## 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)
	) (Jointly Administered)
Debtors.	) Ref. Docket Nos. 5, 6, 7, 8, 9, 32, 33, 34. 35 & 36 )

## OMNIBUS NOTICE OF FIRST DAY MOTIONS AND FINAL HEARING THEREON

**PLEASE TAKE NOTICE** that, on April 13, 2023, the above-captioned debtors and debtors in possession (together, the "**Debtors**") filed, among others, the following first day motions (collectively, the "**First Day Motions**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**"):<sup>2</sup>

- 1. Debtors' Motion for Interim and Final Orders (I) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Utility Services; (II) Deeming Utility Companies Adequately Assured of Future Payment; (III) Establishing Procedures for Determining Additional Adequate Assurance of Payment; and (IV) Setting a Final Hearing Related Thereto [D.I. 5]
- 2. Debtors' Motion for Interim and Final Order (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees and Related Obligations; and (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto [D.I. 6]
- 3. Debtors' Motion Pursuant to Sections 105(a), 363(c), 503(b), 1107(a) and 1108 of the Bankruptcy Code for Authorization to Honor Certain Prepetition Obligations to Customers and Otherwise Maintain (A) the Call Center and (B) the Coupon Program in the Ordinary Course [D.I. 7]
- 4. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing and Approving Continued Use of the Cash Management System; (II) Authorizing Use of Prepetition Bank Accounts and Business Forms; (III) Waiving the Requirements of Section 345(b) on an Interim Basis; and (IV) Granting Certain Related Relief [D.I. 8]

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> The Debtors filed a motion and an application that were approved on a final basis at the First Day Hearing (defined below), which are not listed herein.

5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Wages, Salaries, and Other Compensation, (B) Maintain Payments to Their Professional Employer Organization, (C) Pay Prepetition Employee Business Expenses, (D) Maintain Contributions to Prepetition Employee Benefit Programs and Continuation of Such Programs in the Ordinary Course, (E) Pay Workers' Compensation Obligations, and (F) Pay and Remit Funds on Account of Withholding and Payroll-Related Taxes and Deductions; and (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto [D.I. 9]

**PLEASE TAKE FURTHER NOTICE** that a hearing on the First Day Motions and certain other pleadings was held on April 14, 2023 (the "**First Day Hearing**"), at which time the Court approved the First Day Motions identified above on an interim basis. *See* Docket Nos. 32, 33, 34, 35 & 36.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to final approval of the First Day Motions must be in writing, filed with the Clerk of the Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon the undersigned proposed counsel to the Debtors on or before **May 1, 2023 at 4:00 p.m. (ET)** (the "**Objection Deadline**").

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON FINAL APPROVAL OF THE FIRST DAY MOTIONS WILL BE HELD ON MAY 8, 2023 AT 10:30 A.M. (ET) BEFORE THE HONORABLE MARY F. WALRATH, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 5th FLOOR, COURTROOM NO. 4, WILMINGTON, DELAWARE 19801.

**PLEASE TAKE FURTHER NOTICE** that copies of the First Day Motions, any of the related interim orders, and all other pleadings filed in these chapter 11 cases are available, free of charge, from the website of the Court-appointed claims agent, https://www.donlinrecano.com/Clients/plx/Index.

IF NO OBJECTIONS TO THE FIRST DAY MOTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH FIRST DAY MOTIONS WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 14, 2023 Wilmington, DE

## /s/ Shane M. Reil

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Robert S. Brady (No. 2847) Robert F. Poppiti, Jr. (No. 5052) Shane M. Reil (No. 6195)

1000 North King Street Wilmington, DE 19801

Telephone: (302) 571-6600 Facsimile: (302) 571-1253 Email: rbrady@ycst.com rpoppiti@ycst.com

rpoppiti@ycst.com sreil@ycst.com

-and-

## OLSHAN FROME WOLOSKY LLP

Adam H. Friedman (*pro hac vice* pending) Jonathan T. Koevary (*pro hac vice* pending) 1325 Avenue of the Americas New York, NY 10019

Telephone: (212) 451-2300

Email: afriedman@olshanlaw.com

jkoevary@olshanlaw.com

Proposed Counsel to the Debtors