

**EXHIBIT A**

Proposed Order

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

In re:

VYAIRE MEDICAL, INC.,<sup>1</sup>

### Liquidating Debtor.

)  
) Chapter 11  
)  
) Case No. 24-11217 (BLS)  
)  
) **Re: Docket No.**  
)

## **ORDER GRANTING AND SUSTAINING PLAN ADMINISTRATOR’S THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO CERTAIN CLAIMS**

Upon consideration of the *Plan Administrator's Third Omnibus Objection (Non-Substantive) to Certain Claims* (the "Objection");<sup>2</sup> 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, Schedule 2, and Schedule 3 hereto, the Amico Declaration, 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 Duplicate Claim listed on **Schedule 1** hereto is hereby disallowed and expunged in its entirety.

<sup>1</sup> 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 "Confirmation Order"). 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.

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

4. Each Insufficient Documentation Claim listed on Schedule 3 hereto is hereby disallowed and expunged in its entirety.

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

6. 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.

7. 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, 2, and 3 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.

8. 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.

9. This Order is without prejudice to the 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.

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<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to the terms in the Objection.

10. 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**

**Duplicate Claims**

**SCHEDULE 1**  
**DUPLICATE 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 | Remaining Claim Number | Duplicate Claim to be Disallowed | Remaining Claim Amount & Classification Status                                                                   | Reason for Disallowance                                                                                                                                                                                                                                         |
|----------|---------------------------------------------------|-------------|------------------------------------|------------------------|----------------------------------|------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1        | GE Medical Systems Information Technologies, Inc. | 24-11217    | Vyaire Medical, Inc.               | 220                    | 219                              | (Sec)- \$ -<br>(Adm)- \$ 174,315.60<br>(503)- \$ -<br>(Pri)- \$ -<br>(GUC)- \$ -<br>(Tot)- \$ 174,315.60         | Claim No. 219 is duplicative of Claim No. 220.                                                                                                                                                                                                                  |
| 2        | Georgia Department of Revenue                     | 24-11223    | SensorMedics Corporation           | 3                      | 2                                | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ 584,533.55<br>(GUC)- \$ 41,957.05<br>(Tot)- \$ 626,490.60 | Claim No. 2 is duplicative of Claim No. 3.                                                                                                                                                                                                                      |
| 3        | Greatbatch Medical                                | 24-11217    | Vyaire Medical, Inc.               | 119                    | 147                              | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ -<br>(GUC)- \$ 2,579,488.00<br>(Tot)- \$ 2,579,488.00     | Claim No. 147 is duplicative of Claim No. 119. Claim No. 119 was previously reclassified pursuant to the <i>Order Granting and Sustaining Plan Administrator's First Omnibus Objection (Substantive) to Certain Section 503(b)(9) Claims</i> [Docket No. 1001]. |
| 4        | NM Taxation & Revenue Department                  | 24-11231    | Vyaire Medical 203, Inc.           | 18                     | 15                               | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ -<br>(GUC)- \$ -<br>(Tot)- \$ -                           | Claim No. 15 is duplicative of Claim No. 14, which was subsequently amended by Claim No. 18.                                                                                                                                                                    |
| 5        | Texas Comptroller of Public Accounts              | 24-11217    | Vyaire Medical, Inc.               | 8<br>Case No. 24-11229 | 177                              | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ 166,689.48<br>(GUC)- \$ 7,501.03<br>(Tot)- \$ 174,190.51  | The Debtors' books and records indicate that Claim No. 177 is a duplicate claim made under a different debtor entity. The surviving claim is Claim No. 8 filed against Vyaire Holding Company in case number 24-11229.                                          |

| Item No. | Claimant Name                        | Case Number | Debtor Against Whom Claim is Filed | Remaining Claim Number | Duplicate Claim to be Disallowed | Remaining Claim Amount & Classification Status                                                                  | Reason for Disallowance                                                                                                                                                                                               |
|----------|--------------------------------------|-------------|------------------------------------|------------------------|----------------------------------|-----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6        | Texas Comptroller of Public Accounts | 24-11230    | Vyaire Medical 202, Inc.           | 8<br>Case No. 24-11229 | 3                                | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ 166,689.48<br>(GUC)- \$ 7,501.03<br>(Tot)- \$ 174,190.51 | The Debtors' books and records indicate that Claim No. 177 is a duplicate claim made under a different debtor entity. The surviving claim is Claim No. 8 filed against Vyair Holding Company in case number 24-11229. |
| 7        | Texas Comptroller of Public Accounts | 24-11231    | Vyaire Medical 203, Inc.           | 8<br>Case No. 24-11229 | 11                               | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ 166,689.48<br>(GUC)- \$ 7,501.03<br>(Tot)- \$ 174,190.51 | The Debtors' books and records indicate that Claim No. 177 is a duplicate claim made under a different debtor entity. The surviving claim is Claim No. 8 filed against Vyair Holding Company in case number 24-11229. |

**Schedule 2**

**Late Filed Claims**

**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        | Hogan Lovells US LLP | 1/27/2025        | 24-11217    | Vyaire Medical, Inc.               | 239       | (Sec)- \$ -<br>(Adm)- \$ 9,183.50<br>(503)-<br>(Pri)- \$ -<br>(GUC)-<br>(Tot)- \$ 9,183.50               | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ -<br>(GUC)- \$ -<br>(Tot)- \$ - | Claim No. 239 was filed on 1/27/2025, which was after the Administrative Claims Bar Date, 12/27/2024. |
| 2        | Mitchell Barthelemy  | 9/13/2024        | 24-11217    | Vyaire Medical, Inc.               | 181       | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ 6,593.72<br>(GUC)-<br>(Tot)- \$ 6,593.72          | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ -<br>(GUC)- \$ -<br>(Tot)- \$ - | Claim No. 181 was filed on 9/13/2024 which was after the General Bar Date, 8/2/2024.                  |
| 3        | TDOR                 | 12/18/2024       | 24-11217    | Vyaire Medical, Inc.               | 216       | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)-<br>(Pri)- \$ 10,564.00<br>(GUC)-<br>(Tot)- \$ 10,564.00             | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ -<br>(GUC)- \$ -<br>(Tot)- \$ - | Claim No. 216 was filed on 12/18/2024, which was after the Governmental Bar Date, 12/9/2024.          |
| 4        | TDOR                 | 12/18/2024       | 24-11230    | Vyaire Medical 202, Inc.           | 8         | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ 104,525.00<br>(GUC)- \$ -<br>(Tot)- \$ 157,207.44 | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ -<br>(GUC)- \$ -<br>(Tot)- \$ - | Claim No. 8 was filed on 12/18/2024, which was after the Governmental Bar Date, 12/9/2024.            |
| 5        | TDOR                 | 12/18/2024       | 24-11234    | Vyaire Medical 211, Inc.           | 32        | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ 7,582.00<br>(GUC)- \$ -<br>(Tot)- \$ 7,582.00     | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ -<br>(GUC)- \$ -<br>(Tot)- \$ - | Claim No. 32 was filed on 12/18/2024, which was after the Governmental Bar Date, 12/9/2024.           |

| 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                                                               |
|----------|------------------------|------------------|-------------|------------------------------------|-----------|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| 6        | The West Group Limited | 3/31/2025        | 24-11217    | Vyair Medical, Inc.                | 250       | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ 2,585.00<br>(Pri)- \$ -<br>(GUC)- \$ 199,200.62<br>(Tot)- \$ 201,785.62 | (Sec)- \$ -<br>(Adm)- \$ -<br>(503)- \$ -<br>(Pri)- \$ -<br>(GUC)- \$ -<br>(Tot)- \$ - | Claim No. 250 was filed on 3/31/2025, which was after the General Bar Date, 8/2/2024. |

**Schedule 3**

**Insufficient Documentation Claims**

**SCHEDULE 3**  
**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                    | Case Number | Debtor Against Whom Claim is Filed | Claim No. | Claim Amount & Classification Status |              | Adjusted Classification Status & Amount |      | Reason for Disallowance                                                                                                                                                                                                 |
|----------|----------------------------------|-------------|------------------------------------|-----------|--------------------------------------|--------------|-----------------------------------------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1        | Owens & Minor Distribution, Inc. | 24-11217    | Vyair Medical, Inc.                | 223       | (Sec)-                               | \$ -         | (Sec)-                                  | \$ - | Claim does not include or attach sufficient documentation to constitute <i>prima facie</i> evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any basis for the claim. |
|          |                                  |             |                                    |           | (Adm)-                               | \$ 40,552.84 | (Adm)-                                  | \$ - |                                                                                                                                                                                                                         |
|          |                                  |             |                                    |           | (503)-                               |              | (503)-                                  | \$ - |                                                                                                                                                                                                                         |
|          |                                  |             |                                    |           | (Pri)-                               | \$ -         | (Pri)-                                  | \$ - |                                                                                                                                                                                                                         |
|          |                                  |             |                                    |           | (GUC)-                               | \$ 13,974.29 | (GUC)-                                  | \$ - |                                                                                                                                                                                                                         |
|          |                                  |             |                                    |           | (Tot)-                               | \$ 54,527.13 | (Tot)-                                  | \$ - |                                                                                                                                                                                                                         |