

**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)
)
)
)
)

**CERTIFICATION OF COUNSEL
REGARDING PROPOSED ORDER APPROVING STIPULATION BY AND
BETWEEN OWENS & MINOR DISTRIBUTION, INC. AND PLAN ADMINISTRATOR**

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

1. On or about September 22, 2025, Owens & Minor Distribution, Inc. on the one hand, and the Plan Administrator, on the other hand, entered into that certain *Stipulation By and Between Owens & Minor Distribution, Inc. and Plan Administrator* (the “Stipulation”), attached as Exhibit 1 to the proposed form of order, which is attached hereto as Exhibit A (the “Proposed Order”).

2. Accordingly, the Plan Administrator respectfully requests entry of the Proposed Order approving the Stipulation at the Court’s earliest convenience.

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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

Dated: September 22, 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 Vyair Medical, Inc., et al.*