plan Administrator.

Dated: May 28, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)
Stacy L. Newman (No. 5044)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: preilley@coleschotz.com
snewman@coleschotz.com

- and -

Matteo Percontino, Esq. (admitted *pro hac vice*)
Court Plaza North, 25 Main Street
Hackensack, New Jersey 07601
Telephone: (201) 489-3000
Facsimile: (201) 489-1536
Email: mpercontino@coleschotz.com

Counsel to the Plan Administrator