

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

In re:

Halt Medical, Inc.,¹

Debtor.

Chapter 11

Case No. 17-10810 (LSS)

Re: Docket Nos. 16, 29 & 56

CERTIFICATION OF COUNSEL

The undersigned counsel for the above-captioned debtor and debtor in possession (the “Debtor”) hereby certifies as follows:

1. On May 3, 2017, the Court conducted a hearing (the “Hearing”) to consider entry of a final order regarding the *Debtor’s Motion for Interim and Final Orders Under Bankruptcy Code Sections 105, 361, 362, 363, 364, and 507 and Bankruptcy Rules 2002, 4001 and 9014 (I) Authorizing Postpetition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Super-Priority Claims, (IV) Granting Adequate Protection to Prepetition Secured Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related (Corrected)* [D.I. 16] (the “DIP Motion”).

2. At that hearing, the Court inquired of Debtor’s counsel whether, in light of the Debtor’s stipulations and the related challenge deadline in the interim and final orders granting the DIP Motion, notice of the DIP Motion had been provided to the plaintiffs in the chancery litigation captioned *Calesa Assocs., L.P., et al. v. American Capital, Ltd., et al.*, C,A, No. 10557-VCG (Del. Chan.) (the “Chancery Action”). The information required to respond to the Court’s question was not readily available at the hearing.

¹ The last four digits of the Debtor’s federal tax identification number are 8422. The Debtor’s address is 131 Sand Creek Road, Suite B, Brentwood, CA 94513.

3. After the hearing, Debtor's counsel determined that the plaintiffs in the Chancery Action, who consist of stockholders and/or prepetition noteholders of the Debtor, were not served with the DIP Motion, nor was counsel to the plaintiffs. Plaintiffs' counsel in the Chancery Action took the deposition of Ms. Bridges-Rodriguez one week after the Petition Date, on or about April 19, 2017 (14 days prior to the Hearing), and demonstrated they were aware of the chapter 11 case filing by asking questions in the deposition about the case. Plaintiff and counsel to the plaintiffs will receive the formal Notice of Commencement.

4. The Debtor will serve the DIP Motion, and the interim and final orders granting the same, upon the plaintiffs in the Chancery Action and their counsel.

Dated: May 5, 2017

DRINKER BIDDLE & REATH LLP

/s/ Patrick A. Jackson

Steven K. Kortanek (Del. Bar No. 3106)

Patrick A. Jackson (Del. Bar No. 4976)

Joseph N. Argentina, Jr. (Del. Bar No. 5453)

222 Delaware Ave., Suite 1410

Wilmington, DE 19801-1621

Telephone: (302) 467-4200

Facsimile: (302) 467-4201

Steven.Kortanek@dbr.com

Patrick.Jackson@dbr.com

Joseph.Argentina@dbr.com

*Proposed Lead Counsel for the
Debtor and Debtor in Possession*