

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

)	
In re:)	Chapter 11
)	
AKORN, INC.,)	Case No. 20-11177 (KBO)
)	
Debtor. ¹)	
)	Re: Docket No. 1157
)	

**CERTIFICATE OF NO OBJECTION REGARDING DEBTOR’S MOTION FOR ENTRY
OF AN ORDER (I) ENLARGING THE PERIOD WITHIN WHICH THE DEBTOR MAY
REMOVE ACTIONS AND (II) GRANTING RELATED RELIEF**

The undersigned hereby certifies that she has received no answer, objection, or any other responsive pleading with respect to the *Debtor’s Motion for Entry of an Order (I) Enlarging the Period Within Which the Debtor May Remove Actions and (II) Granting Related Relief* [Docket No. 1157] (the “Motion”) filed by the above-captioned debtor (the “Debtor”) with the United States Bankruptcy Court for the District of Delaware (the “Court”) on November 13, 2023.

The undersigned further certifies that she has reviewed the Court’s docket in the above-referenced chapter 11 case and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the *Notice of Motion and Hearing* filed contemporaneously with the Motion, objections or responses to the Motion were to be filed no later than November 27, 2023 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

¹ The Debtor in this chapter 11 case, along with the last four digits of the Debtor’s federal tax identification number, is: Akorn, Inc. (7400). The chapter 11 cases of the following entities, formerly administratively consolidated with the foregoing case, have been closed: 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); HiTech 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 Debtor’s service address is: 1925 W. Field Court, Suite 300, Lake Forest, Illinois 60045.



WHEREFORE, the Debtor respectfully requests that the proposed form of order, substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Wilmington, Delaware
November 29, 2023

/s/ Emily R. Mathews

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EXHIBIT A

(Proposed Order)

Debtor's notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing (if any) before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing (if any) establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The period within which the Debtor may seek removal of the Actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 is enlarged by 91 days, with a deadline for filing notices of removal through and including February 12, 2024.
3. This Order is without prejudice to the Debtor's right to request a further extension of time to file notices of removal of any or all of the Actions.
4. This Order shall be without prejudice to any position the Debtor may take regarding whether section 362 of the Bankruptcy Code applies to stay any Action.
5. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).
6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.
7. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.