

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

In re:	Chapter 11
PLX PHARMA INC., et al., ¹	Case No. 23-10456 (MFW)
Debtors.	(Jointly Administered)
	<u>Bidding Procedures Objection Deadline:</u> April 27, 2023, at 4:00 p.m. (ET)
	<u>Bidding Procedures Hearing Date:</u> May 8, 2023, at 10:30 a.m. (ET)
	<u>Proposed Stalking Horse APA Sale Objection Deadline:</u> May 5, 2023, at 4:00 p.m. (ET)
	<u>Proposed Non-Stalking Horse APA Sale Objection Deadline:</u> May 23, 2023, at 4:00 p.m. (ET)
	<u>Proposed Sale Hearing Date If Auction Is NOT Held:</u> May 22, 2023, subject to Court availability
	<u>Proposed Sale Hearing Date If Auction Is Held:</u> May 25, 2023, at 10:30 a.m. (ET)

AMENDED NOTICE OF MOTION

TO: (I) THE U.S. TRUSTEE; (II) THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION; (III) THE UNITED STATES DEPARTMENT OF JUSTICE; (IV) ALL STATE ATTORNEYS' GENERAL AND CONSUMER PROTECTION AGENCIES IN JURISDICTIONS IN WHICH THE ASSETS ARE LOCATED; (V) THE PARTIES INCLUDED ON THE DEBTORS' LIST OF TWENTY (20) LARGEST UNSECURED CREDITORS; (VI) ALL PARTIES WHO ARE KNOWN BY THE DEBTORS TO ASSERT LIENS AGAINST THE ASSETS; (VII) ANY PARTY KNOWN OR REASONABLY BELIEVED TO HAVE EXPRESSED AN INTEREST IN ACQUIRING SOME OR ALL OR SUBSTANTIALLY ALL OF THE DEBTORS' ASSETS; AND (VIII) ALL PARTIES WHO, AS OF THE FILING OF THIS NOTICE, HAVE FILED A NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS PURSUANT TO BANKRUPTCY RULE 2002

PLEASE TAKE NOTICE that, on April 13, 2023, the above-captioned debtors and debtors in possession (together, the "**Debtors**") filed the *Debtors' Motion for Entry of (A)*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: PLx Pharma Inc. (5704) and PLx Opco Inc. (6588). The mailing address for each of the Debtors is 9 Fishers Lane, Suite E Sparta, NJ 07871.

Order (I) Approving Bidding Procedures in Connection with Sale of Assets of the Debtors and Related Bid Protections, (II) Approving Form and Manner of Notice, (III) Scheduling Auction and Sale Hearing, (IV) Authorizing Procedures Governing Assumption and Assignment of Certain Contracts and Unexpired Leases, and (V) Granting Related Relief; and (B) Order (I) Approving Asset Purchase Agreement, and (II) Authorizing Sale Free and Clear of All Liens, Claims, Encumbrances, and Other Interests [Docket No. 19] (the “Motion”).

You were previously served with a copy of the Motion, which included a cover notice similar to this notice (the “Prior Notice”).

****This Notice supersedes the Prior Notice in the event of any conflict therewith****

PLEASE TAKE FURTHER NOTICE that any objections to the Motion as it pertains to the entry of the Bidding Procedures Order² must be filed on or before **April 27, 2023 at 4:00 p.m. (ET)** (the “**Bidding Procedures Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, DE 19801. At the same time, you must serve a copy of the objection upon the undersigned proposed counsel to the Debtors so as to be received on or before the Bidding Procedures Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION SOLELY AS IT PERTAINS TO THE ENTRY OF THE BIDDING PROCEDURES ORDER (THE “BIDDING PROCEDURES HEARING”) SHALL BE HELD ON MAY 8, 2023, AT 10:30 A.M. (ET), BEFORE THE HONORABLE MARY F. WALRATH, UNITED STATES BANKRUPTCY JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, WILMINGTON, DE 19801.

PLEASE TAKE FURTHER NOTICE THAT THE DEBTORS ARE REQUESTING THE COURT TO ESTABLISH MAY 5, 2023 AT 4:00 P.M. (ET) AS THE DEADLINE TO FILE ANY OBJECTIONS TO APPROVAL OF THE STALKING HORSE APA TRANSACTION. ANY SUCH OBJECTIONS MUST BE IN WRITING, STATE THE BASIS OF SUCH OBJECTION WITH SPECIFICITY, AND BE FILED WITH THE COURT AND SERVED ON OR BEFORE THE STALKING HORSE APA OBJECTION DEADLINE ON THE FOLLOWING PARTIES: (A) PROPOSED COUNSEL TO THE DEBTORS, OLSHAN FROME WOLOSKY LLP, 1325 AVENUE OF THE AMERICAS, NEW YORK, NY 10019 (ATTN.: ADAM H. FRIEDMAN (AFRIEDMAN@OLSHANLAW.COM) AND JONATHAN T. KOEVARY (JKOEVAR@OLSHANLAW.COM); (B) PROPOSED CO-COUNSEL TO THE DEBTORS, YOUNG CONAWAY STARGATT & TAYLOR, LLP, 1000 N. KING STREET, WILMINGTON, DE 19801 (ATTN.: ROBERT F. POPPITI, JR. (RPOPPITI@YCST.COM) AND SHANE M. REIL (SREIL@YCST.COM)); (C) THE OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE, J. CALEB BOGGS FEDERAL BUILDING, 844 KING STREET, SUITE 2207, LOCKBOX 35, WILMINGTON, DE 19801 (ATTN.: JOSEPH F. CUDIA); (D) COUNSEL TO ANY

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to such terms in the Motion.

STATUTORY COMMITTEE THAT HAS BEEN APPOINTED IN THE CHAPTER 11 CASE; AND (E) COUNSEL TO THE STALKING HORSE BIDDER, DLA PIPER (USA), 444 WEST LAKE STREET, SUITE 900, CHICAGO, IL 60606-0089 (ATTN.: W. BENJAMIN WINGER (BENJAMIN.WINGER@US.DLAPIPER.COM) AND KATIE ALLISON (KATIE.ALLISON@US.DLAPIPER.COM), AND DLA PIPER (USA), 1201 N. MARKET STREET, SUITE 2100, WILMINGTON, DE 19801 (ATTN.: R. CRAIG MARTIN (CRAIG.MARTIN@US.DLAPIPER.COM) AND KAITLIN W. MACKENZIE (KAITLIN.MACKENZIE@US.DLAPIPER.COM)).

FOR THE AVOIDANCE OF DOUBT, ANY OBJECTIONS RELATED TO THE ENTRY OF THE BIDDING PROCEDURES ORDER AND THE RELIEF PROVIDED FOR THEREIN, INCLUDING APPROVAL OF THE BID PROTECTIONS AND AUTHORIZATION FOR THE STALKING HORSE BIDDER TO CREDIT BID UNDER SECTION 363(K) OF THE BANKRUPTCY CODE, ARE DUE BY THE BIDDING PROCEDURES OBJECTION DEADLINE OF APRIL 27, 2023, AT 4:00 P.M. (ET).

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

Dated: April 14, 2023
Wilmington, DE

/s/ Shane M. Reil

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