

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

)	
In re:)	Chapter 11
)	
AKORN, INC., <i>et al.</i> , ¹)	Case No. 20-11177 (KBO)
)	
Debtors.)	(Jointly Administered)
)	
)	Obj. Deadline: August 25, 2020 at 12:00 p.m.
)	Hearing: September 1, 2020 at 10:00 a.m.

**RESERVATION OF RIGHTS OF CATALENT PHARMA SOLUTIONS, LLC AND
CATALENT MICRON TECHNOLOGIES, INC. WITH RESPECT TO THE JOINT
CHAPTER 11 PLAN OF AKORN, INC. AND ITS DEBTOR AFFILIATES**

Catalent Pharma Solutions, LLC (“Catalent Pharma”) and Catalent Micron Technologies, Inc. (“Catalent Micron” and, collectively with Catalent Pharma, “Catalent”) creditors and parties-in-interest in the above-captioned jointly administered chapter 11 cases (the “Chapter 11 Cases”), by and through undersigned counsel, hereby submits the following reservation of rights regarding the *Joint Chapter 11 Plan of Akorn, Inc. and its Debtor Affiliates* [Doc. No. 101] (as modified, amended or supplemented from time to time, the “Plan”), and in support thereof, respectfully states as follows:

1. Catalent expressly and fully incorporates by reference its *Limited Objection of Catalent Pharma Solutions, LLC and Catalent Micron Technologies, Inc. to Debtors’ (I) Sale Motion and (II) Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases* [Doc. No. 485] (the “Limited Sale Objection”) herein.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, if any, are: Akorn, Inc. (7400); 10 Edison Street LLC (7890); 13 Edison Street LLC; Advanced Vision Research, Inc. (9046); Akorn (New Jersey), Inc. (1474); Akorn Animal Health, Inc. (6645); Akorn Ophthalmics, Inc. (6266); Akorn Sales, Inc. (7866); Clover Pharmaceuticals Corp. (3735); Covenant Pharma, Inc. (0115); Hi-Tech Pharmacal Co., Inc. (8720); Inspire Pharmaceuticals, Inc. (9022); Oak Pharmaceuticals, Inc. (6647); Olta Pharmaceuticals Corp. (3621); VersaPharm Incorporated (6739); VPI Holdings Corp. (6716); and VPI Holdings Sub, LLC. The location of the Debtors’ service address is: 1925 W. Field Court, Suite 300, Lake Forest, Illinois 60045.



2. In the event that the Sale² is not approved or consummated, Catalent reserves all of its rights to object to the Plan and confirmation thereof.

Respectfully submitted,

Dated: August 18, 2020

/s/ Sommer L. Ross
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*Counsel to Catalent Pharma Solutions, LLC and
Catalent Micron Technologies, Inc.*

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Limited Sale Objection.