

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

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

**NOTICE OF BANKRUPTCY FILING AND  
FIRST DAY MOTIONS AND RELATED PLEADINGS**

**PLEASE TAKE NOTICE** that on March 29, 2023, the above-captioned debtors and debtors in possession (the “Debtors”) filed voluntary petitions (the “Petitions”) for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), with the United States Bankruptcy Court for the District of Delaware (the “Court”), as set forth below:

A. Voluntary Petitions

1. SiO2 Medical Products, Inc., Case No. 23-10366 (JTD)
2. Advanced Bioscience Labware, Inc., Case No. 23-10367 (JTD)
3. Advanced Bioscience Consumables, Inc., Case No. 23-10368 (JTD)

**PLEASE TAKE FURTHER NOTICE** that, in addition to the filing of the Petitions, the Debtors have filed the following first day motions and related pleadings (the “First Day Motions”):

B. 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]
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]

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<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: 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.

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]
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]
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]
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]
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]
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]
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 29, 2023) [D.I. No. 11]
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]

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]
12. 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]
13. Declaration of R. Seth Bullock, Interim Chief Financial Officer of SiO2 Medical Products, Inc., in Support of Chapter 11 Filing and First Day Motions (Filed March 29, 2023) [D.I. No. 16]

**PLEASE TAKE FURTHER NOTICE** that, copies of the above-referenced Pleadings may be obtained free of charge (i) by request to the Debtors' proposed counsel via email to [pratkowiak@coleschotz.com](mailto:pratkowiak@coleschotz.com); and (ii) at the website of the Debtors' proposed claims and noticing agent, Donlin, Recano & Company, Inc., [www.donlinrecano.com/smp](http://www.donlinrecano.com/smp). In addition, copies of the Pleadings also can be downloaded for a fee from the Court's website, [www.deb.uscourts.gov](http://www.deb.uscourts.gov). To access documents on the Court's website, you will need a PACER password and login which can be obtained at <http://www.pacer.psc.uscourts.gov>.

**PLEASE TAKE FURTHER NOTICE** that the Court has scheduled a Zoom hearing for consideration of the First Day Motions (the "First Day Hearing") on **MARCH 30, 2023 at 1:30 p.m. (ET)** before the Honorable John T. Dorsey, U.S. Bankruptcy Judge, U.S. Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.<sup>2</sup>

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<sup>2</sup> A copy of the Notice of Agenda will be available through (i) the website of the Debtors' proposed claims and noticing agent, Donlin, Recano & Company, Inc., [www.donlinrecano.com/smp](http://www.donlinrecano.com/smp), free of charge; or (ii) the Court's website, [www.deb.uscourts.gov](http://www.deb.uscourts.gov), for a fee.

March 29, 2023  
Wilmington, Delaware

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