

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

In re:)	
)	Chapter 11
SIO2 MEDICAL PRODUCTS, INC., <i>et al.</i> , ¹)	
)	Case No. 23-10366 (JTD)
Debtors.)	
)	(Joint Administration Requested)

**NOTICE OF *AMENDED* AGENDA OF MATTERS SCHEDULED VIA ZOOM FOR
FIRST DAY HEARING ON MARCH 30, 2023 AT 1:30 P.M. (EASTERN TIME)
BEFORE THE HONORABLE JOHN T. DORSEY**

**THIS HEARING WILL NOT BE CONDUCTED VIA COURTCALL. BOTH VIDEO AND
AUDIO WILL BE THROUGH ZOOM.**

**ALL PARTIES MUST REGISTER THEIR ZOOM APPEARANCE AT LEAST
TWO HOURS PRIOR TO HEARING.**

Please use the following registration link:

<https://debuscourts.zoomgov.com/meeting/register/vJltfuiprTkrHfOcV8DwbLnj068qeHohJrQ>

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR YOU WILL NOT
BE ALLOWED INTO THE MEETING.**

RELATED MATTERS

A. Voluntary Petitions

1. SiO2 Medical Products, Inc., Case No. 23-10366 (JTD) (Filed March 28, 2023) [D.I. No. 1]
2. Advanced Bioscience Labware, Inc., Case No. 23-10367 (JTD) (Filed March 28, 2023) [D.I. No. 1]
3. Advanced Bioscience Consumables, Inc., Case No. 23-10368 (JTD) (Filed March 28, 2023) [D.I. No. 1]

B. Declaration of Yves Steffen, Chief Executive Officer of SiO2 Medical Products Inc., in Support of Chapter 11 Filing and First Day Motions (Filed March 29, 2023) [D.I. No. 15]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: SiO2 Medical Products, Inc. (8467); Advanced Bioscience Labware, Inc. (1229); and Advanced Bioscience Consumables, Inc. (2510). The location of the Debtors' principal place of business and service address in these chapter 11 cases is 2250 Riley Street, Auburn, Alabama 36832.

- C. Declaration of R. Seth Bullock, Interim Chief Financial Officer of SiO2 Medical Products, Inc., in Support of DIP Financing and Other First Day Motions (Filed March 29, 2023) [D.I. No. 16]
- D. Motion of Debtors for Entry of an Order (I) Establishing Bidding Procedures, (II) Scheduling Certain Dates With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, and (IV) Granting Related Relief (Filed March 29, 2023) [D.I. No. 17]
- E. Joint Chapter 11 Plan of Reorganization of SiO2 Medical Products, Inc., and Its Debtor Affiliates (Filed March 29, 2023) [D.I. No. 18]
- F. Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of SiO2 Medical Products, Inc., and Its Debtor Affiliates (Filed March 29, 2023) [D.I. No. 19]

MATTERS GOING FORWARD

G. First-Day Motions

- 1. Motion of Debtors for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief (Filed March 29, 2023) [D.I. No. 3]

Status: This matter will be going forward.

- 2. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief (Filed March 29, 2023) [D.I. No. 4]

Status: This matter will be going forward.

- 3. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Perform Intercompany Transactions and (II) Granting Related Relief (Filed March 29, 2023) [D.I. No. 5]

Status: This matter will be going forward.

- 4. Motion of Debtors Seeking Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Prepetition Claims of Certain Critical Vendors, Foreign Vendors, Import/Export Claimants, 503(b)(9) Claimants, and Lien Claimants (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief (Filed March 29, 2023) [D.I. No. 6]

Status: This matter will be going forward.

5. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (B) File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, and (C) Redact Certain Personally Identifiable Information and (II) Granting Related Relief (Filed March 29, 2023) [D.I. No. 7]

Status: This matter will be going forward.

6. Debtors' Application for Entry of an Order Authorizing the Debtors to Employ and Retain Donlin, Recano & Company, Inc. as Claims and Noticing Agent for the Debtors Pursuant to 28 U.S.C. § 156(c), Section 105(a) of the Bankruptcy Code and Local Rule 2002-1(f) (Filed March 29, 2023) [D.I. No. 8]

Status: This matter will be going forward.

7. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance Coverage Entered Into Prepetition and Pay Related Prepetition Obligations and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage and (II) Granting Related Relief (Filed March 29, 2023) [D.I. No. 9]

Status: This matter will be going forward.

8. Motion of Debtors for Entry of Interim and Final Orders (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief (Filed March 29, 2023) [D.I. No. 10]

Status: This matter will be going forward.

9. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief (Filed March 28, 2023) [D.I. No. 11]

Status: This matter will be going forward.

10. Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness With Respect to Common Stock and Preferred Stock and (II) Granting Related Relief (Filed March 29, 2023) [D.I. No. 12]

Status: This matter will be going forward.

11. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Liens Superpriority Administrative Expense Status, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed March 29, 2023) [D.I. No. 14]

- a. **Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Liens Superpriority Administrative Expense Status, (III) Modifying the Automatic Stay, (iv) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed March 30, 2023) [D.I. No. 53]**

Status: This matter will be going forward.

[Signature page follows]

Dated: March 30, 2023

/s/ Patrick J. Reilley

Seth Van Aalten (*pro hac vice* pending)

Justin R. Alberto (No. 5126)

Patrick J. Reilley (No. 4451)

Stacy L. Newman (No. 5044)

COLE SCHOTZ P.C.

500 Delaware Avenue, Suite 1410

Wilmington, Delaware 19801

Telephone: (302) 652-3131

Facsimile: (302) 652-3117

Email: svanaalten@coleschotz.com

jalberto@coleschotz.com

preilley@coleschotz.com

snewman@coleschotz.com

-and-

Brian Schartz, P.C. (*pro hac vice* pending)

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Email: bschartz@kirkland.com

-and-

Joshua M. Altman (*pro hac vice* pending)

Dan Latona (*pro hac vice* pending)

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

300 North LaSalle Street

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Email: josh.altman@kirkland.com

dan.latona@kirkland.com

Proposed Co-Counsel for the Debtors and Debtors in Possession