

Exhibit A

Revised Proposed Order

**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. 1081**
)

**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”);² 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 and Schedule 2 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.

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 “Confirmation Order”). 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 600, Wilmington, DE 19801.

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

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

5. 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.

6. 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 and 2 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.

7. 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.

8. 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.

² Capitalized terms not defined herein shall have the meanings ascribed to the terms in the Objection.

9. 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)- \$ - (Adm)- \$ 174,315.60 (503)- \$ - (Pri)- \$ - (GUC)- \$ - (Tot)- \$ 174,315.60	Claim No. 219 is duplicative of Claim No. 220.
2	Greatbatch Medical	24-11217	Vyaire Medical, Inc.	119	147	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ - (GUC)- \$ 2,579,488.00 (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].
3	NM Taxation & Revenue Department	24-11231	Vyaire Medical 203, Inc.	18	15	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ - (GUC)- \$ - (Tot)- \$ -	Claim No. 15 is duplicative of Claim No. 14, which was subsequently amended by Claim No. 18.
4	Texas Comptroller of Public Accounts	24-11217	Vyaire Medical, Inc.	8 Case No. 24-11229	177	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ 166,689.48 (GUC)- \$ 7,501.03 (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.
5	Texas Comptroller of Public Accounts	24-11230	Vyaire Medical 202, Inc.	8 Case No. 24-11229	3	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ 166,689.48 (GUC)- \$ 7,501.03 (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	24-11231	Vyaire Medical 203, Inc.	8 Case No. 24-11229	11	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ 166,689.48 (GUC)- \$ 7,501.03 (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.

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	Mitchell Barthelemy	9/13/2024	24-11217	Vyair Medical, Inc.	181	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ 6,593.72 (GUC)- \$ - (Tot)- \$ 6,593.72	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ - (GUC)- \$ - (Tot)- \$ -	Claim No. 181 was filed on 9/13/2024 which was after the General Bar Date, 8/2/2024.
2	The West Group Limited	3/31/2025	24-11217	Vyair Medical, Inc.	250	(Sec)- \$ - (Adm)- \$ - (503)- \$ 2,585.00 (Pri)- \$ - (GUC)- \$ 199,200.62 (Tot)- \$ 201,785.62	(Sec)- \$ - (Adm)- \$ - (503)- \$ - (Pri)- \$ - (GUC)- \$ - (Tot)- \$ -	Claim No. 250 was filed on 3/31/2025, which was after the General Bar Date, 8/2/2024.