

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

In re:	)	
	)	Chapter 11
VYAIRE MEDICAL, INC., ¹	)	
	)	Case No. 24-11217 (BLS)
Liquidating Debtor.	)	
	)	Hearing Date: June 11, 2025 at 10:30 a.m. (ET)
	)	Obj. Deadline: June 4, 2025 at 4:00 p.m. (ET)

**NOTICE OF THE PLAN ADMINISTRATOR’S FOURTH OMNIBUS
OBJECTION (SUBSTANTIVE) TO CERTAIN CLAIMS**

TO ALL PARTIES RECEIVING THIS OBJECTION:

YOU SHOULD REVIEW SCHEDULE 1, SCHEDULE 2 AND SCHEDULE 3 TO THE PROPOSED ORDER TO LOCATE YOUR NAME AND CLAIM(S) AND DETERMINE IF YOUR CLAIM(S) ARE SUBJECT TO THIS OBJECTION. IF YOUR CLAIM(S) ARE LISTED ON THE EXHIBITS ATTACHED TO THE PROPOSED ORDER, YOU MAY HAVE SUBSTANTIVE RIGHTS AFFECTED BY THIS OBJECTION.

YOUR SUBSTANTIVE RIGHTS MAY ALSO BE AFFECTED BY FURTHER OBJECTIONS THAT MAY BE FILED IN THESE CHAPTER 11 CASES.

THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE DEBTORS, THEIR ESTATES, ANY SUCCESSORS THERETO OR ANY OTHER PARTY IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS SUBJECT TO THIS OBJECTION, AND NOTHING HEREIN OR THE PROPOSED ORDER IS INTENDED OR SHALL BE DEEMED TO BE AN ALLOWANCE OF ANY SUCH CLAIMS.

PLEASE TAKE NOTICE that David M. Barse, solely in his capacity as the Plan Administrator of Vyair Medical, Inc., *et al.* (the “Plan Administrator”) in the above-captioned case, has filed the attached *Plan Administrator’s Fourth Omnibus Objection (Substantive) to Certain Claims* (the “Objection”).²

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.

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

PLEASE TAKE FURTHER NOTICE that any responses (each, a “Response”) to the relief requested in the Objection must be filed on or before **4:00 p.m. (prevailing Eastern Time) on June 4, 2025** (the “Response Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Court”). At the same time, any party submitting a Response (each, a “Respondent”) must serve a copy of its Response upon the undersigned counsel to the Plan Administrator, so as to be received on or before the Response Deadline.

PLEASE TAKE FURTHER NOTICE that any Response must contain, at a minimum, the following:

- a) a caption setting forth the name of the Court, the above-referenced case number, and the title of the Objection to which the Response is directed;
- b) the name of the claimant and description of the basis for the amount of the Disputed Claim; and
- c) a concise statement setting forth the reasons why a particular Disputed Claim should not be disallowed, modified, or reclassified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection at the Hearing.

PLEASE TAKE FURTHER NOTICE THAT THE HEARING TO CONSIDER THE OBJECTION WILL BE HELD ON JUNE 11, 2025 AT 10:30 A.M. (PREVAILING EASTERN TIME) (THE “HEARING”) BEFORE THE HONORABLE BRENDAN LINEHAN SHANNON, UNITED STATES BANKRUPTCY COURT JUDGE FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 1, WILMINGTON, DELAWARE 19801.

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

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Dated: May 8, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

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

- and -

Matteo Percontino, Esq. (Admitted *Pro Hac Vice*)
Court Plaza North, 25 Main Street
Hackensack, NJ 07601
Telephone: (201) 489-3000
Facsimile: (201) 489-1536
mpercontino@coleschotz.com

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