

**MCKOOL SMITH, PC**

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LLC*

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>EIGER BIOPHARMACEUTICALS, INC., et al.<sup>1</sup></b>	§	<b>Case No. 24-80040 (SGJ)</b>
	§	
<b>Debtors.</b>	§	<b>(Jointly Administered)</b>

**THE LIQUIDATING TRUSTEE'S WITNESS  
AND EXHIBIT LIST FOR DECEMBER 12, 2024 HEARING**

Dundon Advisers, LLC, c/o Joshua Nahas, in its capacity as liquidating trustee (the "Liquidating Trustee") of the liquidating trust of Eiger BioPharmaceuticals, Inc., et al. (the "Liquidating Trust"), by and through its undersigned counsel, in the above-captioned Chapter 11 bankruptcy proceedings of the above-captioned post-effective date debtors and debtors-in-possession (the "Debtors"), hereby submits this witness and exhibit list (the "Witness and Exhibit

<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are: Eiger BioPharmaceuticals, Inc. (1591); EBPI Merger Inc. (9986); EB Pharma LLC (8352); Eiger BioPharmaceuticals Europe Limited (N/A); and EigerBio Europe Limited (N/A). The Debtors' service address is 2100 Ross Ave., Dallas, Texas 75201.



List”) and designate the following witnesses in connection with the matter scheduled for hearing on **December 12, 2024, at 9:30 a.m. (prevailing Central Time)**.

**WITNESSES**

1. Joshua Nahas, Director of Dundon Advisers LLC;
2. Any witness listed by any other party;
3. Any witness called by any other party; and
4. Any impeachment or rebuttal witnesses.

**EXHIBITS**

<b>Ex. No.</b>	<b>Description</b>	<b><u>Off.</u></b>	<b><u>Obi.</u></b>	<b><u>Adm.</u></b>
1.	<i>The Liquidating Trustee’s First Non-Substantive Omnibus Objection to Certain (I) Paid/Satisfied in Part Claims, (II) Superseded Claims, (III) Duplicate Claims, (IV) Late Filed claims, and (V) Misclassified Claims</i> [Docket No. 736]			
2.	<i>Schedule 1 (Satisfied in Part Claims)</i> [Docket No. 736-2]			
3.	<i>Schedule 2 (Superseded Claims)</i> [Docket No. 736-3]			
4.	<i>Schedule 3 (Duplicate Claims)</i> [Docket No. 736-4]			
5.	<i>Schedule 4 (Late Filed Claims)</i> [Docket No. 736-5]			
6.	<i>Schedule 5 (Misclassified Claims)</i> [Docket No. 736-6]			
7.	<i>Declaration of Joshua R. Nahas in Support of The Liquidating Trustee’s First Non-Substantive Omnibus Objection to Certain (I) Paid/Satisfied in Part Claims, (II) Superseded Claims, (III) Duplicate Claims, (IV) Late Filed claims, and (V) Misclassified Claims</i> [Docket No. 737]			
8.	Certificate of Service [Docket No. 742]			
	Any exhibit offered by any other party.			
	Any declaration filed by the Debtors in these bankruptcy cases.			
	Any pleadings, reports, or other documents filed in the above referenced bankruptcy cases, and any transcripts in any such cases.			

	Any exhibit for impeachment of rebuttal purposes.			
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Dated: December 11, 2024

Respectfully submitted,

**MCKOOL SMITH, PC**

/s/ S. Margie Venus

John J. Sparacino (SBN 18873700)

S. Margie Venus (SBN 20545900)

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Houston, Texas 77002

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-and-

Warren J. Martin Jr. (admitted *pro hac vice*)

Rachel A. Parisi (admitted *pro hac vice*)

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RAParisi@pbnlaw.com

*Counsel for the Liquidating Trustee,*

*Dundon Advisers LLC*

**CERTIFICATE OF SERVICE**

I certify that on December 11, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ S. Margie Venus  
S. Margie Venus

**Exhibit 1**

John J. Sparacino (TX Bar No. 18873700)  
S. Margie Venus (TX Bar No. 20545900)  
600 Travis Street, Suite 7000  
Houston, Texas 77002  
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*Counsel for the Liquidating Trustee, Dundon  
Advisers LLC*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	§	Chapter 11
EIGER BIOPHARMACEUTICALS, INC., <i>et al.</i> <sup>1</sup>	§	Case No. 24-80040 (SGJ)
Debtors.	§	(Jointly Administered)

**THE LIQUIDATING TRUSTEE'S FIRST NON-SUBSTANTIVE OMNIBUS  
OBJECTION TO CERTAIN (I) PAID/SATISFIED IN PART CLAIMS, (II)  
SUPERSEDED CLAIMS, (III) DUPLICATE CLAIMS, (IV) LATE FILED CLAIMS,  
AND (V) MISCLASSIFIED CLAIMS**

**\*\*\*CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE  
THEIR NAMES AND CLAIMS IN THE SCHEDULES ATTACHED TO THE  
PROPOSED ORDER FOR THIS OBJECTION\*\*\***

**A COPY OF YOUR CLAIM(S) IS (ARE) AVAILABLE ONLINE AT  
<https://veritaglobal.net/eiger>**

<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are: Eiger BioPharmaceuticals, Inc. (1591); EBPI Merger Inc. (9986); EB Pharma LLC (8352); Eiger BioPharmaceuticals Europe Limited (N/A); and EigerBio Europe Limited (N/A). The Debtors' service address is 2100 Ross Ave., Dallas, Texas 75201.

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ect.txnb.uscourts.gov/> no more than thirty-one (31) days after the date the motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk and filed on the docket no more than thirty-one (31) days after the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

A hearing will be conducted on the matters set forth in this motion on December 12, 2024 at 9:30 a.m. (prevailing Central Time) in Courtroom #1, 14th Floor, Earle Cabell Federal Building, 1100 Commerce Street, Suite 1254, Dallas, Texas 75242. You may participate in the hearing either in person or by an audio and video connection.

Audio communication will be by use of the Court's dial-in facility. You may access the facility at 650.479.3207. Video communication will be by the use of the Cisco WebEx platform. Connect via the Cisco WebEx application or click the link on Judge Jernigan's home page. The meeting code is 2304-154-2638. Click the settings icon in the upper right corner and enter your name under the personal information setting. WebEx hearing instructions may be obtained from Judge Jernigan's hearing/calendar site: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/chief-judge-jernigans-hearing-dates>.

Hearing appearances must be made electronically in advance of electronic hearings. To make your appearance, click the "Electronic Appearance" link on Judge Jernigan's home page. Select the case name, complete the required fields and click "Submit" to complete your appearance.

Dundon Advisers, LLC, c/o Joshua Nahas, in its capacity as liquidating trustee (the "Liquidating Trustee") of the liquidating trust of Eiger BioPharmaceuticals, Inc., *et al.* (the "Liquidating Trust"), by and through its undersigned counsel, in the above-captioned Chapter 11 bankruptcy proceedings of the above-captioned post-effective date debtors and debtors-in-possession (the "Debtors"), files the *Liquidating Trustee's First Non-Substantive Omnibus Objection to Certain (I) Paid/Satisfied in Part Claims, (II) Superseded Claims, (III) Duplicate Claims, (IV) Late Filed Claims; and (V) Misclassified Claims* (the "First Omnibus Objection").

In support of this First Omnibus Objection, the Liquidating Trustee relies on the *Declaration of Joshua Nahas in Support of the Liquidating Trustee's First Non-Substantive*

*Omnibus Objection to Certain (I) Paid/Satisfied in Part Claims, (II) Superseded Claims, (III) Duplicate Claims, (IV) Late Filed Claims; and (V) Misclassified Claims* (the “Nahas Declaration”), and respectfully requests and represents as follows:

### **RELIEF REQUESTED**

1. The Liquidating Trustee seeks entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Order”):

- a. reducing each such claim identified on, and as described in, **Schedule 1** to the Order (collectively, the “Partially Satisfied Claims”) because each such claim has been satisfied, in part;
- b. disallowing and expunging each such claim identified on **Schedule 2** to the Order (collectively, the “Superseded Claims”) because each such claim was a scheduled claim that was superseded and/or amended by a filed proof of claim;
- c. disallowing and expunging each such claim identified on **Schedule 3** to the Order (collectively, the “Duplicate Claims”) because each such claim erroneously asserts the same claim at least twice;
- d. disallowing and expunging each such claim identified on **Schedule 4** to the Order (collectively, the “Late Filed Claims”) because each such claim was not timely filed; and
- e. reclassifying each such claim identified on, and as described in, **Schedule 5** to the Order (collectively, the “Misclassified Claims”) because each such claim is misclassified as a general unsecured claim whereas it is asserting an equity interest.

### **JURISDICTION AND VENUE**

2. This Court has jurisdiction over this case and this matter pursuant to 28 U.S.C. §1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(B). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief requested herein are sections 105(a) and 502 of title 11 of the United States Code (the “Bankruptcy Code”), Bankruptcy Rule 3007, and Rule 3007-1 of the Bankruptcy Local Rules for the Northern District of Texas (the “Bankruptcy Local



Rules”), and Section M of the Procedures for Complex Cases in the Northern District of Texas (“Complex Case Procedures”).

## **BACKGROUND**

### **A. General Case Background**

4. The Debtors were a commercial-stage biopharmaceutical company focused on the development of innovative therapies for hepatitis delta virus (HDV) and other serious diseases. All of the Debtors’ rare disease programs have FDA Breakthrough Therapy designation.

5. On April 1, 2024 (the “Petition Date”), the Debtors petitioned this Court for relief under the Bankruptcy Code commencing these cases (the “Chapter 11 Cases”) in the United States Bankruptcy Court for the Northern District of Texas (the “Bankruptcy Court”).

6. On June 10, 2024, the Office of the United States Trustee for the Northern District of Texas (the “U.S. Trustee”) appointed an official committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code [Dkt. No. 322] (the “Unsecured Creditors Committee”).

7. On June 25, 2024, the U.S. Trustee appointed the Official Committee of Equity Security Holders pursuant to section 1102 of the Bankruptcy Code [Dkt. No. 359, as amended, Dkt. No. 438].

### **B. Bar Dates and Claims**

8. On June 27, 2024, the Court entered in an Order *(I) Setting Bar Dates for Filing Proofs of Claim; (II) Approving Form and Manner for Filing Proofs of Claim; (III) Approving the Form and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests Notice of Bar Dates* [Dkt No. 375].

9. The general bar date was set for July 22, 2024 at 4:00 p.m. prevailing Central Time (the “General Bar Date”). The bar date for all governmental units holding claims against the

Debtors that arose (or are deemed to have arisen) before the Petition Date was set for September 30, 2024 at 4:00 p.m. prevailing Central Time (the “Governmental Bar Date”).

10. On May 6, 2024, the Debtors filed their Schedules of Assets and Liabilities [Dkt. Nos. 8, 10, 12, 228] and Statements of Financial Affairs [Dkt. Nos. 7, 9, 11, 227].

11. To date, 205 total claims have been either filed against the Debtors (87) or scheduled by the Debtors (118).

**C. Plan Confirmation, Emergence and The Liquidating Trust**

12. On September 5, 2024, the Court entered the *Order Approving the Debtors’ Amended Disclosure Statement and Confirming the Fifth Amended Joint Plan of Liquidation of Eiger Biopharmaceuticals, Inc. and its Debtor Affiliates* [Dkt. No. 639] (the “Confirmation Order”) confirming the *Fifth Amended Joint Plan of Liquidation of Eiger BioPharmaceuticals, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 635-1] (as amended or supplemented from time to time, the “Plan”).

13. On August 16, 2024, the Debtors filed the *Notice of Filing Plan Supplement* [Dkt. No. 525] (the “First Plan Supplement”), which attached the Liquidating Trust Agreement as a plan supplement.

14. The Plan became effective on September 30, 2024 (the “Effective Date”). *See Notice of Occurrence of Effective Date* [Dkt. No. 685].

15. Pursuant to the Plan, Confirmation Order, and the Liquidating Trust Agreement, the Liquidating Trustee has exclusive authority to settle or compromise any disputed general unsecured claim and to pursue, abandon or settle any Retained Causes of Action. *See* Plan, Art. IV, §§ B-E; Confirmation Order, ¶¶ 40, 96 & 101; Liquidating Trust Agreement, § 3.1.

### **OBJECTIONS TO CLAIMS**

16. Section 502 of the Bankruptcy Code provides, in pertinent part, as follows: “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). Moreover, Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in an omnibus objection,” which includes objections on the basis that certain claims: (i) duplicate other claims; (ii) have been filed in the wrong case; (iii) have been amended by subsequently filed proofs of claim; (iv) were not timely filed; (v) have been satisfied or released during the case in accordance with the Code, applicable rules, or a court order; (vi) were presented in a form that does not comply with applicable rules, and the objection states that the objector is unable to determine the validity of the claim because of the noncompliance; (vii) are interests, rather than claims; or (viii) assert priority in an amount that exceeds the maximum amount under section 507 of the Code. Fed. R. Bankr. P. 3007(d).

17. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes prima facie evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re Hard-Mire Rest. Holdings, LLC*, 605 B.R. 739, 748 (Bankr. N.D. Tex. 2019). However, a proof of claim loses the presumption of prima facie validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 69 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Revenue*, 530 U.S. 15 (2000)).

18. As set forth herein and in the Nahas Declaration, filed contemporaneously herewith, the Court should disallow, expunge and/or modify: the paid portion of the Partially Satisfied Claims on **Schedule 1**; the Superseded Claims on **Schedule 2**; the Duplicate Claims on **Schedule 3**; the Late Filed Claims on **Schedule 4**; and the Misclassified Claims as provided for in **Schedule 5** (collectively, the “**Disputed Claims**”). If the Disputed Claims are not disallowed and expunged and/or reclassified as set forth herein, the potential exists for the applicable claimants to receive recoveries they are not entitled to, to the detriment of those with Allowed Claims, in addition to equity holders. Thus, the relief requested herein is necessary to prevent the inappropriate distribution of estate funds and facilitate the efficient administration of the claims allowance process.

**A. Partially Satisfied Claims**

19. The Liquidating Trustee objects to the paid portion of the Partially Satisfied Claims identified on **Schedule 1** as each of these claims has already been satisfied as set forth therein.

20. Failure to disallow and expunge such portion of the claims would result in the applicable claimants receiving an unwarranted recovery that would unduly prejudice the creditors and equity holders as they would ultimately have an unjustly smaller “pot” by which they would otherwise be able to share in their recovery from.

21. Accordingly, the Liquidating Trustee requests that the Court enter an order disallowing and expunging the Partially Satisfied Claims identified on **Schedule 1** as set forth therein.

**B. Superseded Claims**

22. The Liquidating Trustee objects to the Superseded Claims identified on **Schedule 2** as these scheduled claims have been superseded and/or amended by the subsequent filing of a proof of claim.

23. Failure to disallow and expunge such claims would result in the applicable claimants receiving an unwarranted recovery that would unduly prejudice creditors and equity holders as they would ultimately have an unjustly smaller “pot” by which they would otherwise be able to share in their recovery from.

24. Accordingly, the Liquidating Trustee requests that the Court enter an order disallowing and expunging the Superseded Claims identified on Schedule 2.

**C. Duplicate Claims**

25. The Liquidating Trustee objects to the Duplicate Claims identified on Schedule 3 to the Order because each such claim is duplicative of at least one other claim that is already filed.

26. Failure to disallow and expunge such claims would result in the applicable claimants receiving an unwarranted recovery that would unduly prejudice creditors and equity holders as they would ultimately have an unjustly smaller "pot" by which they would otherwise be able to share in their recovery from.

27. Accordingly, the Liquidating Trustee requests that the Court enter an order disallowing and expunging the Duplicate Claims identified on Schedule 3.

**D. Late Filed Claims**

28. The Liquidating Trustee objects to the Late Filed Claims identified on Schedule 4 to the Order as claims that were not timely filed. Pursuant to Bankruptcy Rule 3003(c)(3), the court shall fix the time within which proofs of claim or interests may be filed in a Chapter 11 case, and all proofs of claim must be filed by that date. Here, the General Bar Date was July 22, 2024, and the Governmental Bar Date was September 30, 2024. The claims listed on Schedule 4 were filed after the deadlines to which they corresponded, and therefore the claims are not timely.

29. Failure to disallow and expunge such claims would result in the applicable claimants receiving an unwarranted recovery that would unduly prejudice creditors and equity

holders as they would ultimately have an unjustly smaller “pot” by which they would otherwise be able to share in their recovery from.

30. Accordingly, the Liquidating Trustee requests that the Court enter an order disallowing and expunging the Late Filed Claims identified on Schedule 4.

**E. Misclassified Claims**

31. The Liquidating Trustee objects to the Misclassified Claims identified on Schedule 5 to the Order because those claims erroneously assert an equity interest under 11 U.S.C. § 1111, but list it as a general unsecured claim. Based on the Liquidating Trustee and his professionals’ review of the proofs of claim filed for the Misclassified Claims, they have determined that these claims fail to provide a sufficient basis for the asserted general unsecured claim status and are not supported under the Bankruptcy Code and/or the Plan.

32. Accordingly, the Liquidating Trustee seeks to reclassify the Misclassified Claims identified on Schedule 5 to the Order to Class 6 Equity Interests as set forth in Schedule 5.

**RESPONSES TO OBJECTIONS**

33. To contest an objection, a claimant must file and serve a written response to this Objection (each, a “Response”) so that is received no later than December 5, 2024 (the “Response Deadline”). Every response must be filed with the Office of the Clerk of the United States Bankruptcy Court for the Northern District of Texas (Dallas Division), Earle Cabell Federal Building, 1100 Commerce Street, Room 1254, Dallas, TX 75242-1496 and served upon the following entities, so that the Response is received no later than the Response Deadline, at the following addresses:

**MCKOOL SMITH, PC**

John J. Sparacino (TX Bar No. 18873700)  
S. Margie Venus (TX Bar No. 20545900)  
600 Travis Street, Suite 7000  
Houston, Texas 77002  
Telephone: (713) 485-7300  
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Facsimile: (973) 538-5146  
Email: WJMartin@pbnlaw.com  
Email: RAParisi@pbnlaw.com

34. Every Response to this Objection must contain, at a minimum, the following information:

- a. a caption setting forth the name of the Court, the name of the Debtor, the case number, and the title of the objection to which the Response is directed;
- b. the name of the claimant, his/her/its claim number, and a description of the basis for the amount of the claim;
- c. the specific factual basis and supporting legal argument upon which the party will rely in opposing this First Omnibus Objection;
- d. any supporting documentation (to the extent it was not included with the proof of claim previously filed with the clerk of the Court or the Debtors' claims agent, Verita Global) upon which the party will rely to support the basis for, and amounts asserted in the proof of claim;
- e. the name, address, telephone number, email address, and fax number of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Liquidating Trustee should communicate with respect to the claim or the First Omnibus Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the disputed claim on behalf of the claimant.

35. If a claimant fails to file and serve a timely Response by the Response Deadline, the Liquidating Trustee will present to the Court an appropriate order disallowing such claimant's claim, as set forth in Exhibit A, without further notice to the claimant.

### **REPLIES TO RESPONSES**

36. Consistent with 3007-2(a) of the Local Rules, the Liquidating Trustee may, at its option, file and serve a reply to the Response no later than 5:00 p.m. (prevailing Central Time) three (3) days prior to the hearing to consider the Objection.

### **SEPARATE CONTESTED MATTER**

37. To the extent that a Response is filed regarding any claim listed in this Objection and the Liquidating Trustee is unable to resolve the Response, the objection by the Liquidating Trustee to each such claim asserted herein shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding an objection asserted in the Objection shall be deemed a separate order with respect to each claim.

### **RESERVATION OF RIGHTS**

38. The Liquidating Trustee hereby reserves the right to object in the future to any of the claims that are the subject of this First Omnibus Objection on any ground, including, but not limited to, 11 U.S.C. § 502(d), and to amend, modify, and/or supplement this First Omnibus Objection, including, without limitation, to object to amended or newly filed claims. For the absence of doubt, the Liquidating Trustee hereby reserves the right to object, on any basis, in the future to any remaining claim, superseding claim, or reclassified claim reflected in the Schedules to the Order. The Liquidating Trustee also reserves the right to object in the future to any other claim filed by a claimant whose claim is subject to this First Omnibus Objection.

39. Notice of this First Omnibus Objection shall be provided to (i) the Office of the United States Trustee for the Northern District of Texas; (ii) the Plan Administrator, (iii) each of



the claimants whose claim is subject to this First Omnibus Objection; and (iv) the “Master Service List” as of September 19, 2024, maintained by Verita Global. In light of the nature of the relief requested, the Liquidating Trustee submits that no further notice is required.

#### **COMPLIANCE WITH LOCAL RULES**

40. This First Omnibus Objection includes citations to the applicable rules and statutory authorities upon which the relief requested herein is predicated and a discussion of their application to this First Omnibus Objection. The Liquidating Trustee objects to no more than 100 proofs of claim herein. The Liquidating Trustee has served notice of this Objection on those persons whose name appears in the signature blocks on the proofs of claim and in accordance with Bankruptcy Rule 7004. Moreover, the Liquidating Trustee has notified claimants that a copy of their claim may be obtained online at <https://veritaglobal.net/eiger>. Accordingly, the Liquidating Trustee submits that this Objection satisfies Local Rule 3007-2.

WHEREFORE, for the reasons stated above and in the Nahas Declaration, the Liquidating Trustee respectfully requests entry of the Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other relief as is just and proper.

*[Remainder of page intentionally left blank.]*

Dated: November 4, 2024

/s/ S. Margie Venus

**MCKOOL SMITH, PC**

John J. Sparacino (TX Bar No. 18873700)

S. Margie Venus (TX Bar No. 20545900)

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***Counsel for the Liquidating Trustee,  
Dundon Advisers LLC***

**CERTIFICATE OF SERVICE**

I certify that on November 4, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ S. Margie Venus  
S. Margie Venus

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>EIGER BIOPHARMACEUTICALS, INC., et al.<sup>1</sup></b>	§	<b>Case No. 24-80040 (SGJ)</b>
	§	
	§	
<b>Debtors.</b>	§	<b>(Jointly Administered)</b>

**ORDER SUSTAINING THE LIQUIDATING TRUSTEE'S FIRST  
NON-SUBSTANTIVE OMNIBUS OBJECTION TO CERTAIN  
(I) PAID/SATISFIED IN PART CLAIMS,  
(II) SUPERSEDED CLAIMS, (III) DUPLICATE CLAIMS,  
(IV) LATE FILED CLAIMS, AND (V) MISCLASSIFIED CLAIMS**

Upon the objection (the "Objection") of Dundon Advisor LLC (the "Liquidating Trustee")  
for entry of an order (this "Order"): (a) reducing each such claim identified on, and as described

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<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are: Eiger BioPharmaceuticals, Inc. (1591); EBPI Merger Inc. (9986); EB Pharma LLC (8352); Eiger BioPharmaceuticals Europe Limited (N/A); and EigerBio Europe Limited (N/A). The Debtors' service address is 2100 Ross Ave., Dallas, Texas 75201.

in, **Schedule 1** (collectively, the “Partially Satisfied Claims”); (b) disallowing and expunging each such claim identified on **Schedule 2** to the Order (collectively, the “Superseded Claims”); (c) disallowing and expunging each such claim identified on **Schedule 3** (collectively, the “Duplicate Claims”); (d) disallowing and expunging each such claim identified on **Schedule 4** (collectively, the “Late Filed Claims”); and (e) reclassifying each such claim identified on, and as described in, **Schedule 5** (collectively, the “Misclassified Claims”, and together with the Partially Satisfied Claims, Superseded Claims, Duplicate Claims, and Late Filed Claims, the “Disputed Claims”), in each case pursuant to sections 105(a) and 502(b) of the Bankruptcy Code, all as more fully set forth in the Objection; and upon the Nahas Declaration; and this court having jurisdiction over this matter pursuant to 28 U.S.C. § 13345; and venue of this proceeding within the meaning of 28 U.S.C. § 157(b)(2); and the Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of this proceeding being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and appropriate notice of and opportunity of a hearing on the Objection having been given; and the relief requested in the Objection being in the best interests of the Debtors’ estate, their creditors and equity holders and other parties in interest; and this Court having found that the Liquidating Trustees’ notice of the Objection and opportunity for a hearing on the Objection were appropriate and that no other notice need be provided; and this Court having reviewed the Objection and having heard the statements in support of the relief requested therein at a hearing, if any, before this Court; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Objection is sustained to the extent set forth herein.

2. Each Partially Satisfied Claim identified in **Schedule 1** attached hereto is reduced and modified as set forth in Schedule 1.

3. Each Superseded Claim identified in **Schedule 2** attached hereto is disallowed and expunged in its entirety.

4. Each Duplicate Claim identified in **Schedule 3** attached hereto is disallowed and expunged in its entirety.

5. Each Late Filed Claim identified in **Schedule 4** attached hereto is disallowed and expunged in its entirety.

6. Each Misclassified Claim identified in **Schedule 5** attached hereto is reclassified as set forth in Schedule 5.

7. Verita Global, the claims and noticing Agent appointed in these cases, is authorized to update the Claims Register to reflect the relief granted in this Order.

8. Entry of this Order is without prejudice to the Liquidating Trustee's, or any successor in interests', right to object to any other claims in these chapter 11 cases or to further object to (i) the Disputed Claims (to the extent they are not disallowed and expunged pursuant to this Order), (ii) the remaining claims, (iii) the superseding claims, and (iv) the reclassified interest on any grounds whatsoever, at a later date.

9. Each Disputed Claim and the Objection by the Liquidating Trustee to each Disputed Claim identified on **Schedules 1-5** attached hereto constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Disputed Claim. Any stay of this Order shall apply only to the contested matter which involves such creditor and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby.

10. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

11. The Liquidating Trustee is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

12. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

**### END OF ORDER ###**



Order Submitted by:

**MCKOOL SMITH, PC**

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***Counsel for the Liquidating Trustee***

**Schedule 1 (Satisfied In Part Claims)**

1ST OMNIBUS CLAIMS OBJECTION  
SCHEDULE 1

EIGER BIOPHARMACEUTICALS, INC., ET AL., CASE NO. 24-80040  
SATISFIED IN PART CLAIMS

	NAME	DATE FILED	SCHEDULE / CLAIM NUMBER	ASSERTED CLASSIFICATION	ASSERTED CLAIM AMOUNT	PAID AMOUNT	REMAINING CLAIM PRIORITY	REMAINING CLAIM AMOUNT	REASON FOR MODIFICATION
1	Caremark, LLC	7/22/2024	57	ADMIN PRIORITY	\$579,000.00	\$258,930.00	ADMIN PRIORITY	\$320,070.00	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
2	Caremark, LLC	Scheduled	3299900	GENERAL UNSECURED	\$10,500.00	\$3,500.00	GENERAL UNSECURED	\$7,000.00	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
3	Colin Michael Hislop	Scheduled	1087680	PRIORITY GENERAL UNSECURED	\$15,150.00 \$411,210.93	\$15,150.00	PRIORITY GENERAL UNSECURED	\$0.00 \$411,210.93	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
4	Colleen Craig	Scheduled	1087682	PRIORITY GENERAL UNSECURED	\$15,150.00 \$449,470.50	\$15,150.00	PRIORITY GENERAL UNSECURED	\$0.00 \$449,470.50	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
5	Crosscountry Consulting LLC	Scheduled	3299852	GENERAL UNSECURED	\$12,919.20	\$3,024.00	GENERAL UNSECURED	\$9,895.20	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
6	Iron Mountain Information Management LLC	7/19/2024	48	SECURED GENERAL UNSECURED	\$211.00 \$2,225.94	\$211.00	SECURED GENERAL UNSECURED	\$0.00 \$2,225.94	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
7	Monica Gangal	7/15/2024	29	PRIORITY GENERAL UNSECURED	\$15,150.00 \$346,908.57	\$15,150.00	PRIORITY GENERAL UNSECURED	\$0.00 \$346,908.57	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
8	State of Wisconsin Department of Health Services	9/13/2024	76	GENERAL UNSECURED	\$69,632.32	\$49,169.14	GENERAL UNSECURED	\$20,463.18	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.

**Schedule 2 (Superseded Claims)**

1ST OMNIBUS CLAIMS OBJECTION  
SCHEDULE 2

EIGER BIOPHARMACEUTICALS, INC., ET AL. CASE NO. 24-80040  
SUPERSEDED SCHEDULED CLAIMS

	NAME	SCHEDULE NUMBER	SCHEDULED CLASSIFICATION	SCHEDULED AMOUNT	SUPERSEDING CLAIM NUMBER	SUPERSEDING CLAIM CLASSIFICATION	SUPERSEDING CLAIM AMOUNT	REASON FOR MODIFICATION
1	Biorasi, LLC	3299872	GENERAL UNSECURED	\$134,144.59	39	GENERAL UNSECURED	\$532,763.95	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
2	Blair Narog	1087684	PRIORITY GENERAL UNSECURED	\$15,150.00 \$171,111.90	14	PRIORITY	\$180,241.90	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
3	Blair Narog	3299848	GENERAL UNSECURED	\$4,500.49	14	PRIORITY	\$180,241.90	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
4	Bradford Lees	3299787	GENERAL UNSECURED	\$16,650.00	60	GENERAL UNSECURED	\$74,000.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
5	Charissa Elizabeth Bondy	3299791	GENERAL UNSECURED	\$33,187.50	47	GENERAL UNSECURED	\$107,504.71	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
6	Christopher James Kurtz	3299811	GENERAL UNSECURED	\$76,960.00	64	GENERAL UNSECURED	\$76,960.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
7	Connor Group Global Services, LLC	3299829	GENERAL UNSECURED	\$132,510.00	11	GENERAL UNSECURED	\$132,510.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
8	David Apelian	3299812	GENERAL UNSECURED	\$195,000.00	32	GENERAL UNSECURED	\$195,000.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
9	David Cory	3299777	GENERAL UNSECURED	\$213,847.90	16	GENERAL UNSECURED	\$334,400.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
10	Fair Harbor Capital LLC	3299901	GENERAL UNSECURED	\$26,432.81	67	GENERAL UNSECURED	€1,840.00 EUR	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
11	Fujifilm Diosynth Biotechnologies, U.S.A., Inc.	3299847	GENERAL UNSECURED	\$25,000.00	56	GENERAL UNSECURED	\$202,280.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
12	Iron Mountain Information Management LLC	3299836	GENERAL UNSECURED	\$944.92	48	GENERAL UNSECURED SECURED	\$2,225.94 \$211.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
13	James Andrew Vollins	3299816	GENERAL UNSECURED	\$85,000.00	27	GENERAL UNSECURED	\$85,000.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
14	Jump Start Technology, Inc.	3299850	GENERAL UNSECURED	\$17,203.75	44	GENERAL UNSECURED	\$17,203.75	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
15	Kaci Schiermeyer	3299890	GENERAL UNSECURED	\$4,000.00	30	PRIORITY	\$4,000.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
16	Matthew J Bys	3299779	GENERAL UNSECURED	\$29,925.00	41	GENERAL UNSECURED	\$405,053.21	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
17	Monica Gangal	1087681	PRIORITY GENERAL UNSECURED	\$15,150.00 \$346,908.57	29	PRIORITY GENERAL UNSECURED	\$15,150.00 \$346,908.57	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
18	Monica Gangal	3299781	GENERAL UNSECURED	\$200.00	29	PRIORITY GENERAL UNSECURED	\$15,150.00 \$346,908.57	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
19	Pharmaceutical Research Associates Inc, Affiliate of Icon Clinical Research Limited	3299883	GENERAL UNSECURED	\$658.79	53	GENERAL UNSECURED	\$658.79	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
20	Rxcrossroads 3PI LLC	3299877	GENERAL UNSECURED	\$11,767.93	34	GENERAL UNSECURED	\$11,767.93	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
21	Say Technologies LLC	3299892	GENERAL UNSECURED	\$1,282.53	15	GENERAL UNSECURED	\$1,282.53	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
22	Seyfarth Shaw Lip	3299863	GENERAL UNSECURED	\$3,231.00	31	GENERAL UNSECURED	\$5,785.50	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
23	Stanford University	3299903	GENERAL UNSECURED	\$8,453.00	38	GENERAL UNSECURED	\$19,860.58	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
24	Stanford University - office of Technology Licensing	3299823	GENERAL UNSECURED	\$1,116.00	38	GENERAL UNSECURED	\$19,860.58	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
25	Tracey L McLaughlin	3299830	GENERAL UNSECURED	\$2,431.00	73	PRIORITY	\$2,431.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.

**Schedule 3 (Duplicate Claims)**

1ST OMNIBUS CLAIMS OBJECTION  
SCHEDULE 3

EIGER BIOPHARMACEUTICALS, INC., ET AL. CASE NO. 24-80040  
DUPLICATIVE CLAIMS

	NAME	REMAINING CLAIM NUMBER	DUPLICATE CLAIM NUMBER	DUPLICATE CLAIM CLASSIFICATION	DUPLICATE CLAIM AMOUNT	REASON FOR MODIFICATION
1	Department of Treasury - Internal Revenue Service	13	4	PRIORITY GENERAL UNSECURED	\$984.93 \$466.08	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
2	Franchise Tax Board	9	6	GENERAL UNSECURED	UNLIQUIDATED	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
3	Franchise Tax Board	9	8	PRIORITY	\$800.00	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
4	Franchise Tax Board	9	7	GENERAL UNSECURED	UNLIQUIDATED	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
5	Stanford University	38	35	GENERAL UNSECURED	\$19,860.58	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
6	Stanford University	38	36	GENERAL UNSECURED	\$19,860.58	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
7	Stanford University	38	37	GENERAL UNSECURED	\$19,860.58	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
8	State of Wisconsin Department of Health Services	76	3	GENERAL UNSECURED	\$246,094.00	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
9	Texas Comptroller of Public Accounts	72	71	PRIORITY	\$31,882.00	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.

**Schedule 4 (Late Filed Claims)**



1ST OMNIBUS CLAIMS OBJECTION  
SCHEDULE 4

EIGER BIOPHARMACEUTICALS, INC., ET AL. CASE NO. 24-80040  
LATE FILED CLAIMS

	NAME	CLAIM NUMBER	DATE FILED	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	REASON FOR MODIFICATION
1	Dr. Ohad Etzion	62	07/23/24	GENERAL UNSECURED	\$9,550.00	Not timely filed in accordance with Bar Date Order [DI 375].
2	Kryocal, LLC Dba Kyrosphere	66	07/25/24	GENERAL UNSECURED	\$6,562.50	Not timely filed in accordance with Bar Date Order [DI 375].
3	Marc Andrew Osterhaus	74	08/27/24	GENERAL UNSECURED	\$25,350.00	Not timely filed in accordance with Bar Date Order [DI 375]. Claimant has a remaining scheduled claim under MARC ANDREW OSTERHAUS (3299784) for \$225.34, which remains subject to further objection.
4	Specialist Staffing Solutions, Inc	70	08/09/24	GENERAL UNSECURED	\$105,389.13	Not timely filed in accordance with Bar Date Order [DI 375]. Claimant has a remaining scheduled claim under REAL STAFFING GROUP (3299902) for \$61,880.00, which remains subject to further objection.

**Schedule 5 (Misclassified Claims)**

1ST OMNIBUS CLAIMS OBJECTION  
SCHEDULE 5

EIGER BIOPHARMACEUTICALS, INC., ET AL. CASE NO. 24-80040  
MISCLASSIFIED CLAIMS

	NAME	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	REASON FOR MODIFICATION
1	Adam Gross	69	GENERAL UNSECURED	BLANK	Claimant is asserting an equity interest in the Debtor. The Claim is disallowed and expunged as a general unsecured claim, and will be reclassified as a Class 6 Equity Interest which remains subject to further objection.

**Exhibit 2**

**Schedule 1 (Satisfied In Part Claims)**

1ST OMNIBUS CLAIMS OBJECTION  
SCHEDULE 1

EIGER BIOPHARMACEUTICALS, INC., ET AL., CASE NO. 24-80040  
SATISFIED IN PART CLAIMS

	NAME	DATE FILED	SCHEDULE / CLAIM NUMBER	ASSERTED CLASSIFICATION	ASSERTED CLAIM AMOUNT	PAID AMOUNT	REMAINING CLAIM PRIORITY	REMAINING CLAIM AMOUNT	REASON FOR MODIFICATION
1	Caremark, LLC	7/22/2024	57	ADMIN PRIORITY	\$579,000.00	\$258,930.00	ADMIN PRIORITY	\$320,070.00	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
2	Caremark, LLC	Scheduled	3299900	GENERAL UNSECURED	\$10,500.00	\$3,500.00	GENERAL UNSECURED	\$7,000.00	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
3	Colin Michael Hislop	Scheduled	1087680	PRIORITY GENERAL UNSECURED	\$15,150.00 \$411,210.93	\$15,150.00	PRIORITY GENERAL UNSECURED	\$0.00 \$411,210.93	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
4	Colleen Craig	Scheduled	1087682	PRIORITY GENERAL UNSECURED	\$15,150.00 \$449,470.50	\$15,150.00	PRIORITY GENERAL UNSECURED	\$0.00 \$449,470.50	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
5	Crosscountry Consulting LLC	Scheduled	3299852	GENERAL UNSECURED	\$12,919.20	\$3,024.00	GENERAL UNSECURED	\$9,895.20	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
6	Iron Mountain Information Management LLC	7/19/2024	48	SECURED GENERAL UNSECURED	\$211.00 \$2,225.94	\$211.00	SECURED GENERAL UNSECURED	\$0.00 \$2,225.94	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
7	Monica Gangal	7/15/2024	29	PRIORITY GENERAL UNSECURED	\$15,150.00 \$346,908.57	\$15,150.00	PRIORITY GENERAL UNSECURED	\$0.00 \$346,908.57	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.
8	State of Wisconsin Department of Health Services	9/13/2024	76	GENERAL UNSECURED	\$69,632.32	\$49,169.14	GENERAL UNSECURED	\$20,463.18	The claim has been partially paid. The Remaining Claim Amount reflects the outstanding amount, and remains subject to further objection.

**Exhibit 3**

**Schedule 2 (Superseded Claims)**



1ST OMNIBUS CLAIMS OBJECTION  
SCHEDULE 2

EIGER BIOPHARMACEUTICALS, INC., ET AL. CASE NO. 24-80040  
SUPERSEDED SCHEDULED CLAIMS

	NAME	SCHEDULE NUMBER	SCHEDULED CLASSIFICATION	SCHEDULED AMOUNT	SUPERSEDING CLAIM NUMBER	SUPERSEDING CLAIM CLASSIFICATION	SUPERSEDING CLAIM AMOUNT	REASON FOR MODIFICATION
1	Biorasi, LLC	3299872	GENERAL UNSECURED	\$134,144.59	39	GENERAL UNSECURED	\$532,763.95	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
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6	Christopher James Kurtz	3299811	GENERAL UNSECURED	\$76,960.00	64	GENERAL UNSECURED	\$76,960.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
7	Connor Group Global Services, LLC	3299829	GENERAL UNSECURED	\$132,510.00	11	GENERAL UNSECURED	\$132,510.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
8	David Apelian	3299812	GENERAL UNSECURED	\$195,000.00	32	GENERAL UNSECURED	\$195,000.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
9	David Cory	3299777	GENERAL UNSECURED	\$213,847.90	16	GENERAL UNSECURED	\$334,400.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
10	Fair Harbor Capital LLC	3299901	GENERAL UNSECURED	\$26,432.81	67	GENERAL UNSECURED	€1,840.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
11	Fujifilm Diosynth Biotechnologies, U.S.A., Inc.	3299847	GENERAL UNSECURED	\$25,000.00	56	GENERAL UNSECURED	\$202,280.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
12	Iron Mountain Information Management LLC	3299836	GENERAL UNSECURED	\$944.92	48	GENERAL UNSECURED SECURED	\$2,225.94 \$211.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
13	James Andrew Vollins	3299816	GENERAL UNSECURED	\$85,000.00	27	GENERAL UNSECURED	\$85,000.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
14	Jump Start Technology, Inc.	3299850	GENERAL UNSECURED	\$17,203.75	44	GENERAL UNSECURED	\$17,203.75	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
15	Kaci Schiermeyer	3299890	GENERAL UNSECURED	\$4,000.00	30	PRIORITY	\$4,000.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
16	Matthew J Bys	3299779	GENERAL UNSECURED	\$29,925.00	41	GENERAL UNSECURED	\$405,053.21	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
17	Monica Gangal	1087681	PRIORITY GENERAL UNSECURED	\$15,150.00 \$346,908.57	29	PRIORITY GENERAL UNSECURED	\$15,150.00 \$346,908.57	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
18	Monica Gangal	3299781	GENERAL UNSECURED	\$200.00	29	PRIORITY GENERAL UNSECURED	\$15,150.00 \$346,908.57	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
19	Pharmaceutical Research Associates Inc, Affiliate of Icon Clinical Research Limited	3299883	GENERAL UNSECURED	\$658.79	53	GENERAL UNSECURED	\$658.79	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
20	Rxcrossroads 3PI LLC	3299877	GENERAL UNSECURED	\$11,767.93	34	GENERAL UNSECURED	\$11,767.93	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
21	Say Technologies LLC	3299892	GENERAL UNSECURED	\$1,282.53	15	GENERAL UNSECURED	\$1,282.53	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
22	Seyfarth Shaw Lip	3299863	GENERAL UNSECURED	\$3,231.00	31	GENERAL UNSECURED	\$5,785.50	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
23	Stanford University	3299903	GENERAL UNSECURED	\$8,453.00	38	GENERAL UNSECURED	\$19,860.58	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
24	Stanford University - office of Technology Licensing	3299823	GENERAL UNSECURED	\$1,116.00	38	GENERAL UNSECURED	\$19,860.58	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.
25	Tracey L McLaughlin	3299830	GENERAL UNSECURED	\$2,431.00	73	PRIORITY	\$2,431.00	The scheduled claim has been superseded by the respective filed claim, and remains subject to further objection.

**Exhibit 4**

**Schedule 3 (Duplicate Claims)**

1ST OMNIBUS CLAIMS OBJECTION  
SCHEDULE 3

EIGER BIOPHARMACEUTICALS, INC., ET AL. CASE NO. 24-80040  
DUPLICATIVE CLAIMS

	NAME	REMAINING CLAIM NUMBER	DUPLICATE CLAIM NUMBER	DUPLICATE CLAIM CLASSIFICATION	DUPLICATE CLAIM AMOUNT	REASON FOR MODIFICATION
1	Department of Treasury - Internal Revenue Service	13	4	PRIORITY GENERAL UNSECURED	\$984.93 \$466.08	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
2	Franchise Tax Board	9	6	GENERAL UNSECURED	UNLIQUIDATED	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
3	Franchise Tax Board	9	8	PRIORITY	\$800.00	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
4	Franchise Tax Board	9	7	GENERAL UNSECURED	UNLIQUIDATED	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
5	Stanford University	38	35	GENERAL UNSECURED	\$19,860.58	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
6	Stanford University	38	36	GENERAL UNSECURED	\$19,860.58	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
7	Stanford University	38	37	GENERAL UNSECURED	\$19,860.58	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
8	State of Wisconsin Department of Health Services	76	3	GENERAL UNSECURED	\$246,094.00	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.
9	Texas Comptroller of Public Accounts	72	71	PRIORITY	\$31,882.00	The Duplicate Claim is duplicative of the Remaining Claim, which remains subject to further objection.

**Exhibit 5**

**Schedule 4 (Late Filed Claims)**

1ST OMNIBUS CLAIMS OBJECTION  
SCHEDULE 4

EIGER BIOPHARMACEUTICALS, INC., ET AL. CASE NO. 24-80040  
LATE FILED CLAIMS

	NAME	CLAIM NUMBER	DATE FILED	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	REASON FOR MODIFICATION
1	Dr. Ohad Etzion	62	07/23/24	GENERAL UNSECURED	\$9,550.00	Not timely filed in accordance with Bar Date Order [DI 375].
2	Kryocal, LLC Dba Kyrosphere	66	07/25/24	GENERAL UNSECURED	\$6,562.50	Not timely filed in accordance with Bar Date Order [DI 375].
3	Marc Andrew Osterhaus	74	08/27/24	GENERAL UNSECURED	\$25,350.00	Not timely filed in accordance with Bar Date Order [DI 375]. Claimant has a remaining scheduled claim under MARC ANDREW OSTERHAUS (3299784) for \$225.34, which remains subject to further objection.
4	Specialist Staffing Solutions, Inc	70	08/09/24	GENERAL UNSECURED	\$105,389.13	Not timely filed in accordance with Bar Date Order [DI 375]. Claimant has a remaining scheduled claim under REAL STAFFING GROUP (3299902) for \$61,880.00, which remains subject to further objection.

**Exhibit 6**



**Schedule 5 (Misclassified Claims)**

1ST OMNIBUS CLAIMS OBJECTION  
SCHEDULE 5

EIGER BIOPHARMACEUTICALS, INC., ET AL. CASE NO. 24-80040  
MISCLASSIFIED CLAIMS

	NAME	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	REASON FOR MODIFICATION
1	Adam Gross	69	GENERAL UNSECURED	BLANK	Claimant is asserting an equity interest in the Debtor. The Claim is disallowed and expunged as a general unsecured claim, and will be reclassified as a Class 6 Equity Interest which remains subject to further objection.

**Exhibit 7**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
EIGER BIOPHARMACEUTICALS, INC., <i>et al.</i> <sup>1</sup>	§	Case No. 24-80040 (SGJ)
	§	
Debtors.	§	(Jointly Administered)

**DECLARATION OF JOSHUA NAHAS IN SUPPORT  
OF THE LIQUIDATING TRUSTEE’S FIRST NON-SUBSTANTIVE OMNIBUS  
OBJECTION TO CERTAIN (I) PAID/SATISFIED IN PART CLAIMS,  
(II) SUPERSEDED CLAIMS, (III) DUPLICATE CLAIMS, (IV) LATE FILED CLAIMS,  
AND (V) MISCLASSIFIED CLAIMS**

I, Joshua Nahas, pursuant to section 1726 of title 28 of the United States Code, hereby declare that the following is true to the best of my knowledge, information, and belief:

1. I am a Managing Director with Dundon Advisers LLC (“Dundon”), a financial advisory and investment management firm. Dundon maintains offices at, among other places, 10 Bank Street, Suite 1100 White Plains, New York 10606. Dundon is the liquidating trustee (the “Liquidating Trustee”) of the liquidating trust of Eiger BioPharmaceuticals, Inc., *et al* (the “Liquidating Trust”). I am familiar with the circumstances set forth herein, which are based on my actual knowledge as well as information and advice provided to me by employees and professionals under my direction. In addition, the statements made herein are based, in whole or part, upon my review of public and non-public documents and my discussions with other members of Dundon’s team and advisors on whom I have relied, as well as information received from the Debtors. Except as otherwise noted, I have personal knowledge of the matters set forth in this declaration (this “Declaration”). I believe, to the best of my knowledge, that the facts and

---

<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: Eiger BioPharmaceuticals, Inc. (1591); EBPI Merger Inc. (9986); EB Pharma LLC (8352); Eiger BioPharmaceuticals Europe Limited (N/A); and EigerBio Europe Limited (N/A). The Debtors’ service address is 2100 Ross Ave., Dallas, Texas 75201.

circumstances set forth herein are true and correct. References to bankruptcy, the chapter 11 process, and related legal matters are based on my understanding of such in reliance on the explanation provided by, and the advice of, counsel to the Liquidating Trustee.

2. I submit this Declaration in further support of the *Liquidating Trustee's First Non-Substantive Omnibus Objection To Certain (I) Paid/Satisfied In Part Claims, (II) Superseded Claims, (III) Duplicate Claims, (IV) Late Filed Claims, And (V) Misclassified Claims* (the "First Omnibus Objection")<sup>2</sup>, filed contemporaneously herewith.

3. I assisted in the preparation of the First Omnibus Objection. Through my review or with the assistance of employees and professionals under my direction, I am personally and generally familiar with, inter alia, the Debtors' liabilities and amounts owed to their creditors. I am also generally familiar with the Claims Register prepared and provided by the noticing and claims agent in these Chapter 11 Cases.

4. I have personally reviewed the First Omnibus Objection and to the best of my knowledge, information and belief, the information contained on Schedules 1-5 to the Proposed Order attached as Exhibit A to the First Omnibus Objection are true and correct.

**a) PARTIALLY SATISFIED CLAIMS**

5. Following review of the Partially Satisfied Claims identified on Schedule 1 to Exhibit A, I believe that these Partially Satisfied Claims as filed have been partially satisfied by post-petition payments made by the Debtors. Accordingly, the Partially Satisfied Claims should be reduced in the amounts identified on Schedule 1 to reflect their partial satisfaction.

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the First Omnibus Objection.

**b) SUPERSEDED CLAIMS**

6. Following review of the Superseded Claims identified on Schedule 2 to Exhibit A, I believe that these Superseded Claims as scheduled have been superseded and/or amended by the subsequent filing of a proof of claim. Accordingly, the Superseded Claims identified on Schedule 2 should be disallowed and expunged.

**c) DUPLICATE CLAIMS**

7. Following review of the Duplicate Claims identified on Schedule 3 to Exhibit A, I believe that each such claim is duplicative of at least one other claim that is already filed. Accordingly, the Duplicate Claims identified on Schedule 3 should be disallowed and expunged.

**d) LATE FILED CLAIMS**

8. Following review of the Late Filed Claims identified on Schedule 4 to Exhibit A, I believe that each Late Filed Claim was filed after the deadline to which the Late Filed Claim corresponded to, and therefore the claims are not timely. Accordingly, the Late Filed Claims identified on Schedule 4 should be disallowed and expunged.

**e) MISCLASSIFIED CLAIMS**

9. Following review of the Misclassified Claims identified on Schedule 5 to Exhibit A, I believe that the Misclassified Claims fail to provide a sufficient basis for the asserted claim status and are not supported under the Bankruptcy Code and/or the Plan. Accordingly, the Misclassified Claims identified on Schedule 5 should be reclassified as set forth in Schedule 5.

**CONCLUSION**

10. Failure to grant the relief requested in the First Omnibus Objection potentially could result in the claimants receiving an unwarranted recovery from the Debtors to the detriment of other holders of valid and timely filed claims and other parties in interest. For the reasons set

forth herein and in the First Omnibus Objection, I believe the First Omnibus Objection should be sustained.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: November 4, 2024

By: Joshua Nahas  
Joshua Nahas

**Exhibit 8**



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:

EIGER BIOPHARMACEUTICALS, INC., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-80040 (SGJ)

(Jointly Administered)

**CERTIFICATE OF SERVICE**

I, Ronaldo Lizarraga Angulo, depose and say that I am employed by Kurtzman Carson Consultants LLC dba Verita Global (Verita), the claims and noticing agent for the Debtors in the above-captioned case.

On November 5, 2024, at my direction and under my supervision, employees of Verita caused to be served the following documents via Electronic Mail upon the service lists attached hereto as **Exhibit A** and **Exhibit B**; and via First Class Mail upon the service lists attached hereto as **Exhibit C** and **Exhibit D**:

- **The Liquidating Trustee's First Non-Substantive Omnibus Objection to Certain (I) Paid/Satisfied in Part Claims, (II) Superseded Claims, (III) Duplicate Claims, (IV) Late Filed Claims, and (V) Misclassified Claims** [Docket No. 736]
- **Declaration of Joshua Nahas in Support of the Liquidating Trustee's First Non-Substantive Omnibus Objection to Certain (I) Paid/Satisfied in Part Claims, (II) Superseded Claims, (III) Duplicate Claims, (IV) Late Filed Claims, and (V) Misclassified Claims** [Docket No. 737]
- **Notice of Hearing for December 12, 2024 Setting** [Docket No. 738]

Dated: November 19, 2024

/s/ Ronaldo Lizarraga Angulo

Ronaldo Lizarraga Angulo

Verita

222 N. Pacific Coast Highway, 3rd Floor

El Segundo, CA 90245

Tel 310.823.9000

<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are: Eiger BioPharmaceuticals, Inc. (1591); EBPI Merger Inc. (9986); EB Pharma LLC (8352); Eiger BioPharmaceuticals Europe Limited (N/A); and EigerBio Europe Limited (N/A). The Debtors' service address is 2100 Ross Avenue, Dallas, Texas 75201.

# Exhibit A

Description	CreditorName	CreditorNoticeName	Email
Official Equity Security Holders' Committee	Adam Gui, Individually		Email on File
Top 30 Creditor	Addison Whitney	Natasha Kempf, Director of Finance	nkempf@addisonwhitney.com
Top 30 Creditor and Official Committee of Unsecured Creditors	Biorasi LLC	Brian Chaiken, Esq	bchaiken@biorasi.com
Top 30 Creditor and Official Committee of Unsecured Creditors	Biorasi LLC	Chris O'Brien, Chief Executive Officer	cobrien@biorasi.com
Counsel to Innovatus Life Sciences Lending Fund I, LP	Bradley Arant Boulton Cummings LLP	Jay R. Bender, Esq.	jbender@bradley.com
Prepetition Term Loan Advisors	Bradley Arant Boulton Cummings LLP	Roger G. Jones	rjones@bradley.com
Top 30 Creditor	Broadridge ICS	Tim Gokey, CEO	remittance@broadridge.com
Counsel to Oracle America, Inc.	Buchalter, A Professional Corporation	Shawn M. Christianson, Esq.	schristianson@buchalter.com
Counsel to Eton Pharmaceuticals, Inc.	Butler Snow LLP	Candice Carson	candice.carson@butlersnow.com
Counsel to Eton Pharmaceuticals, Inc.	Butler Snow LLP	Martin Sosland	martin.sosland@butlersnow.com
Counsel to Biorasi, LLC	Condon Tobin Sladek Thornton Nerenberg, PLLC	Kendal B. Reed, Aaron Z. Tobin	kreed@condontobin.com; atobin@condontobin.com
Top 30 Creditor and Official Committee of Unsecured Creditors	Connor Group Global Services LLC	Jeff Pickett, Founder and Chair	jeff@connorgp.com
Top 30 Creditor and Official Committee of Unsecured Creditors	Connor Group Global Services LLC	Rob Howey, General Counsel	rob.howey@connorgp.com
Counsel to Merck Sharp & Dohme LLC	Covington & Burling LLP	Joseph R. Dunn	jdunn@cov.com
Counsel to Merck Sharp & Dohme LLC	Covington & Burling LLP	Martin E. Beeler	mbeeler@cov.com
Counsel to Merck Sharp & Dohme LLC	Covington & Burling LLP	Michael St. Patrick Baxter	mbaxter@cov.com
Top 30 Creditor	Fisher Clinical Services, Inc.	Marc N. Casper, Chairman, President and CEO	marc.casper@thermofisher.com
Counsel to Innovatus Life Sciences Lending Fund I, LP	Forshey & Prostok LLP	Jeff P. Prostok, Emily S. Chou	jprostok@forsheyprostok.com; echou@forsheyprostok.com
Top 30 Creditor	Frontage Laboratories, Inc.	Dr. Abdul Mutlib, CEO	AccountsReivable@frontagelab.com
Official Equity Security Holders' Committee	Gary C. Ribe, Individually		Email on File
Counsel to Jeffrey S. Glenn, individually and Eiger InnoTherapeutics, Inc.	Goodwin Procter LLP	David R. Chen	davidchen@goodwinlaw.com
Counsel to Jeffrey S. Glenn, individually and Eiger InnoTherapeutics, Inc.	Goodwin Procter LLP	Kizzy L. Jarashow, Artem Skorostensky	KJarashow@goodwinlaw.com; askorostensky@goodwinlaw.com
Counsel to Jeffrey S. Glenn, individually and Eiger InnoTherapeutics, Inc.	Gray Reed	Jason S. Brookner	jbrookner@grayreed.com
Top 30 Creditor	ICON Clinical Research Limited	Kyle McAllister	SponsorPO@prahs.com
Prepetition Term Loan Agent or Prepetition Term Loan Secured Parties	Innovatus Life Sciences Lending Fund I, LP	Claes Ekstrom	cekstrom@innovatuscp.com

Description	CreditorName	CreditorNoticeName	Email
Counsel to IQVIA, Inc.	Jackson Walker LLP	J Machir Stull, Aaron Lozano	mstull@jw.com; alozano@jw.com
Counsel to Thermo Fisher Scientific entities, including Patheon, Thermo Fisher Bioservices, Thermo Fisher Scientific, and Fisher Clinical Services	Kane Russell Coleman Logan, PC	Joseph Coleman, Esq., Kyle Woodard, Esq.	jcoleman@krcl.com; kwoodard@krcl.com
Official Equity Security Holders' Committee	Kenneth S. Grossman, Individually		Email on File
Top 30 Creditor	Kilpatrick Townsend and Stockton LLP	Paul Rosenblatt	prosenblatt@ktslaw.com
Counsel to Innovatus Life Sciences Lending Fund I, LP	Kramer Levin Naftalis & Frankel LLP	Adam C. Rogoff , P. Bradley O'Neill, Andrew J. Citron	arogoff@kramerlevin.com; boneill@kramerlevin.com; acitron@kramerlevin.com
Counsel for the Official Equity Security Holders' Committee	McKool Smith PC	John J. Sparacino, S. Margie Venus	jsparacino@mckoolsmith.com; mvenus@mckoolsmith.com
Counsel for the Official Equity Security Holders' Committee	McKool Smith PC	Travis E. DeArman	tdearman@mckoolsmith.com
Counsel for the Official Unsecured Creditors' Committee	Meland Budwick, P.A.	Michael S. Budwick, Daniel N. Gonzalez, Meaghan Murphy, Shira A. Baratz	mbudwick@melandbudwick.com; dgonzalez@melandbudwick.com; mmurphy@melandbudwick.com; sbaratz@melandbudwick.com
Top 30 Creditor	Merck Sharp & Dohme LLC	Robert M. Davis , Chairman and CEO	caroline.litchfield@merck.com; emily.sauter@merck.com; mbeeler@cov.com; shoagland@cov.com; MBaxter@cov.com; adam_gates@merck.com
Official Committee of Unsecured Creditors	Monica Gangal		Email on File
Counsel for the Official Unsecured Creditors' Committee	Munsch Hardt Kopf & Harr, P.C.	Davor Rukavina, Thomas D. Berghman, Garrick C. Smith	drukavina@munsch.com; tberghman@munsch.com; gsmith@munsch.com
U.S. Trustee for the Northern District of Texas	Office of The United States Trustee	Lisa L. Lambert, Assistant United States Trustee and Elizabeth Ziegler Young	Lisa.L.lambert@usdoj.gov; Elizabeth.A.Young@usdoj.gov
Counsel to Dr. Colleen Craig Kaludzinski	Parsons Behle & Latimer	Bruce H. White	bwhite@parsonsbehle.com; brothschild@parsonsbehle.com; ecf@parsonsbehle.com
Top 30 Creditor	Patheon Inc.	Marc N. Casper, Chairman, President and CEO	marc.casper@thermofisher.com
Top 30 Creditor	Patheon Manufacturing Services LLC	Marc N. Casper, Chairman, President and CEO	marc.casper@thermofisher.com
Counsel to Sentynl Therapeutics, Inc.	Pillsbury Winthrop Shaw Pittman LLP	Joshua D Morse	joshua.morse@pillsburylaw.com
Counsel to Sentynl Therapeutics, Inc.	Pillsbury Winthrop Shaw Pittman LLP	L. James Dickinson	james.dickinson@pillsburylaw.com
Counsel for the Official Equity Security Holders' Committee	Porzio, Bromberg & Newman, P.C.	Warren J. Martin Jr., Rachel A. Parisi	WJMartin@pbnlaw.com; RAParisi@pbnlaw.com
Top 30 Creditor	Richard Franco C/O TRG Communications LLC		Email on File
Top 30 Creditor	RRD International, LLC	Scott Tarrant, Chief Executive Officer	starrant@rrdintl.com

Description	CreditorName	CreditorNoticeName	Email
Top 30 Creditor	SATT Conectus Alsace SAS	Chairman and Chief Executive Officer	emmanuel.poteaux@satt.conectus.fr
United States Securities and Exchange Commission	SEC Fort Worth Regional Office	Regional Director	dfw@sec.gov
United States Securities and Exchange Commission	SEC Headquarters		SECBankruptcy-OGC-ADO@SEC.GOV
Counsel to Merck Sharp & Dohme LLC	Spencer Fane LLP	Eric M. Van Horn	ericvanhorn@spencerfane.com
Counsel to IQVIA, Inc.	Stradley Ronon Stevens & Young, LLP	Daniel M Pereira	dpereira@stradley.com
Counsel for the Texas Comptroller of Public Accounts	Texas Attorney General's Office, Bankruptcy & Collections Division	John Mark Stern, Assistant Attorney General	bk-jstern@oag.texas.gov; sherri.simpson@oag.texas.gov
United States Attorney's Office for the Northern District of Texas and Counsel to Internal Revenue Service	Texas Northern District US Attorneys Office	Attn Bankruptcy Division and Dawn Whalen Theiss	dawn.theiss@usdoj.gov
Top 30 Creditor	Trustees of the University of Pennsylvania	University of Pennsylvania	patricia.colonna@ogc.upenn.edu
Counsel to Thermo Fisher Scientific entities, including Patheon, Thermo Fisher Bioservices, Thermo Fisher Scientific, and Fisher Clinical Services	Tucker Arensberg, P.C.	Beverly Weiss Manne, Maribeth Thomas	bmanne@tuckerlaw.com; mthomas@tuckerlaw.com
Counsel to Progeria Research Foundation (PRF)	Weil, Gotshal & Manges LLP	Emma Wheeler	Clifford.Carlson@weil.com; Emma.Wheeler@weil.com
Top 30 Creditor	Yuki Gosei Kogyo Co Ltd	Seiichiro Matsumoto, President/CEO/Executive Officer	Y-hiraoka@yuki-gosei.co.jp

## Exhibit B

CreditorName	CreditorNoticeName	Email
Biorasi, LLC	Condon Tobin Sladek	kreed@condontobin.com
Caremark, L.L.C.	Thornton Nerenberg	barry.kennick@cvshealth.com
Caremark, L.L.C.	Barry Kennick	barry.kennick@cvshealth.com
Caremark, L.L.C.	c/o Geoffrey S. Goodman, Foley and Lardner LLP	ggoodman@foley.com
Connor Group Global Services, LLC	Connor Group	rob.howey@connorgp.com
Department of Treasury - Internal Revenue Service	Internal Revenue Service	arnetta.jenkins@irs.gov
Fujifilm Diosynth Biotechnologies, U.S.A., Inc.	c/o Michael L. Schuster	mschuster@polsinelli.com
Fujifilm Diosynth Biotechnologies, U.S.A., Inc.	Polsinelli PC	tggreen@polsinelli.com; kcheves@polsinelli.com
Iron Mountain Information Management LLC	c/o Jacqueline M Price	jmp@bostonbusinesslaw.com
Iron Mountain Information Management LLC		joseph.corrigan@ironmountain.com
Jump Start Technology, Inc.		sonya@jumpstarttech.com
KRYOCAL, LLC DBA KYROSPHERE		cwhite@kryosphere.com
Name on File: ID 15440858		Email on File
Name on File: ID 15440870		Email on File
Name on File: ID 15440887		Email on File
Name on File: ID 15440904		Email on File
Name on File: ID 15440905		Email on File
Name on File: ID 15440929		Email on File
Name on File: ID 15441043		Email on File
Name on File: ID 15441068		Email on File
Name on File: ID 15441076		Email on File
Name on File: ID 15441100		Email on File
Name on File: ID 15467847		Email on File
Name on File: ID 15467857		Email on File
Name on File: ID 15557325		Email on File
Name on File: ID 15557355		Email on File
Name on File: ID 15599039		Email on File
Pharmaceutical Research Associates Inc, affiliate of ICON Clinical Research Limited		ibolya.csemerdr@iconplc.com
RxCrossroads 3PL LLC	Stephanie Hampton	stephanie.hampton@mckesson.com
SAY TECHNOLOGIES LLC		billing@saytechnologies.com
Seyfarth Shaw LLP		dcrowley@seyfarth.com
Specialist Staffing Solutions, Inc		s.alimohammad@sthree.com
Stanford University		RFCS-RECEIVABLES@LISTS.STANFORD.EDU
State of Wisconsin Department of Health Services	Anthony Davenport	anthony.p.davenport@dhs.wisconsin.
State of Wisconsin Department of Health Services	Anthony Davenport	davenportp.anthony@dhs.wisconsin.gov
State of Wisconsin Department of Health Services	Anthony P. Davenport	radkeke@doj.state.wi.us
State of Wisconsin Department of Health Services	Michael D. Morris	morrismd@doj.state.wi.us

CreditorName	CreditorNoticeName	Email
State of Wisconsin Department of Health Services	State of Wisconsin Department of Justice	morrismd@doj.state.wi.us
Texas Comptroller of Public Accounts	Bankruptcy & Collection Division	bankruptcytax@oag.texas.gov
Texas Comptroller of Public Accounts	Lydia H Hewett, Accounts Examiner	bankruptcysection@cpa.texas.gov
Texas Comptroller of Public Accounts	Revenue Accounting Division	bankruptcysection@cpa.texas.gov



# Exhibit C

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip	Country
Top 30 Creditor	Accenture LLP	Julie Sweet, CEO	500 W Madison St		Chicago	IL	60661-2592	
Official Equity Security Holders' Committee	Adam Gui, Individually		Address on File					
Top 30 Creditor	Addison Whitney	Natasha Kempf, Director of Finance	1030 Sync St		Morrisville	NC	27560-5468	
Top 30 Creditor and Official Committee of Unsecured Creditors	Biorasi LLC	Brian Chaiken, Esq	19505 Biscayne Blvd., Suite 2350		Aventura	FL	33180	
Top 30 Creditor and Official Committee of Unsecured Creditors	Biorasi LLC	Chris O'Brien, Chief Executive Officer	19505 Biscayne Blvd Ste 2350		Miami	FL	33180-3648	
Prepetition Term Loan Advisors	Bradley Arant Boult Cummings LLP	Roger G. Jones	1221 Broadway, Suite 2400		Nashville	TN	37203	
Top 30 Creditor	Broadridge ICS	Tim Gokey, CEO	5 Dakota Drive, Suite 300		Lake Success	NY	11042	
CA State Attorney General	California Attorney General	Attn Bankruptcy Department	1300 I St., Ste. 1740		Sacramento	CA	95814-2919	
Top 30 Creditor	Clinigen Inc.	Jerome Charton, Chief Executive Officer	Idis House	Churchfield Road	Weybridge Surrey		KT46 8DB	United Kingdom
Top 30 Creditor and Official Committee of Unsecured Creditors	Connor Group Global Services LLC	Jeff Pickett, Founder and Chair	3979 Freedom Circle	Suite 700	Santa Clara	CA	95054	
Top 30 Creditor and Official Committee of Unsecured Creditors	Connor Group Global Services LLC	Rob Howey, General Counsel	3700 Barron Way, Suite 2		Reno	NV	89511	
Top 30 Creditor	CPA Global Limited	Jerre Stead, Executive Chairman and CEO	2318 Mill Road, 12th Floor		Alexandria	VA	22314	
Top 30 Creditor	Eurofins Lancaster Laboratories, Inc.	Dr. Gilles G. Martin, Chairman of the Board and Chief Executive Officer	2425 New Holland Pike		Lancaster	PA	17601	
Top 30 Creditor	Fisher BioServices, Inc.	Marc N. Casper, CEO	14665 Rothgeb Drive		Rockville	MD	20850	
Top 30 Creditor	Fisher Clinical Services, Inc.	Marc N. Casper, Chairman, President and CEO	13741 Collections Center Drive		Chicago	IL	60693	
Food and Drug Administration	Food and Drug Administration		10903 New Hampshire Ave		Silver Spring	MD	20993-0002	
Top 30 Creditor	Frontage Laboratories, Inc.	Dr. Abdul Mutlib, CEO	700 Pennsylvania Drive		Exton	PA	19341	
Official Equity Security Holders' Committee	Gary C. Ribe, Individually		Address on File					
Top 30 Creditor	ICON Clinical Research Limited	Kyle McAllister	South County Business Park	Leopardstown	Dublin 18			Ireland
Prepetition Term Loan Agent or Prepetition Term Loan Secured Parties	Innovatus Life Sciences Lending Fund I, LP	Claes Ekstrom	777 Third Avenue, 25th Floor		New York	NY	10017	
Top 30 Creditor	Integrichain, Inc.	Josh Halpern, Co-Founder and Chief Executive Officer	8 Penn Center, 3rd Flr.	1628 JFK Blvd.	Philadelphia	PA	19103	
Internal Revenue Service	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346		Philadelphia	PA	19101-7346	
Top 30 Creditor	Intsel Chimos	Corinne Truffault, Chief Executive Officer	1 Rue Royale- Batiment D		Saint-Cloud		92210	France
Top 30 Creditor	IQVIA Biotech LLC	Mary Fisher	1700 Perimeter Park Dr		Morrisville	NC	27560	

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip	Country
Top 30 Creditor	IQVIA Inc.	Debora Mesquita, Associate Clinical Project Management Director	1700 Perimeter Park Dr		Morrisville	NC	27560	
Official Equity Security Holders' Committee	Kenneth S. Grossman, Individually		Address on File					
Top 30 Creditor	Kilpatrick Townsend and Stockton LLP	Paul Rosenblatt	1100 Peachtree Street NE Suite 2800		Atlanta	GA	30309	
Top 30 Creditor	Merck Sharp & Dohme LLC	Robert M. Davis , Chairman and CEO	126 East Lincoln Avenue		Rahway	NJ	07065	
Official Committee of Unsecured Creditors	Monica Gangal		Address on File					
U.S. Trustee for the Northern District of Texas	Office of The United States Trustee	Lisa L. Lambert, Assistant United States Trustee and Elizabeth Ziegler Young	Earle Cabell Federal Building	1100 Commerce Street, Room 976	Dallas	TX	75242	
Top 30 Creditor	Partners4access B.V.	Sophie Schmitz, Managing Partner	Boslaan 18		Hilversum		1217 CV	Netherlands
Top 30 Creditor	Patheon Inc.	Marc N. Casper, Chairman, President and CEO	168 Third Avenue		Waltham	MA	02451	
Top 30 Creditor	Patheon Manufacturing Services LLC	Marc N. Casper, Chairman, President and CEO	5900 Martin Luther King Jr Hwy.		Greenville	NC	27834	
Top 30 Creditor	Real Staffing Group	Andrew Beach, Chief Financial Officer	C/O Specialist Staffing Solutions, Inc.	909 Fannin Street Suite P 350	Houston	TX	77010	
Top 30 Creditor	Richard Franco C/O TRG Communications LLC		Address on File					
Top 30 Creditor	RRD International, LLC	Scott Tarrant, Chief Executive Officer	7361 Calhoun Place, Suite 510		Rockville	MD	20855	
Top 30 Creditor	SATT Conectus Alsace SAS	Chairman and Chief Executive Officer	5 Rue Schiller		Strasbourg Bas- Rhin		67000	France
United States Securities and Exchange Commission	SEC Fort Worth Regional Office	Regional Director	801 Cherry Street, Suite 1900, Unit 18		Fort Worth	TX	76102	
United States Securities and Exchange Commission	SEC Headquarters		100 F St NE		Washington	DC	20549	
Top 30 Creditor	Sharp Packaging Services LLC	Kevin Orfan, CEO	7451 Keebler Way		Allentown	PA	18106	
Counsel to IQVIA, Inc.	Stradley Ronon Stevens & Young, LLP	Daniel M Pereira	2005 Market Street, Suite 2600		Philadelphia	PA	19103	
United States Attorney's Office for the Northern District of Texas and Counsel to Internal Revenue Service	Texas Northern District US Attorneys Office	Attn Bankruptcy Division and Dawn Whalen Theiss	1100 Commerce St Third Fl		Dallas	TX	75242-1699	
Top 30 Creditor	Trustees of the University of Pennsylvania	University of Pennsylvania Seiichiro Matsumoto, President/CEO/Executive Officer	Patricia K. Colonna, Office of the General Counsel	2929 Walnut Street, Suite 400, FMC Tower	Philadelphia	PA	19104-5509	
Top 30 Creditor	Yuki Gosei Kogyo Co Ltd		10-4, Nihonbashi- Ningyocho 3-Chome	Chuo-Ku	Tokyo		103-0013	Japan

## Exhibit D

CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country
Biorasi, LLC	Condon Tobin Sladek Thornton Nerenberg	8080 Park Lane, Suite 700			Dallas	TX	75231	
Caremark, L.L.C.	Barry Kennick	3100 Sanders Road			Northbrook	IL	60062	
Caremark, L.L.C.	c/o Geoffrey S. Goodman, Foley and Lardner LLP	321 N. Clark Street Suite 3000			Chicago	IL	60654	
CAREMARK, LLC		ONE CVS DRIVE			WOONSOCKET	RI	02895	
Connor Group Global Services, LLC	Connor Group	3700 Barron Way, Suite 2			Reno	NV	89511	
CROSSCOUNTRY CONSULTING LLC		1600 TYSONS BLVD, SUITE 1100			MCLEAN	VA	22102	
Department of Treasury - Internal Revenue Service	Internal Revenue Service	1100 Commerce St., M/S MC5027DAL			Dallas	TX	75242	
Department of Treasury - Internal Revenue Service		PO Box 7346			Philadelphia	PA	19101-7346	
Dr. Ohad Etzion	Mor Research Application LTD	Lena Shot	40 Tuval Street		Ramat Gan		5252247	Israel
Fair Harbor Capital LLC	As assignee of Excellis Europe Ltd	PO Box 237037			New York	NY	10023	
Franchise Tax Board	Bankruptcy Section MS A340	PO Box 2952			Sacramento	CA	95812-2952	
Fujifilm Diosynth Biotechnologies, U.S.A., Inc.	c/o Michael L. Schuster	Polsinelli PC	1401 Lawrence Street, Suite 2300		Denver	CO	80231	
Fujifilm Diosynth Biotechnologies, U.S.A., Inc.	Polsinelli PC	Trinitee G. Green and P. Kyle Cheves	2950 N. Harwood, Suite 2100		Dallas	TX	75201	
Iron Mountain Information Management LLC	c/o Jacqueline M Price	Hackett Feinberg PC	155 Federal Street 9th Floor		Boston	MA	02110	
Iron Mountain Information Management LLC		1101 Enterprise Drive			Royersford	PA	19468	
Jump Start Technology, Inc.		2375 Gabriel Avenue			Mountain View	CA	94040	
KRYOCAL, LLC DBA KYROSPHERE		14001 WESTON PARKWAY, SUITE 106			CARY	NC	27513	
Name on File: ID 15440858		Address on File						
Name on File: ID 15440870		Address on File						
Name on File: ID 15440886		Address on File						
Name on File: ID 15440887		Address on File						
Name on File: ID 15440904		Address on File						
Name on File: ID 15440905		Address on File						
Name on File: ID 15440929		Address on File						
Name on File: ID 15441043		Address on File						
Name on File: ID 15441068		Address on File						
Name on File: ID 15441076		Address on File						
Name on File: ID 15441100		Address on File						
Name on File: ID 15467847		Address on File						
Name on File: ID 15467857		Address on File						
Name on File: ID 15557325		Address on File						
Name on File: ID 15557355		Address on File						
Name on File: ID 15599039		Address on File						

CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country
Pharmaceutical Research Associates Inc, affiliate of ICON Clinical Research Limited		4130 Parklake Avenue			Raleigh	NC	27612	
RxCrossroads 3PL LLC	RxCrossroads by McKesson	Lori Ross	PO Box 74007100		Chicago	IL	60674	
RxCrossroads 3PL LLC	Stephanie Hampton	6651 Gate Parkway			Jacksonville	FL	32256	
SAY TECHNOLOGIES LLC		85 WILLOW ROAD			MENLO PARK	CA	94025	
Seyfarth Shaw LLP		233 S. Wacker Dr Suite 8000			Chicago	IL	60606	
SEYFARTH SHAW LLP		3807 COLLECTIONS CENTER DRIVE			CHICAGO	IL	60693	
Specialist Staffing Solutions, Inc		909 Fannin Street, Suite P-350			Houston	TX	77010	
Stanford University		485 Broadway, University Hall, Third Floor			Redwood City	CA	94063-3136	
Stanford University		PO Box 884253			Los Angeles	CA	90088-4253	
STANFORD UNIVERSITY - OFFICE OF TECHNOLOGY LICENSING		STANFORD UNIVERSITY OFFICE OF TECHNOLOGY LICENSING	415 BROADWAY STREET		REDWOOD CITY	CA	94063	
State of Wisconsin Department of Health Services	Anthony Davenport	1 West Wilson Street			Madison	WI	53703	
State of Wisconsin Department of Health Services	Anthony P. Davenport	17 West Main			Madison	WI	53707	
State of Wisconsin Department of Health Services	Michael D. Morris	PO Box 7857			Madison	WI	53707	
State of Wisconsin Department of Health Services	State of Wisconsin Department of Justice	Michael D. Morris	17 West Main	PO Box 7857	Madison	WI	53707	
Texas Comptroller of Public Accounts	Bankruptcy & Collection Division	Office of the Attorney General	PO Box 12548, MC-008		Austin	TX	78711	
Texas Comptroller of Public Accounts	Lydia H Hewett, Accounts Examiner	Attn Revenue Accounting Div.	111 E. 17th Street		Austin	TX	78711	
Texas Comptroller of Public Accounts	Revenue Accounting Division	Attention Bankruptcy	PO Box 13528		Austin	TX	78711	